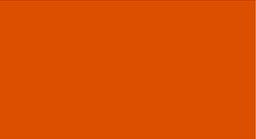


CITY OF EUREKA GENERAL PLAN UPDATE

Final Environmental Impact Report
SCH # 2016102025

Prepared for
City of Eureka

September 2018



CITY OF EUREKA GENERAL PLAN UPDATE

Final Environmental Impact Report
SCH # 2016102025

Prepared for
City of Eureka
Planning and Building Department
531 K Street
Eureka, CA 95501

September 2018

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CHAPTER 1

Introduction and List of Commenters

1.1 Purpose of this Document

This Final Environmental Impact Report (Final EIR) document includes all agency and public comments received on the Draft Environmental Impact Report (Draft EIR, SCH #2016102025) for the City of Eureka 2040 General Plan Update project (proposed project). Written comments were received by the City of Eureka during the public comment period from May 29, 2018 through July 13, 2018. This document includes written responses to each comment received on the Draft EIR. The responses correct, clarify, and amplify text in the Draft EIR, as appropriate, and these text changes are included in Chapter 3 of this document. These changes do not alter the conclusions of the Draft EIR.

This Final EIR document has been prepared in accordance with the California Environmental Quality Act (CEQA), and will be used by the decision-makers during project hearings.

1.2 Organization of the Final EIR

The Final EIR is organized as follows:

Chapter 1 – Introduction and List of Commenters: This chapter summarizes the project under consideration and describes the contents of the Final EIR. This chapter also contains a list of all of the agencies, organizations, and individuals that submitted comments on the Draft EIR during the public review period.

Chapter 2 – Comments and Responses: This chapter contains the comment letters received on the Draft EIR, followed by responses to individual comments. Letters are grouped by agencies, organizations, and individuals, but are otherwise presented in the order in which they were received. Each comment letter is presented with brackets indicating how the letter has been divided into individual comments. Each comment is given a binomial with the letter number appearing first, followed by the comment number. For example, comments in Letter 1 are numbered 1-1, 1-2, 1-3, and so on. Immediately following the letter are responses, each with binomials that correspond to the bracketed comments.

Some comments that were submitted to the City do not pertain to CEQA environmental issues or do not address the adequacy of the analysis contained in the Draft EIR. When a comment does not

directly pertain to environmental issues analyzed in the Draft EIR, does not ask a question about the adequacy of the analysis contained in the Draft EIR, expresses an opinion related to the merits of the project or how it should be implemented, or does not question an element of or conclusion of the Draft EIR, the response notes the comment and may provide additional information where appropriate. The intent is to recognize the comment. Many comments express opinions about the merits or specific aspects of the proposed project and these are included in the Final EIR for consideration by the decision-makers.

Chapter 3 – Revisions to the Draft EIR: This chapter summarizes refinements and text changes made to the Draft EIR in response to comments made on the Draft EIR and/or staff-initiated text changes. Changes to the text of the Draft EIR are shown by either a line through the text that has been deleted, or is underlined where new text has been inserted. The revisions contain clarification, amplification, and corrections that have been identified since publication of the Draft EIR. The text revisions do not result in a change in the analysis and conclusions presented in the Draft EIR.

1.3 Summary of Proposed Project

The proposed project is an update to the City of Eureka’s General Plan. The current General Plan for the City of Eureka was adopted in February 1997 and has not been comprehensively updated since its adoption. Some of the data, analyses, and policies in the 1997 plan do not fully reflect the current conditions or objectives of the City. As a result, in addition to being required by state law, an update of the General Plan is necessary to reflect the community’s current vision for accommodating future growth and providing services within Eureka through 2040.

California Government Code Section 65300 et seq. directs that all cities and counties in the state adopt a comprehensive planning document, called the general plan. The general plan provides guidance to local government decision-makers regarding the conservation of resources and the future physical form and character of development for the jurisdiction. It is the official local government statement regarding the extent and types of development of land and infrastructure that will achieve the community’s physical, economic, social, and environmental goals. A general plan expresses a city’s or county’s goals and articulates its intentions with respect to the rights and expectations of the general public, property owners, community interest groups, prospective investors, and business interests. Although the general plan consists of individual sections, or “elements,” that address specific areas of concern, it also embodies a comprehensive and integrated planning approach for the jurisdiction.

The City of Eureka 2040 General Plan creates a framework to plan for and guide residential and non-residential growth and conservation in Eureka from now until 2040. This framework is based on a set of comprehensive goals and policies that expand the existing land use patterns, encouraging new growth in undeveloped and underutilized areas of the City and its SOI.

The following objectives have been established for the proposed project and will aid decision makers in their review of the project and associated environmental impacts.

- Provide a comprehensive update to the City’s General Plan to more effectively address the issues facing Eureka and to reflect the current values and vision of the community (see the Preface of the General Plan for the General Plan Vision);
- Enhance Eureka’s quality of life and enrich its sense of community;
- Support well planned infill projects that build upon Eureka's historic development patterns and that utilize development intensities and building heights that are in closer alignment with the City’s pre-1950s history;
- Meet the housing needs of existing and future residents through a variety of housing types and designs including infill development, higher density products, and mixed use;
- Preserve and enhance existing neighborhoods;
- Promote a vital Core Area with a mix of uses that include retail, office, residential, entertainment, and cultural uses that attract local residents, regional visitors, and tourists;
- Provide additional opportunities for industry and employment to strengthen and diversify the economic base of the City;
- Foster a diverse and resilient local economy, friendly to new business investment and the creation and retention of quality jobs;
- Minimize development regulations, such as parking requirements and other development standards that unnecessarily complicate development processes;
- Improve mobility and safety for pedestrians, bicyclists, and vehicles; and
- Accommodate growth that protects important environmental resources, as well as ensures long term economic sustainability, and equity and social well-being for the entire community.

The proposed General Plan contains the elements listed below. Those elements marked with an asterisk (*) are those required by State law. Those not marked with an asterisk are optional elements that the City has included in the General Plan.

- | | |
|--------------------------------------|------------------------|
| • Land Use* | • Open Space* |
| • Circulation/Mobility* | • Noise* |
| • Housing* | • Safety* |
| • Conservation* | • Economy |
| • Historic and Cultural Preservation | • Arts and Culture |
| • Agriculture and Timberlands | • Parks and Recreation |
| • Air Quality and Climate Change | • Utilities |
| • Health and Safety | |

1.4 Required Jurisdictional Approvals

City of Eureka

The 2040 General Plan requires the approval of a number of discretionary actions by the City Council. According to Sections 15050 and 15367 of the CEQA Guidelines, the City is designated as the Lead Agency for the project under CEQA. Project implementation would require a series of interrelated planning and regulatory approvals by the City of Eureka, as Lead Agency. Specifically, the City is considering taking the following approval actions:

- Certification of the EIR; and
- Adoption of the 2040 General Plan

The Final EIR, along with other applicable documents, including CEQA Findings of Fact and a Statement of Overriding Considerations, will be reviewed by the Planning Commission and a recommendation will be made to the City Council regarding Final EIR approval. The City Council will consider and certify the Final EIR if it is determined to be in compliance with CEQA. The Final EIR will include any text changes made to the Draft EIR, and responses to comments received on the Draft EIR during the public review period. After or concurrent with certification of the Final EIR, the City Council will consider the 2040 General Plan for approval.

Other Governmental Agency Approvals

As the Lead Agency and as appropriate under CEQA, the City also intends this EIR to serve as the CEQA-required environmental documentation for consideration of this project by other Responsible Agencies and Trustee Agencies which may have limited discretionary authority over development proposals associated with the project. Under the CEQA *Guidelines*, the term “Responsible Agency” includes all public agencies, other than the Lead Agency, which have discretionary approval power over aspects of the project for which the Lead Agency has prepared an EIR (Section 15381); and the term “Trustee Agency” means a state agency having jurisdiction by law over natural resources affected by the project which are held in trust by the people of California (Section 15386).

While there are no responsible agencies for the adoption of the 2040 General Plan, there are several potential responsible agencies for the implementation of future development projects consistent with the General Plan. Those agencies include:

Local Agencies

- Humboldt Local Agency Formation Commission (LAFCO) – Any Sphere of Influence (SOI) modifications or annexations associated with the General Plan would be reviewed and approved by LAFCO.

Regional and State Agencies

- Regional Water Quality Control Board (RWQCB) – Construction projects over one acre require coverage under the National Pollution Discharge Elimination System (NPDES). New point sources of discharge, including industrial and public facilities, may require individual permits issued by the RWQCB.
- California Department of Transportation (Caltrans) – Transportation improvements identified in this EIR include facilities operated by Caltrans. Encroachment permits and other approvals may be required for the implementation of these improvements.
- North Coast Unified Air Quality Management District (NCUAQMD) – Future development projects may be subject to review by the NCUAQMD. In the case of “new sources” of criteria air pollutants, the NCUAQMD may require permits, and act as a responsible agency.
- California Coastal Commission (CCC) – Review and approval of development projects within the Coastal Zone.

Federal Agencies

- Federal agencies, including US Fish and Wildlife Service and the Army Corps of Engineers may have jurisdiction over future development projects (those which may impact federally protected species or jurisdictional waters of the US). For projects affecting the airspace protection surfaces surrounding Humboldt County airports, the Federal Aviation Administration may be a reviewing and/or permitting agency. Expenditure of federal funds to support future development within the scope of the 2040 General Plan (such as housing or infrastructure projects) may involve other federal agencies not identified here. While the federal agencies discussed here are identified as potential agencies of jurisdiction with regards to future development, federal agency actions must comply with the National Environmental Policy Act (NEPA), and are therefore not typically considered responsible agencies under CEQA.

1.5 Public Participation and Review

The City of Eureka has complied with all noticing and public review requirements of CEQA. This compliance included notification of all responsible and trustee agencies and interested groups, organizations, and individuals that the Draft EIR was available for review. The following list of actions took place during the preparation, distribution, and review of the Draft EIR:

- On October 12, 2016, the City sent a Notice of Preparation (NOP) to the State Clearinghouse [SCH No. 2016102025], responsible and trustee government agencies, organizations, and individuals potentially interested in the project. The NOP requested that agencies with regulatory authority over any aspect of the project describe that authority and identify relevant environmental issues that should be addressed in the EIR. Interested members of the public were also invited to comment. A scoping meeting was held on October 26, 2016.

- On May 25, 2018, a Notice of Completion (NOC) was filed with the State Clearinghouse to announce the availability of the Draft EIR. Copies of the Draft EIR were distributed to the Clearinghouse and interested agencies following the requirements of CEQA Guidelines Sections 15085 and 15206. Notices of the Draft EIR’s availability were also distributed to interested agencies, organizations, and individuals using the same distribution process as outlined above. An announcement was also posted in a newspaper of general circulation. The Draft EIR was also published on the City’s website and filed at the County Clerk’s office. The 45-day public comment period began on May 29, 2018, and ended on July 13, 2018.

1.6 List of Commenters

The City received 13 comment letters or emails during the comment period on the Draft EIR for the proposed project. The table below indicates the numerical designation for each comment letter, the author of the comment letter, and the date of the comment letter. Letters are grouped by agencies, organizations, and individuals, but are otherwise presented in the order in which they were received.

COMMENT LETTERS RECEIVED ON THE EUREKA 2040 GENERAL PLAN UPDATE EIR

Letter #	Entity	Author(s) of Comment Letter/e-mail	Date Received
Agencies			
1	California Department of Transportation – District 1	Jesse Robertson, Transportation Planning	July 9, 2018
2	Governor’s Office of Planning and Research	Scott Morgan, Director	July 10, 2018
3	North Coast Regional Water Quality Control Board	Alydda Mangelsdorf, Planning and Stewardship Division	July 17, 2018
4	Humboldt County Department of Health and Human Services	Dana Murguía, Sr. Program Manager Public Health, Healthy Communities	June 25, 2018
5	Humboldt County Association of Governments	Oona Smith, Senior Planner	July 13, 2018
6	Humboldt County Department of Public Works	James Tompkins, Associate Civil Engineer	July 13, 2018
Organizations			
7	Humboldt Fishermen’s Marketing Association	Ken Bates, Vice-President, Board of Directors	June 17, 2018
8	Redwood Community Action Agency	Emily Sinkhorn Deputy Director, Natural Resources Services Division	July 5, 2018
9	Humboldt Bay Bicycle Commuters Association	Rick Knapp, President	July 10, 2018
10	Eureka Heritage Society	Mary Ann McCulloch, President	July 11, 2018
11	Coalition for Responsible Transportation Priorities	Colin Fiske, Executive Director	July 12, 2018

COMMENT LETTERS RECEIVED ON THE EUREKA 2040 GENERAL PLAN UPDATE EIR

Letter #	Entity	Author(s) of Comment Letter/e-mail	Date Received
12	Humboldt Baykeeper	Jennifer Kalt, Director	July 13, 2018
13	Environmental Protection Information Center (EPIC)	Tom Wheeler, Executive Director and Staff Attorney	July 13, 2018
Individuals			
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CHAPTER 2

Comments and Responses

2.1 Introduction

This section contains the comment letters that were received on the Draft EIR. Following each comment letter is a response by the City intended to supplement, clarify, or amend information provided in the Draft EIR or refer the reader to the appropriate place in the document where the requested information can be found. Comments that are not directly related to environmental issues may be discussed or noted for the record. Where text changes in the Draft EIR are warranted based upon the comments, those changes are discussed in the response to comments and also included in Chapter 3, *Text Changes to the Draft EIR*.

2.2 Master Responses

This section presents a response to issues raised in multiple comments. Rather than responding individually, this master response has been developed to address such comments comprehensively. The Master Response number is identified in the individual response to comments so that reviewers can readily locate all relevant information pertaining to the following issue of concern.

Master Response 1: Comments Expressing Support or Opposition to the Proposed General Plan, and Comments Suggesting Changes to the General Plan and its Policies

A number of comments were received expressing support or opposition to the proposed General Plan, as well as comments that put forth suggestions for changes to the proposed General Plan and its policies.

The principal purpose of an EIR is to inform decision makers and the public of the likely environmental effects of a proposed project. When a Draft EIR is circulated for public review, it is done so to provide the public with an opportunity to determine if the Draft EIR has adequately analyzed and disclosed the project's environmental effects. An EIR is not intended to advocate for or against a particular action. Instead, it is intended to serve as an impartial analysis that informs the public and decision makers of the environmental effects that are likely to occur if a project is implemented.

A number of comments were received that either expressed support or opposition to the General Plan and its policies, or provided suggestions as to how the General Plan and its policies should be modified to better meet the goals and desires of the commenters. These types of comments, though of interest to decision makers, concern the policy content of the General Plan itself, not the adequacy of the environmental analysis presented in the Draft EIR. Ultimately, these comments assert the opinion of the commenters as to how the General Plan should be implemented. They do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. Accordingly, no additional analysis, nor a direct response to these comments is required. [See *Twain Harte Homeowners Ass'n v. County of Tuolumne* (1982) 138 Cal.App.3d 664, 679, and CEQA Guidelines Section 15132(d).] However, the City will take all General Plan suggestions under advisement, and all comments will be forwarded to the City Council for consideration. In addition, the City may take proactive action to modify some General Plan policies in response to public suggestions.

2.3 Individual Responses

This section contains the responses to comments submitted during the public review period. Commenters on the Draft EIR, their associated agencies, and assigned letter identifications are listed in the table below. This section presents the comment letters received on the Draft EIR. Each comment letter received during the public comment period was bracketed to identify individual topics, and individual responses to those comments are provided. In situations where the comment issue(s) was identified in multiple letters, a “Master Response” was prepared to address the general concern, and the response to comment may refer the reader to one of the Master Responses provided above. If a subject matter of one letter overlaps that of another letter, the reader may be referred to more than one group of comments and responses to review all information on a given subject. Where this occurs, cross-references are provided.

COMMENT LETTERS RECEIVED ON THE EUREKA 2040 GENERAL PLAN UPDATE EIR

Letter #	Entity	Author(s) of Comment Letter/e-mail	Date Received
Agencies			
1	California Department of Transportation – District 1	Jesse Robertson, Transportation Planning	July 9, 2018
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COMMENT LETTERS RECEIVED ON THE EUREKA 2040 GENERAL PLAN UPDATE EIR

Letter #	Entity	Author(s) of Comment Letter/e-mail	Date Received
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13	Environmental Protection Information Center (EPIC)	Tom Wheeler, Executive Director and Staff Attorney	July 13, 2018
Individuals			
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DEPARTMENT OF TRANSPORTATION

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FAX (707) 445-6314
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*Making Conservation
a California Way of Life.*

July 9, 2018

1-HUM-Eureka
Eureka 2040 GPU DEIR
SCH# 2016102025

Rob Holmlund, Director
Community Development Services
City of Eureka
531 K Street
Eureka, CA 95501

Dear Mr. Holmlund:

Thank you for giving Caltrans the opportunity to review and comment on the proposed City of Eureka 2040 General Plan Update (GPU) Draft Environmental Impact Report (DEIR). We offer the following comments:

2040 General Plan Update

We would like to praise Eureka city staff for promoting innovative and sustainable land uses that help to promote a more affordable and efficient transportation network.

Because public investment in bicycle and pedestrian facilities can promote private investment, we encourage the City to consider the potential economic benefits to low income populations and small business when prioritizing infrastructure investments.

Page 132: Streets and Highways

The definition for “Freeway” is characterized in the by restricted access and the presence of grade-separated cross traffic more so than the number of travel lanes. Grade separation improves travel time by eliminating traffic control devices (traffic signals and stop signs) by putting conflicting traffic on separate alignments, which allows for unimpeded, high-speed travel. Grade separation also eliminates the potential for high severity collisions (broadside and head-on collisions). The number of lanes may vary based on travel demand, which indicative of the number of people dependent upon the facility (or a function of the population size).

The definition for “Expressway” is characterized by restricted access of the abutting properties but without having grade-separated intersections. These facility types are efficient at moving large volumes of traffic at higher speeds due to limited but still present cross traffic.

Freeways, when not congested, are inherently safer than expressways due to the presence of over-crossings and under-crossings, and with access limited to interchanges. Freeways, and to a lesser extent expressways, enable long-distance travel with a minimal investment of time.

Page 137: Goods Movement

The City may wish to consider designating specific city streets as routes for truck traffic, including:

- Railroad Ave/Waterfront Drive;
- 6th Street;
- 7th Street; and,

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- Myrtle Avenue.

Page 138: Complete Streets Goals

M-1.1 Setting goals to develop “Complete Streets” is valuable to remind the public, commissioners, and councilmembers of the need and benefits of accommodating multiple modes of travel. It is also a State law, which was passed in 2008 (AB 1358, Leno). For existing streets with narrow rights of way, it may not be possible to reconstruct streets to accommodate all modes of travel for all ability levels. Where compromise is needed among competing space for transportation facilities, we recommend the development of a “layered” transportation network that distributes a range of facility types across neighborhoods and districts.

Page 139: Complete Streets Goals

M-1.9 Aesthetic design or enhancements have been proposed for State routes within the City of Eureka (US Route 101, State Route 255). A visual preference survey that was conducted in November 2017 in conjunction the General Plan Update and the subsequent zoning code updates or amendments, indicated a preference for street trees or other landscaping within the Broadway (US 101) corridor. While it is possible for the State to cooperate with the City to construct landscape strips adjacent to sidewalk areas, the City would need to fund the installation and maintenance of landscaping and other aesthetic betterments, subject to an updated maintenance agreement with Caltrans. The City should identify potential revenue sources that can be dedicated to landscaping or other aesthetic enhancement purposes.

Page 140: Streets and Highways Goals

M-2.1 Street classifications are a function of the Federal Highway Administration and are a determinant for federal funding eligibility. The Caltrans Local Assistance office is responsible for ensuring that local government agencies adhere to requirements tied to federal transportation funding.

Pages 145-146: City-wide Circulation, Parking Supply and Management

M-5 We suggest that the City consider adding a policy which supports the “unbundling” of parking costs for multi-family residential developments where existing parking requirements can be reduced in favor or promoting other modes of travel. “Unbundled” parking costs provide parking to residents or building occupants for an additional price, beyond rents charged strictly for occupancy. This measure could be employed as a suite of measures employed by the City for parking management and travel demand management.

In addition to or as part of a Parking Management Program, we suggest that the City consider a Curb Zone Management Program. Curb space in Core Areas is a valuable public asset, and parking is only one of the desired uses of this area. Other users/uses of curb zone space could include delivery trucks, buses, taxis/TNCs, bike parking, bike share, and parklets.

Pages 148-149: Implementation

Imp M-4 Because Vehicle Miles Traveled (VMT) is proposed to replace Level of Service (LOS) under CEQA (California Environmental Quality Act) for measuring transportation impacts, we recommend that the City study the applicability of VMT to future City growth and development. The trip lengths that are used to evaluate project-specific VMT analysis for CEQA is not limited by jurisdictional boundaries, so we encourage the City to work with the Humboldt County Association of Governments (HCAOG) when evaluating potential regional applications both to evaluate and to reduce VMT. With support from other local agencies,

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cont.

2

HCAOG may be willing to develop a regional methodology or program as a part of their annual Overall Work Program.

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cont.

Draft Environmental Impact Report

The DEIR for the Eureka 2040 General Plan Update identifies a significant and unavoidable effect related to Vehicle Miles Traveled with the implementation of the General Plan Update. The City may have less influence over trip origination (home-based trips) than trip destination as the City holds the distinction as the primary employment center within the County. The City may provide encouragement for employers to establish travel demand measures to curb VMT for employees.

