

### **3. Comments and Responses**

During the public comment period for the IS/MND, the City received three formal written comment letters on the Project from the public and/or agencies on the IS/MND. This includes Ron Harris of Rainbow Self Storage on September 25, 2023, Caltrans on October 3, 2023, and Tim Doherty on October 16, 2023. Two verbal comments were received by the City from the Bear River Band of the Rohnerville Rancheria on September 13, 2023, and the CDFW on September 25, 2023. These comments are attached and summarized in Table 3-1.

In addition, the City received five comment letters responding to the lot line referral mailed to the City's referral list. This includes correspondence from Caltrans on September 19, 2023, Pacific Gas and Electric (PGE) on September 19, 2023 and September 26, 2023, California Highway Patrol (CHP) on September 20, 2023, and Humboldt County Department of Public Works (HCDPW) on September 21, 2023. These comments are attached and summarized in Table 3-1.

Additionally, a meeting was held between the City and Caltrans on September 26, 2023 to discuss the Project and preview the comments raised in the formal letter submitted by Caltrans. Verbal comments are summarized in Table 3-1.

# Comment Letter 1

09/21/2023



Cristin Kenyon

Brian Gerving:

City of Eureka

531 K St

Eureka, CA

95503

Cristin, Brian:

**Ref: Initial Study/Mitigated Negative Declaration ED-23-0018**

**APN 019-341-008 and 019-341-007**

Since my property, Rainbow Self Storage at 4055 Broadway, is near the proposed project and storm water from the proposed development property flows across my property to Broadway and considering that my property was recently damaged by excessive flows and lack of maintenance to the stormwater drainpipe from the project area, I would like to request a meeting with whomever is responsible for the design of the proposed project.

## **History:**

This flooding resulted in a protracted lawsuit (10/18/2018) against the Cemetery and the Brewery.

The Cemetery paid the sum of \$72,500 and the Brewery paid \$17,500.

These sums did not cover the total cost of the repairs and the legal fees.

As per the settlement of this suit the Cemetery has an ongoing legal obligation to maintain this pipe crossing the Rainbow Self Storage property. To date they have made no attempt to maintain the system.

I am very happy to have the City of Eureka as a neighbor, since the project will probably be well designed, and the managers of the property will be local.

Trying to deal with the cemetery was futile. Forcing them into court and obtaining a TRO was the only way to open a dialog.

I would like to meet with whomever in the City that is planning and designing the new project to go over how stormwater drainage across my property will occur.

Please contact me at: [ron.rainbow@gmail.com](mailto:ron.rainbow@gmail.com) Phone/Text 707-502-2281

Or mail to:

4055 Broadway

Eureka, CA

95503

Thank You



Ron Harris, Owner

Rainbow Self Storage, 4055 Broadway, Eureka, CA 95503

# Comment Letter 2

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

## California Department of Transportation

DISTRICT 1  
P.O. BOX 3700 | EUREKA, CA 95502-3700  
(707) 445-6600 | FAX (707) 441-6314 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



October 3, 2023

1-HUM-101-75.66  
Eureka Operations Complex  
SCH# 2023090278

Ms. Cristin Kenyon  
Development Services  
City of Eureka  
531 K Street  
Eureka, CA 95501

Dear Ms. Kenyon:

Thank you for giving Caltrans the opportunity to review and comment on the Mitigated Negative Declaration for the proposed Eureka Operations Complex. The City proposes to acquire approximately 5.6 acres east of Broadway/US Route 101 to construct a new City Operations Complex, which would house the City's existing corporation yard, administrative offices and the City's emergency operations center for responding to emergencies and natural disasters. The anticipated number of staff on site is expected to be 66 employees. The primary access to the site will be from Oceanview Cemetery Road, which is a private road. Secondary access is proposed to come from Weiler Road via Sunset. Weiler Road is a minor local road. Utility extensions would be located underground and extended from the US Route 101 corridor. We offer the following comments:

Caltrans is currently developing the South Broadway Complete Streets project, EA 01-0K940, which is scheduled to go out for bid in June of 2024 but should be considered a tentative date. The South Broadway Complete Streets project description proposes to install a traffic signal at the intersection of Hilfiker Lane and Broadway/US 101. The existing two-way center left-turn lane (TWLTL) on Broadway will be converted to a left-turn pocket in the northbound direction. The conversion of the TWLTL will reduce the available storage for southbound left-turns on Broadway. During peak periods, likely during the morning weekday commute, the access at Oceanview Cemetery may be impacted, particularly by larger heavy-duty vehicles and vehicles hauling trailers. Based on our observation more storage area is available at Sunset, therefore we recommend that the access to Weiler Road be open or accessible during regular business hours. The ability for vehicles to utilize both access points is expected to result in a less than significant finding for transportation safety.

