

Harris Medical Center Project
Final Initial Study/Mitigated Negative Declaration (IS/MND)
SCH No. 2024090215
Response to Comments

Project Title:	Harris Medical Center Project
Project(s):	General Plan Map Amendment and Zone Reclassification GPA-24-0001 and ZR-24-0001
Location:	272 Harris Street
APN:	010-261-012
Applicant:	Dr. Deepak Stokes
Property Owner:	Apostolic Faith Mission
Purpose/Use:	Change the land use map and zoning map designations from residential to mixed-use on a 1.01-acre parcel/former-church site to allow subsequent redevelopment with residential and commercial uses.
Current General Plan Land Use/ Zoning Designations:	Low Density Residential (LDR)/ Residential Low (R1)
Proposed General Plan Land Use/ Zoning Designations:	Neighborhood Commercial (NC)/Henderson Center (HC)
Staff Contact:	Caitlin Castellano, Development Services Deputy Director

This Response to Comments document is organized into the following sections:

- 1) Section 1: Introduction. This section discusses the use and organization of this Final IS/MND, and the environmental review process.
- 2) Section 2: Comments and Responses. This section includes a description of who commented on the IS/MND and a response to that comment.

Section 1: Introduction

1.1 Purpose of the Response to Comments Document

This document provides responses to comments received on the circulated Initial Study/Mitigated Negative Declaration (IS/MND) for the Harris Medical Center Project (Project). The IS/MND was circulated between September 9, 2024 and October 9, 2024. The IS/MND identified the likely environmental consequences associated with the Project, and recommended mitigation measures to reduce potentially significant impacts. This Response to Comments document, together with the IS/MND, constitutes the Final IS/MND if the City Council of the City of Eureka adopts it as complete and adequate under the provisions of the California Environmental Quality Act (CEQA).

I.2 Environmental Review Process

CEQA requires lead agencies to consult with public agencies having jurisdiction over a proposed project, and to provide the general public and project applicant with an opportunity to comment on the IS/MND. This Response to Comments has been prepared to respond to the two comment letters received on the IS/MND within the 30-day review period.

A Notice of Completion and a Notice of Intent (NOI) to Adopt, and the draft IS/MND, were filed with the Office of Planning and Research (OPR) State Clearinghouse on Monday, September 9, 2024. The NOI (which included directions for how to access and review the IS/MND) was also mailed to all property owners within 300 feet of the project site, posted at the Humboldt County Recorder's Office, the City's website, and the City's bulletin board at City Hall. The state and local review period ended at 5:00 p.m. on October 9, 2024. The IS/MND was distributed to responsible and trustee agencies via the Office of Planning and Research State Clearinghouse (SCH No. 2024090215). The general public was advised of the IS/MND through the public notice mailing and posting as described above.

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

The information provided in this Response to Comments document of the IS/MND does not constitute "significant new information" requiring recirculation pursuant to Public Resources Code §21092.1 and CEQA Guidelines §15088.5. Therefore, this Final IS/MND merely responds to the comments received.

Section 2: Comments and Responses

2.1 Comments Received

During the public comment period for the IS/MND, the City received two comment letters from neighbors related to construction noise and traffic. The comment letters were from affected neighbors and are included as Exhibit I to this document.

2.2 Response to Comments

Construction Noise:

Neighbors are concerned about the impacts of six days a week construction noise on their wellbeing, and request construction activities be limited to weekdays.

Construction activities may occur over a period of one to two years. Construction noise impacts are addressed in section XIII (Noise) of the IS/MND (Pages 76-81). As specified on Page 79, the 2040 General Plan Policy N-1.13 limits construction-related noise activities within 500 feet of noise sensitive uses (including residences) to the hours of 7:00 a.m. and 7:00 p.m. Mitigation Measure NOI-1: Construction Noise Limits already further restricts construction activities beyond General Plan Policy N-1.13 by reducing construction days from seven days a week to six

(no work on Sundays), prohibiting any construction noise before 8 a.m. on weekdays and 9 a.m. on Saturdays, or after 5 p.m. on weekdays and Saturdays, and prohibiting construction activities on holidays. An Environmental Impact Report (EIR) was certified for the 2040 General Plan on October 15, 2018, in conjunction with adoption of the General Plan (SCH No. 2016102025). The General Plan EIR analyzes gradual buildout of the City over a 20-year period (through 2040) and concludes impacts from noise generated by construction of future development under the 2040 General Plan buildout will be less than significant with the implementation of 2040 General Plan Policy N-1.13. Given Mitigation Measure NOI-1 limits construction hours beyond what is allowed under General Plan Policy N-1.13, Mitigation Measure NOI-1 is adequate.

Traffic:

Neighbors are concerned the Project would increase traffic on an already busy street, creating an unsafe situation.

Potential transportation impacts resulting from the Project are addressed in the Access and Proximity to Public Transportation subsection of the Project Description (Pages 9-11) and section XVII (Transportation) of the IS/MND (Pages 89-95). As specified on Page 9, Harris Street is a major arterial street. “Per the 2040 General Plan, Major Arterial Streets are those designated as high-capacity roadways that ‘connect regional facilities and accommodate regional, intro-city, and sub regional travel.’” Also, Harris Street is an existing Class II Bikeway, has sidewalks, and serves several bus routes.

