California Environmental Quality Act

(CEQA)

Initial Study &

Draft Mitigated Negative Declaration

FOR

Humboldt Transit Authority

Hydrogen Fueling Station

in the City of Eureka

SCH#: TBD

Date: July 30, 2025

Prepared for:

Humboldt Transit Authority
133 “V” Street
Eureka, CA 95501

Lead Agency - City of Eureka
531 “K” Street
Eureka, CA 95501

Prepared by:

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Project Summary

Project Title:	Humboldt Transit Authority Hydrogen Fueling Station
Project Applicant:	Humboldt Transit Authority (HTA) 133 V Street, Eureka CA 95501
Project No:	Coastal Development Permit CDP-25-4 Environmental Document ED-25-6
Project Location:	133 V Street, Eureka, CA 95501. HTA Facility is bordered by 1st and 2nd Streets on the north and south sides and V and X Streets on the west and east sides.
APN:	002-081-005; 002-091-003, -008, and -010; 002-121-002; and 002-124-008, -009, and -010
Zoning Designation:	Coastal Zoning - Service Commercial (CS)
General Plan Designation:	1997 Adopted Local Coastal Program General Service Commercial (GCS)
Lead Agency:	City of Eureka
Contact Person:	Chris Lohoefener, Senior Planner clohoefener@eurekaca.gov
Project Summary:	HTA is transitioning its bus fleet from diesel and gasoline to hydrogen fuel to comply with the Innovative Clean Transit Regulation established by the California Air Resources Board in December 2018. To support this switch, HTA proposes to construct a hydrogen fueling station at its existing Operations and Maintenance Facility (Facility or Project Site). The proposed project includes installation of a liquid hydrogen storage tank and compression gas system capable of providing hydrogen fuel to various types of vehicles at different fueling pressures. The project also involves demolition of an existing office building located at the Project Site, use of a temporary hydrogen fueling station during construction, construction of a permanent storage and fueling system, retrofit of the existing fleet maintenance bays, and construction of a building addition to the existing administration and maintenance building. The fueling system will also be available to the public.

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1.0 BACKGROUND AND SETTING

1.1 CEQA REQUIREMENTS

The Humboldt Transit Authority (HTA) Hydrogen Fueling Station project (Project) is subject to the requirements of the California Environmental Quality Act (CEQA). The lead agency is the City of Eureka (City). The purpose of this Initial Study is to provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration, or a Negative Declaration. This Initial Study is intended to satisfy the requirements of CEQA (Public Resources Code, Div 13, §21000-21177) and the CEQA Guidelines (California Code of Regulations, Title 14, §15000-15387). CEQA encourages lead agencies and applicants to modify their Projects to avoid significant adverse impacts.

§15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

- A description of the Project including the location of the Project;
- An identification of the environmental setting;
- An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- A discussion of the ways to mitigate the significant effects identified, if any;
- An examination of whether the Project would be consistent with existing zoning, plans, and other applicable land use controls; and
- The name of the person or persons who prepared or participated in the Initial Study.

1.2 BACKGROUND

Humboldt Transit Authority History

HTA was established in 1975 as a joint powers authority (JPA) signed by Humboldt County and the cities of Arcata, Eureka, Fortuna, Rio Dell and Trinidad. HTA is funded primarily through fares and Transportation Development Act (TDA) funds from the JPA members. HTA is headquartered in the county seat of Eureka and is governed by a seven-member Board of Directors comprised of one representative each from the five incorporated cities and two representatives from the County of Humboldt. HTA operates and maintains the Redwood Transit System (RTS), the Willow Creek Transit Service, and the Southern Humboldt Transit Systems.

HTA provides riders with affordable fixed route and dial-a-ride transportation options that allow access throughout Humboldt County. Services span from Trinidad, south along Highway 101 to Benbow and Ukiah, and east on Highway 299 from Arcata to Blue Lake and Willow Creek, including the Arcata–Eureka Airport and the communities of McKinleyville, Eureka and Fortuna.

HTA serves a majority of the population in Humboldt County including the communities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, McKinleyville, Rio Dell, and Trinidad. Associated 2020 population data is provided in the table below (HCAOG, 2023).

Table 1: 2020 Population Estimates

Community	2020 Population
Arcata	18,857
Blue Lake	1,208
Eureka	26,512
Ferndale	1,398
Fortuna	12,516
McKinleyville	16,292
Rio Dell	3,379
Trinidad	307
Unincorporated Areas	55,994
Humboldt County Total	136,463

HTA is headquartered in Eureka at their Operations and Maintenance Facility (Facility) located at 133 V Street. The Facility consists of their main administrative building, maintenance bays, bus storage yard, existing gasoline and diesel fueling station, and secondary administration building located at 104 W Street. A snapshot of current HTA fleet size, employee vehicle parking demand, and operation hours is provided below.

HTA Fleet Size, Employee Vehicle Parking Demand, and Operational Hours

City Buses	32	
Large Cutaways	8	
Small Cutaways and Vans	17	
Shop road call truck	1	HD shop truck for road calls
In-yard vehicles	1	Fork lift
Staff Cars	11	light duty vehicles for driver changes, road calls, etc.
Employee Cars (on any given weekday)	40	Total cars present at peak time. Drivers and maintenance staff have different shifts throughout the day
Employee Cars (on any given Saturday)	16	Total cars present at peak time. Drivers and maintenance staff have different shifts throughout the day
Weekday hours over which staff are on-site	4:30AM to 11:30PM on weekdays	
Saturday hours over which staff are on-site	6:30AM to 10:30PM on weekdays	
Office Hours	Weekdays 8:00AM - 4:00PM, closed 12-1, closed on weekends	
Sunday	Not operational	