The California Natural Resources Agency is nearing the end of the formal rulemaking process which will amend the CEQA Guidelines to maintain consistency with recent legislation, including Senate Bill 743. Among the anticipated changes include the removal of Level of Service (LOS) as a measure of transportation impacts. While the City may continue to use LOS for managing the design and operation of city streets, LOS may no longer be considered a potential impact under CEQA. While Caltrans may continue to request future operational analyses for encroachment permit projects, we will focus future CEQA comments on ways to reduce trip lengths, the provision of multi-modal facilities (or “Complete Streets” facilities), and on facility design elements to ensure the safety of the traveling public.

3

Future interagency transportation coordination efforts both to reduce trip length (Vehicle Miles Traveled) and reduce congestion on interregional road corridors and networks can be conducted through the Greater Eureka Area (GEA) Travel Demand Model forum. Continuous, collaborative engagement in the GEA Technical Advisory Group is needed to keep the model up-to-date.

Page 3.12.19 of the Draft Environmental Impact Report quotes the Caltrans Director’s Policy 22, regarding Context Sensitive Solutions. Please note that since the Policy was written, Caltrans has revised its mission and vision to the following:

- Mission: Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability;
- Vision: A performance-driven, transparent and accountable organization that values its people, resources and partners, and meets new challenges through leadership, innovation and teamwork.

4

3.12.1 Truck Routes

The description of the “Terminal Access” Surface Transportation Assistance Act (STAA) truck route states that industry standard trucks may be accessed on westbound State Route 299 “from Iron Mountain Road near Redding to US [Route] 101 southbound to Eureka”. Please be aware that the entirety of SR 299 is designated an STAA truck route within the State of California. To avoid confusion, we recommend removing the reference to Iron Mountain Road as it introduces an unnecessary partition of the route.

5

Errata

- Figure 3.12-1: (1). The map of street classifications states that Waterfront Drive is a Major Collector. The classification changes status at H Street and is only true for the portion of Waterfront Drive west of H Street. Two sections of Waterfront Drive are classified as “Local” streets. (2). It appears that Figure 3.12-1 also shows Harrison Ave continuing south to Bainbridge, which is mislabeled as a Major Collector. The southern terminus of Harrison Ave currently ends at Manzanita Street. Please refer to CRS Map 1D14 for the most up-to-date street classifications.
- The Streets and Highways Policy 3.A.4 refers to the California Traffic Manual, which has been

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replaced by California Manual of Uniform Traffic Control Devices (CA MUTCD).

↑ 7
cont.

Resources

The Governor’s Office of Planning and Research (OPR) has developed and published a web page (<http://opr.ca.gov/planning/transportation/>) with resources for addressing transportation in General Plan Updates and for CEQA compliance. The City may wish to consider expanding the General Plan Update policies to provide city staff with more targeted approaches for addressing parking demand in Old Town, improve transportation affordability for city residents, adopt rural travel demand management measures with the potential to reduce the need for costly infrastructure projects, or to achieve other community goals and priorities.

8

We look forward to collaborating with the City to implement the 2040 General Plan Update. Please contact me with questions or for further assistance regarding the above comments at: (707) 441-4693 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,



Jesse Robertson
Transportation Planning
Caltrans District 1

c: State Clearinghouse

Letter 1 Response **Jesse Robertson, Transportation Planning, California
Department of Transportation – District 1 (Caltrans)**

July 9, 2018

- 1-1 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. It should be noted, however, that the City has proactively revised portions of the General Plan to incorporate some of the additional information that was provided in the District’s letter. For instance, the definitions of “Freeways” and Expressways” have been modified to conform to the District’s definitions. Certain General Plan policies have also been revised to reflect some of the District’s suggestions. These revisions can be found in the General Plan itself, or, when those revisions affected text in the Draft EIR, in Chapter 3 of this Final EIR. These revisions do not alter the conclusions of the Draft EIR, and no additional analysis is required.
- 1-2 See the response to comment 1-1, above.
- 1-3 See the response to comment 1-1, above.
- 1-4 See the response to comment 1-1, above.
- 1-5 Based on the District’s comment, the referenced information in the Draft EIR has been revised. Please see Chapter 3 of this Final EIR. These revisions do not alter the conclusions of the Draft EIR, and no additional analysis is required.
- 1-6 The classifications shown were current as of the date of the General Plan’s initiation and circulation of the Notice of Preparation. Regardless, the changes described in the District’s letter are minor in nature, and would not affect the findings contained in the Draft EIR. As such, no additional analysis is required.
- 1-7 Policy 3.A.4 is a policy in the City’s existing General Plan, which dates from 1997. This policy will not be a part of the 2040 General Plan, and will no longer be applicable when adopted.
- 1-8 See the response to comment 1-1, above.



STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

July 10, 2018

RECEIVED
JUL 12 2018
DEPARTMENT OF
COMMUNITY DEVELOPMENT

Rob Holmlund
City of Eureka
531 K Street
Eureka, CA 95501

Subject: City of Eureka 2040 General Plan Update and Climate Action EIR
SCH#: 2016102025

Dear Rob Holmlund:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 9, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2016102025
Project Title City of Eureka 2040 General Plan Update and Climate Action EIR
Lead Agency Eureka, City of

Type EIR Draft EIR
Description The project consists of a comprehensive update to the current General Plan for the City of Eureka, as well as a Climate Action Plan. Buildout of the 2040 General Plan could result in approx. 2,500 additional housing units and 1.2 million sq. ft. of additional non-residential space.

Lead Agency Contact

Name Rob Holmlund
Agency City of Eureka
Phone 707-441-4160 **Fax**
email
Address 531 K Street
City Eureka **State** CA **Zip** 95501

Project Location

County Humboldt
City Eureka
Region
Lat / Long 40° 48' 07" N / 124° 09' 49" W
Cross Streets
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways US 101, SR 255
Airports Murray Field Airport
Railways NCRA(inactive)
Waterways Humboldt Bay, Eureka Slough, Elk River
Schools Several
Land Use Various/Multiple

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Coastal Zone; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Wildlife, Region 1; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 1; Office of Emergency Services, California; Department of Housing and Community Development; Regional Water Quality Control Board, Region 1; Native American Heritage Commission; Public Utilities Commission

Date Received 05/25/2018 **Start of Review** 05/25/2018 **End of Review** 07/09/2018

1
cont.

DEPARTMENT OF TRANSPORTATION

DISTRICT 1, P. O. BOX 3700
EUREKA, CA 95502-3700
PHONE (707) 441-4693
FAX (707) 445-6314
TTY 711

deu
7-9-18
E



Making Conservation
a California Way of Life.

July 9, 2018

1-HUM-Eureka
Eureka 2040 GPU DEIR
SCH# 2016102025

Rob Holmlund, Director
Community Development Services
City of Eureka
531 K Street
Eureka, CA 95501

Governor's Office of Planning & Research

JUL 09 2018

STATE CLEARINGHOUSE

Dear Mr. Holmlund:

Thank you for giving Caltrans the opportunity to review and comment on the proposed City of Eureka 2040 General Plan Update (GPU) Draft Environmental Impact Report (DEIR). We offer the following comments:

2040 General Plan Update

We would like to praise Eureka city staff for promoting innovative and sustainable land uses that help to promote a more affordable and efficient transportation network.

Because public investment in bicycle and pedestrian facilities can promote private investment, we encourage the City to consider the potential economic benefits to low income populations and small business when prioritizing infrastructure investments.

Page 132: Streets and Highways

The definition for "Freeway" is characterized in the by restricted access and the presence of grade-separated cross traffic more so than the number of travel lanes. Grade separation improves travel time by eliminating traffic control devices (traffic signals and stop signs) by putting conflicting traffic on separate alignments, which allows for unimpeded, high-speed travel. Grade separation also eliminates the potential for high severity collisions (broadside and head-on collisions). The number of lanes may vary based on travel demand, which indicative of the number of people dependent upon the facility (or a function of the population size).

The definition for "Expressway" is characterized by restricted access of the abutting properties but without having grade-separated intersections. These facility types are efficient at moving large volumes of traffic at higher speeds due to limited but still present cross traffic.

Freeways, when not congested, are inherently safer than expressways due to the presence of over-crossings and under-crossings, and with access limited to interchanges. Freeways, and to a lesser extent expressways, enable long-distance travel with a minimal investment of time.

Page 137: Goods Movement

The City may wish to consider designating specific city streets as routes for truck traffic, including:

- Railroad Ave/Waterfront Drive;
- 6th Street;
- 7th Street; and,

Mr. Rob Holmlund
7/9/18
Page 2 of 4

- Myrtle Avenue.

Page 138: Complete Streets Goals

M-1.1 Setting goals to develop “Complete Streets” is valuable to remind the public, commissioners, and councilmembers of the need and benefits of accommodating multiple modes of travel. It is also a State law, which was passed in 2008 (AB 1358, Leno). For existing streets with narrow rights of way, it may not be possible to reconstruct streets to accommodate all modes of travel for all ability levels. Where compromise is needed among competing space for transportation facilities, we recommend the development of a “layered” transportation network that distributes a range of facility types across neighborhoods and districts.

Page 139: Complete Streets Goals

M-1.9 Aesthetic design or enhancements have been proposed for State routes within the City of Eureka (US Route 101, State Route 255). A visual preference survey that was conducted in November 2017 in conjunction the General Plan Update and the subsequent zoning code updates or amendments, indicated a preference for street trees or other landscaping within the Broadway (US 101) corridor. While it is possible for the State to cooperate with the City to construct landscape strips adjacent to sidewalk areas, the City would need to fund the installation and maintenance of landscaping and other aesthetic betterments, subject to an updated maintenance agreement with Caltrans. The City should identify potential revenue sources that can be dedicated to landscaping or other aesthetic enhancement purposes.

Page 140: Streets and Highways Goals

M-2.1 Street classifications are a function of the Federal Highway Administration and are a determinant for federal funding eligibility. The Caltrans Local Assistance office is responsible for ensuring that local government agencies adhere to requirements tied to federal transportation funding.

Pages 145-146: City-wide Circulation, Parking Supply and Management

M-5 We suggest that the City consider adding a policy which supports the “unbundling” of parking costs for multi-family residential developments where existing parking requirements can be reduced in favor or promoting other modes of travel. “Unbundled” parking costs provide parking to residents or building occupants for an additional price, beyond rents charged strictly for occupancy. This measure could be employed as a suite of measures employed by the City for parking management and travel demand management.

In addition to or as part of a Parking Management Program, we suggest that the City consider a Curb Zone Management Program. Curb space in Core Areas is a valuable public asset, and parking is only one of the desired uses of this area. Other users/uses of curb zone space could include delivery trucks, buses, taxis/TNCs, bike parking, bike share, and parklets.

Pages 148-149: Implementation

Imp M-4 Because Vehicle Miles Traveled (VMT) is proposed to replace Level of Service (LOS) under CEQA (California Environmental Quality Act) for measuring transportation impacts, we recommend that the City study the applicability of VMT to future City growth and development. The trip lengths that are used to evaluate project-specific VMT analysis for CEQA is not limited by jurisdictional boundaries, so we encourage the City to work with the Humboldt County Association of Governments (HCAOG) when evaluating potential regional applications both to evaluate and to reduce VMT. With support from other local agencies,

Mr. Rob Holmlund
7/9/18
Page 3 of 4

HCAOG may be willing to develop a regional methodology or program as a part of their annual Overall Work Program.

Draft Environmental Impact Report

The DEIR for the Eureka 2040 General Plan Update identifies a significant and unavoidable effect related to Vehicle Miles Traveled with the implementation of the General Plan Update. The City may have less influence over trip origination (home-based trips) than trip destination as the City holds the distinction as the primary employment center within the County. The City may provide encouragement for employers to establish travel demand measures to curb VMT for employees.

The California Natural Resources Agency is nearing the end of the formal rulemaking process which will amend the CEQA Guidelines to maintain consistency with recent legislation, including Senate Bill 743. Among the anticipated changes include the removal of Level of Service (LOS) as a measure of transportation impacts. While the City may continue to use LOS for managing the design and operation of city streets, LOS may no longer be considered a potential impact under CEQA. While Caltrans may continue to request future operational analyses for encroachment permit projects, we will focus future CEQA comments on ways to reduce trip lengths, the provision of multi-modal facilities (or “Complete Streets” facilities), and on facility design elements to ensure the safety of the traveling public.

Future interagency transportation coordination efforts both to reduce trip length (Vehicle Miles Traveled) and reduce congestion on interregional road corridors and networks can be conducted through the Greater Eureka Area (GEA) Travel Demand Model forum. Continuous, collaborative engagement in the GEA Technical Advisory Group is needed to keep the model up-to-date.

Page 3.12.19 of the Draft Environmental Impact Report quotes the Caltrans Director’s Policy 22, regarding Context Sensitive Solutions. Please note that since the Policy was written, Caltrans has revised its mission and vision to the following:

- Mission: Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability;
- Vision: A performance-driven, transparent and accountable organization that values its people, resources and partners, and meets new challenges through leadership, innovation and teamwork.

3.12.1 Truck Routes

The description of the “Terminal Access” Surface Transportation Assistance Act (STAA) truck route states that industry standard trucks may be accessed on westbound State Route 299 “from Iron Mountain Road near Redding to US [Route] 101 southbound to Eureka”. Please be aware that the entirety of SR 299 is designated an STAA truck route within the State of California. To avoid confusion, we recommend removing the reference to Iron Mountain Road as it introduces an unnecessary partition of the route.

Errata

- Figure 3.12-1: (1). The map of street classifications states that Waterfront Drive is a Major Collector. The classification changes status at H Street and is only true for the portion of Waterfront Drive west of H Street. Two sections of Waterfront Drive are classified as “Local” streets. (2). It appears that Figure 3.12-1 also shows Harrison Ave continuing south to Bainbridge, which is mislabeled as a Major Collector. The southern terminus of Harrison Ave currently ends at Manzanita Street. Please refer to CRS Map 1D14 for the most up-to-date street classifications.
- The Streets and Highways Policy 3.A.4 refers to the California Traffic Manual, which has been

Mr. Rob Holmlund
7/9/18
Page 4 of 4

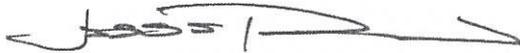
replaced by California Manual of Uniform Traffic Control Devices (CA MUTCD).

Resources

The Governor's Office of Planning and Research (OPR) has developed and published a web page (<http://opr.ca.gov/planning/transportation/>) with resources for addressing transportation in General Plan Updates and for CEQA compliance. The City may wish to consider expanding the General Plan Update policies to provide city staff with more targeted approaches for addressing parking demand in Old Town, improve transportation affordability for city residents, adopt rural travel demand management measures with the potential to reduce the need for costly infrastructure projects, or to achieve other community goals and priorities.

We look forward to collaborating with the City to implement the 2040 General Plan Update. Please contact me with questions or for further assistance regarding the above comments at: (707) 441-4693 or by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,



Jesse Robertson
Transportation Planning
Caltrans District 1

c: State Clearinghouse

Letter 2 **Scott Morgan, Director, Governor’s Office of Planning and**
Response **Research (OPR)**

July 10, 2018

- 2-1 This letter acknowledges receipt of the Draft EIR by the State Clearinghouse, and indicates that the Clearinghouse circulated the Draft EIR for agency review. The Clearinghouse also forwarded a comment letter on the General Plan and Draft EIR from Caltrans District 1. That letter has been responded to in Letter 1 of this response to comment document. No further response is required.



North Coast Regional Water Quality Control Board

July 17, 2018

Mr. Rob Holmlund, AICP
City of Eureka, Planning and Zoning
531 K Street
Eureka, CA 95501

Dear Mr. Holmlund:

Subject: Comments on the City of Eureka 2040 General Plan Update 2018 DEIR,
SCH No. 2016102025

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Eureka’s 2040 General Plan Update. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of those waters.

The proposed project consists of a General Plan Update designed to bring the existing Plan into alignment with current market conditions and growth projections. The project will result in an increase in the inventory of housing units in the City by up to 1,886 dwelling units and up to 3,683 residents. The 2040 General Plan also provides for a total of up to 1.6 million square feet of nonresidential uses.

Germane to the statutory responsibilities of the Regional Water Board, specific environmental information that is prudent to identify in a subsequent Environmental Impact Report (EIR) include impacts to wetlands and waters of the state, biological resources affected, potential hazardous materials associated with candidate sites, wastewater treatment and disposal, construction and post-construction storm water Best Management Practices (BMPs), and the proposed use of Low Impact Development (LID) techniques. Additionally, the Regional Water Board strongly recommends that the proposed new developments be located within areas containing existing infrastructure with adequate capacity to accommodate the projected increase in demand.

We have reviewed the Notice of Preparation (NOP) prepared for the City of Eureka 2040 General Plan Update and offer the following general comments:

1

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The following permits may be required for this project:

Construction General Storm Water Permit: Land disturbances on projects of one acre or more require coverage under the construction general storm water permit. If the land disturbance will be one acre or more, the owner of the property will need to apply for coverage under this permit prior to the commencement of activities on-site. This permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies BMPs to implement and maintain to minimize pollutant discharges from a construction site. The permit also requires a risk level analysis for the project based on erosion risk and sensitivity of the receiving waters, inspections of construction sites before and after storm events, and every 24 hours during extended storm events, storm event monitoring, and electronic document and data submittal. The permit requires the use of Low Impact Development to treat post-construction storm water runoff from impervious surfaces. Owners may find the permit at:

https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html

Waste Discharge Requirements (WDRs) or a Conditional Waiver of WDRs: Under authority of the California Water Code, the Regional Water Board may issue WDRs for any project which discharges or threatens to discharge waste to waters of the state. Projects that impact waters of the state (including discharges of post-construction storm water runoff, grading activities within stream courses or wetlands, and removal of riparian vegetation in some cases) require permitting by the Regional Water Board.

Where projects involve the repair and installation of new and replacement onsite wastewater treatment systems (also known as septic systems or OWTS), the OWTS must meet the minimum standards contained in Tier 1 of the statewide Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (OWTS Policy), or an alternate standard provided by a Local Agency Management Program (LAMP), if the local agency has an approved LAMP.

The Regional Water Board approved the Humboldt County LAMP on February 8, 2018. The approval authorizes the County to regulate OWTS with projected wastewater flows up to 10,000 gallons per day. For OWTS with projected wastewater flows greater than 10,000 gallons per day or for OWTS that receive high strength wastewater from a commercial service building, project proponents are required to submit a report of waste discharge (Form 200) to the Regional Water Board for possible establishment of waste discharge requirements.

The Form 200/application for waste discharge requirements can be downloaded at https://www.waterboards.ca.gov/publications_forms/forms/docs/form200.pdf

Water Quality Certification (401 Certification): Permits must be issued for activities resulting in dredge or fill within waters of the United States. All projects must be evaluated for the presence of jurisdictional wetlands and other waters of the state. Destruction of or impacts to these waters should be avoided. Under the Clean Water Act Sections 401 and 404, disturbing wetlands requires a permit from the United States Army Corps of Engineers (ACOE) and a state 401 permit. To determine whether wetlands may be present on any proposed construction site,

2
cont.

please contact Kasey Sirkin of ACOE at (707) 443-0855. If wetlands are present, please contact Stephen Bargsten from our office at (707) 576-2653 for a 401 Permit or other permit action.

↑ 2
cont.

In addition to the preceding general comments, Regional Water Board staff has the following specific comments on the draft City of Eureka 2040 General Plan Update:

1. Goal U-2.7 (p. 3.3-39) Best Management Practices to reduce waste water flows to waste water treatment plant – The use of waterless toilets, composting toilets, and the like will require a revision to Humboldt County’s LAMP, which Regional Water Board staff understands applies to OWTS within the City boundaries, or development and approval of LAMP specifically for the City of Eureka. Also, Goal U-2.7 appears to conflict with Goal U-2.5, which prohibits alternative wastewater treatment and disposal systems.
2. Goal U-4.4 (p. 3.3-39)- Composting operations may require permitting under statewide Composting General Waste Discharge Requirements, State Water Resources Control Board Order *WQ 2015-0121-DWQ, General Waste Discharge Requirements for Composting Operations*.
3. Policy 6.A.3 (p. 3.4-33) – The Regional Water Board supports water recycling/reuse of wastewater to reduce treated wastewater discharges to surface water.
4. Policy 7.A.9 (p. 3.6-20), Policy HS-1.6 (p. 3.6-26) – Regional Water Board strongly recommends that the City develop an Emergency Response Plan to ensure water supply and delivery and wastewater treatment and disposal in case of damage to these assets from seismic events, sea-level rise, and other disasters.
5. Section 3.8 Hydrology and Water Quality (Sea Level Rise, p.3.8-8) – The General Plan should acknowledge that, as a condition of the City’s NPDES permit, Waste Discharge Requirements Order No. R1-2016-0001 (NPDES Permit No. CA0024449, the City of Eureka is required to prepare and submit a Climate Change Readiness Study Plan by July 1, 2020. Order No. R1-2016-0001 requires the City to “(1) conduct an assessment of the wastewater treatment facility, operations, collection and discharge systems to determine areas of short and long-term vulnerabilities related to climate change, (2) identify control measures needed to protect, improve, and maintain wastewater infrastructure, waste discharge compliance, and receiving water quality under changing climate conditions, and (3) develop a schedule to implement necessary control measures. Control measures shall include, but are not limited to, emergency procedures, contingency plans, alarm/notification systems, training, backup power and equipment, and the need for planned mitigations to ameliorate climate-induced impacts such as changing influent and receiving water quality and conditions, as well as the impact of rising sea level, storm surges and back-to-back severe storms that are expected to become more frequent.”
6. NR-1.7 Groundwater Protection (p. 3.8-20) – This Policy indicates that the City is regulating the use of septic systems or OWTS. If the City intends to regulate OWTS within its jurisdiction, it must develop and submit to the Regional Water Board a Tier 2 LAMP, or regulate OWTS in compliance with Tier 1 of statewide OWTS Policy.