Ms. Cristen Kenyon  
10/03/2023  
Page 2

To coordinate the development of the City's project with the Caltrans Complete Streets project on Broadway/US Route 101, please contact the Caltrans Project Manager, Jeff Pimentel.

We recommend that the access to the Operations Center include accommodation for non-motorized travel. The proposed access routes may have an adequately low-stress condition suitable for a shared facility for cyclists.

An Encroachment Permit from Caltrans will be required for any work within Caltrans Right-of-Way, including utility connections and/or extensions. Applications are reviewed for consistency with State standards and are subject to Department approval. To streamline the permit application and review process, we encourage the applicant to consult with our Permit staff prior to submitting an application. Requests for permit applications can be sent to: Caltrans District 1 Permits Office, P.O. Box 3700, Eureka, CA 95502-3700, or requested by phone at (707) 441-5741. For additional information, the Caltrans Encroachment Permit Manual and Standard Application please visit: <<https://dot.ca.gov/programs/traffic-operations/ep>>.

Please feel free contact me with questions or for further assistance at (707) 684-6879, or by email at: <[jesse.robertson@dot.ca.gov](mailto:jesse.robertson@dot.ca.gov)>.

Sincerely,

*Jesse G. Robertson*

Jesse Robertson  
Transportation Planning  
Caltrans District 1

e-copy: State Clearinghouse  
Heidi Quintrell, Chief, Caltrans District 1 Encroachment Permits  
Jeff Pimentel, Caltrans District 1 Project Manager

# Comment Letter 3

From: Tim Doherty <[tjdbills@gmail.com](mailto:tjdbills@gmail.com)>  
Sent: Monday, October 16, 2023 11:26 AM  
To: Planning <[planning@ci.eureka.ca.gov](mailto:planning@ci.eureka.ca.gov)>  
Subject: CEQA document- Eureka Operations Complex Project

⚠ NOTICE: This came from outside of the City's email system! ⚠ Please exercise caution. Do not click links or open attachments unless you have verbally confirmed with the sender that the message actually came from them and that the content is safe. Contact the Helpdesk if you are unsure!

To whom it may concern,

I just found out about the Eureka Operations Complex Project via a letter in the mail dated October 5, 2023. I just spoke with Cristin Kenyon (Development Services Director, City of Eureka this morning (10/16/2023) about my concerns because I am a property owner at 4241 Weiler Rd. I would like my comments entered into the CEQA document on this project.

Weiler Rd is a private dirt/gravel road and any commercial traffic would adversely affect it. I am deeply concerned that the commercial trucks and trailers used by the City of Eureka would cause great damage to our private road. It is not clear from the CEQA document what share of the road expense the City of Eureka will pay for. A quick internet research showed the equivalent road damage by a tractor trailer vs. a passenger car. A fully loaded tractor trailer with 5 axles causes the equivalent damage of 9,600 passenger cars! That amount of road damage is unacceptable for our private road and I want assurance that the City of Eureka will pay for all maintenance and upkeep of our road because the vast majority of damage will now come from their vehicles and very little will come from passenger cars.

Another concern is when the Broadway Multimodal Corridor Plan Southern section is under construction. The construction will cut off access to the Eureka Operations Complex Project via Hwy 101 and all traffic will be diverted to Sunset and Weiler Rd, causing even greater commercial truck traffic from the City of Eureka and damaging our private road. The timeline for completion is unknown and this private road will sustain far too much damage. It is advisable that the City of Eureka pave and maintain this private road since it will be creating the vast majority of damage to the existing dirt/gravel road.

Tim Doherty  
4241 Weiler Rd

Please note that email correspondence with the City of Eureka, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

# Comment Letter 6

## Cristin Kenyon

---

**From:** ROBERTSON, JESSE GRAHAM@DOT <jesse.robertson@dot.ca.gov>  
**Sent:** Tuesday, September 19, 2023 10:48 AM  
**To:** Cristin Kenyon; Planning  
**Subject:** RE: Referral Eureka Operations Complex LLA

This email appears to have legitimately come from a frequently-contacted external vendor or agency. Still, please exercise caution when replying or interacting with links or attachments.

Thanks for sending, Cristin.

We found this referral on the State Clearinghouse website last week. We are currently looking at the road connections on Broadway and we expect to submit comments when our review is complete.