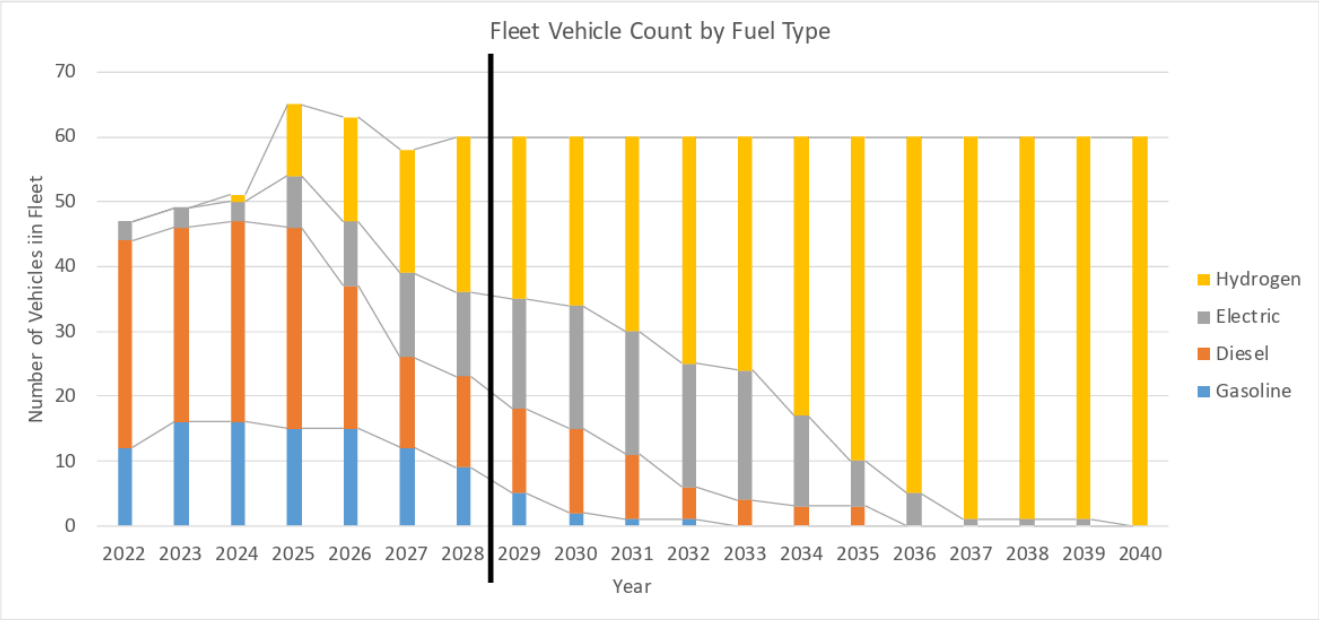
HTA has been awarded a $38.7M grant from the California State Transportation Agency's Transit and Intercity Rail Capital Program that will launch HTA's transition to a zero-emission fleet. With these funds, HTA and Project partners have bought one and will procure 10 - 15 more new zero-emission hydrogen fuel cell electric buses (FCEBs), implement this Project to install a hydrogen fueling station to provide fuel for the buses and for private and other fleet vehicles, and HTA will design and construct an intermodal transit and housing center in Old Town Eureka.

Transportation Planning Documents

Numerous planning documents guide HTA services including the Variety in Rural Options of Mobility (VROOM) 2022-2042, Humboldt County Transit Development Plan 2023-2028, North Coast US 101 Corridor Intercity Bus Consolidation Study (2023), McKinleyville Transit Study (2021), Coordinated Public Transportation Plan: Humboldt County (2021), Mobility-on-Demand Strategic Development Plan (2020), Climate Resilient Battery Electric Fleet Feasibility Assessment for Humboldt County Public Transit (2020), and the HTA Zero Emission Bus Rollout Plan (2023).

The HTA Zero Emission Bus Rollout Plan (ZEBRP) was adopted to meet the requirements of the California Air Resource Board (CARB) Innovative Clean Transit (ICT) regulation per Title 13 of the California Code of Regulations §2023. The ICT regulation requires all public transit agencies to gradually reduce fleet vehicle tailpipe emissions and encourages them to provide innovative first and last-mile connectivity and improved mobility for transit riders (CARB, 2025). The ZEBRP outlines HTA's plans for transitioning its fleet to hydrogen and electric vehicles in order to reduce emissions. Figure 1 shows the planned transition of vehicles by fuel type from 2022 to 2040 (HTA, 2023).

Figure 1: HTA Planned Fleet Count by Fuel Type



In order to support the transition to zero emission vehicles, upgrades to the current HTA Facility (noted as the Admin and Maintenance Facility in the ZEBRP) will be required. This includes installation of hydrogen fuel storage tanks and dispensers, and hydrogen vehicle maintenance equipment. In order to have adequate space for the new hydrogen fueling dispensers, the Project Site (described below) will need to be reconfigured which will include demolition of an existing structure.

In addition to supporting efforts to transition the bus fleet to zero emission vehicles, HTA will be looking to completely upgrade its Facility as infrastructure begins to reach the end of its useful life. This upgrade is known as the HTA Next Generation Facility. The Next Generation Facility Project is a State of Good Repair replacement of aging Facility infrastructure, and will accommodate planned growth to meet transit growth targets as described in the VROOM.

HTA's Facility includes infrastructure that dates back to at least the 1970's. HTA purchased three of the currently owned 10 parcels in the 1980's from a tree trimming service, which included two of HTA's five maintenance bays and a portion of the current administrative building. HTA added on additional administrative space, three additional maintenance bays, and the bus wash area in 1999. Hence, the administrative building and maintenance bays are a mix of 25-year-old and 50-year-old construction. Much of the existing lifts, cranes, and bay doors are significantly past the standard 20-year useful life. The bus detail bay in the east yard is at least 40 years old. The fueling island was installed in 2006 and is still within useful life.

The timeline for completing the Next Generation Facility is unknown as no funding has been secured to complete CEQA, design, or construction. HTA is currently starting the first phase of the Master Planning step with target completion estimated to be 2035.

Description and History of Project Site

The Project Site is approximately 3 acres and is generally bordered by 1st and 2nd Streets to the north and south, and V and X Streets to the west and east. An additional portion of the Project Site (Staging Area A) is located just north of 1st Street in between 2235 1st Street and 2135 1st Street. The existing HTA Facility consists of an office building located at 133 V Street with bus maintenance bays and car wash adjacent to the eastern portion of the building, a gasoline and diesel fueling station for buses and other HTA vehicles just north of the office building, a smaller office building located at 104 W Street that was a single-family residence prior to 1985, and a large bus parking area with additional maintenance and storage space located at 2223 2nd Street.

