

## California Department of Transportation

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June 2, 2025

City of Arcata  
Local Coastal Element  
Public Draft Review  
May 2025

Mr. David Loya  
Community Development Director  
City of Arcata  
736 F Street  
Arcata, CA 95521

Dear Mr. Loya:

Thank you for providing Caltrans an opportunity to comment on the 2025 update to the City of Arcata's Local Coastal Element (LCE). The City of Arcata's LCE incorporates numerous measures and policies to address climate change and sea level rise. The coastal zone within the City of Arcata is served by two state highways, SR 101 and SR 255. Caltrans offers the following comments:

### **Introductory comments**

There are clear benefits to proposed land use plans, including the Gateway Area Infill Opportunity Zone, which will protect natural resources by increasing housing availability close to jobs, services, and transit. The proposed Mixed Use and High-Density Residential development in proximity to the City's center also has the potential to reduce vehicle miles traveled. In addition, the LCE addresses sea level rise for many vulnerable areas of Arcata.

### **SR 255 and LCE**

Portions of the city south and north of SR 255 are vulnerable to sea level rise. However, areas north of SR 255 are not included in the City's proposed Sea Level Rise Adaptation Zones. It appears Route 255 is used as a demarcation for the coastal industrial land use type vs commercial mixed use and high density residential. There may be updated water inundation modeling that can change the area delineated to be affected in the future, but it should be known that highways are not legally designed to serve as flood protection and are more-so being designed to allow water to pass through these days to restore hydraulic connectivity and keep the road from experiencing erosion. The Federal Highway Administration has a memo on this: <https://www.fhwa.dot.gov/engineering/hydraulics/policymemo/20080910.cfm>

The proposed high density of dwelling and commercial units combined with the threat of sea level rise warrants the need to adequately address sea level rise in vulnerable areas north of the 255. It should not be assumed SR 255 will provide protection from sea level rise threats to development north of the roadway. A SLR plan created in coordination with Caltrans could be required by the LCE to permit future development here. Including the vulnerable areas north of SR 255 in sea level rise policies would help ensure development is designed and sited for conditions throughout the design life of structures and help minimize the risk to life and property.



**Figure C-8-1**

## Clarifying comments

These general comments are offered to support greater clarity in the LCE:

- In Figure C-1-1 Coastal Zone Boundary, it is difficult to make out the Coastal Commission Appeal Jurisdictions. Recommend making these jurisdictions marked with a more noticeable color or stronger weight if using black.
- Under 7.1 Introduction – second paragraph, consider adding here that earthquakes could lead to sudden vertical land motion, which can either increase or decrease susceptibility to coastal flooding depending on if there's uplift or subsidence from an earthquake. Reference: Dura et. al. 2025 "Increased Flood Exposure in the Pacific Northwest following earthquake-driver subsidence and sea-level rise".
- 7.2.10 Failure of Matthews Dam – recommend providing a map of areas of potential inundation to provide transparency to the public with this hazard. This also seems to go under Flood Hazards. Consider clarifying the nexus of the geologic hazard leading to dam failure here.
- 7.2.18 Low Intensity/Occupancy Uses – allowed in floodways or FEMA flood hazard Zone V. Recommend adding a detail that Zone 5 represents the 1% chance of being inundated with water in a year.
- Figure C-8-1 Sea Level Rise Policy Area: the last sentence in the notes is cut off at the word "coastal" and should include the remainder of the missing text.

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- New Development 8.3.6 Design for Sea Level Rise, subsection 3 – was three ft selected to represent the intermediate sea level rise scenario for the year 2100? Perhaps the LCE should clarify this to explain the design life and/or timeline for resiliency of new structures based on current sea level rise guidance associated with a 3ft raise from current elevations.

If you have any questions, please contact me at [daniel.gjerde@dot.ca.gov](mailto:daniel.gjerde@dot.ca.gov), or (707) 497-7742.

Sincerely,

*Daniel Gjerde*

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Caltrans District 1