3



- 7. Goal U-2.5 Onsite Sewage Treatment (p. 3.8-21) – Regional Water Board generally discourages disposal of industrial waste to septic systems, even with pretreatment of the waste. Regional Water Board staff recommends connection of industrial wastewater systems to municipal sanitary sewer systems. Where non-domestic wastewater is discharged to a septic system, the owner of the septic system must submit a report of waste discharge for possible establishment of waste discharge requirements for the discharge.
- 8. Goal U-2.7 Best Management Practices (p. 3.8-21) – This Policy appears to encourage alternative wastewater treatment systems, such as waterless toilets and composting toilets. Use of waterless toilets, composting toilets, and the like will require change to Humboldt County LAMP or development and approval of LAMP for the City of Eureka. Goal U-2.7 appears to conflict with Goal U-2.5, which prohibits alternative wastewater treatment and disposal systems.
- 9. California Department of Public Health (p. 3.13-10) – This section is outdated. Enforcement authority and regulatory oversight of the state’s Safe Drinking Water Program was transferred from CDPH to the State Water Resources Control Board in 2014. The General Plan should be updated to acknowledge this change. For details, see the State Water Board webpage at https://www.waterboards.ca.gov/drinking_water/safedrinkingwaterplan/.

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cont.

4

If you have any questions or comments, please contact Chuck Striplen at (707) 576-2689 or Charles.Striplen@waterboards.ca.gov.

For additional questions, please contact:

Storm Water: Brendon Thompson, (707) 576-2699 or Brendan.Thompson@waterboards.ca.gov

Water Quality Certification: Stephen Bargsten, (707) 576-2653 or Stephen.Bargsten@waterboards.ca.gov

Waste Discharge Requirements: Rachel Prat, (707) 576-2542 or Rachel.Prat@waterboards.ca.gov

Sincerely,



Alydda Mangelsdorf, Chief
Planning and Stewardship Division

180717_AM_er_CityofEureka_CEQA_Ltr

cc: Scott Morgan, State Clearinghouse, PO Box 3044, Sacramento, CA 95812
Re: SCH No. 2016102025

**Letter 3 Alydda Mangelsdorf, Planning and Stewardship Division North
Response Coast Regional Water Quality Control Board (NC RWQCB)**July 17, 2018

- 3-1 This comment provides an overview of the proposed General Plan and the Board's statutory responsibilities concerning management of water quality. This aspect of the comment raises no new environmental concerns that have not already been adequately analyzed and disclosed in the EIR, so no further response to this aspect of the comment is required (see Master Response No. 1 in Section 2.2 of this chapter). The comment additionally suggests that future development that is carried out as part of the General Plan's implementation be located in areas containing existing and adequate infrastructure. This comment reflects the opinion of the Board as to how the General Plan should be implemented, and no further response is required. However, the City would like to take this opportunity to state that a principal component of the General Plan is the encouragement of infill development in areas that already contain adequate infrastructure. As such, the Board's expressed concern will be addressed by the land use plan and the policies already contained within the General Plan.
- 3-2 This comment outlines the statutory and regulatory requirements that would have to be met as part of the General Plan's implementation. Each of the regulations, permits, or other requirements listed in the Board's comment were presented and described in the various topical discussions of the EIR, particularly Sections 3.1 *Biological Resources*; 3.6 *Geology, Soils, and Paleontological Resources*; 3.8 *Hydrology and Water Quality*; and 3.13 *Utilities and Service Systems*. Therefore, the comment does not raise any new environmental concerns that have not already been adequately analyzed and disclosed in the EIR, so no further response to the comment is required (see Master Response No. 1 in Section 2.2 of this chapter).
- 3-3 This comment raises various points concerning the General Plan's implementation: 1) the comment presents additional information as to the regulatory requirements that could be associated with aspects of the General Plan's implementation; 2) the comment indicates the Board's support for various policies within the General Plan; and 3) the comment provides suggestions concerning the General Plan's implementation or suggestions for revision of various General Plan policies. The comment does not raise any new environmental concerns that have not already been adequately analyzed and disclosed in the EIR, and no further response is required (see Master Response No. 1 in Section 2.2 of this chapter).
- 3-4 The City appreciates the Board's pointing out this outdated information on Page 3.13-10 of the Draft EIR. The relevant information has been updated, as described in Chapter 3 of this Final EIR.

From: [Luke Evans](#)
Sent: Monday, July 16, 2018 10:59 AM
To: [Luke Evans](#)
Subject: FW: GPU Language

From: Murguia, Dana [<mailto:DMurguia@co.humboldt.ca.us>]
Sent: Monday, June 25, 2018 2:00 PM
To: Rob Holmlund <rholmlund@ci.eureka.ca.gov>
Cc: Nelson, Sarah <SNelson@co.humboldt.ca.us>
Subject: GPU Language

Hello, Rob:

I wanted to ask you if there is still time to make a mini-change to the language of the GPU. It would be the highlighted text below.

Is this a possibility?

“HS-5.2 Education for Healthy Communities.

Promote opportunities for health education and awareness throughout the City, emphasizing the importance of **not smoking**, regular exercise, walking, nutrition, and regular check-ups as a preventive measure against cardiovascular and other diseases. (PI)”

Thanks so much!

In Partnership,

Dana

Dana Murguía, MBA
Sr. Program Manager
Public Health, Healthy Communities
Phone: (707) 441-5086
BlackBerry: (707) 296-8295
dmurguia@co.humboldt.ca.us
[CLICK Here ▶ Healthy Communities Programs & Services](#)



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**Letter 4
Response****Dana Murguía, Senior Program Manager for Public Health,
Healthy Communities, Humboldt County Department of Health
and Human Services**June 25, 2018

- 4-1 This comment presents a suggestion for revisions to one of the General Plan's policies. The comment addresses the policy content of the General Plan itself, and does not raise any concerns about the adequacy of the environmental analysis presented in the Draft EIR. Accordingly, no additional analysis is required (please see Master Response No. 1 in Chapter 2.2 of this Final EIR). However, in response to the Department's suggestion, Policy HS-5.2 has been revised to incorporate the requested revision. This revision can be found in Chapter 3 of this Final EIR. The revision does not alter the conclusions of the Draft EIR, and no additional analysis is required.



HCAOG
*Regional Transportation
Planning Agency*

611 I Street, Suite B
Eureka, CA 95501
707.444.8208
Fax: 707.444.8319
www.hcaog.net

July 12, 2018

Attn: General Plan Update
Development Services Department
City of Eureka
531 K Street
Eureka, CA 95501
c/o generalplanupdate@ci.eureka.ca.gov

Dear Ms. Kristen Goetz,

The Humboldt County Association of Governments (HCAOG), in its capacity as the designated Regional Transportation Planning Agency (RTPA) for Humboldt County, has the duty to guide the development of a safe, efficient, coordinated, balanced regional transportation system. In that capacity, HCAOG is pleased to review the City of Eureka’s draft *2040 General Plan*, and associated Draft EIR, for consistency and coordination with the goals of the Regional Transportation Plan (RTP).

HCAOG’s *Regional Transportation Plan–Variety in Rural Options of Mobility*, or *VROOM*, is the primary policy and planning document that HCAOG uses to identify specific actions that will address the region’s needs for connectivity, mobility, accessibility, and goods movement. (*VROOM* is a 20-year plan, which HCAOG last updated and adopted in December 2018.)

I have read “Our Vision” in the draft *2040 General Plan*, and Chapter 3 “Goals and Policies” for Land Use, Air Quality and Climate Change, and Mobility. In these elements the *2040 General Plan* promotes land use and transportation planning strategies to improve multi-modal balance, access to active transportation and transit, and use of existing infrastructure investments, away from car-centric land use patterns which tend to foster sprawl, single-occupancy vehicle trips, and greenhouse gas emissions. The proposed policies align with *VROOM* policies, which are meant to achieve (six objectives) balanced mode share/complete streets, economic vitality, efficient and viable transportation systems, environmental stewardship, equitable and

1

sustainable use of resources, and safety. Overall, the Land Use, Air Quality and Climate Change, and Mobility Elements support these regional objectives and do not propose policies that directly conflict with them.

Below are my comments on specific policies in the draft *2040 General Plan*.

- (1) **LU-1.10 Parking Standards for Existing Buildings.** Limit adverse impacts to existing sites caused by required new on-site parking, including when the use of a site changes. (RDR)

The “adverse impacts” are open to interpretation, i.e. this policy could mean you want to expand, protect, limit, or decrease parking spaces. This could make it confusing for Council members, commission members, and staff to interpret and apply consistently.

- (2) **Core Area.** Goal LU-2 and Figure LU-1: Pedestrian-Oriented Shopping District.

Will the City plan for transition areas for mobility within the Core Area between the proposed Ped-Oriented Shopping District and 4th Street (C St. through I Street, between 3rd and 4th Street), and also 4th and 5th Streets between Old Town Commercial and Downtown Commercial? (Is this to be included in the proposed development of (LU-2.11) Core Area Specific Plan?)

- (3) **LU-2.5 Parking Analyses and Fundraising.** Study the concept of expanding the Parking Assessment District to cover the entirety of the Core Area and collecting an assessment in the district. Initiate periodic parking studies to assess potential parking needs, capacities, and recommended actions. Actively manage public parking facilities, including the raising of funds for the development, maintenance, and operation of parking facilities as appropriate.

Consider potential parking funds expended not just on parking facilities, but on facilities and services that get people to not drive their personal cars to the Core Area; such as public transit, shuttles, bikeshare, walking infrastructure, carshare, and the like.

- (4) **LU-3.9 Measure N.** Consider efforts to repeal ballot Measure N (November 2010) should it become an impediment to the desired development of the Marina District (formerly known as the Balloon Track).

This sentence could be more clearly stated as “Consider supporting a ballot measure to repeal ballot Measure N...” As written, it is a little confusing: “Consider efforts to repeal” – consider whose efforts to repeal? And “it” in “...should it become an impediment” could refer to the repeal of Measure N.

- (5) **AQ-1.7 Large Employers.** Encourage large employers to allow for flexibility in the work schedule that would reduce emissions of air pollutants, such as more alternative schedules and telecommuting, in addition to providing incentives for public transit and carpooling and non-motorized transportation.

- (6) **AQ-1.9 Transit Funding.** Strive to secure adequate funding for transit, autonomous vehicle, and ridesharing services to provide viable transportation alternatives to help reduce greenhouse gas emissions. New development shall contribute its fair share of the transit service costs to serve new projects.

Consider if it would be worthwhile to also explicitly include “mobility on-demand” services.

1
cont.

(7) **AQ-1.13 Reducing the City's Operation Emissions.** Continue to promote strategies aimed at lowering the City's operation emissions, including exploring the feasibility of purchasing 100% renewable power through a Community Choice Aggregation program.

Is there reason not to direct exploring power through the local (RCEA) CCA program?

(8) **Goal M-3.** Consider adding: "to walk and bike for commute, utilitarian, or recreational trips."

(9) Suggested addition: **M-3.9 Facilities at New Developments.** Where applicable, require new development to provide bicycle access to and through projects, as well as secure and properly installed bicycle parking and/or storage, and to construct, dedicate and/or pay its equitable share contribution to the citywide system.

(10) **Transit Goal M-4 and policies.** The Goal 4 transit policies set good practices for enhancing transit service and amenities; however, the strategies tend to be more responsive than proactive, even in Policy M-4.4 Developer Improvements. I encourage the City of Eureka to discuss and discover what opportunities the City has for planning transit-oriented development at the foundational level of the General Plan, and/or at the level of neighborhood strategic plans.

In light of the goals to revitalize and focus growth in the Core Area (Goal LU-2), the City would be well served to develop a comprehensive plan for how to bring people from other parts of the City into the Core Area via public transit, and how to maximize transit service in the City's densely developed areas, where public transit tends to work best.

(11) Suggested addition: **M-4.3 Intermodal Transportation Center.** Work with the Humboldt Transit Authority to develop an intermodal transportation center that would provide a central focal point for all transportation modes serving Humboldt County, including buses, cabs and limousines, bicycling and bikeshare, railroad passenger service, bay excursion services, horse-drawn carriages, and possibly cruise ships, and trolleys, and carshare.

(12) **Goal M-5.** A circulation and parking system that serves the diverse needs of the City. The *2040 General Plan's* efforts to refresh the balance of parking (personal car storage) and access for other travel modes opens up more opportunities to create neighborhoods that have more diverse activities and uses, as well as more opportunities to maximize the use of developed land. In addition, in order to affect real change in driving behavior, the City and community at-large must consider and weigh the unintended consequences of free parking.¹ Although it tends to be one of the most controversial changes, curtailing free parking is one of the very simplest ways to effectively promote mode shift.

(13) Suggested addition: **M-5.4 Parking Lot Location.** Discourage placement of parking lots along major commercial, high pedestrian-use street frontages, and corners in the interest of maintaining continuous building frontages along the primary commercial streets and improving the "walkability" quality in the Core Area.

1
cont.

¹ See, for example, Petter Christiansen, Øystein Engebretsen, NilsFearnley, and JanUsterud Hanssen, "Parking facilities and the built environment: Impacts on travel behavior" in Transportation Research Part A: Policy and Practice (Vol. 95, Jan. 2017); Donald Shoup "Instead of Free Parking," Access No. 15, Fall 1999.

(14) *M-5.6 Self-driving vehicle strategies.* This is a good, forward-looking policy. Consider giving the same type of attention to integrating bikeshare, carshare, and electric-vehicle share programs (such as e-scooters), including dockless share programs.

↑ 1
cont.

Below are my comments on the associated Draft EIR (May 2018).

(15) (Pages 3.12-39 and -40) Vehicle Miles Traveled (VMT) – “Per capital VMT is projected to decrease only slightly over the next 20 years”.... and the impact is “likely to be significant and unavoidable.” The DEIR states there are no feasible mitigation measures for VMT, but it seems that there are mitigation measures that could lessen the severity of the impact even if they would not lessen it to a level of less than significant. There are more stringent standards that the City could consider to aggressively promote and support modal shift, such as funding criteria or priorities for active transportation projects, eliminating free public parking, or increasing public transit service. It may be that these practices may not be feasible for the City of Eureka, but the DEIR doesn’t discuss why that may be the case..

↑ 2

(16) Impact 3.12-2. The reference to HCAOG’s RTP is incorrect. The current RTP was adopted not in 2014, but in December, 2017. The Policy HR-11 that is reproduced in the DEIR is from HCAOG’s 2008 RTP, and therefore no longer applies.

↑ 3

Additionally, I have attached an errata sheet that lists a few minor syntax errors or typos that I noticed while reading the documents. The sections I read are organized well and have impressively few typos, which makes it easier for the reader to concentrate on the content and is much appreciated.

Thank you for this opportunity to comment.

Sincerely,

Oona Smith
Senior Planner

ERRATA

City of Eureka “2040 General Plan” (Draft)

Goals and Policies

- page 48 – i. Waterfront hotel(s) that draw(s)
j. Vacation rentals
l. Craftsman shops
n. Government facilities and services
- page 55 – LU-5.4. ...Encourage the location of high density housing in elose proximity to...
{Or “housing close to...” , but not both.}
- page 56 – c. ...in any single-family residential neighborhood.
- page 60 – (4th paragraph) At this time,... however, if future annexation were considered...
- page 105 – *When an adjective, hyphenate sea level rise, e.g., sea-level-rise policies, sea-level-rise adaptation policies, sea-level-rise impacts.*
- page 109 – **SL-1.4 Raise Structures.** Require new development and substantial improvements to existing development...
- page 111 – Imp AQ-1, Responsible Department: Development Services, Redwood Coast Energy Authority {*Consider clarifying, as RCEA is not a City department, and is not responsible for preparing a Climate Action Plan for the City.*}
- page 137 – Public Transit – ... ~~The Two~~ regional fixed bus route system within Humboldt County is are the Redwood Transit System (whose Mainline route is along the US-101 corridor) and which operates the Southern Humboldt Intercity Route and the Mainline (the US-101 corridor) Route. Both routes are operated by the Humboldt Transit Authority. Both routes provide service to Eureka and surrounding communities.
- page 138 – Do these two references refer to the same existing guide?
 - M-1.1 “City of Eureka Design/Complete Streets Design Guide”
 - M-2.5 “...standards shown in the street design guidelines.”
- page 143 – M-3.7 “to improve way-finding for bicyclists...”
- page 147 – M-8.1 Fishing Facilities. This policy applies more to economy and recreation than mobility or water transportation.
- There is no Goal 6 in the 2040 General Plan.

4

Draft Environmental Impact Report (EIR) (May 2018)

- page 2-22 – Light Industrial... “Intended to be able to operate in elose proximity to commercial...”
- page 3.12-11– Humboldt County Regional Pedestrian Plan *should be italicized or in quotation marks.*
- page 3.12-15– ~~“Redwood Transit System~~ Humboldt Transit Authority provides regional fixed bus route systems within Humboldt County.” {*Redwood Transit System is/has the Mainline, which is distinct from the Southern Humboldt Intercity System. Both are operated by HTA. (It is misstated in at least one place on their website.)*}
- page 3.12-27– M-1.9: “...when designing and ~~construction~~ constructing new transportation facilities...”

FHWA → [Livability](#) → [Newsletter](#)

FHWA's Fostering Multimodal Connectivity Newsletter - July 2018

Washington D.C. Explores Dockless Bikeshare Options

Jonathan Rogers, Transportation Management Specialist, District Department of Transportation

The District of Columbia has operated a bicycle-sharing system since 2008, and today a decade later, [Capital Bikeshare](#) offers more than 4,300 bicycles at nearly 500 stations throughout the region. As the District continues to expand the number of stations and bicycles available to riders, new private-sector stationless or dockless bikeshare companies have emerged as a new model of bicycle



Figure 4: Dockless bikeshare bikes parked at bicycle racks. (Image courtesy of DDOT)

sharing. These dockless bikeshare systems require relatively low public investment and have the potential to rapidly improve access to bicycles for residents and visitors. With sustainability and social equity in mind, the District Department of Transportation (DDOT) began a [dockless bikeshare demonstration period](#) in late September 2017. The demonstration period was designed to determine whether this new service could increase bicycle ridership in the District overall, introduce new users to bicycle sharing, complement the Capital Bikeshare system, and provide greater mobility to underserved communities. As the demonstration progressed, the opportunity to evaluate new vehicles such as electric scooters also emerged. Using [Federal Highway Administration \(FHWA\) funding programs](#) to support research staff, DDOT is well positioned to evaluate the success of its dockless demonstration.

The District of Columbia has the second highest share of bicycle commuters in the country, reflecting the District's [Sustainable DC](#) goals for reducing single occupancy motor vehicle trips, as well as DDOT's [moveDC](#) goals to improve mobility and active transportation. To pilot the dockless bikeshare model, DDOT opted to create an open system, in which operators could apply to offer a fleet of vehicles no greater than 400. Seven companies are participating in the demonstration from September 2017 through August 2018, allowing DDOT to observe several different models of dockless vehicle sharing in action. These models included standard bicycles and motorized (or electric pedal-assist) bicycles, bicycles that utilize rear-wheel locks, and bicycles that require locking to a piece of street furniture, as well as electric standing scooters.

Open data has been a guiding principle in DDOT's dockless demonstration because it provides transparency to the public and enables robust evaluation of the program's performance. DDOT required each dockless company to provide a public application programming interface (API) that displays the location of every vehicle available to rent in real time. In addition, DDOT required internal monthly reporting that includes information on all trips taken, such as the route and duration of each trip. This data has been critical in assessing the interaction of dockless services with Capital Bikeshare and in detecting origin and destination locations of the highest demand.

While a strong foundation of bicycle infrastructure - such as protected bike lanes, trails, and sufficient bicycle parking in public spaces - is integral to the success of any bicycle-sharing approach, local jurisdictions interested in increasing bicycle ridership may consider dockless bikesharing. Setting parameters for the program will help mitigate some of the main drawbacks of dockless bikesharing. During the DDOT demonstration, such challenges included:

- Parking of bicycles at locations not permitted by DDOT (such as national parks or private property) or within DDOT rights-of-way but in a fashion that creates barriers to accessibility (blocking curb ramps and sidewalks).
- The likelihood of some degree of bicycle theft and vandalism in a dockless program.
- Need for regional collaboration, as bicyclists will justifiably cross municipal borders in their travels.

Based on the findings from the demonstration period, DDOT offers a number of recommendations for other jurisdictions to consider regarding dockless bicycle systems:

- Consider a cap on the total number of vehicles, companies, and/or vehicles per company that are allowed to participate in the program.
- Decide what kinds of vehicles should participate, taking existing regulations into account. Will the program include bicycles, motorized bicycles, electric scooters, etc.? Review what current regulations do not explicitly disallow.
- Monetize the value and calculate the cost of private companies operating in public space. Consider offsetting the costs of program administration through a permit fee.
- Evaluate what kind of parking infrastructure will be required. Will the program include new designated parking areas?
- Actively encourage dockless companies to improve access to bicycling for underserved communities. This could include geographic distribution requirements and/or addressing barriers to using bikesharing systems.
- Explore the kinds of data you will need to evaluate the effectiveness of the program and decide which data would be valuable to the public.
- Remember that most dockless bikeshare models involve smartphone applications that track and provide valuable customer data. Ensure there are protections for customer privacy and that user data cannot be exploited.
- Coordinate with law enforcement on an approach to address theft and vandalism.

DDOT continues to evaluate ridership data, survey responses, and public input as the demonstration period moves forward through the summer of 2018. The results of the demonstration will inform the District's approach to dockless vehicle sharing in the future, likely in the form of regulations that would shape any permanent vision of the program.

