

**DEPARTMENT OF TRANSPORTATION**

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a California Way of Life.*

August 13, 2020

1-HUM-101-PM 54.29 8/13/2020  
Water Infrastructure Improvement Project  
SCH# 2020079016

Governor's Office of Planning & Research

**Aug 14 2020**

**STATE CLEARINGHOUSE**

Kyle Knopp, City Manager  
City of Rio Dell  
675 Wildwood Avenue  
Rio Dell CA, 95562

Dear Mr. Knopp:

Thank you for giving Caltrans the opportunity to review and comment on the proposed Water Infrastructure Improvement Project for the City of Rio Dell. The project consists of distribution system improvements, valve and fire hydrant replacements, and a redwood water tank replacement. The distribution system proposes to install or replace five water lines beneath US 101 by directional drilling methods and two of three alternatives to replace an existing water line across the Eel River are proposed within Caltrans right of way; either through directional drilling beneath the river or by attaching a new water line to the southbound US 101 bridge. We offer the following comments:

The water distribution line crossing US 101 between Painter Street and Riverside Drive is proposed to be accessed within Caltrans' access-controlled right-of-way. Encroachment Permit applications for work within access-controlled State right-of-way are issued on an exception basis. Caltrans policy generally prohibits encroachments within freeway segments.

The Caltrans Office of Structures Maintenance and Investigations (OSMI), in Sacramento, reviews proposals to attach utilities to bridges within State right-of-way. The directional drilling within State right of way will need to be reviewed by OSMI to ensure that the drilling will not impact the bridge abutments. The District office in Eureka did not receive a response from the OSMI office in Sacramento within the review period for commenting on the Mitigated Negative Declaration for the proposed project. Input from OSMI will be needed prior to selecting a preferred alternative for the Eel River crossing. The District offers to facilitate future dialogue between the City, the City's engineer(s), and Caltrans OSMI.

Any work done within Caltrans right of way will require an encroachment permit. Depending on the complexity of the project and the dollar amount for

construction costs within State right-of-way, there is a possibility that any work within our right of way will be considered as an oversight project, which more closely adheres to the Caltrans project delivery processes than to standard encroachment permit procedures.

Any features that deviate from the Highway Design Manual (HDM) will require a design exception: <<https://dot.ca.gov/programs/design/manual-highway-design-manual-hdm>>

Design exceptions are covered in the Caltrans Project Development Procedures Manual (PDPM) in Appendix BB, which can be found online: <<https://dot.ca.gov/programs/design/manual-project-development-procedures-manual-pdpm>>

For more information regarding exceptions to policy, please refer to the (EPM) Chapter 300 – Exceptions to Policy, which can be found online: <<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/epm-chapters-all-ada.pdf>>

The description of the work provided within the Mitigated Negative Declaration do not provide enough detail to determine what permit requirements will be. Please review our Encroachment Permit Manual (Chapter's 300 (link above) and 600, link below). Any transverse crossings will require an encroachment permit. Any facilities that are proposed to be located within our right of way will require an exception to policy. <<https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/encroachment-permits/chapter-6-ada.pdf>>.

Encroachment permit applications are reviewed for consistency with State standards and are subject to Department approval. To streamline the permit application and review process, we require the applicant to consult with our Permit staff prior to applying. Requests for permit applications can be sent to: Caltrans District 1 Permits Office, P.O. Box 3700, Eureka, CA 95502-3700, or requested by phone at (707) 498-5684. For additional information, the Caltrans Encroachment Permit Manual and Standard Application is available online at: <<https://dot.ca.gov/programs/traffic-operations/ep>>.

The attachment or installation of utilities to the Eel River bridges (Bridge #: 04-0016L, 04-0016R) should be done after the migratory bird nesting season and bat maternity roost season, or approximately after September 15. If this is not feasible, we suggest scheduling the work as late in the summer months as possible to avoid potential adverse effects to birds and bats that may utilize these bridge structures. These bridges have not previously been surveyed for presence of birds and bats so their presence should be assumed. Biologists from

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Caltrans associated with future projects to retrofit these bridges will start surveys in 2021. If the applicant believes work associated with the City water infrastructure improvement project will not occur on these bridges until after 2021, Caltrans will be able to share survey data.

The Caltrans Encroachment Permit application requests documentation that the applicant has adequately reviewed the potential environmental impacts of any work performed within State right-of-way. Caltrans will not assume any CEQA lead agency responsibilities on behalf of the proposed project. To ensure that State-owned cultural resources are not impacted, triggering a need to comply with Public Resources Code 5024, Caltrans will need the complete Historic Property Identification Report (including any appendices):

Angeloff, N. 2020. Historic Properties Identification Report for the Rio Dell Water Infrastructure Improvement Project Final Report, Rio Dell, Humboldt County, CA. Prepared for the City of Rio Dell.

Without the cited data, we will be unable to certify CEQA compliance for the work within State right-of-way.

Please contact me with questions or for further assistance regarding the above comments by email at: <jesse.robertson@dot.ca.gov>.

Sincerely,

JESSE ROBERTSON  
Transportation Planning  
Caltrans District 1

c: Heidi Quintrell, Caltrans District 1 Encroachment Permits Chief