The Project Site was originally established as a residential area. Single family homes existed there from the late 1800's to the mid 1900's. Historical imagery from 1931 shows a portion of the Project Site (Figure 2, blue outline) located at 133 V Street. Numerous houses can be seen on the Project Site and the surrounding area. More recent imagery from December 2004 (Figure 3) shows that the Project Site (yellow outline) changed substantially since 1931. Many houses were removed and replaced by commercial buildings. The northeastern portion of the Project Site at X and 1st Streets was a vacant lot. Recent aerial imagery from 2023 (Figure 4) shows the current conditions of the Project Site. A large portion of the Project Site is paved for parking the bus fleet and employee personal vehicles. The surrounding area has been developed for commercial, light industrial, and mixed uses.

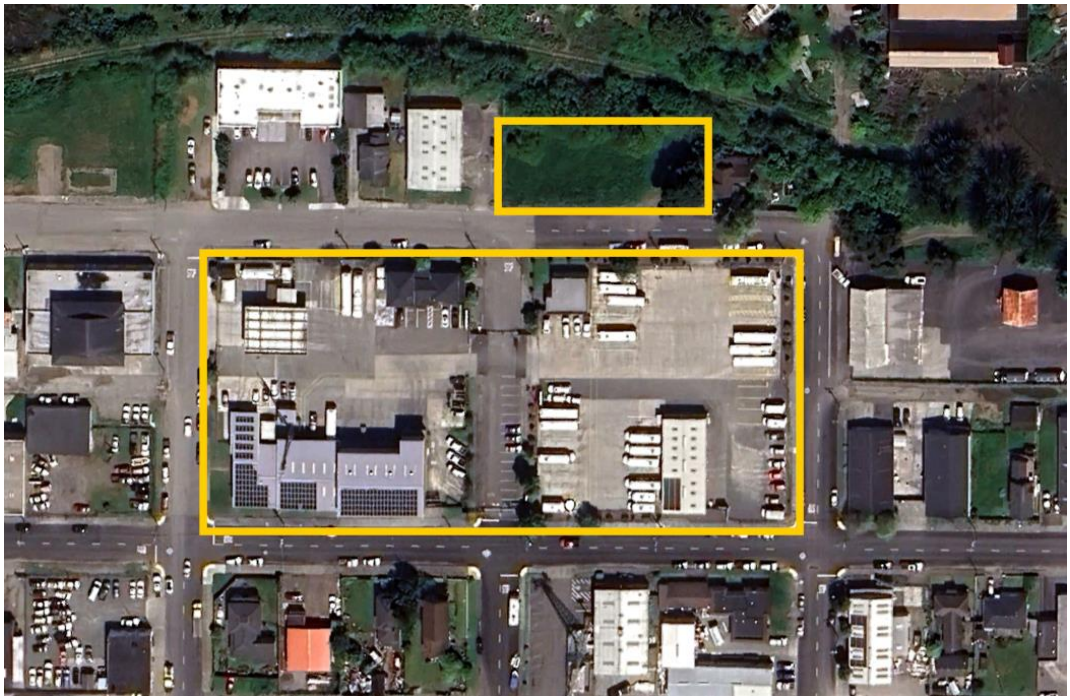
Figure 2: Aerial Imagery of Project Site (1931)



Figure 3: Aerial Imagery of Project Site (2004)



Figure 4: Aerial Imagery of Project Site (2023)



Project Site Timeline

- 1980: HTA leased a part of the western portion of the existing Facility from Utility Tree Service, Inc.
- 1989: Removal and clean-up of diesel leaking underground storage tank (LUST)
- 1991: Removal of contaminated soil around LUST.
- 1993: HTA purchased parcels in the western portion of the existing Facility from Utility Tree Service, Inc.
    - Existing buildings included two of HTA's five maintenance bays, and a portion of the current administrative building. At that time HTA operated only the Redwood Transit System and the fleet size was roughly 15 buses.
- 1998: LUST site soil deemed cleaned and case closed.
- 2000: Additions to administration building, addition of three maintenance bays for a total of five, and addition of bus wash.
- 2001: HTA purchased the 1st Street parcels (Staging Area A).
- 2005: City of Eureka City Council Resolution 2005-42 vacating the alley between W Street and X Street.
- 2001 and 2006: HTA purchased the parcels in the eastern portion of the existing Facility.
- 2006: Existing above ground gasoline and diesel fueling station constructed.
- 2019: The stretch of W Street between 1st and 2nd Streets was passed from the City to HTA.

1.3 PROJECT NEED AND SUMMARY

As noted previously, HTA is transitioning its bus fleet from diesel and gasoline to hydrogen fuel in accordance with the ZEBRP. The primary purpose of the Project is the construction of a hydrogen fueling station which will allow HTA to operate and maintain hydrogen fuel cell electric buses (FCEBs) at HTA's Facility. The fueling station will consist of a liquid hydrogen storage tank and compression and storage gas system capable of providing hydrogen fuel to various types of vehicles at different fueling pressures. The station will be designed to meet the estimated fuel demand for HTA's near-term and future plans, which include:

- HTA FCEB already under contract:
    - 1 New Flyer XHE40 FCEB delivered March 2025;
    - 10 – 15 New Flyer XHE40 FCEBs to be delivered between January 2026 through June 2026;
- Future medium duty (MD) and heavy duty (HD) H35 and/or H70[1] buses and fleet vehicles per HTA's Zero Emission Fleet Transition Plan;
- H70 light duty (LD) and MD vehicles using the public access H70 dispenser, including HTA-owned LD vehicles;
- Future non-HTA HD fleet vehicles (e.g., refuse trucks) who may use the H35 fueling station as a secondary fuel source for resiliency and reliability purposes; and
- HTA's transition to a 100% hydrogen fleet, as outlined in its Zero Emission Bus Rollout Plan (by 2040)

Additional features of the Project that will occur to facilitate the construction of the hydrogen fueling station include:

- Procurement of a temporary hydrogen fuel dispenser that will be placed on-site during construction to fuel buses during construction;
- Demolition of an existing wood frame building that currently serves as office space for HTA staff;
- Retrofit of existing fleet maintenance bays to comply with NFPA 2 standards and allow HTA to maintain the FCEBs; and
- Construction of a building addition, with combined space of less than 2,000 sq. ft., to the existing administration and maintenance building to move HTA staff from the demolished building.

