

Memorandum

Governor's Office of Planning & Research

Date: December 10, 2021

To: Keith Pelfrey

North Region Office of Environmental Management

1657 Riverside Drive

Redding, CA 96001

Keith.Pelfrey@dot.ca.gov

Dec 13 2021

STATE CLEARINGHOUSE

From: Susan Stewart, Environmental Scientist / Caltrans Liaison

**Subject: Klamath River Bridge (Horse Creek) Replacement Project
(Caltrans EA Code: 02-1H360) (SCH# 2021110181)**

Dear Mr. Pelfrey,

On November 11, 2021, the North Coast Regional Water Quality Control Board (Regional Water Board) received a draft Initial Study and Proposed Mitigated Negative Declaration (draft IS/MND) from the California Department of Transportation (Caltrans) for the Horse Creek Bridge Replacement Project (Project), Siskiyou County, California. The draft IS/MND compares and evaluates the potential impacts between the Build Alternative (Alternative 1) and the No-Build Alternative (Alternative 2). The draft IS/MND notes that comments must be submitted no later than December 10, 2021. The Regional Water Board hereby submits the following comments.

Project Description

Caltrans proposes to replace the Klamath River Bridge (Bridge No. 02-0117) on State Route (SR) 96 at post mile (PM) 77.15 in Siskiyou County. The existing four-span bridge will be replaced with a three-span bridge with two 12-foot wide traffic lanes and two eight-foot-wide shoulders. The new bridge will be constructed on a new alignment, approximately 12 feet north of the existing bridge. The roadway to and from the new bridge will be widened to have two 12-foot-wide traffic lanes and two eight-foot-wide shoulders to match the new bridge deck width and profile. Construction equipment parking and material stockpiling would occur within Caltrans right-of-way

The existing bridge is a 419-foot long and 26-feet, 10-inches wide, with three piers, and a bridge clearance of 15-feet, 11-inches above the Klamath River at normal flow. The new bridge will be longer and wider at 545-foot length and 44-feet wide, with two piers and 34.1-foot clearance above the Klamath River. The piers would be constructed within the riparian zone. Approximately 1.17 miles of the roadway would be realigned, and an equal amount decommissioned; five culverts would be replaced along the new alignment.

The proposed Project will likely include construction of temporary access roads approximately 20-feet wide at the northeast and northwest corners of the existing bridge and along the riverbanks between the existing and new bridges. Temporary work

platforms (falsework and trestle) would be required for the construction of the new bridge and supported on temporary piles to maintain water flows. Bridge construction may also require gravel work pads placed in the river to allow cranes and equipment access.

Regional Water Board Permitting

The proposed Project will require a Water Quality Certification under section 401 of the Clean Water Act (33 U.S.C. § 1341) for activities related to Project construction within or affecting waters of the U.S. and waters of the State.

1.3.4. Construction of In-Water Gravel Work Pad - On page 5, regarding the in-river gravel work pads, the draft IS/MND states: “They may remain in the river for up to two winters and three summers.”

RWB Comment 1): In submittal of an application for 401 Certification, please present a proposal for wet season removal of the in-river gravel work pads.

1.4. Project Alternatives – In Section 1.4.1 & 1.4.2 - On pages 9 & 10, the draft IS/MND presents Build and No Build Alternatives.

RWB Comment 2): In submittal of an application for 401 Certification, a more complete alternatives analysis beyond the Build and No Build Alternatives will be required. Please refer to Procedures for Discharges of Dredged or Fill Material to Waters of the State, section IV. A(g):

https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2019/040219_10_procedures_clean_v032219_conformed_final.pdf

3.6. Hydrology and Water Quality - On page 94, the draft IS/MND states, “The project will NOT require post-construction stormwater treatment BMPs under Caltrans NPDES Permit No. CAS000003 since the new impervious surface will be less than one acre.”

RWB Comment 3): The 401 Certification will require post-construction stormwater treatment BMPs if the combined new impervious and replaced impervious pavement exceed 5,000 sqft. The State Water Resources Control Board Resolution (SWRCB) No. 2008-0030 “Directs Water Boards’ staff to require sustainable water resources management such as Low Impact Development (LID) and climate change considerations, in all future policies, guidelines, and regulatory actions.” For reference please refer to the SWRCB LID webpage at

http://www.swrcb.ca.gov/water_issues/programs/low_impact_development/index.shtml

1.3.5. Construction of the new bridge and associated bridge element - On page 5, the draft IS/MND states, “The piers would be constructed within the riparian zone.”

3.3.2 Special Status Animal Species - Project impacts to riparian habitat for several terrestrial species are listed within this section; however, no mitigation is proposed.

RWB Comment 4): The new piers will be located within the riparian area and this will be a permanent impact. Please propose mitigation for restoration of impacts to riparian areas.

Thank you for providing the Regional Water Board the opportunity to comment on this draft IS/MND. If you have any questions or comments or would like to discuss these recommendations, please contact Environmental Scientist, Susan Stewart at (707) 576-2657 or by email at Susan.Stewart@waterboards.ca.gov.

Best regards,

Susan Stewart

Ec:
State Clearinghouse, Office of Planning and Research
State.Clearinghouse@opr.ca.gov