We do appreciate receiving referrals from both the lead agency and the State Clearinghouse. Please continue to send your planning referrals to me. Thanks again.

Jesse Robertson  
Transportation Planning  
Caltrans District 1  
(707) 684-6879 (mobile)

---

**From:** Cristin Kenyon <ckenyon@eurekaca.gov>  
**Sent:** Tuesday, September 19, 2023 10:37 AM  
**To:** Planning <planning@eurekaca.gov>  
**Subject:** Referral Eureka Operations Complex LLA

**EXTERNAL EMAIL.** Links/attachments may not be safe.

Hi All:

Attached is a referral for a Lot Line Adjustment (LLA-23-0003) to reconfigure three parcels into two parcels for purposes of separate sale of one resulting parcel.

Please keep the same subject line and reply to me on or before Tuesday, October 3, 2023. If you have no comment you may ignore this email, or feel free to send a reply of "No Comment." Please contact me if you have questions or need additional information.

If you are not the appropriate person, or someone else in your agency should instead/also receive referrals, please provide their name and e-mail address to me and we'll update the referral e-mail list.

Thank you!

Cristin

**Cristin Kenyon, AICP**

Development Services Director | City of Eureka

*Please note that email correspondence with the City of Eureka, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.*





September 19, 2023

Cristin Kenyon  
City of Eureka  
531 K Street  
Eureka, CA 95501

Ref: Gas and Electric Transmission and Distribution

Dear Cristin Kenyon,

Thank you for submitting the Eureka Operations Complex Lot Line Adjustment plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: [https://www.pge.com/en\\_US/business/services/building-and-renovation/overview/overview.page](https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page).
2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.
3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team  
Land Management



## Attachment 1 – Gas Facilities

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: <https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf>

1. **Standby Inspection:** A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.
2. **Access:** At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.
3. **Wheel Loads:** To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. **Grading:** PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.
5. **Excavating:** Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch



wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [ $24/2 + 24 + 36/2 = 54$ ] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible ( $90^\circ \pm 15^\circ$ ). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.



11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

## Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as **"RESTRICTED USE AREA – NO BUILDING."**
2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.
3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.
4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.
5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.
6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.
7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.



8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 ([http://www.cpuc.ca.gov/gos/GO95/go\\_95\\_startup\\_page.html](http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html)) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

# Comment Letter 8

## Cristin Kenyon

---

**From:** Parker, Gabriel@CHP <GParker@chp.ca.gov>  
**Sent:** Wednesday, September 20, 2023 1:57 PM  
**To:** Cristin Kenyon  
**Cc:** Depee, Larry@CHP  
**Subject:** RE: Referral Eureka Operations Complex LLA

This email appears to have legitimately come from a frequently-contacted external vendor or agency. Still, please exercise caution when replying or interacting with links or attachments.

Good afternoon Cristin,

The CHP has no comment on the attached Lot Line Adjustment.

Sergeant Gabriel Parker  
California Highway Patrol  
Humboldt Area  
255 East Samoa Blvd.  
Arcata, CA 95521  
Phone:(707) 822-5981  
Email: [gparker@chp.ca.gov](mailto:gparker@chp.ca.gov)

CONFIDENTIALITY NOTICE: This communication, and its contents or attachments, may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

---

**From:** Cristin Kenyon <ckenyon@eurekaca.gov>  
**Sent:** Tuesday, September 19, 2023 10:37 AM  
**To:** Planning <planning@eurekaca.gov>  
**Subject:** Referral Eureka Operations Complex LLA

[Warning: This email originated outside of CHP. Do not click links or attachments unless you recognize the sender and know the content is safe.]

Hi All:

Attached is a referral for a Lot Line Adjustment (LLA-23-0003) to reconfigure three parcels into two parcels for purposes of separate sale of one resulting parcel.

Please keep the same subject line and reply to me on or before Tuesday, October 3, 2023. If you have no comment you may ignore this email, or feel free to send a reply of "No Comment." Please contact me if you have questions or need additional information.

If you are not the appropriate person, or someone else in your agency should instead/also receive referrals, please provide their name and e-mail address to me and we'll update the referral e-mail list.

Thank you!