[1] H70 refers to hydrogen fuel that is dispensed at 70 Megapascals (MPa) (700 Bar) or approximately 10,000 psi; H35 refers to hydrogen fuel that is dispensed at 35 MPa (350 Bar) or approximately 5,000 psi.

1.4 SETTING

As noted previously, the HTA Facility (Project Site) is located at 133 V Street, Eureka, California, and encompasses approximately 3 acres. The Project Site is generally bordered by 1st and 2nd Streets to the north and south, and V and X Streets to the west and east. W Street runs through the Project Site, the majority of which is owned by HTA and closed to public access (Figure 5).

See Figure 6 for a general overview of the Project Site and Figure 7 for existing equipment and adjacent infrastructure that will be utilized for the Project.

Figure 5: Location of HTA's Facility at 133 V Street

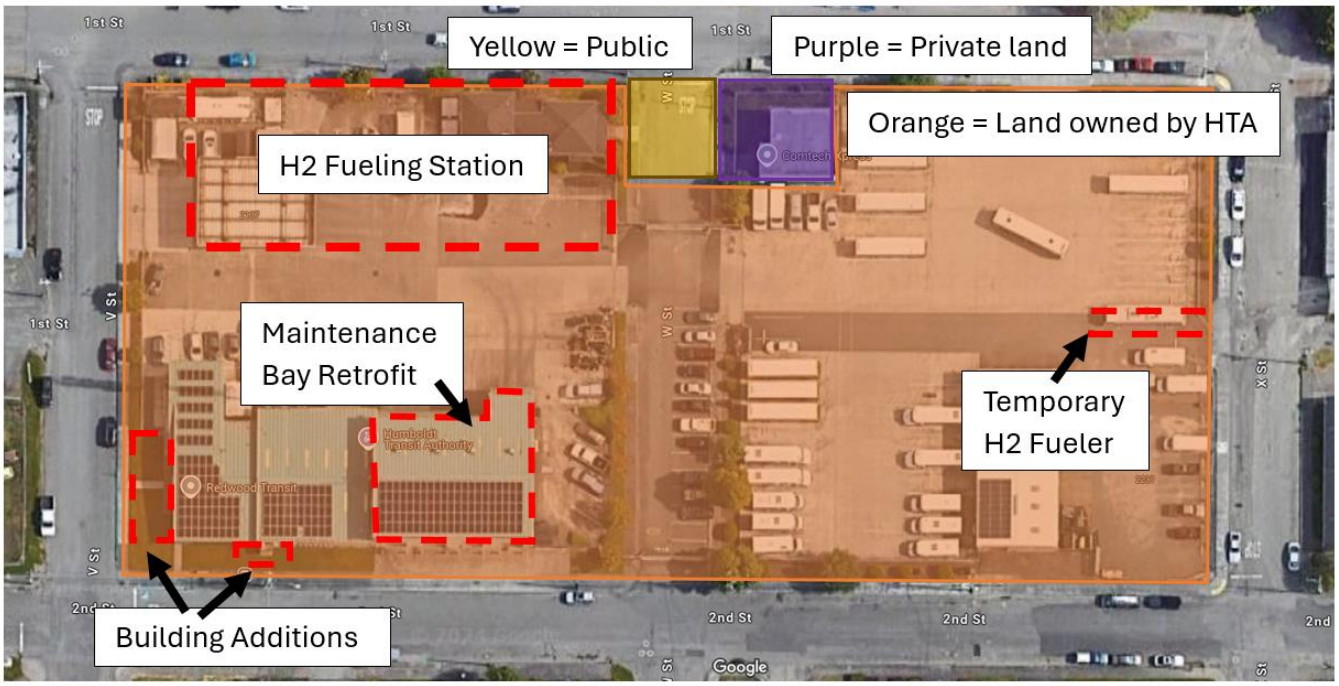
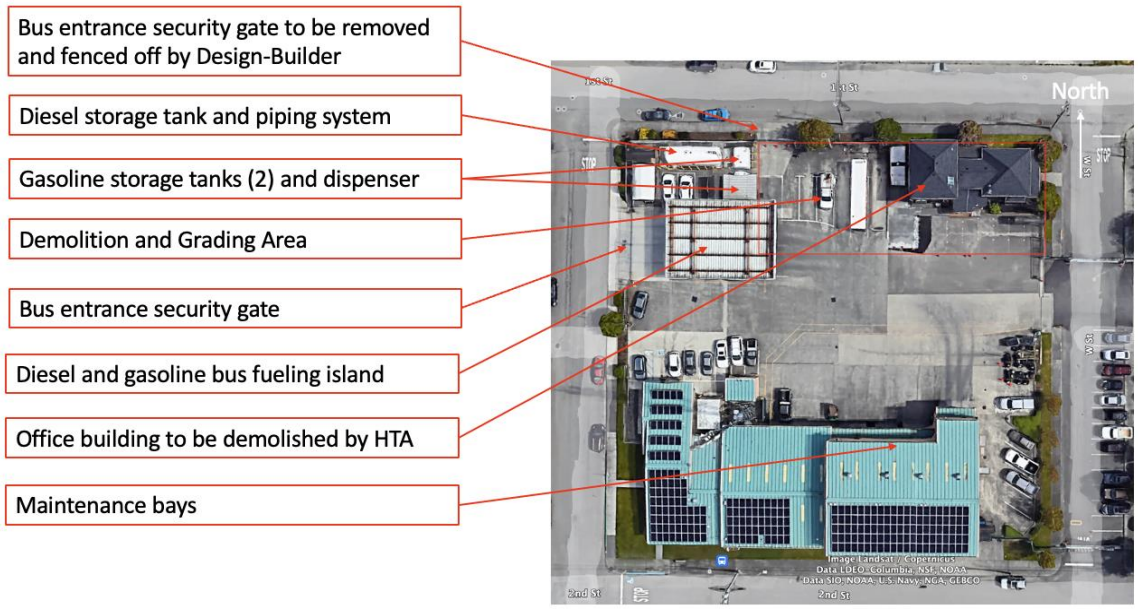