Letter 5 **Oona Smith, Senior Planner, Humboldt County Association of**
Response **Governments**

July 12, 2018

- 5-1 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. It should be noted, however, that the City has proactively revised portions of the General Plan and its policies to incorporate some of the additional information and suggestions that were offered by various commenters, including HCAOG. These revisions can be found in the General Plan itself, or, when those revisions affected text in the Draft EIR, in Chapter 3 of this Final EIR. These revisions do not alter the conclusions of the Draft EIR, and no additional analysis is required.
- 5-2 The General Plan contains numerous policies to encourage and support modal shifts, particularly in the Core Area. These policies have been strengthened further with the revisions to numerous policies within the Mobility Element, many of which were suggested by HCAOG. Please see Chapter 3 of this Final EIR for descriptions of those revisions.
- In response to the comment that the Draft EIR did not discuss why impacts to per-capita VMT would be significant or unavoidable, or why the General Plan's policies would not substantially lessen those impacts, please refer to the Vehicle Miles Traveled discussion under Impact 3.12-1, beginning on page 3.12-39 of the Draft EIR. The discussion lists some of the policies that would contribute to reductions in VMT, including provisions for more efficient transit operations, the increased availability of alternative modes of transportation (walking, biking, etc.), and implementation of Transportation Demand Management (TDM) programs and techniques when applicable. The discussion also points out that the General Plan's largest contribution to VMT reductions will be the land use plan itself, which provides for higher levels of densification, infill development, and provisions for housing and employment within the central core of the City. In general, both the land use plan and the proposed policies contained within the General Plan are relatively aggressive with respect to the goal of VMT reduction, particularly for a city like Eureka, given its size and setting. As stated in the Draft EIR, these VMT reduction strategies are generally in line with strategies being implemented in other cities in California, many of which are much denser and more heavily urbanized than Eureka is ever likely to be, especially given the region's flat projections for population growth. However, and as stated in the Draft EIR, the effectiveness of these or other strategies in Eureka is lessened by the existing development patterns of the area and the continued reliance on

automobile travel in this rural portion of the state. In summary, the Draft EIR provides a firm and reasonable justification for why VMT impacts will remain significant and unavoidable, and why the General Plan's policies or even more stringent policies would be limited in their effectiveness. As such, the comment does not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR, and no additional analysis is required.

5-3 The City appreciates HCAOG's pointing out this outdated information on Page 3.12-40 of the Draft EIR. The relevant information has been updated, as described in Chapter 3 of this Final EIR.

5-4 The City has proactively revised portions of the General Plan and its policies to incorporate some of the additional information and suggestions that were offered by various commenters, including HCAOG. These revisions can be found in the General Plan itself, or, when those revisions affected text in the Draft EIR, in Chapter 3 of this Final EIR. These revisions do not alter the conclusions of the Draft EIR, and no additional analysis is required.

5-5 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR, and no additional analysis is required.



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

ARCATA-EUREKA AIRPORT TERMINAL
 MCKINLEYVILLE
 FAX 839-3596

PUBLIC WORKS BUILDING
 SECOND & L ST., EUREKA
 FAX 445-7409

CLARK COMPLEX
 HARRIS & H ST., EUREKA
 FAX 445-7388

AVIATION 839-5401

ADMINISTRATION	445-7491	NATURAL RESOURCES	445-7741
BUSINESS	445-7652	NATURAL RESOURCES PLANNING	267-9540
ENGINEERING	445-7377	PARKS	445-7651
FACILITY MAINTENANCE	445-7493	ROADS & EQUIPMENT MAINTENANCE	445-7421

LAND USE 445-7205

07/13/2018

City of Eureka Development Services Department
 Attn: General Plan Update
 531 K Street
 Eureka CA 95501

RE: GENERAL PLAN UPDATE

The Department has reviewed the draft General Plan and draft EIR and offers the following comments:

1.0 Airports: The City of Eureka city limit is located within close proximity to Murray Field. Murray Field is a general aviation airport maintained by the County. It is critical that development of property near the airport be compatible with the airport. The Department requests that:

- 1.1 The general plan conforms to the Airport Land Use Compatibility Plan. The General Plan will need to have a consistency determination with the Airport Land Use Commission. The Department is staff to the Airport Land Use Commission.
- 1.2 Proposed projects near the airport be evaluated for consistency with the Airport Land Use Compatibility Plan.
- 1.3 Aviation easements and overflight easements be granted to the County as properties are developed.
- 1.4 That projects within Airport Land Use Compatibility Zone A or B submit form 7460-1 to the FAA; and that projects not be approved until comments from the FAA are incorporated into the project.
- 1.5 That projects within Airport Land Use Compatibility Zone A or B be referred to the Department for comment; and that projects not be approved until comments from the Department are incorporated into the project.
- 1.6 The general plan designation and zoning for the airport are consistent will all airport uses, incidental uses, and appurtenant uses.

2.0 County Owned Properties: The County owns many parcels in the down town and old town areas within the City. The County requests that these properties have general plan and

1

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zoning designations that support public facility uses, incidental uses, and appurtenant uses.
 The following properties are owned by the County within the City.

Assessor Parcel Number	Previous General Plan Designation	Proposed Plan Designation	Humboldt County Recommended Designation
011-056-002	Low Density Residential	Low Density Residential	Low Density Residential
001-191-002-004, 006-007	Public/Quasi Public	Civic Government Center, Public/Quasi Public, Downtown Commercial	Civic Government Center, Public/Quasi Public, Downtown Commercial
001-194-001 & 002	Civic Government Center	Civic Government Center, Public/Quasi Public, Downtown Commercial	Civic Government Center, Public/Quasi Public, Downtown Commercial
001-134-003 & 005	Professional & Core Res Office	Professional & Core Res Office	Professional & Core Res Office
011-055-006	Professional Office	Professional Office	Professional Office
011-055-008	Professional Office	Professional Office	Professional Office
011-055-010	Low Density Residential	Low Density Residential	Low Density Residential
011-062-001	Professional Office	Professional Office	Professional Office
013-101-009 & 010	Medical Services Commercial	Medical Services Commercial & Professional Office	Medical Services Commercial & Professional Office
013-101-006, 013-111-003, 013-101-007	Medical Services Commercial	Medical Services Commercial & Professional Office	Medical Services Commercial & Professional Office
011-073-003	Professional Office	Professional Office	Professional Office
016-222-018	Low Density Residential	Low Density Residential	Low Density Residential
302-071-010	Agriculture	Agriculture, Natural Resources	Agriculture, Natural Resources
015-111-008	Neighborhood Commercial, Low Density Residential	Neighborhood Commercial, Low Density Residential, Medium Density Residential	Neighborhood Commercial, Low Density Residential, Medium Density Residential
010-183-007	Low Density Residential	Low Density Residential	Low Density Residential
010-183-006	Low Density Residential	Low Density Residential	Low Density Residential
005-023-002	High Density Residential	High Density Residential, Public/Quasi Public	High Density Residential, Public/Quasi Public
001-161-005	Core Residential-Office	Core Residential-Office, Professional Office	Core Residential-Office, Professional Office
001-172-001	Core Residential-Office	Core Residential-Office, Professional Office	Core Residential-Office, Professional Office
001-213-001	Core Residential-Office	Core Residential-Office, Professional Office	Core Residential-Office, Professional Office
014-091-002	General Service Commercial	General Service Commercial, General Commercial	General Service Commercial, General Commercial
017-102-011	Natural Resources, Public/Quasi Public	Natural Resources, Public/Quasi Public	Natural Resources, Public/Quasi Public

2
cont.

3.0 Development of the Greater Eureka Area/Traffic: Much of the development in recent years has been focused in the McKinleyville Area. Most of McKinleyville has been developed or has approved tentative maps on the remaining vacant land. There are only a handful of larger developable vacant parcels that have yet to apply for a subdivision. As the remaining inventory of land in McKinleyville is depleted, it is anticipated that growth will most likely shift from McKinleyville to the unincorporated area that is adjacent and south of the City of Eureka. It is important that circulation plans address the need for connectivity into the City of Eureka and that policies are in place that facilitate this eventual growth. The County recently adopted an updated general plan. It would be ideal if the circulation maps in both the City and County general plans were synchronized. The circulation map from the County's current general plan is shown below.



2 cont.

General Plan Circulation System Improvements for the Eureka Community Plan.

No.	Proposed Road Improvements	Area	Length (feet)	Class	Maintenance Responsibility
27	Connection from Cypress to Harris at Girard	ECPA	7,348	Urban Collector	Maintenance District
28	Cypress Avenue Extension to new Connector 27/29	ECPA	529	Local	Maintenance District
30	Fern Street Extension (Not on Circulation Diagram)	ECPA	581	Urban Collector	County of Humboldt
31	Connection from Northridge to Walnut at Pleasant	ECPA	4,914	Local	Maintenance District
32	Connection from Home to Fairway	ECPA	10,124	Urban Collector	County of Humboldt
33	Connection from Ridgewood at Eggett to Lundblade	ECPA	9,828	Urban Collector	County of Humboldt
34	Connection from Connector 32 to Connector 33	ECPA	2,311	Local	Maintenance District
35	Connection from Connector 33 to Elk River at Swain Slough	ECPA/ HBAP	10,161	Urban Collector	County of Humboldt
36	Hilma Drive Extension to Connector 33	ECPA	3,009	Local	Maintenance District
37	Bassford Road Extension to Connector 33	ECPA	1,719	Local	Maintenance District
38	Eggett Road Extension to Elk River Road	ECPA	5,873	Urban Collector	County of Humboldt
39	Connection from Loma at King Salmon Drive to London	ECPA/ HBAP	2,699	Urban Collector	County of Humboldt
40	Aspen Road Extension to Loma	HBAP	1,361	Urban Collector	County of Humboldt
41	Mesa Avenue Extension to Connector 39	HBAP	1,269	Local	Maintenance District
42	Connection from Humboldt Hill to Tompkins Hill	ECPA/ HBAP	5,975	Urban Collector	County of Humboldt
43	Connection from Barry Property to Connector 42	HBAP	568	Local	Maintenance District

Source: Humboldt County Department of Public Works, 2016

2
cont.

4.0 General Plan Policy Statements: The Department requests that the following policy statements be modified as follows: (additions are in underline and deletions are in ~~strike-through~~)

4.1 Civic Government Center – Please define what is permitted for this land use.

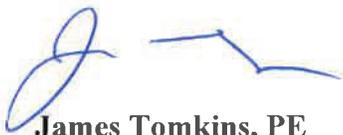
4.2 Coastal Service Commercial – Please remove “Coastal Service Commercial from Page 2-8 & Change to “General Service Commercial”.

5.0 EIR Statements: The Department requests that the following statements be modified as follows: (additions are in underline and deletions are in ~~strike-through~~) – No modifications at this time.

3

If you have any questions, please feel free to call me at 707.445.7205.

Sincerely,



James Tomkins, PE
Associate Civil Engineer
Land Use Division
3015 "H" Street
Eureka, CA 95501

Letter 6 James Tompkins, Associate Civil Engineer, Humboldt County
Response Department of Public WorksJuly 13, 2018

- 6-1 The General Plan and the Draft EIR provided detailed analysis of land use compatibility with Murray Field, particularly as it relates to new development that could be implemented under the General Plan. Existing conditions associated with the airport are presented on page 3.7-7 of the Draft EIR, airport land use compatibility requirements are discussed on page 3.7-14, and impacts associated with compatibility are addressed on page 3.7-26 under Impact 3.7-4. The analysis addressed the General Plan's consistency with the Airport Land Use Compatibility Plan (ALUCP), and the Airport Land Use Commission's legal authority over proposed development that could conflict with safe and efficient airport operations. As such, this comment does not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. Further, an additional policy has been added to the General Plan (Policy LU-1.22) to further clarify the requirement for compliance with the ALUCP. Please see Chapter 3 of this Final EIR for the new policy. This revision to the Draft EIR does not alter the EIR's conclusions, and no additional analysis is required.
- 6-2 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR.
- In discussing this particular comment with the County, the City has learned that the comment is an expression of a concern that the new land use designations would reduce or prohibit the uses that are currently allowed on County-owned parcels below the levels that are currently allowed. The City has subsequently reviewed each parcel. Based on that analysis, it does not appear that the proposed land use changes would result in an existing use to no longer be allowed. Additionally, in many cases, the new land use designations allow for greater densities and intensities (floor area ratio) than previously allowed. The City will continue to work with the County on this issue if the County so desires.
- 6-3 No response is required.

Re: Opposition to changes in CDI zoning

Greetings,

After a thorough review of the “online” condensed version of the proposed 2018 Eureka General Plan Update document , there appears to be many significant benefits to Eureka residents and land-based business interests located outside of the City’s waterfront area. Unfortunately these benefits do not carry over to the commercial fishing industry. The text changes to CDI zoning in the new plan document are unacceptable in light of the General Plan’s goal to protect and enhance Eureka’s Inner Reach working waterfront. Just the idea that the consultants and city staff might consider the addition of non-water dependent, non-conforming uses being allowed to compete within the zone from C Street south (the 3 ½ block scrap of waterfront left to the commercial fishing industry) is unreasonable, if not absurd, considering the General Plan’s succinctly stated goals. Including this language in the General Plan document basically reinstates the city’s policies of the 1970’s to erode and erase fishing fleet activities from the Inner Reach Waterfront .

Humboldt Fishermen’s Marketing Association will not allow any further reduction or challenge to our Coastal Dependent industry by individuals, businesses, nor the city itself --- in the “interim” or long term.

Below is the exact wording for CDI wording which the commercial fishing industry will accept. Strikeouts denote removal and underlining denotes addition to Text.

Coastal Dependent Industrial (CDI), Land Use- Section 2

Coastal Dependent and coastal related manufacturing and processing, fishing, shipping, marine services, aquaculture, oil and gas facilities and other uses that must be located on or adjacent to Humboldt Bay in order to function. Intended to encourage activities related to shipping and fishing industries and support those uses given priority by the California Coastal Act of 1976. Retail and service uses that are incidental and ancillary to the primary use.

~~Interim non-coastal uses, non-coastal dependent uses and non-coastal related uses may be allowed by the applied zoning district. Offices and other non-coastal dependent uses may be allowed on upper floors as provided by applied zoning district.~~

Residential and visitor serving uses not allowed, due to the potential of the permitted uses to produce loud continuous noise, noxious odors and emissions, vibrations, strong lights, glare and high volumes of forklift and truck traffic.

Please note:

The above text directly mirrors the General Plan Goal LU-4.2 which states **“protect industrial lands from encroachment by incompatible uses and activities that can conflict with or limit industrial activities”**

The city’s latest press release for the June 2018 public meeting asks Eureka citizens to “imagine the 19th century waterfront amidst a lively scenery of fishing boats and shops”. One only needed to be in Eureka as recently as 1970 to see six fish processing plants, three fish

buying stations, the largest cold storage in Northern California and the entire fishing fleet of over 300 boats moored on the Eureka waterfront from “I” Street to Washington Street — all producing huge economic benefit for Old Town and Downtown, all the while generating the “lively scenery “ the city now pines for.

Removing protective zoning language and advocating for non-coastal dependent shops, restaurants etc, within the CDI zoning from C Street south will just continue the short sighted policy of 1972 Eureka in which the city evicted the fishing fleet and inadvertently destroyed the vibrant fishing economy and culture of our community. Our present City Council , professional city staff and Humboldt Fishermen’s Marketing Association (HFMA) have been left with the task of recovery from a massive failure of the misguided economic development plan of the 1970’s in Eureka.

The HFMA board of directors believes this is the appropriate opportunity to correct this oversight in the proposed General Plan as well as addressing the HFMA text amendment for Woodley Island Marina submitted to the General Plan update process in 2013 and still not brought before the City Council for action. While HFMA has had years of success in appealing zoning and land use issues before the Coastal Commission, it is always our first choice to work with the city for everyone’s collective benefit .

Thank you for these considerations and for your insightful efforts to preserve and enhance Eureka’s future.

Ken Bates, Vice-President
Humboldt Fishermen’s Marketing Association
Board of Directors

CC California Coastal Commission
Bob Merrill
Cristin Kenyon
Cassidy Teufel
Laurie Richmond
Denise Vanden Bos



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cont.

**Letter 7 Ken Bates, Vice-President, Board of Directors, Humboldt
Response Fishermen’s Marketing Association**

June 17, 2018

- 7-1 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. No further analysis is required, and no response is required.

Comments on the Eureka General Plan Update 2040

July 5, 2018

Emily Sinkhorn
Deputy Director, Natural Resources Services Division
Redwood Community Action Agency

Introduction

Thank you for the opportunity to provide comments on the Eureka General Plan Update 2040. It is wonderful to see a forward-thinking General Plan Public Review Draft that will benefit our city in many ways for decades to come. Below are several comments on specific sections of the Public Review Draft. Previously, I had provided comments on multi-modal transportation issues and community gardens during the release of draft GPU chapters. Thank you for the consideration of these comments.

Specific Comments

Page 136 Map

- Comments on Figure M-2: Bike Facilities
 - Proposed routes are shown as dashed lines on the maps but solid thin lines in the legend
 - Campton has existing Class II bike lanes from Oak Street to the city limit boundary to the south
 - The trails through Cooper Gulch Park, Sequoia Park and the Eureka Dog Park, while somewhat bike compatible are not Class I trails. Perhaps add “Bike Compatible Trail” to the legend? Class I trails define an expectation of conditions for bicycling that may not be met by these natural surface, steep and more narrow trails.
 - A Class I trail is shown along Truesdale between the Eureka Waterfront Trail and Highway 101...this is not accurate. There are no bike facilities on this stretch of road.
 - Suggest extending the scope of the map further south to include Herrick Avenue and the proposed Class I trail south from the Hikshari’ to Spruce Point.
 - I have not seen W Street between Harris and Hemlock signed as an existing Class III bike route. Consider updating.
 - The southern section of Marina Way was vacated by the city so Marina Way is no longer a loop.

- Include the proposed Bay to Zoo Class I Trail on this map (Public Works department leading)
- The Eureka North South Multimodal Corridor Plan project (currently ongoing with presentation to City Council on July 17, 2018) has proposed bike facilities on both H and I Streets, whether Class II or Class IV. Consider adding proposed Class II on H and I between 6th and Harris.
- Suggest taking a look at HCAOG's recent Regional Bicycle Plan Update for accurate mapping (<http://www.hcaog.net/calendar/date/tac-meeting-74>)

Page 137

- Under definition of Class II Bikeway – Vehicle parking is **not** permitted in a bicycle lane!

Page 139

- I wonder about the compatibility between M-1.7 (consider multimodal level of service) and M-2.3 which sets a Level of Service Standard of C as the goal for city streets. How to make sure LOS standard for vehicles not become only priority for analyzing roadways?

Page 141

- M-2.8 Proportional Share Payments and M-2.13 Traffic Impact Fees seem very similar...the Implementation Measure associated with M-2.8 (Imp M-5) references Traffic Impact Fees

Page 145

- Could it be feasible to add here: Bike parking requirements for commercial developments? Car parking space reduction if provide bike parking?

These policies are great!

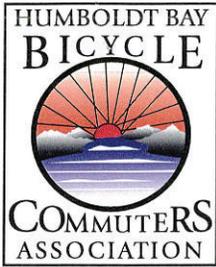
- M-3.7 Bicycle Signage Infrastructure
- M-5.4 Parking Lot Location

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cont.

Letter 8 **Emily Sinkhorn Deputy Director, Natural Resources Services**
Response **Division, Redwood Community Action Agency**

July 5, 2018

- 8-1 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. No further analysis is required, and no response is required.



Our goal: To improve and encourage bicycle commuting

P.O. Box 9054, Eureka, California 95502-9054

RECEIVED July 8, 2018
 JUL 10 2018
 DEPARTMENT OF
 COMMUNITY DEVELOPMENT

City of Eureka Development Services Department
 Attn: General Plan Update
 531 K Street
 Eureka, CA 95501

Dear Development Services Staff:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (DEIR) for the City's Draft General Plan Update (GPU). We commend the city on Draft GPU policies—particularly land use policies—that are strongly supportive of walkable and bikeable development. However, the mobility element policies do not seem to integrate with land use policies in a way that will support an increase in walking and biking. The DEIR recognizes this in its analysis of impacts to vehicle miles traveled (VMT): “Most importantly, the proposed land use plan itself provides a pattern of development that would rely heavily on infill development and densification within the central portion of the City. These VMT-reduction strategies are generally in line with similar strategies being implemented in other cities in California, but the effectiveness of those strategies in Eureka is lessened by the existing development patterns of the area and the continued reliance on automobile travel in this rural portion of the state” (DEIR 3.12-39).

The City of Eureka is in a unique position to change “reliance on automobile travel.” The City's geographical size, mild climate, and grid street network are all assets to bicycling for transportation. Prioritizing—rather than just accommodating—bicycle travel could help to decrease the City's VMT to less than significant levels. We encourage you to consider some of the strategies below to realize an increase in bicycling for transportation.

1. Establish mode share targets. Such targets could be tied to land use. For example, perhaps aim for 50% of all trips to schools, 40% of all trips in core areas and commercial centers, and 20% of trips in commercial corridors could be accomplished by walking and biking. Programs and infrastructure projects should be focused on achieving mode share targets, and a way to monitor the increase in bicycling over time should be established.
2. Establish level of stress targets for all bikeways, including Class III bike routes. The current planned bicycle facilities will not result in mode shift. Roughly 60% of adults identify as “interested but concerned” when it comes to riding bicycles. This group of potential riders are more sensitive to traffic stress, and they prefer low speed, low volume routes. Many of the planned bicycle facilities (for example, Class III routes on 14th, Buhne, and S/West) will not result in low-stress routes, and thus will not appeal to the “interested but concerned” potential cyclists. Bikeway classifications (e.g. Class I, II, III, & IV) do not inherently indicate the level of traffic stress experienced by cyclists. However, a full range of bikeway options should be considered in development of a bikeway network. The Draft GPU and DEIR do not include Class IV separated bikeways nor are bicycle boulevards discussed as an “enhanced” Class III bike route option.