Cristin

Cristin Kenyon, AICP

Development Services Director | City of Eureka

[ckenyon@eureka.gov](mailto:ckenyon@eureka.gov) (707) 441-4165

*Please note that email correspondence with the City of Eureka, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.*



# Comment Letter 9



DEPARTMENT OF PUBLIC WORKS  
**C O U N T Y O F H U M B O L D T**  
MAILING ADDRESS: 1106 SECOND STREET, EUREKA, CA 95501-0579  
AREA CODE 707

ON-LINE

WEB: CO.HUMBOLDT.CA.US

	PUBLIC WORKS BUILDING SECOND & L ST., EUREKA FAX 445-7409		CLARK COMPLEX HARRIS & H ST., EUREKA FAX 445-7388
ADMINISTRATION	445-7491	NATURAL RESOURCES	445-7741
BUSINESS	445-7652	NATURAL RESOURCES PLANNING	267-9540
ENGINEERING	445-7377	PARKS	445-7651
FACILITY MANAGEMENT	445-7493	ROADS	445-7421
		LAND USE	445-7205

---

---


## LAND USE DIVISION INTEROFFICE MEMORANDUM

---

---

TO: Cristin Kenyon, Development Services Director, City of Eureka

FROM: Ken Freed, Assistant Engineer

DATE: 09/21/2023 

RE: **CITY OF EUREKA OPERATIONS COMPLEX, APN 019-341-007, -008 LLA**

*Lot Line Adjustment:* The proposed lot line adjustment does not affect any facilities maintained by the Department.

The city limits of the City of Eureka follow along the west line of Weiler Road and therefore the entire road is located within the unincorporated County area. Weiler Road is not a County maintained road. Sunset is a City maintained road to Weiler Road. Oceanview Cemetery Road is a private road.

Recommended Conditions of Approval:

*1 Record of Survey:* The corners of the new property lines shall be monumented, pursuant to Section 325.5-9 of the Humboldt County Code. A Record of Survey shall be filed unless this requirement is waived by the County Surveyor. The requirement for a Record of Survey may be waived if, in the opinion of the County Surveyor, any one of the following findings can be made:

- (a) The new boundary line(s) are already adequately monumented of record.
- (b) The new boundary line(s) can be accurately described from Government Subdivision Sections or aliquot parts thereof.
- (c) The new boundary line(s) can be accurately described and located from existing monuments of record.
- (d) The new boundary is based upon physical features (i.e. roads, creeks, etc.) which themselves monument the line.

Informational Notes:

1. Low Impact Development (LID): The subject property is located within the municipal separate storm sewer system (MS4) boundary area. Development of the property will be required to comply with the MS4 permit requirements. [Reference: National Pollutant Discharge Elimination System (NPDES) General Permit For Waste Discharge Requirements (WDRS) for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems (MS4S), Order No. 2013-0001-DWQ, NPDES No. CAS000004 adopted 02/05/2013, MS4 permit section E.12.b; Humboldt Low Impact Development Stormwater Manual v3.0 (08/18/2021) Part A (Table 1), Part 2, and Part 3 (Section 1.4) // END //

# Comment Letter 10



**Pacific Gas and  
Electric Company**

Plan Review Team  
Land Management

PGEPlanReview@pge.com

September 26, 2023

Cristin Kenyon  
City of Eureka  
531 K Street  
Eureka, CA 95501

Re: LLA-23-0003  
Eureka Operations Complex

Dear Cristin Kenyon,

Thank you for providing PG&E the opportunity to review the proposed plans for LLA-23-0003 dated 9/19/2023. Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding our response, please contact the PG&E Plan Review Team at [pgeplanreview@pge.com](mailto:pgeplanreview@pge.com).