Figure 6: General Overview of the Hydrogen Fueling Station Area



Figure 7: Existing Equipment and Adjacent Infrastructure to the Project Site



1.5 SURROUNDING LAND USES

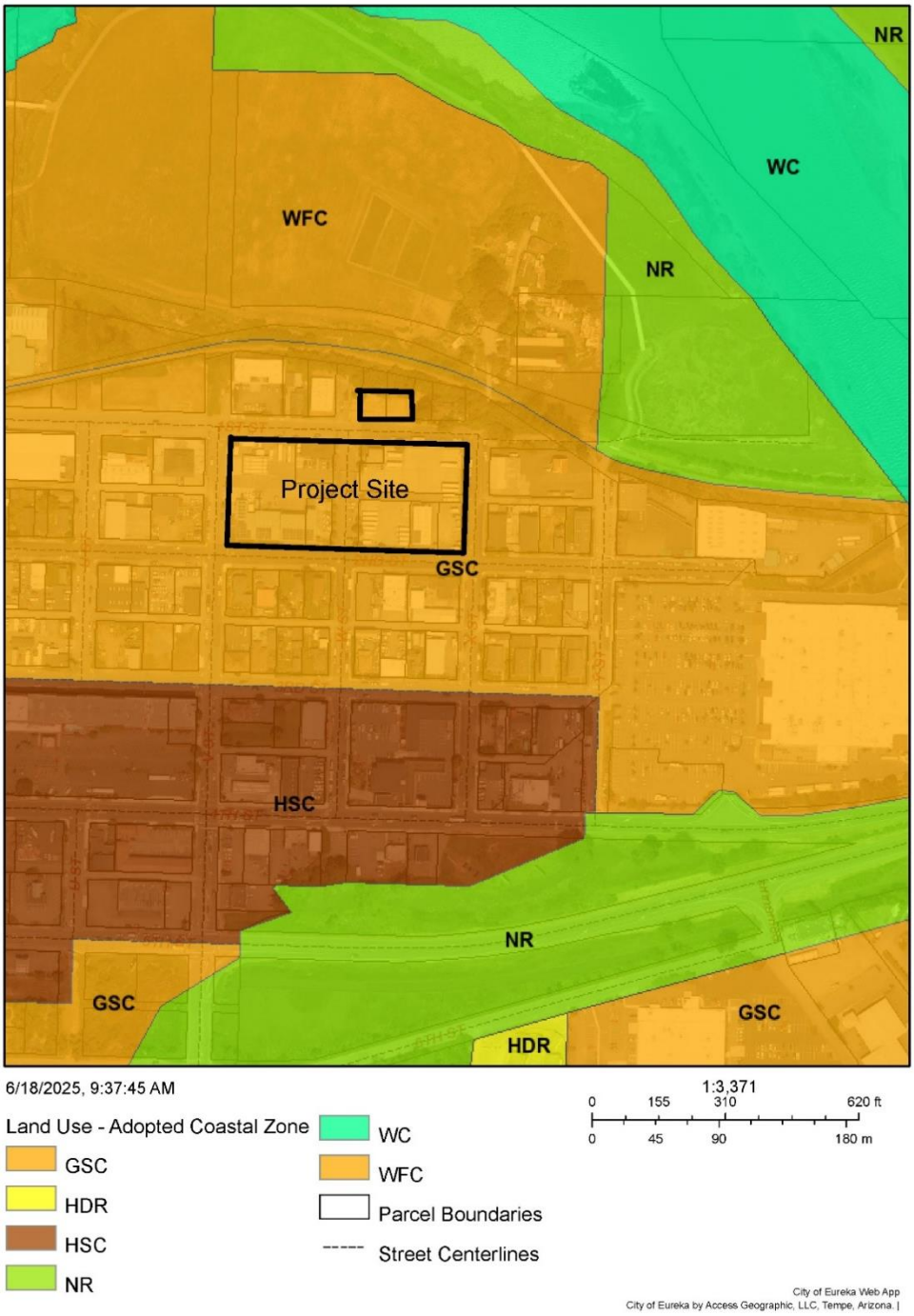
The Project Site is located in a mixed-use area that includes commercial, light industrial, and residential development. It is surrounded by a diverse mix of business-serving commercial retail, office, and service-related uses, light industrial manufacturing, and residential uses.

To the north, land uses include residential, healthcare, and light industrial (warehouse), with grasslands and wetlands located further north, followed by the Eureka Waterfront Trail and Humboldt Bay. Immediately adjacent to the west and east, the site is bordered by a mix of commercial and light industrial uses. Immediately to the south, land uses include a combination of residential and commercial development. Over the past several decades, this area has gradually transitioned from primarily residential to more commercial and light industrial uses.

The current land use designation for the Project Site and adjacent properties is General Service Commercial (GCS). North of the site, beyond the railroad right-of-way, the land use designation changes to Waterfront Commercial (WFC), and to the northwest along Humboldt Bay, it is designated Natural Resource (NR). The zoning designation for the Project Site is Service Commercial (CS) (City of Eureka, 2025). Figure 8 shows the land use designations for the site and surrounding area.

Although not certified by the California Coastal Commission, the Project Site is included in "The Bridge District" as identified by the 2040 General Plan. "Entirely in the Coastal Zone, located to the east of the Library District, south of the Commercial Bayfront district, north of 4th Street, and west of the Eureka Slough, the Bridge District is home to medium-density residential uses as well as a diverse mix of business-serving commercial uses, offices, and light manufacturing. The Bridge District is envisioned to continue to grow as an area of diversely intermixed uses." Although the Bridge District boundaries have not yet been certified by the California Coastal Commission, they represent the City's adopted long-range land use vision.

Figure 8: Project Site Land Use Map



1.6 PROJECT DESCRIPTION

Introduction

The Project consists of adding a hydrogen fueling station, with liquid hydrogen storage and gaseous hydrogen compression, storage, and dispensing to the existing HTA Facility. The Project includes:

- Site preparation, including demolition of existing wood-frame office building at 104 W Street;
- Installation of a temporary hydrogen fueling station during construction;
- Installation of electrical utility service power and backup generation;
- Construction of an addition to the existing administrative building;
- Design, engineering, and construction of the permanent hydrogen fueling station; and
- Retrofit of existing maintenance bays.