Pursuant to CEQA §21099, the criteria for determining the significance of transportation impacts must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” As a result, CEQA Guidelines §15064.3 identifies vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project’s transportation impacts, and asserts that a project’s effect on automobile delay does not constitute a significant environmental impact. CEQA Guidelines §15064.3(b)(1) states that generally projects within one-half mile of an existing major transit stop should be presumed to cause a less than significant transportation impact. The Project is located approximately 660 feet from a major transit stop at the corner of F and Harris Streets and therefore meets this criterion. Furthermore, the California Office of Planning and Research’s (OPR’s) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA suggests that mixed-use projects in areas with low VMT can be presumed to cause a less-than-significant impact on transportation. The Project involves mixed-use commercial and residential development; and, according to OPR’s Site Check Tool (<https://sitecheck.opr.ca.gov/>), per capita VMT in Eureka is 15% or more below the regional average. The Project adds residents and services within a centrally-located mixed-use neighborhood with pedestrian, bicycle, and transit facilities, and therefore is not anticipated to increase per capita VMT for future residents, employees, and clients.

As specified on Page 92 of the IS/MND,

“Operation of the Proposed Project would involve an increase of daily traffic to and from the area, from residents, medical patients, patrons of the commercial space, employees, and visitors...As the site is currently unoccupied, onsite development of any kind would inherently increase traffic volumes. However, the site is in an existing developed area

designed to handle traffic volumes associated with residential and mixed-use land use designations.”

Page 94 goes on to say,

“All activities associated with redevelopment would occur entirely on the site and would not result in any changes to road geometry. No changes to existing streets or public access are proposed, although the Proposed Project could trigger an evaluation of surrounding sidewalks and potential repairs to bring existing sidewalks up to City of Eureka and CBC [California Building Code] standards. Site access, circulation, and traffic signs would be reviewed for consistency with code standards involving vision clearance areas at ingress/egress access points, limits on driveways, and internal pedestrian access. The project does not involve any potentially dangerous traffic or transportation hazards, nor does it propose any incompatible uses (e.g., farm equipment) that could affect existing traffic or circulation in the project area.”

Additionally, Page 95 further states,



“The site is accessible from a driveway off of Harris Street, a straight, paved, major arterial street with excellent visibility on either side, with two additional driveways on Williams Street to the west and D Street to the east. The number of people accessing the site would change with redevelopment. Per the projected daily trips described in Section XVII b), above, it is estimated that the Proposed Project would generate a maximum of 235 trips per day, with 27 of those trips comprising peak hour traffic trips at 11 a.m. and 4 p.m. on Harris Street. A site-specific traffic study is required when a project could generate 50 or more peak hour trips, at the discretion of the City Engineer. As 27 peak hour traffic trips are anticipated, a site-specific traffic study has not been prepared. Project referrals were sent to the City Engineer and it was determined at that time no traffic study would be required of the site. As a result, the Proposed Project would not substantially increase hazards due to a design feature or incompatible uses. A less than significant impact would occur.”

Therefore, for the reasons included above, and further described in the IS/MND, the Project is not expected to significantly increase traffic or create any traffic safety issues.

Attachment

Exhibit I: Comment Letters

From: [Maya B](#)
Sent: Monday, October 7, 2024 6:11 PM
To: [Planning](#)
Subject: Harris Street Medical Center Comment

 **NOTICE: This came from outside of the City's email system!** 

Please exercise caution. Do not click links or open attachments unless you have *verbally* confirmed with the sender that the message actually came from them and that the content is safe. Contact the [Helpdesk](#) if you are unsure!

To Whom It May Concern,

We live within the 300 foot "close neighbor" radius of the proposed Harris Street Medical Center. While we are not opposed to the project itself, we are very concerned about the impacts of long-term construction on our quality of life.

At the community meeting on 9/25, the project developer stated that construction will take place six days a week. This seems excessive. The noise and traffic of construction will have a significant impact on those of us close to the property. Most of the "close neighbors" work hard for our community (among us: two teachers in Eureka City Schools, a county Building Department employee, a medical professional at St. Joe's, a TSA officer, a county correctional officer, and several College of the Redwoods employees), and we believe we are entitled to have our weekends protected so that we can rest and recuperate.

We agree that Eureka needs more housing and medical services, and are excited to see the property developed. However, we want to be able to have time in our home that is restful. Limited construction to weekdays seems like a reasonable request.

Thank you for your consideration,

Maya & Katrina

Williams St

City of Eureka Planning Dept.

I am writing in response to the Harris Medical Center re-zoning proposal.

My husband and I own the property across the street from the existing church. Our house is 1226 D St Eureka.

We have owned this property for many years and the idea of having the zoning changed and a large facility replacing the church would introduce a large amount of traffic on an already busy street. This area is designated low density because more traffic would lead to an unsafe situation.

Please consider the safety of the property owners in this area by voting No on this project.

Please vote the new facility in an area where the zoning does not need to be changed.

Thank you,

Catherine + Ludwig Bentz
4185 Ficker Hill Rd
Arcata, Calif. 95521