3. Use bikeway classification designations (e.g. Class I, II, III, & IV) consistent with the Streets and Highways Code, Sections 890 through 891. Bikeway classifications are a function of transportation engineering; they indicate the transportation facility is consistent with State and/or nationally recognized design guidance. The trails identified in Cooper Gulch and Sequoia Park are not consistent with the minimum design criteria for Class I bikeways (also called shared use paths), so it is misleading to define them as such. We strongly encourage the City to adhere to engineering design guidance when planning, constructing, and maintaining bikeways to encourage their use as safe, efficient transportation facilities.
4. Reexamine the planned bicycle facilities network. We are strongly supportive of future planning efforts that will increase the use of bicycling for transportation in Eureka. Such efforts identified in the Draft GPU include the development of a Pedestrian and Bicycle Master Plan (policies M-3.1 and Imp 3-6) and various parking analyses and strategies. The proposed Pedestrian and Bicycle Master Plan should reexamine the planned bicycle facilities network through a robust public process, set mode share targets if none will be included in the GPU, and perform a level of traffic stress analysis. Bicycle parking should be included in parking analyses. Bicycle parking should not be driven by demand, as suggested in policy M-3.8. Rather, convenient and visible bicycle parking should be used as a strategy to support increased bicycle use. We also suggest that other curb-zone uses be analyzed as part of parking studies. In addition to vehicle and bicycle parking, curb zone area use may also include delivery vehicles, taxis/transportation network companies, parklets, and bike share stations.

The Draft GPU includes exciting policies that will have positive impacts on the quality of life for Eureka's residents. If the City prioritizes bicycling for transportation, the cumulative effect when combined with the proposed land use policies and the existing assets could position Eureka to be one of the more bikeable cities in the nation. We hope you consider our comments. Increasing bicycling for transportation will not only reduce VMT impact; it will also help realize the vision set forth in the GPU for the health and prosperity of our community.

Sincerely,



Rick Knapp, President



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cont.

**Letter 9
Response**

**Rick Knapp, President, Humboldt Bay Bicycle Commuters
Association**

February 15, 2018

9-1

Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. No further analysis is required, and no response is required.



July 11, 2018

City of Eureka
Development Services
ATTN: General Plan Update
531 K Street
Eureka, CA 95501

This letter is the Eureka Heritage Society's response/comments to the Draft EIR for the City of Eureka 2040 General Plan Update (GPU), specifically in the area of cultural and historic resources and in other areas of the plan update that directly, or indirectly, affect cultural and historic resources.

The Eureka Heritage Society has been advocating for the preservation of historic resources in the city of Eureka since 1973 and is intimately familiar with the impacts of Eureka's General Plan Updates and zoning on Eureka's historic neighborhoods. Over the decades, we have witnessed the demolition of historic homes to create higher-density dwellings, which only served to degrade neighborhoods, both aesthetically and economically.

Comments

2040 GPU Project Objectives:

- Enhance Eureka's quality of life and enrich its sense of community
- Preserve and enhance existing neighborhoods

These objectives align with those of the Eureka Heritage Society; however, upon further review of the General Plan details, the objectives and details seem to be in direct conflict. Encouraging development in Medium Density Residential (MDR) and High Density Residential neighborhoods to an extent that exceeds the current General Plan density (increase in density per *gross* acre vs. less density per *net* acre in current plan - see Table 2-3) will certainly result in demolition of historic resources (as noted in the Draft EIR) and the degradation of existing neighborhoods. Evidence of neighborhood deterioration due to the current General Plan has occurred in the western half of Eureka, where higher density and development has been encouraged for decades and homeowners have felt ignored. The Eureka Heritage Society would encourage the retention of the current Medium and High Density Residential density levels in order to maintain the

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historic resources in those areas and to support the homeowners and those who continue to come to Eureka to purchase historic homes.

2040 GPU Project Objective: Minimize development regulations, such as parking requirements and other development standards, that unnecessarily complicate development processes.

This objective is vague and, honestly, too subjective. Current parking requirements and other development standards were implemented for a reason. Those reasons should be thoroughly explored and the impacts on affected homeowners of removing any requirements and development standards should be vetted. Dismissing these requirements as not being necessary without thorough examination is irresponsible. Adequate parking is necessary to a well-planned community.

Policy HCP-1.1 encourages and supports the identification, preservation, rehabilitation, and restoration of historically significant buildings. As stated in the Draft EIR, historic resources throughout the city have not been subjected to professional historical resource surveys or evaluations since 1973. That is only partially correct: the building inventory surveyed in 1973 was again evaluated in 1987 for inclusion in *Eureka: An Architectural View*. The architectural consultants for the book reviewed the survey materials and a site visit was performed if they questioned a building's historic integrity; however, not every structure was visually surveyed at that time. Identification of structures that have become historic since the 1973 survey is imperative in order to ensure that a historic resource is identified and is not lost in the implementation of this proposed GPU.

Policy HCP-1.4 discourages demolition of only those structures listed in the Local Register of Historic Places. As the Local Register had an "opt-out" clause when the Register was implemented, there are many buildings in Eureka that are not on the Local Register, but are eligible for the register. In addition, as mentioned above, buildings in Eureka have not been surveyed since 1973; therefore, many potentially historic structures, which may be eligible for the Local Register, have not been identified. Unless a survey is completed upon immediate implementation of the proposed General Plan, other means of dealing with possible demolition of historic resources need to be found. City of Eureka Historic Preservation Commission review of all proposed demolitions of buildings older than 50 years must be implemented in the new General Plan to protect our historic resources. In addition, salvage of materials should be included in an environmentally responsible plan, rather than disposing the materials in a landfill.

Policy HCP-1.5 promotes Heritage Tourism opportunities. Currently, many visitors to Eureka tour our historic neighborhoods and streetscape architecture. Implementing a plan that encourages development without determining a way to appropriately mitigate the possible demolition of thousands of historic buildings will significantly decrease the chance for Heritage Tourism opportunities.

Impacts and Mitigation Measures for Impact 3.5-1: Implementation of the proposed Eureka 2040 General Plan could cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5: For a city that prides itself on its historic



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architecture and is continually recognized for its wealth of historic buildings, the statement that a potentially significant impact is unavoidable to those resources is unacceptable. In our response to Policy HCP-1.4, we have provided one mitigation measure. There are certainly others. We should avoid demolishing any historic structure without qualified review. Once they are gone, they cannot be replaced.

Eureka is unique: it does not, and should not, resemble any other city. One of Eureka's exceptional attributes is the number of historic structures that have survived over the decades. It is what makes Eureka special. Eureka should not lose its identity in the name of development. Progress can certainly be made while protecting our historic resources. Other California cities have done so and thrived; in fact, by embracing the past, property values have increased in those cities without destroying the historic fabric with new development.

Sincerely,

Mary Ann McCulloch
President

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cont.

**Letter 10
Response****Mary Ann McCulloch, President, Eureka Heritage Society**July 11, 2018

10-1 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. No further analysis is required, and no response is required. It should be noted, however, that with respect to the commenter's comments on proposed General Plan Policy HCP-1.4, existing design review regulations within the City of Eureka Historic Preservation Code (Eureka Municipal Code Chapter 157) provide for review and assessment of proposed additions, alterations, new construction, and demolition of listed structures and features. The General Plan would not change this existing requirement, and policies within the General Plan will support its continued implementation.

10-2 As stated in the above response to comment, existing City requirements provide for qualified review and assessment of proposed additions, alterations, new construction, and demolition of listed structures and features. In addition, General Plan Policy HCP-1.4 directly reduces the probability of demolition by requiring the City to consider demolition of listed historic resources as a last resort, to be permitted only if rehabilitation is not feasible, and where demolition is necessary to protect health, safety, and welfare, or the public benefit.

Despite these requirements, and as stated under Impact 3.5-1 of the Draft EIR, it is not feasible to retain every historic resource in the City, and it would be unrealistic for the City to suggest that it could do so over the approximately 20-year timeline of the General Plan. Therefore, as disclosed in the Draft EIR, it is likely that some existing historic resources will be lost over the life of the General Plan. As further disclosed in the Draft EIR, this would be the case regardless of whether the General Plan is implemented or not. The Draft EIR freely discloses that this likely outcome would result in a permanent loss of some historic resources. As provided for in CEQA Guidelines Section 15064.5, such an impact is, by definition, significant. Further, there are no measures that can *fully* mitigate the loss of those resources, because, as stated by the commenter, once historic structures are gone, they cannot be replaced. Therefore, the Draft EIR's finding that such an impact would be significant and unavoidable is the only logical and legally supportable conclusion that can be made. Accordingly, the comment does not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR, and no further analysis is required.



July 12, 2018

Rob Holmlund, Director
 Development Services, City of Eureka
 531 K Street
 Eureka, CA 95501

via email: rholmlund@ci.eureka.ca.gov

RE: Comments on Draft Environmental Impact Report (DEIR) for City of Eureka 2040 General Plan Update

Mr. Holmlund:

The Coalition for Responsible Transportation Priorities (CRTP) is an organization whose mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast of California. CRTP appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City’s 2040 General Plan Update (GPU). Our comments are as follows:

Infill & Densification

Three of the seven significant and unavoidable impacts identified in the DEIR (Impacts 3.3-1, 3.3-3 and 3.12-1) relate directly to vehicle miles traveled (VMT). Impact 3.12-1 is an impact to VMT per se, while Impacts 3.3-1 and 3.3-3 are impacts to air quality related to PM₁₀ which the DEIR specifically identifies as largely a result of increased VMT (p.3.3-45). Significantly reducing VMT requires dense, mixed-use development patterns, as well as directing new development toward already urbanized areas. The GPU does contain policies designed to encourage this kind of infill and densification, as the DEIR correctly notes. However, the DEIR is incorrect in concluding that there is no additional mitigation which could reduce VMT (and thus also PM₁₀ air quality impacts) below the level of significance.

We strongly support the following features and policies of the GPU, which will encourage denser infill development:

- Policy LU-1.2 (“Compact Form”)
- Policy LU-2.12 (“Building Intensity”)
- Policy LU-5.3 (“High Density Housing”)



- Policy LU-5.4 (“Location”)
- Policy LU-6.2 (“Infill First”)
- Policy M-1.6 (“Dense Development”)
- Policy CS-3.4 (“Accessible School Sites”)
- Policy U-5.2 (“Energy Conserving Land Use Practices”)
- Increased density and intensity in many of the proposed land use designations (e.g., p.2-21 et seq.)

However, in contrast to these policies, we note that the vast majority of residential land in the city will continue to be restricted to low densities under the GPU (e.g., p.5-8). In fact, Policy LU-5.5 (“Existing Neighborhoods”) appears to be focused largely on maintaining the low-density nature of most of Eureka’s residential areas and preventing any densification beyond the development of Accessory Dwelling Units. The lack of any densification of the approximately one-third of the City’s (non-water) land area currently devoted to low-density residential neighborhoods severely limits the potential effectiveness of the policies noted above.

The failure to allow or provide for any densification of these neighborhoods is also perhaps the most important reason the GPU has failed to limit per capita VMT sufficiently, as they constitute a significant portion of the “existing development patterns of the area” and the resultant “continued reliance on automobile travel” (p.3.12-40). Furthermore, there is no reason that some additional housing densification and mixed-use development could not be allowed in these neighborhoods. Therefore, the GPU could and should provide for some additional densification and mixed-use development of low-density residential neighborhoods in order to mitigate impacts to VMT and air quality.

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Sea Level Rise

Dense infill development is of little use in reducing VMT, or achieving any other public purpose, if it is at a high risk of damage or destruction from natural or otherwise predictable events or causes. We are concerned that much of the GPU’s proposed dense infill development is directly in the path of expected sea level rise (SLR). We do not have confidence in Policy SL-1.8 (“Protection Management Strategy”), which calls for protecting “developed areas and areas designated for urban uses” from SLR “until such time as the magnitude of sea-level rise is such that the protection management strategy can no longer be achieved.” Current SLR protections make it hard to imagine the City being able to defend its entire shoreline through the GPU planning horizon.

We do believe that protecting some of the most valuable portions of the shoreline—likely Downtown and Old Town—from sea level rise will likely be technically and financially feasible. However, the City will have to prioritize. We are particularly concerned with the areas north and south of Downtown and Old Town, much of which the GPU targets for infill development, but which is at high risk of inundation from SLR and will likely not be feasible to protect.

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We encourage the City to direct infill development away from areas which it cannot have the reasonable expectation of being able to protect from SLR for the foreseeable future. The threat of SLR increases the importance of densifying existing inland low-density residential neighborhoods.

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Encouraging Walking, Bicycling & Transit

As noted above, three of the significant and unavoidable impacts identified in the DEIR relate directly to VMT. Another critical factor in reducing VMT is shifting transportation modes away from personal vehicles and toward walking, bicycling and transit.

We strongly support the following policies in the GPU, which are designed to encourage residents, workers and visitors to Eureka to move from place to place by foot, by bicycle, or by transit:

- Policy LU-1.3.g (“encourages people to walk, bike or use transit”)
- Policy LU-1.3.h (“...plazas, boardwalks, trails...”)
- Policy LU-1.14 (“Public Realm”)
- Policy LU-1.19 (“Pedestrian Oriented Design”)
- Policy LU-5.2 (“Parking Access for Residential Uses”)
- Policy LU-5.5.d (“...infilling sidewalk gaps...”)
- Policy AG-1.8 (“McKay Tract Community Forest”)
- Policy AQ-1.7 (“Large Employers”)
- Policy AQ-1.10 (“Non-Motorized Transportation”)
- Policy AQ-1.11 (“City Employee Incentives”)
- Policy M-1.2 (“Investment in Alternative Modes”)
- Policy M-1.7 (“Consider All Users of Transportation System”)
- Policy M-2.9 (“Multi-modal Access”)
- Goal M-3 and supporting policies (“a system of walkways, bikeways and bicycle parking facilities...”)
- Goal M-4 and supporting policies (“coordinated transit service...”)

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Policy M-1.2 is particularly important, as it calls for prioritizing investment in non-vehicular modes in order to level the playing field among modes (left decidedly unlevel by the last century of car-dominated transportation planning). We also commend the City for including Policy M-1.8 (“Slowing Traffic”), which will help to make our communities safer for people walking and bicycling, and Policy E-7.4 (“Strategic Street Closures”), which has the potential to transform parts of the Core Area into culturally and economically vibrant pedestrian zones.

However, we have noted two important omissions in the treatment of bicycles and pedestrians in the GPU. First, Policy M-3.8 calls for bicycle parking to be installed “in areas generating substantial bicycle traffic and at major public facilities.” In fact, bicycle parking must be required

even in areas which do not currently generate substantial bicycle traffic, because secure parking is a major part of the infrastructure which supports and encourages bicycling. Limiting bicycle parking infrastructure to areas which already see high levels of bicycling will not serve the GPU’s many other goals and policies which encourage more transportation by bicycle.

Second, we think it is critically important that the DEIR include descriptions of the high levels of vehicular collisions with bicyclists and pedestrians in Eureka. The city has some of the highest rates of such collisions in the state, but the current description of the bicycle & pedestrian system (p.3.12-10 et seq.) contain no mention of this critical fact.

In addition to addressing Eureka’s bicycle and pedestrian safety problem, the GPU’s many strong policies in support of walking, bicycling and transit will surely reduce per capita VMT. However, some of these measures could be strengthened, as described above, to further mitigate Impacts 3.3-1, 3.3-3 and 3.12-1.

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Vehicular Parking

Abundant free parking has been shown to encourage driving, among many other negative impacts to the urban landscape. We applaud the City for recognizing the problems associated with providing too much parking and working to reduce parking requirements for new development and reuse projects (e.g., p.S-4).

We strongly support the following policies to reduce the requirement to devote valuable space to free parking for private vehicles:

- Policy LU-1.10 (“Parking Standards for Existing Buildings”)
- Policy LU-1.17 (“Parking”)
- Policy LU-2.1.d (“...reduced or eliminated parking requirements”)
- Policy LU-2.6 (“Parking for Urban Uses”)

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We also strongly support the creation and utilization of Parking Assessment Districts, as suggested in Policies LU-2.5 (“Parking Analyses and Fundraising”) and LU-3.5 (“Henderson Center”). These Districts reduce the public subsidy required to maintain parking for private vehicles and reduce the incentive to drive, and in many places they have been very successful at raising money to improve local neighborhoods.

All of these policies, and any others which reduce the availability or increase the cost of parking, should be considered to reduce the severity of Impacts 3.3-1, 3.3-3 and 3.12-1. Finally, we support Policy M-5.5 (“Alternative Fuel Vehicle Parking”) and Policy AQ-1.4 (“Off-Street Parking”) to encourage the use of zero-emission vehicles. These policies will also reduce the severity of Impacts 3.3-1 and 3.3-3.

Level of Service, Congestion Management and Road Capacity

Aside from the lack of densification of most residential neighborhoods in the city (see above), the other main factor contributing to the GPU's failure to adequately reduce VMT per capita is the continuation of outmoded congestion management goals and policies.

Policy M-2.2 ("Traffic Management") and Policy M-2.10 ("Congestion Relief") call for the reduction of traffic congestion and delays. These policies may be reasonable if they are pursued by means of reducing the number of cars on the road (reducing VMT). However, if they instead result in building increased vehicular capacity or modifying infrastructure to allow existing traffic volumes to flow more quickly, they will be entirely counter-productive. It is well established that increased capacity and increased travel speed induces travel demand and leads directly to increased VMT.¹

Unfortunately, it appears that the GPU intends to manage congestion by increasing capacity and travel speed. Almost all of the planned future improvements to the road system identified in the DEIR at p.3.12-33 et seq. add vehicular capacity, a fact explicitly recognized when they are referred to at p.3.12-38 ("the planned changes in the transportation system that would increase capacity").

Furthermore, Policy M-2.3 ("Level of Service Standard") doubles down on the City's use of outmoded Level of Service (LOS) standards for vehicular transportation management. Use of LOS to assess traffic impacts has been shown to lead to the construction of increased capacity, which in turn leads directly to more traffic (increased VMT). For this reason, the State of California is transitioning to the use of VMT rather than LOS to measure transportation impacts, and the use of VMT in CEQA proceedings will be required by all jurisdictions by January 1, 2020. At that time, it would appear that Policy M-2.3, which calls for the use of LOS in evaluating development proposals, would be in direct conflict with state law. The same may apply to Policy M-2.4 ("Vehicle Miles Traveled"), which calls only for the City to "consider the applicability" of using VMT to assess transportation impacts.

The use of LOS in the DEIR itself to assess the transportation impacts of the GPU (p.3.12-35 et seq.) is similarly problematic, and for the same reasons. Additionally, this analysis assumes an "adequacy" standard of LOS C. However, it is not at all clear why this should be the case, since the existing General Plan's standards cannot logically be applied to the project (as its entire purpose is to update and modify the existing General Plan), and the GPU itself is not yet in effect. Thus, there is no logical justification for the use of LOS to determine the significance of the GPU's transportation impacts.

This analysis further points out the flaw in the DEIR's conclusion that impacts to VMT and to PM₁₀ (the latter in large part a result of VMT impacts) are "significant and unavoidable." In fact, replacing the policies which promote LOS and traditional congestion management via capacity

¹ Cervero, Robert. 2003. "Road Expansion, Urban Growth, and Induced Travel: A Path Analysis." *Journal of the American Planning Association* 69(2): 145-163.

increases with policies which promote VMT as the standard for measuring impacts and which further promote lower-emission modes of transportation could help mitigate these impacts to a less than significant level.

However, it is also clear that the VMT analysis performed in the DEIR is inadequate. The analysis assesses only VMT “using roads within the City of Eureka” (p.3.12-39), but development in the city has huge impacts on traffic outside its limits. The city’s high “job density” compared to its population (p.2-4) results in a large population of commuters, and its status as the county seat also generates a significant amount of travel for services from outside the city. The DEIR must analyze the GPU’s impact on VMT overall, rather than arbitrarily drawing a boundary at the City limits.

Finally, we must note that Policy AQ-1.8 (“Localized Concentrated Air Pollution”) relies partly on the false premise that reducing congestion will reduce air pollution. In fact, as we have demonstrated, reducing vehicle delays will simply lead to more driving and thus more pollution. Furthermore, the DEIR itself demonstrates that intersections in Eureka do not result in hotspots of such toxic pollutants as carbon monoxide (p.3.3-47). The proposal contained in Policy AQ-1.8 to reduce pollution by synchronizing traffic lights is a red herring.

Freight Transportation

We applaud the City for Policy M-8.3 (“Shipping”), which encourages short-sea shipping as a freight transportation strategy. Short-sea shipping has the potential to replace a significant fraction of the truck trips in and out of our region with a lower-cost, lower-emission mode of transportation. However, we oppose Policy E-5.2 (“Alternative Goods Movement”) as currently written, as it calls for an expansion of highway and rail freight which would be both economically and environmentally unsustainable. Expanding the use of highway freight also exacerbates the GPU’s impact on VMT.

Additionally, we encourage the DEIR to include analysis of the pending legislative approval of SB 1029, the Great Redwood Trail Act, which would dramatically change the environment for local freight rail by dissolving the North Coast Railroad Authority and railbanking its rights-of-way.

In sum, we applaud the GPU for its many policies in support of dense infill development; walking, bicycling, and use of transit; and reduction of free and abundant parking. However, the DEIR notes that these policies have not effectively reduced the GPU’s impact to VMT below the level of significance, nor the resultant air quality impacts. Therefore, the City must implement additional measures to mitigate these impacts. The most important mitigation measures available include: (1) planning for increased density and mixed-use development in existing low-density residential neighborhoods; and (2) abandoning LOS, capacity increases, and other



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outmoded congestion management tools in favor of explicit VMT-reduction plans and measures.

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Thank you for your consideration of our comments.