The portion of the fueling station that provides H70 LD/MD fueling will be open to the public for retail fuel sales. A point-of-sale (POS) system will be included to support public access and transactions. Public access will be provided from 1st Street and will be similar to standard gasoline and diesel stations. Fueling infrastructure will roughly look like the example fueling stations shown in Figure 9. These pictures do not represent the exact aesthetics of the Project but are reasonably close examples.

Figure 9: Examples of Existing Hydrogen Stations and Temporary Fueling Station

Upstream Equipment (example shown here is Orange County Transit Authority's fueling station)	
H35 Dispensers (example shown here is AirProducts fueling station in Canton, Ohio that serves the Stark Area Regional Transit Authority)	
H70 Public Dispensers (example shown here is AC Transit's Emeryville Station)	

Temporary Hydrogen Fueling Station (example is what will be delivered to HTA)		

Staging

Two locations have been identified as construction staging areas. As shown in Figure 10, one is a 0.15-acre site is located on the north side of 1st Street on HTA owned parcels (Staging Area A) and the other is a 0.1-acre area located within the existing HTA corporation yard in the southeast corner (Staging Area B).

For Staging Area A located on the north side of 1st Street:

- The site is located next to a riparian swale created by the grading from the old Northwestern Pacific railroad which is now the Great Redwood Trail (GRTA) Right of Way (ROW). This swale has previously been established as a three-parameter wetland. As such, additional Best Management Practices (BMPs) will be utilized to ensure that impacts to the area are less than significant.
- This staging area is intended to be used for temporary vehicle parking, and equipment staging which will include installation of gravel and/or pavers, and temporary security lighting and fencing with a gate.
- The wetland portions of the site will be identified and flagged by a qualified biologist prior to construction activities taking place and will be avoided during construction.

For Staging Area B on the southeast corner of the HTA corporation yard:

- Sufficient space will exist between the staging area and the shed immediately west of the staging area as HTA needs to retain a walking path of travel along the east edge of the shed. Additionally, there will be sufficient vehicle path of travel along the east edge of the existing shed to allow vehicle access to the existing bay door on the east side.

Access to and from this staging area will primarily occur from an existing access point on X Street and generally will not occur from inside the yard. This is to minimize disruption to

bus movement in the yard, and to minimize potential safety hazards. There is an existing access gate on X Street.

Figure 10: Proposed Construction Staging Areas



Demolition

Figure 11 shows the wood frame building located at 104 W Street (formerly a single-family residence) currently used as HTA office space that is proposed for demolition. The building contains both asbestos and lead-based materials and has been evaluated for potential historic resources. The Asbestos Survey and Lead Paint Sampling report is included as Attachment A, and the Cultural Resources Technical Report is included as Attachment B.

Figure 11: Demolition Site and Street View





Demolition will be conducted using standard industry practices and will incorporate standard BMPs to ensure impacts to the surrounding environment remain less than significant. Hazardous materials previously identified will be managed in accordance with applicable regulations, including:

- Cal/OSHA Lead Construction Standard
- Title 8 CCR 1532.1
- CCR Title 17, CCR 35000-36100
- EPA Lead Renovation, Repair, and Painting Rule, 40 CFR Part 745.

Asbestos removal will follow:

- EPA Asbestos Hazard Emergency Response Act
- EPA National Emissions Standard for Hazardous Air Pollutants
- Cal/OSHA Asbestos Construction Standard
- Department of Toxic Substance Control 22 CCR 66261-66263

Construction

Final design plans will be prepared and will be subject to the City of Eureka's Coastal Design Review and Development requirements as outlined in City Code §10-5.1801.2 and 10-5.201. Final design plans will be submitted to the City for review and approval prior to construction. Construction will generally take place between the hours of 7:00 a.m. to 7:00 p.m., consistent with City of Eureka 2040 General Plan in Policy N-1.13.

Electrical System, Utility Upgrades, and Electrical Service Power
The new electrical service and distribution system, including the main switchgear, distribution panels, backup generator, etc., will be sized and designed to serve the full electrical load of the H35 FCEB fueling station and the H70 LD/MD fueling station. In addition, the designed electrical load will be increased by 30% above the anticipated peak design load to account for the growth of HTA's fuel cell vehicle fleet and the installation of a future H70 MD/HD fueling system.

The hydrogen fueling station will utilize a new separate electricity meter and will add 300kW – 350kW of new load. No transmission or distribution upgrades are necessary to support the Project. A dedicated backup generator for the Hydrogen Fueling Station will be included and will be a diesel fueled unit sized to carry the entire hydrogen fueling station electrical load. Diesel fuel for the backup generator will be sourced from the existing on-site diesel storage.

Site Preparation
To address space constraints and improve overall safety at the hydrogen fueling station, the Project also includes the following:

- Relocate and integrate the existing gasoline dispenser into the existing fueling island.
- Remove and fence off the north driveway entrance gate.

To provide ample space for the hydrogen fueling station and enhance safety, HTA will demolish the existing building located at 104 W Street, remove all debris, and grade the site for development of the H70 LD/MD public fueling island. HTA will determine whether utilities that serve the building will be useful for the hydrogen fueling station site design. If

so, HTA will make them available for the Project; if not, they will be safely removed and terminated.

