



# **Eureka Flood Reduction and Sea Level Rise Resiliency Project**

**Final Initial Study/Mitigated Negative  
Declaration; SCH # 2023060362**

City of Eureka

August 14, 2023

**→ The Power of Commitment**



# Eureka Flood Reduction and Sea Level Rise Resiliency Project

## Final Initial Study/Mitigated Negative Declaration (ISMND); SCH #: 2023060362

This document has been prepared for:



City of Eureka, Public Works Department  
Jesse Willor  
531 K Street  
Eureka, CA 95501  
T (707) 441-4194 | E [jwillor@ci.eureka.ca.gov](mailto:jwillor@ci.eureka.ca.gov) | [www.ci.eureka.ca.gov](http://www.ci.eureka.ca.gov)

In collaboration with:



GHD  
718 3rd Street  
Eureka, California 95501, United States  
T (707) 267-2207 | E [kerry.mcnamee@ghd.com](mailto:kerry.mcnamee@ghd.com) | [ghd.com](http://ghd.com)

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<b>Author</b>	Kerry McNamee, Brett Vivyan, PE
<b>Project manager</b>	Brett Vivyan, PE
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August 14, 2023

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### Appendix A ISMND Comment Letter from Caltrans

# 1. Introduction

## 1.1 Purpose of the Response to Comments Documentation

This document provides responses to comments received on the 2023 circulated Initial Study/Proposed Mitigated Negative Declaration (ISMND) for the proposed Eureka Flood Reduction and Sea Level Rise Resiliency Project (Project). The ISMND was circulated between June 13, 2023 and July 13, 2023. The ISMND identified the likely environmental consequences associated with the Project, and recommended mitigation measures to reduce potentially significant impacts.

This document, together with the ISMND, constitutes the Final ISMND if the City of Eureka (the City) adopts it as complete and adequate under the California Environmental Quality Act (CEQA).

## 1.2 Environmental Review Process

CEQA requires lead agencies to consult with public agencies having jurisdiction over a proposed project, and to provide the general public and project applicant with an opportunity to comment on the ISMND. This Response to Comments has been prepared to respond to the comments received on the ISMND.

The Notice of Completion and ISMND were filed with the Humboldt County Recorder's Office and the Office of Planning and Research State Clearinghouse on July 13, 2023, and the ISMND was made available for public review also on July 13, 2023. The Notice of Intent was published in the Times-Standard on July 13, 2023. The review period ended at 5:00 pm on July 13, 2023. The document was made available for review at the following locations: 1) Eureka City Hall, located at 531 K Street, Eureka, California, 95501; and 2) on the City's website. The ISMND was distributed to responsible and trustee agencies via the Office of Planning and Research State Clearinghouse. The general public was advised of the ISMND through the public notice posted in the Times-Standard and by the County Clerk as required by law.

This ISMND will be provided to the City for their review, and consideration as a full disclosure of potential impacts, and mitigation measures. If the Project is approved, the ISMND will be adopted, and the recommended mitigation measures will be implemented as specified in the City's resolution and an accompanying Mitigation Monitoring and Reporting Program.

The additions made in this Response to Comment of the ISMND do not constitute "significant new information" requiring recirculation pursuant to Public Resources Code section 21092.1 and CEQA Guidelines Section 15088.5. The Final ISMND merely clarifies, amplifies, and makes insignificant modifications to the adequate ISMND, per CEQA Guidelines Section 15088.5(b).

## 1.3 CEQA Requirements

The Response to Comment is organized into the following chapters:

- Chapter 1 – Introduction. This chapter discusses the use and organization of this Final ISMND, and environmental review process.
- Chapter 2 – Comments and Responses. This chapter includes the names of agencies and individuals who commented on the ISMND and responses to those comments. The response to each comment are keyed to the comments which precede them.

## 2. Comments and Responses

### 2.1 Comments Received

During the public comment period for the ISMND, the City received one comment letter which included nine comments on the ISMND. The comment letter was received from Jesse Robertson of the California Department of Transportation (Caltrans) on June 30, 2023. The unmarked comment letter is included as Appendix A to this document.

#### Comment Letter – Caltrans

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)



June 30, 2023

1-HUM-101-77.24  
Eureka Flood Reduction Project  
SCH# 2023060362

Mr. Jesse Willor, P.E.  
Public Works Department  
City of Eureka  
531 K Street  
Eureka, CA 95501

Dear Mr. Willor:

Thank you for giving Caltrans the opportunity to review and comment on the Mitigated Negative Declaration for the proposed Eureka Flood Reduction and Sea Level Rise Resiliency Project. The project proposes to reduce flooding, increase sea level rise resiliency, and improve water quality in Humboldt Bay. The Project would increase the storage capacity and conveyance of the storm drain network, implement flow attenuation and water quality improvements, reduce trash conveyance into waterways, and enhance tidal circulation to provide flood reduction and sea level rise resiliency. A portion of the project is located within State right-of-way, at the intersection of Del Norte Street and US 101, for the stormwater pipe replacement between B Street and the Eureka Waterfront Trail. We have the following comments:

Little information has been provided about the proposed work within State right of way. We have concerns about the potential impacts to US 101 from the construction methods for replacing a 60-inch stormwater pipe under US Route 101 at Del Norte Street, due in part to conflicts with other existing utilities at that location. Directional boring would require large sending and receiving jacking pits that would require a detailed traffic control plan prior to approval. Ground settlement monitoring is likely to be recommended with jacking and boring as well. We also request to review the proposed methods for resurfacing and/or restoring US 101 to State standards once the stormwater pipe has been replaced. These issues will need to be resolved with the District Permits staff before an encroachment application is submitted.