Sincerely,

Colin Fiske
Executive Director
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org

Letter 11 Response **Colin Fiske, Executive Director, Coalition for Responsible Transportation Priorities**July 13, 2018

- 11-1 In response to the comment that the Draft EIR did not discuss why impacts to per-capita VMT would be significant or unavoidable, or why the General Plan’s policies or other proposed measures would not substantially lessen those impacts, please refer to the Vehicle Miles Traveled discussion under Impact 3.12-1, beginning on page 3.12-39 of the Draft EIR. The discussion lists some of the policies that could be expected to contribute to reductions in VMT, including provisions for more efficient transit operations, the increased availability of alternative modes of transportation (walking, biking, etc.), and implementation of Transportation Demand Management (TDM) programs and techniques when applicable. The discussion also points out that the General Plan’s largest contribution to VMT reductions will be the land use plan itself, which provides for higher levels of densification, infill development, and provisions for housing and employment within the central core of the City. In general, both the land use plan and the proposed policies contained within the General Plan are relatively aggressive with respect to the goal of VMT reduction, particularly for a city like Eureka, given its size and setting. As stated in the Draft EIR, these VMT reduction strategies are generally in line with strategies being implemented in other cities in California, many of which are much denser and more heavily urbanized than Eureka is ever likely to be, especially given the region’s generally flat or declining projections for population growth. However, and as stated in the Draft EIR, the effectiveness of these or other strategies in Eureka is lessened by the existing development patterns of the area and the continued reliance on automobile travel in this rural portion of the state. In summary, the Draft EIR provides a firm and reasonable justification for why VMT impacts will remain significant and unavoidable, and why the General Plan’s policies or even more stringent policies would be limited in their effectiveness. As such, the comment does not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR, and no additional analysis is required.
- 11-2 Please refer to the preceding response to comment. Also, please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR, and no further analysis is required.
- 11-3 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its

policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR, and no further analysis is required.

- 11-4 Please see the response to comment 11-3, above. With respect to information in the Draft EIR concerning bicyclist and pedestrian safety, questions and thresholds concerning these issues are not included in the Environmental Checklist contained in Appendix G of the CEQA Guidelines, and therefore such information is typically not included in EIRs. This is particularly true if the issue has not been identified by the public during the EIR scoping process as a topic of environmental concern that should be analyzed. Ultimately, it is not clear what bearing such information would have on the environmental analysis. Regardless, and as noted by the commenter, the General Plan contains a number of policies that could be expected to have a beneficial effect with respect to bicyclist and pedestrian safety. As such, the comment does not raise any new environmental impacts that have not already been analyzed and disclosed in the Draft EIR, and no further analysis is required.
- 11-5 Please see the response to comment 11-3, above.
- 11-6 Please see the response to comment 11-3, above. With respect to the adequacy of the VMT analysis contained within the Draft EIR, please see response to comment 11-1, above. With respect to the suitability of including an analysis of LOS impacts in the Draft EIR: as stated by the commenter, the State of California is currently transitioning to the use of VMT rather than LOS to determine impacts. This transition, however, is not fully in effect, and the current guidelines concerning that transition are still interim in nature. As such, the presentation and analysis of both LOS and VMT impacts, as presented in the Draft EIR, is a reasonable approach. Regardless, if LOS had been precluded from the analysis, as is apparently being advocated by the commenter, the final conclusion of the VMT analysis would remain unchanged. As such, the comment does not raise any new environmental impacts that have not already been analyzed and disclosed in the Draft EIR, and no further analysis is required.
- 11-7 Please see the response to comment 11-3, above.
- 11-8 Please see the response to comment 11-3, above.
- 11-9 Comment noted. As of the time of this response, SB 1029 is no longer titled the “Great Redwood Trail Act” and no longer calls for the dissolution of the NCRA. Also, since there are currently no operating rail connections to Eureka, nor have any existed for the past 20+ years, nor are there any reasonably viable plans to provide such services, it would be reasonable to assume that passage and implementation of the referenced legislation (or any similar legislation) would

have no effect with respect to impacts from rail connectivity to Eureka. As such, the comment does not raise any new environmental impacts that have not already been analyzed and disclosed in the Draft EIR, and no further analysis is required.

11-10 Please see the responses to comments 11-1, 11-3, and 11-6, above.



July 13, 2018

Rob Holmlund, Director
Development Services, City of Eureka
531 K Street
Eureka, CA 95501

RE: Comments on Draft Environmental Impact Report (DEIR) for City of Eureka 2040 General Plan Update

Mr. Holmlund:

Humboldt Baykeeper works to safeguard our coastal resources for the health, enjoyment, and economic strength of the Humboldt Bay community, and is a member of the California Coastkeeper Alliance and the international Waterkeeper Alliance.

We appreciate the opportunity to comment on the City’s 2040 General Plan Update, which establishes a roadmap for the long-term physical, social, and economic future of Eureka; provides goals, policies, and programs to direct land use and development decisions, manage resources, deliver public services, and provide infrastructure; and provides the City’s decision makers with guidance in setting priorities for the conservation of resources, provision of services and infrastructure, and allocation of public expenditures.

The Plan will shape Eureka’s future, and includes many forward-thinking policies, but the implementation measures for many policies are unusually vague for a 20-year planning document. In general, we recommend more specific implementation measures for many of the policies discussed below. Our specific comments are as follows:

Stormwater Drainage

We support the policy that continues to encourage the use of green infrastructure in new construction as well as retrofitting of existing development (U-1.5), as well as the policy that requires new development and redevelopment to minimize stormwater runoff and pollutants entering drainage facilities and drainage courses by incorporating Low Impact Development measures and appropriate Best Management Practices (U-3.11).

We question whether it is consistent with state and federal regulations to allow manmade drainage to be dredged etc. even if classified as wetlands (U-3.5). The document does not



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appear to include a definition of wetlands, which should be included. We strongly support the adoption of the single-parameter wetland definition used by state agencies and the U.S. Fish & Wildlife Service, since it is much more effective in protecting water quality and habitat values for protected species.

Adequate infrastructure to accommodate stormwater runoff and prevent flooding (U-3.1) should also take into consideration erosion and sedimentation related to peak flows, and should incorporate long-term plans to prepare for sea level rise.

Biological Resources

We support the plan to develop guidelines for gulch greenway preservation and management (NR-2.2). Given that this was an intended outcome of the last General Plan and has yet to be completed, specific implementation measures should be adopted to ensure that this is completed in a timely manner.

The policy that allows limited development in gulches and greenways states that vegetation removal must not occur below the high water mark (NR-2.1). This is wholly inadequate to protect water quality, habitat values, and wildlife corridors that riparian buffers provide. The related policy on buffers is also inadequate (NR-2.6); it requires the provision and maintenance of “reasonably-sized buffers,” which has no meaning whatsoever. It also states that the buffers need not be larger than recommended by a “qualified professional ecologist,” which is not a licensed or certified professional classification and again has no specific meaning. We strongly support adoption of quantifiable buffer widths for riparian, wetland, and sensitive habitat areas that are consistent with established standards.

Marina District

We support policies LU-3.8 and LU-3.9 as well as the vision of the Marina District as expanding the look and feel of Old Town to the west, instead of expanding the look and feel of Broadway to the north (p. 21). Full characterization of contamination at this the site is long overdue, and the zoning enacted by Measure N is inconsistent with the City’s LCP and Coastal Act standards. Any comprehensive planning for the site should involve early consultation with the Coastal Commission to ensure that coastal resources, particularly wetlands, are protected.

Hazardous Materials and Toxic Contamination

We generally support the policies on site identification (HS-3.2) and remediation (HS-3.3), although again, implementation measures are vague. We also support the policy on known areas of contamination (HS-3.4), but a policy on suspected contamination at former industrial sites should be added. Many of these sites, including but not limited to historic lumber mill sites, contain soil and groundwater contamination that has not been identified. Any historic or extant industrial sites that have not been subject to appropriate site assessment should be investigated before any ground-disturbing activities are permitted.

Sea Level Rise Adaptation Measures

We support the policy that calls for integrating resilience to anticipated sea level rise impacts into City project designs when repairing and replacing aging infrastructure (SL-1.12). However, the Plan fails to describe the long-term planning for capital improvements to vulnerable infrastructure. The City’s land use and development plan for the next two decades ought to

begin planning in earnest for the flooding, erosion, and rising groundwater that is projected in the coming decades.

Policy SL-1.9 calls for placing “safe” fill material in the Bay to protect existing and planned development should specify what is considered safe. Given our work on contamination issues, we assume it to mean “uncontaminated,” but the policy should be made more clear, perhaps by references standards that govern fill placement in Humboldt Bay.

We strongly support the inclusion of policies to limit new development in low-lying areas that will be subject to the projected impacts of sea level rise. Instead, the Plan proposes to simply kick the can down the road to future generations by enlarging shoreline protective structures (SL-1) and incorporating a “Protection Management Strategy” (SL-1.8). This strategy calls for protecting “developed areas and areas designated for urban uses” from sea level rise “until such time as the magnitude of sea-level rise is such that the protection management strategy can no longer be achieved.” At best, this is poor planning; on its face, it appears infeasible, unlikely to be funded, and will create more problems than already exist by putting more life and property in hazardous zones. We strongly recommend that the City take a more conservative approach by planning for protection in strategic areas of existing developed areas while launching the long-term planning process to move critical infrastructure to higher elevations, restore low-lying areas to preserve, restore, and enhance coastal wetlands that will absorb wave action, and limit new development in vulnerable areas.

Again, we appreciate the opportunity to comment on the City’s 2040 General Plan Update.

Sincerely,

____s/
Jennifer Kalt, Director
jkalt@humboldtbykeeper.org



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**Letter 12
Response**

Jennifer Kalt, Director, Humboldt Baykeeper
July 13, 2018

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Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. It should be noted, however, that the City has proactively revised portions of the General Plan to incorporate some of the additional information and recommendations provided in the commenter's letter. These revisions can be found in the General Plan itself, or, when those revisions affected text in the Draft EIR, in Chapter 3 of this Final EIR. These revisions do not alter the conclusions of the Draft EIR, and no additional analysis is required.

Sent via email on date shown below

July 13, 2018

Rob Holmlund, Director
Development Services, City of Eureka
531 K Street
Eureka, CA 95501

RE: Comments on Draft General Plan and Draft Environmental Impact Report

Please accept these comments on behalf of the Environmental Protection Information Center (EPIC) the Eureka's draft General Plan and accompanying Environmental Impact Report. EPIC advocates for the science-based protection and restoration of Northwest California's forests, using an integrated approach, combining public education, citizen advocacy, and strategic litigation.

EPIC applauds the broad goal of the General Plan to create a more livable Eureka through the promotion of infill development. As the city is largely built out, with the exception of its greenways and gulches, to grow Eureka must build up. Failure to do so will not only negatively impact Eureka but will impact the whole county, as pent up housing pressure will be relieved in unincorporated areas, reducing the open space and coastal forests that make Humboldt such a special place and increasing our carbon footprint by requiring longer commutes.

If you have any questions or concerns about these comments, please do not hesitate to contact EPIC at tom@wildcalifornia.org or 707 822 7711.

Hire a Sustainability Director

EPIC recommends that the city hires a Sustainability Director, to be housed under the City Manager, to develop and implement sustainability-related programs and projects identified in the General Plan and to coordinate inter-departmental sustainability initiatives.

EPIC is concerned that absent a staff person directly tasked with implementing some of these items, that their development will not occur. For example, in the 1996 General Plan, the city called for the development of a greenways and gulches policy. In 2006, the city released a draft document for comment only to never finalize the plan. Now, over 20 years later, the new General Plan again calls for the development of a greenways and gulches preservation and management guidelines.

In addition to the development of the greenways and gulches management guidelines, the Sustainability Director could work to, inter alia:

- Pursue available funding sources for open space acquisition, management, and enhancement. (NR-3.4)
- Development and maintain a program to identify, evaluate, and eradicate non-native invasive species on public lands where they are displacing native species. (NR-2.8)
- Develop a program to encourage the preservation of native plants and trees (NR-2.7)
- Develop an active relationship with adjacent community and government agencies to coordinate on natural resource issues. (NR 1.10, NR-2.9)

Plan for Rising Sea Levels

The city must plan for sea level rise, including which areas will be armored and defended and which areas will be retained as natural shorelines. The General Plan does not contain any mandate for planning of this nature; rather, it leaves questions largely unanswered about where the city will work to protect development. EPIC requests that the General Plan be amended to include a direction that the city plan for which areas it anticipates it will allow to be inundated by rising

As the General Plan acknowledges, sea level rise is already occurring and will continue to rise, inundating parts of the city unless some action is taken. EPIC appreciates that some areas of the city will need to be defended against sea level rise; it makes sense to protect the historic buildings of Old Town and other investments, however it is not likely feasible that all of the shoreline can be protected. Where it can't the city should work to develop natural shorelines and remove existing infrastructure in advance of rising tides.

Mandate Use of VMT and Eliminate Use of LOS

EPIC applauds the city's stated desire to promote infill development, however this goal is undercut by the city's insistence on retaining LOS and its lukewarm approach towards adopting VMT as its preferred transportation metric.

Use of LOS to assess traffic impacts has been shown to lead to the construction of increased capacity, which in turn leads directly to more traffic (increased VMT). For this reason, the State of California is transitioning to the use of VMT rather than LOS to measure transportation impacts, and the use of VMT in CEQA proceedings will be required by all jurisdictions by January 1, 2020. At that time, it would appear that Policy M-2.3, which calls for the use of LOS in evaluating development proposals, would be in direct conflict with state law. The same may



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apply to Policy M-2.4 (“Vehicle Miles Traveled”), which calls only for the city to “consider the applicability” of using VMT to assess transportation impacts. EPIC urges the city

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Develop City Fleet Policy

The General Plan should direct that all city departments develop a fleet policy that encourages the purchase of plug-in hybrid vehicles (PHEV), zero emission vehicles (ZEV), and alternative forms of transportation. EPIC appreciates the intent of AQ-1.12 “City Vehicle Fleet” although the existing language only weakly encourages their purchase. Of emissions directly attributable to city business, the city’s vehicle fleet is the most significant source of greenhouse gas emissions. By evaluating each department’s vehicle use, the city can plan for the transition of city-owned vehicles from standard combustion engines to electric. Without such a policy, decisions will be made on an ad hoc basis, and given the current price disparity, the city will continue to invest in standard cars. Each purchase has an elongated temporal impact, as the city will continue to use and maintain these vehicles for many years, delaying the city’s ultimate transition to fossil free infrastructure.

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Letter 13 Response **Tom Wheeler, Executive Director, Environmental Protection Information Center (EPIC)**

July 13, 2018

- 13-1 Please refer to Master Response 1 in Section 2.2 of this chapter for a master response to comments that either supported or opposed the General Plan and its policies, or recommended changes to the General Plan and its policies. These comments do not identify or raise any new environmental issues or impacts that were not thoroughly analyzed and disclosed in the Draft EIR. It should be noted, however, that the City has proactively revised portions of the General Plan to incorporate some of the additional information that was provided in the commenter’s letter. These revisions can be found in the General Plan itself, or, when those revisions affected text in the Draft EIR, in Chapter 3 of this Final EIR. These revisions do not alter the conclusions of the Draft EIR, and no additional analysis is required.
- 13-2 See the response to comment 13-1, above.
- 13-3 See the response to comment 13-1, above. With respect to the suitability of including an analysis of LOS impacts in the Draft EIR: as stated by the commenter, the State of California is currently transitioning to the use of VMT rather than LOS to determine impacts. This transition, however, is not fully in effect, and the current guidelines concerning that transition are still interim in nature. As such, the presentation and analysis of both LOS and VMT impacts, as presented in the Draft EIR, is a reasonable approach. Regardless, if LOS had been precluded from analysis, as is apparently being advocated by the commenter, the final conclusion of the VMT analysis would remain unchanged. As such, the comment does not raise any new environmental impacts that have not already been analyzed and disclosed in the Draft EIR, and no further analysis is required.
- 13-4 See the response to comment 13-1, above.

CHAPTER 3

Revisions to the Draft EIR

3.1 Introduction

This section summarizes text changes made to the Draft EIR either in response to a comment letter or initiated by City staff or in response to a technical correction or modification to the proposed project.

3.2 Text Changes to the Draft EIR

New text is indicated in underline and text to be deleted is reflected by a ~~strike through~~. Text changes are presented in the page order in which they appear in the Draft EIR. The text revisions provide clarification, amplification, and corrections that have been identified since publication of the Draft EIR. The text changes do not result in a change in the analysis or conclusions of the Draft EIR.

Chapter 2.0, Project Description

Page 2-21, Table 2-3, the “Estate Residential” land use designation is revised to read:

Estate Residential (ER)	Single-family detached homes, accessory dwelling units and limited agricultural uses on larger lots. Intended to retain a lower density, rural character compatible with adjacent agriculture, timberland and open space uses. The City may approve the clustering of ER units to preserve significant open space resources.	Density: Up to 4.0 dwelling units per gross acre; <u>greater density may be allowed through a special permit as provided by the applied zoning district.</u>
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Page 2-21, Table 2-3, the “Low Density Residential” land use designation is revised to read:

Low Density Residential (LDR)	Single-family detached and attached homes, accessory dwelling units and compatible public/quasi-public uses. Intended to be suburban in character and located in proximity to parks, schools, and public services. Limited neighborhood serving market-commercial uses may be allowed where they enhance the quality of life of the neighborhood and as provided by the applied zoning district.	Density: Up to one primary unit and one accessory dwelling unit per lot; <u>greater density may be allowed through a special permit as provided by the applied zoning district.</u>
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Page 2-21, Table 2-3, the “Medium Density Residential” land use designation is revised to read:

<p>Medium Density Residential (MDR)</p>	<p>Single-family detached and attached homes, multi-family housing, accessory dwelling units, and compatible public/quasi-public uses. Intended to compliment the character of adjacent lower density residential and neighborhood commercial development, and be located in proximity to parks, schools, public services, and employment centers. Limited neighborhood serving market-commercial uses may be allowed where they enhance the quality of life of the neighborhood and as provided by the applied zoning district.</p>	<p>Density: Up to 22 dwelling units per gross acre (equivalent to maximum of three units on an average 6,000 square foot City lot); <u>greater density may be allowed through a special permit as provided by the applied zoning district.</u></p>
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Page 2-21, Table 2-3, the “High Density Residential” land use designation is revised to read:

<p>High Density Residential (HDR)</p>	<p>Higher density multi-family housing, accessory dwelling units, and compatible public/quasi-public and related uses. Intended to be urban in character and located in proximity to commercial and employment uses, parks, schools, and public services. Limited neighborhood serving market-commercial uses and limited mixed use development <u>with residential/neighborhood-serving retail</u> may be allowed as provided by the applied zoning district.</p>	<p>Density: Up to 44 dwelling units per gross acre (equivalent to maximum of six units on an average 6,000 square foot City lot); greater density may be allowed through a special permit as provided by the applied zoning district.</p>
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Page 2-21, Table 2-3, the “Downtown Commercial” land use designation is revised to read:

<p>Downtown Commercial (DT)</p>	<p>Mix of ground-floor retail, restaurants, lodging, entertainment, cultural, visitor services, offices, and <u>upper floor</u> residential uses. Applied to the bulk of the Core Area, which serves as the traditional business and cultural center for the City. Intended to have a high intensity urban form, retain and enhance Eureka’s identity and historic character, and promote a vibrant pedestrian environment. Residential and office uses are primarily allowed only on upper floors and <u>non-street-facing portions of buildings, and</u> only as provided by the applied zoning district.</p>	<p>Intensity: Maximum 6.0 FAR</p>
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Page 2-21, Table 2-3, the “Neighborhood Commercial” land use designation is revised to read:

<p>Neighborhood Commercial (NC)</p>	<p>Limited-scale convenience retail, restaurants, offices, residential, and personal services, including pedestrian-oriented neighborhood retail. Intended to primarily serve nearby neighborhoods, be compatible with the character and form of adjacent residential uses, support a vibrant pedestrian environment, and promote short neighborhood-based trips. Residential and office uses are primarily allowed only on upper floors <u>and non-street-facing portions of multi-story commercial</u> buildings, and only as provided by the applied zoning district.</p>	<p>Intensity: Maximum 2.5 <u>3.0</u> FAR</p>
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Page 2-21, Table 2-3, the “General Commercial” land use designation is revised to read:

General Commercial (GC)	Broad variety and scale of retail, office, restaurants, lodging, entertainment, outdoor sales, large product retail sales, storage, warehousing, wholesale, and residential uses. Intended to be an intensive auto- and pedestrian oriented commercial district primarily located in or adjacent to highly visible areas, and provide for local, regional and visitor needs. Residential and office uses are primarily allowed only on upper floors of multi-story commercial and non-street-facing portions of buildings, and only as provided by the applied zoning district.	Intensity: Maximum 2.5 FAR
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Page 2-22, Table 2-3, the “Old Town Commercial” land use designation is revised to read:

Old Town Commercial (OC)	Visitor-related retail, restaurants, lodging, entertainment, recreation, and tourist services, as well as residential and office uses. Intended to emphasize commercial retail and tourism-related uses, recreation, leisure activities, hotels, and upper floor office/residential uses. Primarily caters to local and non-local visitors in historic and multi-story buildings with pedestrian-scaled storefronts lining the sidewalks. Residential and office uses are primarily allowed only on upper floors and <u>non-street-facing portions of buildings</u> , and only as provided by the applied zoning district.	Intensity: Maximum 5.0 FAR
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Page 2-22, Table 2-3, the “Bayfront Commercial” land use designation is revised to read:

Bayfront Commercial (BC)	Visitor-related retail, restaurants, multi-story lodging, entertainment, recreation, boating, and tourist services, as well as residential, office, and a mix of coastal and non-coastal dependent uses. Intended to emphasize commercial retail and tourism-related uses, leisure activities, hotels, and upper floor office/residential uses along the bayfront. Primarily caters to local and non-local visitors in multi-story buildings with pedestrian-scaled storefronts lining the sidewalks, boardwalk, and waterfront trails. Residential and office uses are primarily allowed only on upper floors <u>or non-street facing portions of buildings</u> , and only as provided by the applied zoning district.	Intensity: Maximum 4.0 FAR
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Page 2-22, Table 2-3, the “Light Industrial” land use designation is revised to read:

Light Industrial (LI)	Lower-intensity manufacturing, assembly, packaging, processing, wholesaling, warehousing, distribution, research and development and other employment-generating uses. Intended to be able to operate in close proximity to commercial and residential uses with minimum mutual adverse impacts. Small scale retail service uses that support employees and are incidental to the primary use may be allowed as provided by the applied zoning district. <u>Office uses and upper floor residential uses</u> may be conditionally allowed as provided by the applied zoning district.	Intensity: Maximum 2.0 FAR
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Page 2-22, Table 2-3, the “Coastal Dependent Industrial” land use designation is revised to read:

Coastal Dependent Industrial (CDI)	Coastal-dependent and coastal-related manufacturing and processing, fishing, shipping, marine services, aquaculture, oil and gas facilities and other uses that must be located on or adjacent to Humboldt Bay in order to function. Intended to encourage activities related to the shipping and fishing industries and support those uses given priority by the California Coastal Act of 1976. Retail and service uses that are incidental to the primary use, interim non-coastal uses, non-coastal-dependent uses, and non-coastal related uses may be allowed as provided by the applied zoning district. Office spaces <u>Offices and other non-coastal-dependent or non-coastal-related uses</u> may be allowed on upper floors as provided by the applied zoning district.	Intensity: Maximum 2.0 FAR
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Page 2-23, Table 2-3, the “Public/Quasi-Public” land use designation is revised to read:

Public/Quasi-Public (PQP)	Public and private institutional uses, government facilities and services, schools, courts, cemeteries, fairgrounds, airports, marinas and wharves, and major utility facilities, as well as parks, golf courses and other public recreational facilities. Intended to be applied to uses and facilities that are of a size and intensity that warrant an individual land use designation and/or to accommodate both active/programmable and passive/self-directed recreational facilities. Retail, service uses, <u>and other uses determined to have a public benefit and</u> that are incidental to the primary use may be allowed as provided by the applied zoning district.	Intensity: Maximum 4.0 FAR
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Page 2-23, Table 2-3, the “Agriculture” land use designation is revised to read:

Agriculture (A)	Production of crops, livestock grazing, animal and poultry raising, apiaries, dairies, stables and associated residences and farmworker housing. Intended to protect land, including farmed or grazed wetlands, that is primarily suitable for long-term agricultural and wildlife habitat uses and to ensure adequate separation from adjacent development. Compatible commercial and public/quasi-public uses may be conditionally allowed as provided by the applied zoning district.	Density: Maximum 2 dwelling units per lot <u>plus farmworker housing as allowed by the applied zoning district.</u>
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Page 2-23, Table 2-3, the “Natural Resource” land use designation is revised to read:

Natural Resource (NR)	Protection, enhancement, restoration, management, study, and passive recreational use of land-based habitats and natural areas. Intended to protect land that is primarily suitable for permanent habitat preservation, compatible resource related uses, nature study, and natural-resource related recreation. Public access, passive recreation, and <u>active recreation, and visitor-related facilities (such as restrooms, interpretive centers, trailheads, etc.)</u> may be allowed as provided by the applied zoning district.	Intensity: Nature-study-related buildings/structures may be constructed at an intensity determined by the applied zoning district.
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Page 2-23, Table 2-3, the “Water Conservation” land use designation is revised to read:

Water Conservation (WC)	Protection, enhancement, restoration, management, and study of environmentally sensitive habitat within the estuarine waters of Humboldt Bay. Intended to protect waters that are primarily suitable for permanent habitat preservation, compatible resource related uses, nature study, and natural-resource-related recreation. Public access, passive recreation, active recreation, <u>boat ramps</u> , commercial fishing, aquaculture, <u>commercial outdoor recreation</u> , and other compatible uses may be allowed as provided by the applied zoning district.	Intensity: NA
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Section 3.2, Agricultural and Timber Resources

Page 3.2-16, Policy E-4.3 is revised as follows:

E-4.3: Cold Storage Facility. Work with the Humboldt Bay Harbor, Recreation, and Conservation District, ~~HBHRCD [Humboldt Bay Harbor, Recreation, and Conservation District]~~, private landowners, and other stakeholders to secure a site and funding for the construction and operation of a commercial cold storage facility.

Section 3.3, Air Quality and Greenhouse Gas Emissions

Page 3.3-35, Policy AQ-1.7 is revised as follows:

AQ-1.7: Large Employers. Encourage large employers to allow for flexibility in the work schedule that would reduce emissions of air pollutants, such as more alternative schedules and telecommuting, in addition to providing incentives for non-single occupancy vehicle commuting modes, including public transit, and carpooling, and non-motorized transportation.

Page 3.3-35, Policy AQ-1.9 is revised as follows:

AQ-1.9: Transit Funding. Strive to secure adequate funding for transit, autonomous vehicle, mobility on-demand, and ridesharing services to provide viable transportation alternatives to help reduce greenhouse gas emissions. Require n~~New development to~~ shall contribute its fair share of the transit service costs to serve new projects.

Section 3.4, Biological Resources

Page 3.4-42, Policy NR-2.1 is revised as follows:

NR-2.1: Development in Gulches and Greenways. Allow limited development within Eureka’s gulches and greenways and permit private property owners adjacent to gulch and greenway areas to develop, provided sensitive species habitat, fish and wildlife corridors, and the hydrologic capacity of the resource are protected and vegetation removal does not occur below the high water mark (~~usually a change in slope of 20 percent or greater~~) or in areas subject to flooding, consistent with local, State, and federal regulations.

Page 3.4-42, Policy NR-2.2 is revised as follows:

NR-2.2: Gulch Greenway Preservation and Management Guidelines. Prepare and adopt Gulch Greenway Preservation / Management Guidelines that identify and protect sensitive species habitat and the hydrologic capacity of Eureka’s gulches and greenways. Include provisions in tThese guidelines ~~shall include provisions~~ for defining the boundaries of gulches and greenways, as generally indicated in Figure NR-1, identifying the boundaries of all affected parcels lying wholly or partly within the gulches and greenways, ensuring new development is compatible with the environmental and public safety values of the gulches and greenways, and restoring gulch vegetation, wetlands, and sensitive species habitat as appropriate.

Page 3.4-42, Policy NR-2.6 is revised as follows:

NR-2.6: Buffers. Require the provision and maintenance of reasonably-sized buffers between sensitive habitat and adjacent urban uses to minimize disturbance of the resources, as appropriate. Buffers need not be larger than is recommended by a qualified professional ecologist (such as an ecologist, biologist, or wetland scientist).

Section 3.5, Cultural and Historic Resources

Page 3.5-17, Policy HCP-1.1 is revised as follows:

HCP-1.1: Preservation. Encourage and support the identification, preservation, rehabilitation, and restoration of historically significant buildings, landscape features, significant trees and plantings, hardscapes, fountains, lighting, sculptures, signs, and other natural or designed features through incentives such as reduction of Historic Preservation application fees and programs such as the Local Register of Historic Places and the Mills Act.

Page 3.5-18, Policy HCP-1.2 is revised as follows:

HCP-1.2: City-owned Resources. Maintain City-owned historic buildings and resources, such as structures, objects, monuments, landscapes, ~~and rights-of-way~~ improvements, retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs, and gutters in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Page 3.5-18, Policy HCP-1.4 is revised as follows:

HCP-1.4: Discourage Demolition. Consider demolition of historic resources that are listed in EUREKA An Architectural View (Architectural Resources Group, 1987), also known as “the Green Book” ~~the Local Register of Historic Places~~ as a last resort, to be permitted only if rehabilitation is not feasible, demolition is necessary to protect health, safety, and welfare, or the public benefit outweighs the loss of the historic resource consistent with City regulations.

Page 3.5-19, policy HCP-2.7 is revised as follows:

HCP-2.7: Discretionary Projects. Require discretionary development projects be designed to avoid potential impacts to significant archaeological and cultural resources whenever feasible, reduce unavoidable impacts to the maximum extent feasible, and comply with mitigation measures as agreed upon during formal consultation. Make ~~d~~eterminations of significance, impacts, and mitigation ~~shall be made~~ in conjunction with a qualified cultural resources professional and/or local Tribes.

Section 3.7, Hazards and Hazardous Materials

Page 3.7-22, is revised by the addition of a new policy, as follows:

Land Use Element

Goal LU-1: A Community that values its unique small town charm and livability while thoughtfully advancing new prospects for growth and economic vitality.

Policies

LU-1.22 Airport Compatible Land Uses. Comply with the building intensity and height requirements in the Airport Land Use Compatibility Plan for the Humboldt County Airports, for projects located within the airport land use compatibility zones.

Page 3.7-20, Goal HS-4 and its associated policies are revised as follows:

Goal HS-34: Safe production, use, storage, transport, treatment, and disposal of hazardous materials and hazardous waste. (Modified 1997 General Plan Goal 7.E)

Policies

HS-34.1 Regulatory Compliance. Ensure that the use and disposal of hazardous materials in Eureka complies with local, State, and federal safety standards.

HS-34.2 Site Identification. Participate in efforts to identify former and current sites involving hazardous materials storage and disposal to reduce the risk of exposure.

HS-34.3 Remediation. Continue to work with property owners affected by toxic contamination to identify cost-effective approaches to remediation of contaminated soils and develop unified strategies to address the cleanup of large areas (e.g., the Westside Industrial Area).

HS-34.4 Known Areas of Contamination. Require the development of projects near or within known hazardous waste disposal or handling facilities, or known areas of contamination to perform comprehensive soil and groundwater contamination assessments. If contamination exceeds regulatory levels, require remediation procedures consistent with county, regional, State, and federal regulations prior to any site disturbance or development.

HS-34.5 Buffering. Require new industries that store and process hazardous materials to provide an adequate buffer, as determined by the City, between the installation and the property boundaries sufficient to protect public safety. ~~The adequacy of the buffer zone shall be as determined by the City.~~

HS-34.6 Disclosure. Require applications for discretionary development projects that will generate hazardous wastes or utilize hazardous materials to include detailed

information on hazardous waste reduction, recycling, and storage, consistent with local, regional, and State regulations.

HS-34.7 Best Management Practices. Encourage industries, businesses, and residents to incorporate best management practices and technologies to minimize the hazardous material use and hazardous waste generation.

HS-34.8 Disposal. Collaborate with Humboldt Waste Management Authority, other local agencies, businesses, and residents to encourage household hazardous waste and E-waste disposal at special events and the Eureka Recycling Center.

HS-34.9 Public Education. Promote education efforts regarding the proper use, storage, and disposal of hazardous materials.

HS-34.10 Financial Support. Financial Support. Continue to provide financial assistance for the Humboldt/Del Norte Hazardous Material Response Team (HMRT), as a member agency of the Humboldt/Del Norte Hazardous Materials Response Authority, to ensure adequate countywide response capability to hazardous materials emergencies.

HS-34.11 Safe Homes. Promote and improve the quality of residential properties by ensuring compliance with housing and property maintenance standards including the use and removal of hazardous materials such as lead based paint, and asbestos.

Page 3.7-21, Goal HS-4 and its associated policies are revised as follows:

Goal HS-4: Adequate community response to effectively prepare for, respond to, recover from, and mitigate the effects of natural or technological disasters and emergencies.

Policies

HS-45.1 Emergency Services Planning. Regularly review and update all documents which relate to emergency services planning within Eureka and adjacent areas.

HS-45.2 Emergency and Disaster Preparedness. Continue to cooperate with Humboldt County and other relevant agencies in conducting disaster-preparedness exercises, and developing and operating a coordinated response program for major emergencies or disasters.

HS-45.3 Humboldt Operational Area Hazard Mitigation Plan. Continue to participate in, and ensure that new development and infrastructure are consistent with, the Humboldt Operational Area Hazard Mitigation Plan.

HS-45.4 Tsunami Readiness. Continue to enhance the City's tsunami awareness program, in coordination with Humboldt County and other local agencies, to ensure that Eureka residents and visitors are informed about the threat of tsunami and inundation.

HS-45.5 Evacuation Routes. Continue to work with Humboldt County, and appropriate state and federal agencies, to identify major emergency transportation corridors for use during disasters and emergencies. In particular, the City should ensure safe access routes to communication centers, hospitals, airports, staging areas, and fuel storage sites.

HS-45.6 Critical Facilities. Ensure the continued function of critical facilities such as hospitals, fire stations, police stations, and emergency command centers following a

major disaster to facilitate post-disaster recovery. Locate such facilities outside of identified hazard areas.

HS-45.7 Emergency Access. Require adequate road standards, driveway widths, and road clearances around structures consistent with local and State requirements to ensure adequate emergency access.

HS-45.8 Emergency Communication. Ensure government has the ability to communicate with each critical facility and level of government.

HS-45.9 Alternative Energy Sources. Identify alternative sources of energy (i.e., fueled generators, solar, wind) for use in the event energy supplies are interrupted as a result of an emergency.

HS-45.10 Wildland Fire Preparedness. Continue to work with Humboldt County, CALFIRE, the U.S. Forest Service, and other regional cooperators to plan for and mitigate the potential for wildland fire.

Page 3.7-26, Impact 3.7-4, is revised as follows:

Impact 3.7-4: Implementation of the proposed Eureka 2040 General Plan would not result in a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport that would result in a safety hazard for people residing or working in the Plan Area.

As discussed in the Environmental Setting, Murray Field and Samoa Field Airport are the only airports located within two miles of the Eureka City limits. Murray Field's Master Plan was updated in 2008, during which time it was determined that existing land uses surrounding the airport were compatible with normal airport activities and did not conflict with the safety compatibility criteria established in the County's ALUCP.¹ Per the requirements of the facility's ALUCP, new non-conforming land uses or major new development projects would be subject to review for compatibility by the County's Airport Land Use Commission. The ALUCP contains designated zones within which certain off-airport activities would be deemed incompatible, such as the construction of structures that exceed certain heights, facilities that could attract birds and other wildlife that could pose a hazard to aviation, and the construction of uses that would be at risk in the event of an aviation accident (schools, hospitals, etc.). By law, the Commission is vested with the legal authority to require modification of proposed projects that could conflict with safe and efficient airport operations. Accordingly, if any off-airport projects are proposed within these designated zones, they would be required to undergo review and approval by the Commission, and a determination of consistency with the ALUCP would have to be made. As such, and as specified in proposed General Plan Policy LU-1.22, new projects in the vicinity of the airport would need to be consistent with the ALUCP, and safety hazards for people working and/or residing in the area would be avoided. The impact would therefore be **less than significant**.

¹ County of Humboldt Division of Aviation. 2008. Murray Field Airport Master Plan Update Environmental Assessment

Samoa Field Airport does not have an adopted ALUCP, though plans are underway to include the facility in the County's comprehensive update of selected ALUCP's within the County. In general, however, the airstrip is oriented in a north-south direction, and approach and departure flight paths occur over Humboldt Bay to the south or the Pacific Ocean to the north. As such, approaches and departures to and from the facility do not occur over populated areas. In addition, once an ALUCP is adopted for Samoa Field, and proposed development would be required to abide by the ALUCP, as specified in proposed General Plan Policy LU-1.22. Accordingly, development associated with the General Plan Update would not place people or structures in such a manner as to create a safety hazard. The impact would therefore be **less than significant**.

Section 3.8, Hydrology and Water Quality

Page 3.8-20, Policy NR-1.7 is revised as follows:

NR-1.7: Groundwater Protection. Continue to ~~regulate the use of septic systems,~~ encourage septic system users to connect to City services, and ~~regulate prevent~~ onsite disposal of toxic substances per local and State regulations to reduce groundwater contamination.

Page 3.8-21, Policy U-2.7 is revised as follows:

U-2.7: Best Management Practices. Identify and implement, where feasible, best practices and technologies for wastewater collection and treatment, including strategies that reduce wastewater ~~demand requiring treatment, such as waterless toilets or composting garbage disposals and toilets,~~ maintain maximum energy efficiency, and reduce costs and greenhouse gas emissions.

Page 3.8-22, Policy U-3.5 is revised as follows:

U-3.5: Manmade Drainage. Allow manmade drainage systems to be dredged, cleared, and maintained to preserve the drainage capacity for which they were designed, even those classified as wetlands, consistent with State and federal regulations.

Section 3.9, Land Use, Population, and Housing

Page 3.9-15, Policy LU-1.10 is revised as follows:

LU-1.10: Parking Standards for Existing Buildings. Allow developed sites to change uses without requiring more parking than can adequately be provided on-site, even if the number of parking spaces is below the minimum required for the use. Protect existing sites from having to accommodate new off-street parking, including in situations when the use of a site changes.

Page 3.9-15, is revised by the addition of a new policy as follows:

LU-1.22 Airport Compatible Land Uses. Comply with the building intensity and height requirements in the Airport Land Use Compatibility Plan for the Humboldt County Airports, for projects located within the airport land use compatibility zones.

Page 3.9-16, Policy LU-2.1 is revised as follows:

LU-2.1: Core Area Uses and Activities. Support the following uses and activities within the Core Area:

- a. Mixed-use emphasizing a highly-interactive retail and service environment at the street level with office and residential uses primarily above the first floor and in portions of buildings that do not have street frontage;
- b. Evening Uses and activities that extend the hours of activity in the core area;
- c. Housing including the rehabilitation and conversion of vacant upper floors of buildings and portions of buildings that do not have street frontage;
- d. Incentivized live-work and mixed use spaces that allow for joint living and working quarters that are promoted through reduced or eliminated parking requirements and other incentives;
- e. Neighborhood markets and other services needed to serve the residents and employees of the district;
- f. Specialty and boutique shops, restaurants, and other locally-owned storefront businesses with particular focus on the creation of a distinct pedestrian oriented shopping district from C Street to I Street, and the Waterfront to 3rd Street;
- g. Cultural and art related facilities and events that attract patrons with particular focus on the creation of a cultural arts/theater district and renovation of the Ingomar Theater and other historic facilities;
- h. Visitor serving uses, ~~mixed uses~~, and recreational activities on street frontages, ~~and office, residential, and other compatible uses on upper floors and non-street frontages~~;
- i. Waterfront Hotel(s) ~~that~~ to draw new visitors to businesses in the Core Area and throughout the City (New);
- j. Vacation Rentals that draw new visitors to businesses in the Core Area and throughout the City (New);
- k. Professional and business services, such as attorneys, realtors, architects, engineers, investment specialists, and other professional fields that provide a daily customer base for the retail and food-related uses in the area;
- l. Craftsman Shops where items such as baked goods, glass, pottery, small furniture, clocks, and other specialized items are made on site and sold onsite are strongly encouraged (New);
- m. Public Spaces such as plazas, squares, parks, pocket parks, parklets, small community gardens, trails, boardwalks, piers, and public and private recreational uses including the redesign and retrofit of the Gazebo and Clark Plaza to increase their usefulness, safety and comfort;
- n. Government Facilities and Services consolidated into a regional center of civic offices, services and functions.

Page 3.9-17, Policy LU-2.4 is revised as follows:

LU-2.4: Non-Coastal-Dependent Uses. Promote compatible, non-coastal dependent mixed use ~~non-coastal dependent~~ uses along Eureka's commercial waterfront as a mechanism to make development of these high maintenance properties viable.

Page 3.9-17, Policy LU-2.8 is revised as follows:

LU-2.8: Homeless Services. Discourage the development of new ~~homeless~~ services or facilities that promote the concentration of homeless services in the Core Area. The City supports the dispersal of homeless related services and facilities throughout Humboldt County.

Page 3.9-17, Policy 2.11 is revised as follows:

LU-2.11: Core Area Specific Plan. Initiate a specific plan for the Core Area to create a framework to focus community efforts and enhance the ability to attract funding for reinvestment. The specific plan should solicit the active participation of property owners, investors, local business owners, and residents and address:

- a. Specific strategies to attract the types of users and activities identified in Policy LU-2.1;
- b. Use of vacant buildings and unused upper-story space;
- c. Historic resource preservation;
- d. Improvements to streetscapes and other public spaces including pedestrian scale lighting;
- e. Land use strategies for key properties along the waterfront including Halverson Park and lands east of the Samoa Bridge, the waterfront properties between C and F Streets, and the property north of First Street between G and I Streets;
- f. Enhanced pedestrian, bicycle, and transit connectivity and safety, including transitioning south to 5th Street between Old Town and Downtown;
- g. Parking;
- h. Increased public safety and security;
- i. Incentives, branding and promotional strategies; and
- j. Identification of grants, associations, partnerships, financing districts and other public and private funding mechanisms to implement defined actions, improvements and maintenance.

Page 3.9-18 is revised by the addition of two new policies, as follows:

LU-2.13: Residential as Permitted Use. Allow residential uses as a permitted use in all Core Area zoning districts.

LU-2.14: Housing Expansion and Integration. Expand the supply of housing in the Core Area through the vertical and horizontal integration of residential uses with other uses.

Page 3.9-18, Policy LU-3.4 is revised as follows:

LU-3.4: Corridor Plan. Coordinate with Caltrans to initiate a corridor plan for the Broadway Corridor to create a framework to focus community efforts and enhance the ability to attract funding for reinvestment. The corridor plan should solicit the active participation of local business owners and residents and address:

- a. Upgrades to the visual quality and cohesiveness of development;
- b. Improvements to the streetscape and other public spaces;
- c. Integration of complete streets standards including enhancement of pedestrian, bicycle and transit connectivity and safety;
- d. Improved access, visibility and parking for businesses;
- e. The development of underutilized, dilapidated or vacant properties;
- f. Uses, activities and strategies to encourage visitors and pass-through traffic to stop in Eureka;
- g. Incorporation of ~~upper floor~~ residential uses and mixed use nodes;
- h. Disposition and adaptive reuse of older hotels;
- i. Increased public safety and security;
- j. Incentives, unique branding, and promotional strategies that give each district/corridor a unique image and sense of identity; and
- k. Identification of grants, associations, partnerships, financing districts and other public and private funding mechanisms to implement defined actions, improvements and maintenance.