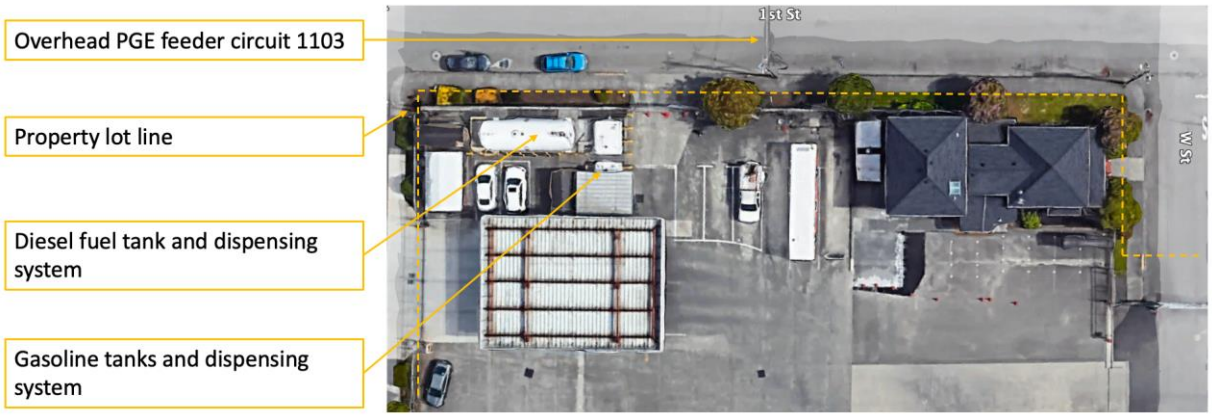
HTA will also construct an addition to the existing administration and maintenance building to support HTA staff currently working in the building slated for demolition. This addition will be less than 2,000 square feet and will provide office spaces for staff. The addition will be designed to meet current City of Eureka zoning requirements.

Figure 6 above shows an outline of the fueling station footprint and the general locations for the H35 equipment and H70 equipment, H35 and H70 dispensers, and the H70 public fueling island. The developable footprint is approximately 50 feet by 170 feet and includes the area outside the existing fence up to the sidewalks. Two (2) H35 hydrogen dispensers will be located under the existing fueling island canopy and one (1) H70 LD/MD public fueling island will be located along 1st Street.

Some of the preliminary code-regulated exposures that will need to be addressed by construction of fire walls and/or equipment layout within the footprint are listed below:

- electrical overhead lines,
- flammable and hazardous fuel storage tanks and piping (i.e., diesel and gasoline),
- lot lines, and
- parked cars.

Figure 12: Exposures Near and Within the Project Site



Liquid Hydrogen Storage Tank

Given the significant seismic activity in the region, a horizontal storage tank will be installed. The tank structural support system will be designed and rated for the local seismic zone. The Project will include an 18,000-gallon storage tank. Usable tank capacity will be sufficient to offload the complete liquid contents of a commercially available cryogenic hydrogen delivery trailer.

Temporary Hydrogen Fueling During Construction

A temporary fueling solution is needed to support the pilot bus testing and production bus delivery phases prior to Final Acceptance of Construction Work. It is anticipated that the pilot bus will run a service route that requires a 50kg fill once per week and the production buses will conduct short weekly trips for testing and to maintain a satisfactory battery system state of charge throughout the delivery period until Final Acceptance of Construction Work.

Maintenance Bay Retrofits

HTA will design, engineer, and construct hydrogen-safe modifications to three existing vehicle maintenance bays. Design, engineering, and installation scopes will be in compliance with all applicable locally adopted versions of local, state, and national codes and standards, including:

- NFPA 2
- California Fire, Electrical, Building, and Mechanical code.
- NFPA 30A, 70
- American Society Mechanical Engineers
- American National Standards Institute

Modifications will replace, re-route, add, or connect new and modified systems to existing structures, circuits, conduits, conductors, and accessories, as required. New hydrogen detection systems will be installed. Any existing building elements affected by installation of new hydrogen detection systems, and modifications of existing systems will be improved and restored to a condition existing before the Project commenced. The ongoing service of existing fleet vehicles (diesel, gasoline, and battery electric) will continue.

Components of the maintenance bay retrofits, include:

- Upgraded ventilation systems, both steady-state and under alarm conditions.
- Improved gas detection and alarm, including H_2, CO, and NOx.
- Improved safety for electrical hazard areas (per National Electric Code, NFPA 70).
- Upgraded HVAC systems, including heaters approved for use with FCEBs, battery electric buses, and gasoline- and diesel-powered buses and other vehicles.
- New emergency detection systems, alarms, and notification appliances
- Retrofit of facility to locally adopted version of NFPA 30A, when required by the Authority Having Jurisdiction (AHJ).

Additional items that will be taken into consideration when upgrading the maintenance bays will include areas utilizing open flames, arcing/sparking tools, and welding, as well as, architectural considerations, such as low or high spots where fugitive gas or vapors may accumulate or concentrate. The maintenance bays will meet all applicable standards and are designed with the highest level of safety in mind.

Construction Access

Routes for construction access are shown in Figure 13 and Figure 14. Figure 14 shows the proposed path of travel for the delivery of large pieces of equipment and mobilization of large construction equipment as needed.

Construction access is proposed by way of H Street (for south travel to Highway 101) and I Street (for north travel from Highway 101). These streets are both two-lane one-way streets that will allow easier turning access for larger construction vehicles. Travel will then continue along Waterfront Drive to 1st Street. The proposed routes are less likely to impede the regular flow of traffic caused by slow moving or wide load construction vehicles. Alternative construction access may be provided by V Street to 1st Street. However, V Street is narrower and has two-way traffic.

Figure 13: Preliminary Planned Construction Traffic Access Between Highway 101 and the Project Site