Sincerely,

PG&E Plan Review Team  
Land Management

**Table 3.1 Comments Received During Public Comment Period**

<b>Comment Letter</b>	<b>Commentor</b>	<b>Summary of Comment Received</b>	<b>City Response</b>
<b>IS/MND Comments</b>			
1	Ron Harris (Rainbow Self Serve Storage)	Concern over stormwater drainage from Project to adjacent property and request for a meeting.	All stormwater would be treated on-site or routed to the City storm drain system. Off-site flooding would not occur. Please see section 3.10(c)(ii). The City is able to meet to discuss the Project in greater detail, as requested.
2	Caltrans	Recommendation to consider ability for vehicles to make south-bound left-turn access to the Project Area from both Ocean View Cemetery Drive as well as Sunset and Weiler Drive during peak periods, commute times, or during road work.	As the design progresses, the City would continue outreach to the Caltrans Complete Street team to discuss the recommendation.
2	Caltrans	Recommendation to include non-motorized travel accommodation in the Project.	As the design progresses, the City would continue outreach to the Caltrans Complete Street team to discuss opportunities to enhance non-motorized travel to and from the Project Area.
2	Caltrans	The portion of the work that may occur within Caltrans right-of-way will require an encroachment permit prior to construction.	The City would seek an encroachment permit from Caltrans for any work within the Caltrans right-of-way.
3	Tim Doherty	Concern of heavy truck traffic damage to the dirt/gravel Weiler Road and request for assurance that the City would pay for all maintenance and upkeep of the road.	The City would improve Weiler Road as noted within Sections 1.4, 1.5, 1.8, and throughout Section 3 of the IS/MND. The City would improve Weiler Road by adding gravel, compacting the roadway, and routinely grading/maintaining the roadway.
3	Tim Doherty	Noted that construction of the Broadway Multimodal Corridor Plan Southern section will likely require traffic to the Eureka Operations Complex be diverted along Sunset and Weiler Road, resulting in degradation of the road.	The Broadway project construction is anticipated to occur prior to occupancy of the Operations Complex, as Caltrans is scheduled to go out for bid in June 2024. Even if the Caltrans' project does result in traffic diversion, the City would adequately maintain and improve Weiler Road to accommodate City vehicle traffic.
4 (Verbal IS/MND comment)	CDFW	Vegetation removal should occur, if feasible, between October 1 through March 15. After clearing, vegetation should be regularly maintained to prevent wildlife habitat regrowth during construction.	The City would follow the vegetation best practices outlined by CDFW.

<b>Comment Letter</b>	<b>Commentor</b>	<b>Summary of Comment Received</b>	<b>City Response</b>
5 (Verbal IS/MND Comment)	Bear River Band of the Rohnerville Rancheria	Recommendation that the City dedicate a planting area along Cemetery Drive to plant culturally significant, traditional native plants such as hazel and beargrass.	As the Project design progresses, the City would facilitate the design and implementation of the planting area as recommended.
5 (Verbal IS/MND Comment)	Bear River Band of the Rohnerville Rancheria	Request for site access for future tribal members to collect native plants or access the land in general.	The City would continue collaborative dialogue with the tribes. The City would design a planting area along Cemetery Drive for culturally significant native plants such as hazel and bear grass, that would be accessible for walking and collecting (i.e., not behind a gate). Tribal members would be able to gain access to gated locations by a walk-in at the visitor entrance or calling ahead.
<b>Lot Line Adjustment Comments</b>			
6	Caltrans	Comment that Caltrans plans to submit comments on the IS/MND and would appreciate receiving direct referrals from the City rather than the City relying on the State Clearinghouse distribution.	Noted. The City would continue collaboration with Caltrans.
7	PGE	Comment for requirements related to gas and electric facilities.	As the design progresses, the City would continue to reach out to PGE for areas within PGE properties or easements.
8	CHP	No comment.	Noted.
9	HCDPW	Recommend condition of approval of Lot Line Adjustment to monument the corners of the new property lines and submit a Record of Survey.	The City has included a condition of approval in the Lot Line Adjustment to ensure compliance.
9	HCDPW	Informational note stating the subject property is located within the municipal separate storm sewer system (MS4) boundary area. Development of the property will be required to comply with the MS4 permit requirements	The City would comply with the applicable MS4 permit requirements.
10	PGE	Comment that the Project does not appear to interfere with existing PGE facilities or easement rights.	The City thanks the commentor for their review.

## 4. Errata

The purpose of this errata is to document revisions to the IS/MND that are intended to clarify project details since it was submitted to the Office of Planning and Research State Clearinghouse on September 13, 2023, and publicly circulated between September 13, 2023 and October 16, 2023.

The errata include excerpts of text from the IS/MND that are proposed for modification and does not include the entire IS/MND. Specifically, the entire subsection that contains the text proposed for modification is copied into the errata, and newly proposed text in the errata is **underlined and bolded**, deleted text from the original IS/MND is stricken with ~~single-strikethrough~~, and unchanged text remains in normal font. Only the subsections of the original IS/MND that are proposed for modification are copied into the errata.

### Tree and Vegetation Removal

Approximately 11 trees with a diameter at breast height (dbh) of 12-30 inches would be removed adjacent to the Oceanview Cemetery Road (Figure 5). If feasible, vegetation clearing would ~~be~~ between October 1<sup>st</sup> and ~~April 30<sup>th</sup>~~ **March 15<sup>th</sup>**, outside of the nesting bird and bee flight season.

## **5. Report Preparers**

### **5.1 City of Eureka**

Cristin Kenyon, Director of Development Services

### **5.2 GHD**

Andrea Hilton, Senior Environmental Planner

Christian Hernandez, Environmental Scientist