Page 3.9-19, Policy LU-4 is revised as follows:

LU-3.9: Measure N. Consider ~~supporting a ballot measure efforts~~ to repeal ballot Measure N (November 2010) should Measure N ~~not~~ become an impediment to the desired development of the Marina District (formerly known as the Balloon Track).

Page 3.9-20, Policy LU-5.4 is revised as follows:

LU-5.4: Location. Encourage the location of high density housing in ~~close~~ proximity to commercial and community services, employment opportunities, major transportation corridors, and where City infrastructure can accommodate increased densities.

Page 3.9-20, Policy LU-5.5 is revised as follows:

LU-5.5: Existing Neighborhoods. Protect and enhance the integrity of Eureka’s existing neighborhoods by:

- a. Retaining unique and/or historic residences and architecture;
- b. Supporting efforts to improve and maintain neighborhood appearance and the existing housing stock;
- c. Promoting and supporting the development of Accessory Dwelling Units, while striving to ensure that such development does not deteriorate the quality of life or home values in any single-family residential neighborhoods;
- d. Promoting/requiring the infilling of sidewalk gaps, upgrading of substandard sidewalks and streetscapes where needed and including pedestrian scale lighting on private property and public sidewalks, where feasible; Infilling gaps and upgrading substandard sidewalks and streetscapes where needed and including pedestrian scale lighting on private property and public sidewalks where feasible;
- e. Implementing traffic calming as appropriate; and
- f. Ensuring that new or renovated structures are compatible with the established character, development form, and function of the neighborhoods.
- g. Encouraging solar powered systems and lighting.

Section 3.10, Noise and Vibration

Page 3.10-18, Policy N-1.7 is revised as follows:

N-1.7: Frequent, High-Noise Events. Require development of noise-sensitive uses proposed in areas subject to frequent, high-noise events (such as aircraft overflights, or truck traffic) to adequately evaluate and mitigate the potential for noise-related impacts. Implement Mitigation shall to ensure noise-related annoyance, sleep disruption, speech interference, and other similar effects are minimized using metrics and methodologies appropriate to the effect(s) to be assessed and avoided.

Page 3.11-27, the Note in Table 3.10-9 is revised as follows:

NOTES: Lower eEach of the noise levels specified above shall be lowered by five dB for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).

Section 3.11, Public Services and Recreation

Page 3.11-23, Policy CS-2.5 is revised as follows:

CS-2.5: Funding Strategy. ~~Periodically review the existing~~ Explore the possibility of adopting and maintaining a Fire-related development impact fee ~~and explore the possibility of adopting and maintaining~~ or an alternate funding mechanism for new and existing development projects to assist in funding Humboldt Bay Fire operations and facilities and to maintain adequate levels of fire protection.

Page 3.11-27, the footnote in Table PR-1 is revised as follows:

NOTES: ~~Develop~~ New parks and recreational facilities shall be developed to minimize impacts on environmentally sensitive areas such as wetlands and riparian habitat. (Table based on Table 5-1 and Policy 5.A.1)

SOURCE: Table derived from Table PR-1 of the 1997 City of Eureka General Plan.

Section 3.12, Transportation

Page 3.12-1, final paragraph, is revised as follows:

Freeways provide for intra- and inter-regional mobility. They are characterized by restricted access and grade separation, thereby accommodating higher volumes and higher speeds, generally with two or more lanes in each direction. The only freeway segment within the City limits is on US-101 at the southerly entry to the City, and ends just north of the Herrick Avenue interchange. US-101 is grade-separated and carries 32,000 vehicle trips per day at the interchange with Herrick Avenue, then transitions to a major arterial as it enters the City. This roadway generally has four lanes, two in each direction, and connects the City of Eureka to points as far south as Los Angeles and north to the State of Oregon.

Page 3.12-3, first paragraph, is revised as follows:

Expressways ~~also~~ provide for intra- and inter-regional mobility, but access is allowed only at key intersections. They typically have two or more lanes in each direction, and are characterized by lack of access from abutting properties. US-101 transitions from major arterial to Expressway as it exits the City of Eureka and continues north towards Arcata. The road carries approximately 37,500 vehicle trips per day and has two lanes in each direction divided by a large unpaved median.

Page 3.12-16, second paragraph, is revised as follows:

Terminal Access Truck Routes are State routes or local roads that allow Surface Transportation Assistance Act (STAA) trucks (the federal standard length-). US-101 is the only STAA route through Eureka. ~~Eureka may also be accessed by STAA vehicles travelling SR-299 westbound from Iron Mountain Road near Redding to US-101 southbound to Eureka. STAA vehicles may continue on 101 south of Crescent City to the vicinity of Benbow Drive in southern Humboldt County.~~

Page 3.12-26, Policy M-1.1 is revised as follows:

M-1.1: Complete Streets. Design and construct both new and reconstructed streets with adequate rights-of way and facilities to support the full range of locally available travel modes, compliant with the City of Eureka Design/Complete Streets Design Guide and the California Complete Streets Act (AB 1358). Consider a layered transportation network approach that distributes a range of facility types across neighborhoods and districts.

Page 3.12-26, Policy M-1.2 is revised as follows:

M-1.2: Investment in Alternative Modes. Emphasize investment in alternative travel modes in order to provide a realistic and cost-effective balance between travel modes, the City shall emphasize investment in alternative modes.

Page 3.12-27 is revised by the addition of a new policy, as follows:

M-1.10: Shared Transportation. Develop guidelines and incentives to direct how transportation sharing (e.g., bikeshare, carshare, rideshare, e-scooters, bike rentals) would be accommodated in the City, including where docking would be required, what amount and type of parking (e.g., automobile spaces, bike parking, docking stations) would be required, passenger loading zones, and other considerations.

Page 3.12-27, policy M-2.1 is revised as follows:

M-2.1: Street Classifications. Expand and maintain the street and highway system according to the most current version of the Caltrans Functional Classification Road System Maps. Classifications as of 2016 are depicted in the Figure M-1 Street Classifications diagram [see Figure 3.12-1 of this EIR].

Page 3.12-27, Policy M-2.3 is revised as follows:

M-2.3: Level of Service Standard. Strive to manage streets and highways to maintain Level of Service (LOS) C operation on all roadway segments and signalized intersections, except for along any portion of US 101, where LOS D is shall be acceptable. For evaluation purposes, service levels shall be determined service levels using methodologies and thresholds as set forth in the most up-to-date version of the Highway Capacity Manual, Institute of Transportation Engineers. For purposes of evaluating development proposals, impacts of a project are less than significant if an intersection is operating at LOS E or F without project-generated traffic added, the project's impact shall be considered less than significant if it and the project does not cause operation to fall from LOS E to LOS F and it increases average delay for the intersection as a whole increases by no more than 5 seconds or less. Where LOS for multiple modes including vehicles, bikes, pedestrian and transit conflict, the project will be taken to the City's Transportation Safety Commission for recommendation to staff.

Page 3.12-27, Policy M-2.5 is revised as follows:

M-2.5: Design Standards. Unless otherwise approved by the Transportation and Safety Commission (or equivalent body), require that all new and improved streets in Eureka be designed, developed, and maintained in accordance with the roadway cross-sections standards shown in the City of Eureka Design/Complete Streets Design Guide street design guidelines.

Page 3.12-28, Policy M-2.8 is revised as follows:

M-2.8: Traffic Impact Fee. Coordinate with Humboldt County Public Works to determine the feasibility, impacts, and benefits of establishing a Traffic Impact Fee that requires all new development to pay its fair share contribution of the cost of any local or regional transportation improvements.
M-2.8: Proportional Share Payments. Require all

~~new development projects to contribute a proportional or equitable share of the cost of any local or regional transportation improvements that can be attributed to the new or intensified uses.~~

Page 3.12-28, Policy M-2.13 is revised as follows:

~~**M-2.13: Traffic Impact Fee.** Coordinate with Humboldt County Public Works to determine the feasibility, impacts, and benefits of establishing a Traffic Impact Fee.~~

Page 3.12-28, Policy M-2.14 is revised as follows:

M-2.134: New Roads in Gulches. Require that streets developed in steep gulch areas result in as little disruption of the natural topography as feasible. Do not allow new roads to be constructed in such areas unless there is no feasible, less environmentally damaging alternative and the impacts can be adequately mitigated.

Page 3.12-28, Policy M-2.15 is revised as follows:

M-2.145: Street Trees. Continue to work with local service and volunteer organizations, and property owners to plant, maintain, and expand the street tree plan for public streets.

Page 3.12-28, Goal M-3 is revised as follows:

Goal M-3: A system of walkways, bikeways and bicycle parking facilities which will safely and effectively serve those wishing to walk and bicycle for commute, basic services, or recreational trips.

Page 3.12-29, Policy M-3.8 is revised as follows:

M-3.8: Bike Parking. ~~Prioritize~~ Promote the installation of secure bicycle parking and other supporting facilities in areas generating substantial bicycle traffic and at major public facilities. Install, and encourage the installation by other entities of, bike parking throughout the city.

Page 3.12-29, Policy M-3.9 is revised as follows:

M-3.9: Facilities at New Developments. Where applicable, require new development to provide bicycle access to and through projects, as well as properly and securely installed bicycle parking and/or storage, and to construct, dedicate and/or pay its equitable share contribution to the citywide system.

Page 3.12-29, Policy M-4.3 is revised as follows:

M-4.3: Intermodal Transportation Center. Work with ~~the~~ Humboldt Transit Authority to ~~develop~~ explore the development of an intermodal transportation center that would provide a central focal point for all transportation modes serving Humboldt County, including buses, cabs and limousines, rideshare, railroad passenger service, bay excursion services, horse-drawn carriages, and possibly cruise ships, ~~and~~ trolleys, and carshare.

Page 3.12-30, Policy M-4.5 is revised as follows:

M-4.5: *Transit Use.* Work with Core Area employers, workers, residents, and visitors to encourage ~~their employees to use~~ public transit use, thereby reducing traffic congestion and parking demand in the Core Area.

Page 3.12-30, Policy 5.2 is revised as follows:

M-5.2: *Parking Management Program.* Continue to work with Core Area business and property owners to develop a parking management program, such as a parking permit program, to balance the long and short-term parking needs of residents, employees, business patrons, and tourists. Include a curb zone management program that defines users/uses of curb zone space to include delivery trucks, buses, taxis, ride share companies, bike parking, bike share, and parklets.

Page 3.12-30, Policy 5.4 is revised as follows:

M-5.4: *Parking Lot Location.* Discourage placement of parking lots along major commercial, high pedestrian-use street frontages, and corners in the interest of maintaining continuous building frontages along the primary commercial streets and improving walkability in the Core Area.

Page 3.12-30 is revised by the addition of a new policy, as follows:

M-5.7: *Paid Parking.* Explore removing free parking in the Core Area and evaluating how paid parking may be used to promote a shift to non-single occupancy vehicle travel.

Page 3.12-30 is revised by the addition of a new policy, as follows:

M-5.8: *Unbundling Parking Costs.* Support the separation of parking costs for multi-family residential developments such that parking for residents or building occupants is available for an additional price thereby reducing existing parking requirements and promoting other modes of travel.

Page 3.12-30, Goal M-7 and its associated policies are revised as follows:

Goal M-~~6~~7: **Transportation facilities that ensure goods can be moved to and from industrial and commercial sites in Eureka in a safe and efficient manner while ensuring that heavy trucks remain on freeways and major arterial streets except when accessing sites within the city.**

Policies

M-~~6~~7.1: *Delivery Schedules.* Encourage business owners to schedule deliveries during off-peak traffic periods in residential, commercial, or mixed-use areas.

M-~~6~~7.2: *Passenger Air Service.* Work with the County of Humboldt to plan for a full range of aviation services and promote airline services that meet the present and future needs of residents and the business community, while mitigating noise and other impacts to residents and businesses.

M-~~6~~7.3: *Truck Route.* Continue to study the feasibility and necessity of a truck route.

Page 3.12-31, Goal M-8 and its associated policies are revised as follows:

Goal M-78: Water transportation facilities that serve the needs of commercial fishing and recreational boating operations, short sea shipping, and a maritime highway. (Modified 1997 General Plan Goal)

Policies

M-78.1: Fishing Facilities. Protect and, where feasible, upgrade facilities serving and supporting the commercial fishing and recreational boating industries. Participate in the design and construction of new or improved facilities to support commercial fishing and recreational boating and seek funding sources to maintain and enhance existing facilities. Such facilities shall not be reduced unless the demand for the facilities no longer exists or adequate substitute space has been provided. Proposed recreational boating facilities shall, to the maximum extent feasible, be designed and located so as not to interfere with the needs of the commercial fishing industry.

M-78.2: Berthing Facilities. Limit new or expanded berthing facilities to sites at the Woodley Island Marina, the Eureka Small Boat Basin, or the Eureka Channel Inner Reach. ~~Provide facilities supporting party- or charter-fishing boat operations shall be provided~~ at these sites to meet demand for them.

M-78.3: Shipping. Promote Eureka as a port and rail City including options such as short sea shipping.

Page 3.12-40, the discussion in the first paragraph under Impact 3.12-2 is revised as follows:

The Humboldt County Association of Governments (HCAOG) is the Regional Transportation Planning Agency for Humboldt County. There is no regional congestion management agency in the County. The HCAOG Regional Transportation Plan (RTP) was adopted in ~~2014~~2017, and does not establish LOS standards for roadway or multi-modal facilities.

~~Policy HR 11 within the RTP states that LOS standards are to be used to measure the performance of all regionally significant roadways that contribute to the regional transportation network. Objectives that are intended to carry out this policy call for the development and maintenance of a list of regionally significant roadways with established minimum acceptable LOS for each, and periodic traffic volume counts to determine whether minimum LOS levels are being maintained. A second objective calls for the traffic volume LOS to be coordinated with other bicycle and pedestrian LOS to achieve balanced multi-modal use of roadways.~~

Section 3.13, Utilities and Service Systems

Page 3.13-10, paragraph 5, is revised as follows:

California Department of Public Health

~~The California DPH is responsible for implementing the federal Safe Drinking Water Act of 1974 and its updates, as well as California statutes and regulations related to drinking water. As part of their efforts, the DPH inspects and provides regulatory oversight for public water systems within~~

California. In addition, in the Eureka area the NCRWQCB has the responsibility for protecting the beneficial uses of the state's waters, including groundwater, and these include municipal drinking water supply, as well as various other uses. Public water system operators are required to regularly monitor their drinking water sources for microbiological, chemical, and radiological contaminants to show that drinking water supplies meet the regulatory requirements listed in Title 22 of the California Code of Regulations as primary maximum contaminant levels (MCLs).

Created by the State Legislature in 1967, the five member State Water Quality Control Board protects water quality by setting statewide policy, coordinating and supporting the Regional Water Board efforts, and reviewing petitions that contest Regional Board actions. The State Board is also solely responsible for allocating surface water rights.

The State of California has passed several state bills pertinent to water supply and water management as summarized on their website including:

- ~~AB 3030 Groundwater Management Act allows existing local agencies to develop a groundwater management plan.~~
- ~~SB 1938 Amendments to Local Groundwater Management Water Codes requires any agency requesting funds from the Department of Water Resources to develop a comprehensive plan outlining the agencies objectives for basin management, basin planning, and basin monitoring. The goal of the legislation is that agencies would be more involved in their basin management to ensure proper planning and prevent over utilization of the basin.~~
- ~~AB 303 Local Groundwater Management Assistance Act of 2000 provides public agency grants to study and manage groundwater with the expectation the agency will become better suited to manage the water supply quality, delivery, and storage.~~
- ~~SB 610 Water Supply Assessments and SB 221 Verification of Sufficient Water Supply were passed to prevent development from proceeding without adequate consideration for water supply to the developed area. Senate Bill 610 was passed in 2001, and it specifically requires that for a public water system to be eligible for flood relief funds from the Department of Water Resources, that entity must provide an urban water management plan. That plan should outline all water supplies available for that entity's use over the next five years. The plan should also include water supply for any anticipated growth. Reliability of the water supply should also be evaluated. SB 221 requires any development having more than 500 parcels or units to have a complete water supply plan prior to approval for development. Review and approval of these documents would fall to the local governing board (rather than the State of California).~~
- ~~AB 901 Water Supply Planning requires Urban Water Management Plans to include information relating to the quantity of existing sources of water available to an urban water supplier over given time periods and the manner in which water quantity affects water management strategies and supply. This information includes, but is not limited to, the historic, current, and future reliability of the supply source and quality of the water source. A plan for what actions would be taken if the quantity or quality of water deteriorates is also required. Additional and supplemental sources of water must also be included in the Urban Water Management Plan.~~

Safe Drinking Water Plan

With the transition of the Drinking Water Program from the California Department of Public Health (CDPH) on July 1, 2014, the State Water Board now has the primary enforcement authority (primacy) to enforce federal and state safe drinking-water acts, and is responsible for the regulatory oversight of about 8,000 public water systems throughout the state.

In 1993, the California Department of Health Services (CDHS) (now CDPH) submitted to the Legislature the report entitled, "Drinking Water into the 21st Century: Safe Drinking Water Plan for California" (1993 Plan). In 1996, the California Legislature enacted Senate Bill (SB) 1307 (Chapter 755, Statutes of 1996). SB 1307 amended Health and Safety (H&S) Code Section 116355 to require a periodic update of the original Plan. The issues that were to be addressed were essentially the same as those included in the 1993 Plan.

CDPH assembled a team of experts that conducted extensive reviews and analyses, resulting in a draft plan that included an overview of drinking water regulation, reviews and plans for drinking water quality/monitoring and threats, treatment technologies, funding aspects and financial assistance, and a focus on the challenges faced by small drinking water systems. Following the July 1, 2014 transition of the Drinking Water Program to the State Water Board, the draft plan's recommendations and implementation plan have been enhanced based on the synergies and resources resulting from incorporation of the program into the State Water Board.

The Safe Drinking Water Plan for California includes the State Water Board's assessment of the overall quality of the state's drinking water, the identification of specific water quality problems, an analysis of the known and potential health risks that may be associated with drinking water contamination in California, and specific recommendations to improve drinking water quality.

Page 3.13-21, Policy NR-1.7 is revised as follows:

NR-1.7: Groundwater Protection. Continue to ~~regulate the use of septic systems,~~ encourage septic system users to connect to City services, and ~~regulate prevent~~ onsite disposal of toxic substances per local and State regulations to reduce groundwater contamination.

Page 3.13-22, Policy U-2.7 is revised as follows:

U-2.7: Best Management Practices. Identify and implement, where feasible, best practices and technologies for wastewater collection and treatment, including strategies that reduce wastewater demand requiring treatment, such as waterless toilets or composting garbage disposals and toilets, maintain maximum energy efficiency, and reduce costs and greenhouse gas emissions.

Page 3.13-22, Policy U-3.5 is revised as follows:

U-3.5: Manmade Drainage. Allow manmade drainage systems to be dredged, cleared, and maintained to preserve the drainage capacity for which they were designed, even those classified as wetlands, consistent with State and federal regulations.

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Environmental Impact Report ERRATA
Adopted by Eureka City Council on October 15, 2018

Following production and printing of the Final EIR, the following revisions were made to portions of the text to either correct errors or to refine elements of the text:

Page 2-22, Table 2-3, the “Light Industrial” land use designation is revised to read:

Light Industrial (LI)	Lower-intensity manufacturing, assembly, packaging, processing, wholesaling, warehousing, distribution, research and development, existing offices , and other employment-generating uses. Intended to be able to operate in close proximity to commercial and residential uses with minimum mutual adverse impacts. Small scale retail service uses <u>and office uses</u> that support employees and are incidental to the primary uses and support employees , may be allowed as provided by the applied zoning district. <u>New office uses and upper floor residential uses may be conditionally allowed as provided by the applied zoning district.</u>	Intensity: Maximum 2.0 FAR
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Page 3.5-18, Policy HCP-1.2 is revised as follows:

HCP-1.2: City-owned Resources. Maintain City-owned historic buildings and resources, such as structures, objects, monuments, cemeteries, landscapes, and rights-of-way improvements, retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs, and gutters in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Page 3.5-18, Policy HCP-1.4 is revised as follows:

HCP-1.4: Discourage Demolition. Consider demolition of Eligible Historic Resources ~~as a last resort, that are listed in the Local Register of Historic Places as a last resort~~, to be permitted only if rehabilitation is not feasible, demolition is necessary to protect health, safety, and welfare, or the public benefit of demolition outweighs the loss of the structure, historic resource consistent with City regulations.

Page 3.11-24, Policy CS-2.7 is deleted.

~~***CS-2.7: Rental Unit Inspection.*** Annually inspect all residential occupancies as required by the California Health & Safety Code, Building and Fire Code, or as determined by the City, for compliance with fire safety requirements.~~

Page 3.11-24, Policy CS-1.2 is revised as follows:

CS-1.2 Chief's Advisory Panel. Establish and maintain an advisory panel of community stakeholders appointed by the City Manager and Council to advise the Chief of Police to give counsel, support, and recommendations to the Chief for the purpose of improving transparency and fostering strong relationships with the community by promoting fair and humane policing to ensure the safety of citizens and police officers, recommending improvements in budget, policy, procedures and training of police personnel, acting as a sounding board regarding community needs and concerns, and providing feedback on proposed police programs and priorities. (MP)