The City's Flood Reduction project overlaps with the location of the Caltrans proposed Koster Couplet and Middle Couplet projects currently in development. Proposed underground work, particular vaults and other features with surface developments must be coordinated with Caltrans engineering staff to ensure elevations allow for

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Mr. Jesse Willor, P.E.  
6/30/2023  
Page 2

present and future roadwork compatibility. There are two locations on Koster and one at Washington Street which may be a concern. Future curbs planned for those areas will also have associated drainage structure and grades.

As noted in the Mitigated Negative Declaration, any work within Caltrans Right-of-Way will require an Encroachment Permit from Caltrans. Permit applications are reviewed for consistency with State standards and are subject to Department approval. To streamline the Encroachment Permit application and review process, we require the applicant to consult with Caltrans Permits staff prior to submittal. Requests for Encroachment 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) 498-5684. For additional information, the Caltrans Encroachment Permit Manual and Standard Application is available online at: <<https://dot.ca.gov/programs/traffic-operations/ep>>.

Please 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

## 2.2 Response to Comment

### Response to Comment #1

It is noted that Caltrans has concerns about the potential impacts to US 101 from the construction methods for installing a 60-inch stormwater pipe under US Route 101 at Del Norte Street, due in part to potential conflicts with other existing utilities at that location. To avoid potential conflicts with existing utilities, the City will identify utility location and elevation by “pot-hole” prior to construction and will accommodate in the Project plans. The portion of the Project within the Caltrans right-of-way will be constructed to state highway standards. The 60-inch stormwater pipe will be installed using trenchless installation, or an open trench, or a combination of both. Installation methods will be detailed in the Project plans and submitted to Caltrans to review prior to submission of the Encroachment Permit application.

### Response to Comment #2

It is noted that the use of directional boring methodologies would require large sending and receiving jacking pits that would require a detailed traffic control plan prior to approval. The City is expecting to implement a standard Caltrans-approved traffic control plan as mentioned in Section 1.10.2 of the ISMND (page 1-19). The potential requirement for a detailed traffic control plan will be discussed further with Caltrans prior to submittal of the Caltrans Encroachment Permit application.

### Response to Comment #3

It is noted that ground settlement monitoring is likely to be recommended by Caltrans if jacking and boring methods are implemented. The City will discuss this potential requirement with Caltrans to reach agreement on the specifications prior to submittal of the Caltrans Encroachment Permit application.

### Response to Comment #4

It is noted that Caltrans requests to review the proposed methods for resurfacing and/or restoring US 101 to State standards once the stormwater pipe has been replaced. The City will provide said methods prior to submittal of the Caltrans Encroachment Permit application.

### Response to Comment #5

It is noted that Caltrans requests these issues be resolved with Caltrans District Permits staff before an encroachment permit application is submitted. The City will begin dialogue with Caltrans District Permits staff to discuss Caltrans’ concerns mentioned in comments #1 through #5.

### Response to Comment #6

It is noted that the City’s Project overlaps with the location of two Caltrans projects that are currently in development: Koster Couplet and Middle Couplet, which is noted on page 3-74 of the ISMND.

### Response to Comment #7

It is noted that coordination with Caltrans engineering staff is requested for the proposed underground work (including particular vaults) with surface developments with respect to elevations and allowance for present and future roadwork compatibility. The City will coordinate with Caltrans engineering staff regarding the compatibility of elevations with future Caltrans roadwork.

### Response to Comment #8

It is noted that there are two locations on Koster Street, and one at Washington Street which may be a concern to Caltrans due to future curbs planned for those areas which will also have associated drainage structure and grades. The City will communicate with Caltrans engineering staff regarding compatibility of the projects.

### Response to Comment #9

The City plans to acquire a Caltrans encroachment permit for all work occurring in the Caltrans right-of-way, and plans to consult with Caltrans Permits staff prior to submittal.

## 2.3 Summary of Responses

The portion of the Project within the Caltrans right-of-way will be constructed to meet state highway standards. The 60-inch stormwater pipe will be installed using trenchless installation, or an open trench, or a combination of both. Installation methods will be detailed in the Project plans and submitted to Caltrans to review prior to submission of the Encroachment Permit application. In summary, the City will consult with Caltrans District Permits staff prior to submittal of the Caltrans Encroachment Permit application regarding the location of existing utilities, traffic control plan(s), ground settlement monitoring, and proposed methods for resurfacing and/or restoring US 101 to State standards following stormwater pipe placement. City staff will also coordinate with Caltrans engineering staff regarding the compatibility between the proposed Project and Caltrans' Koster Couplet and Middle Couplet projects.



# Appendices

# **Appendix A**

**ISMND Comment Letter from Caltrans**

## California Department of Transportation

DISTRICT 1  
P.O. BOX 3700 | EUREKA, CA 95502-3700  
(707) 445-6600 | FAX (707) 441-6314 TTY 711  
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June 30, 2023

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Public Works Department  
City of Eureka  
531 K Street  
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The City's Flood Reduction project overlaps with the location of the Caltrans proposed Koster Couplet and Middle Couplet projects currently in development. Proposed underground work, particular vaults and other features with surface developments must be coordinated with Caltrans engineering staff to ensure elevations allow for

Mr. Jesse Willor, P.E.

6/30/2023

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Please 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