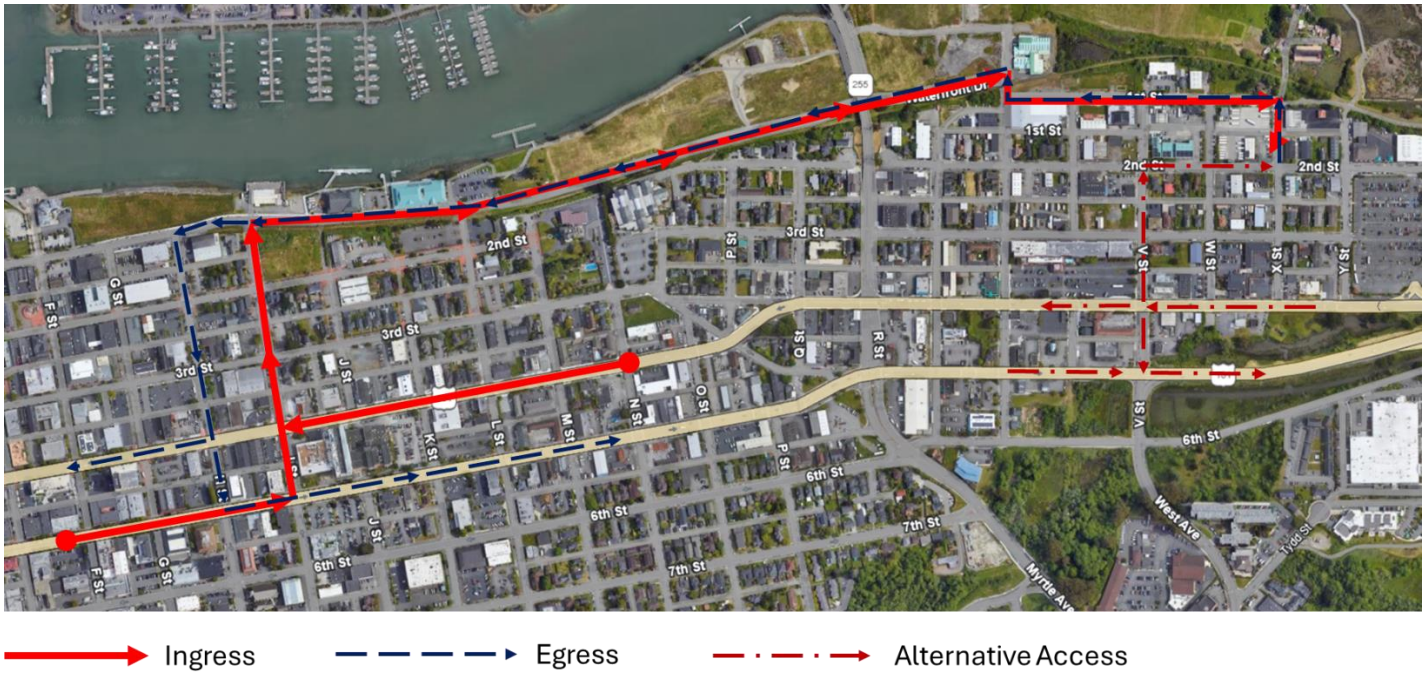
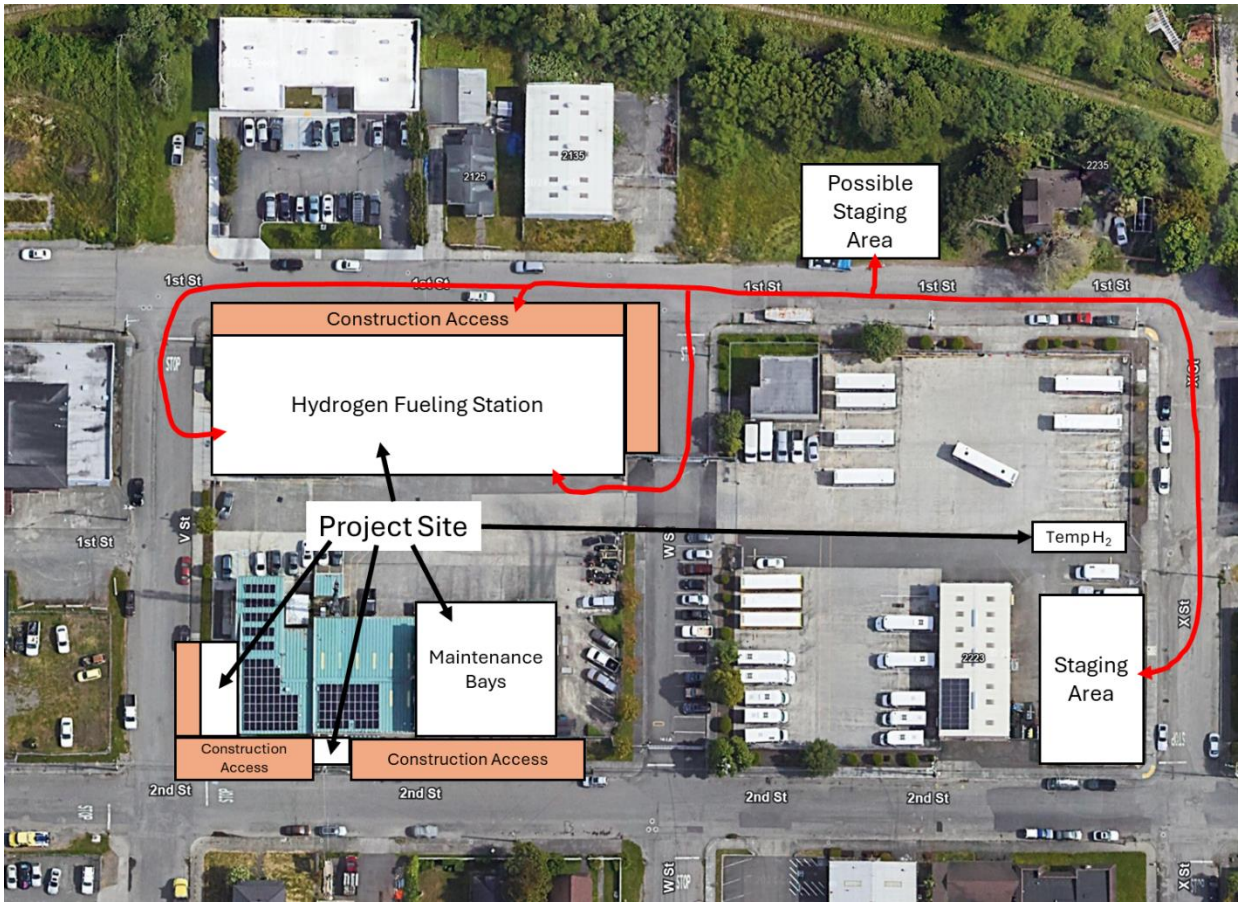


Figure 14: Construction Equipment and Vehicle Movement Around Project Site



Maintenance

Hydrogen is considered non-toxic, odorless, and does not “spill” like traditional fossil fuels. Hydrogen gas is lighter than air and quickly dissipates into the atmosphere if leaked. Liquid hydrogen is similar in that once it contacts ambient air, it immediately volatizes to a gas and quickly dissipates. For these reasons, it is unlikely that any major fires or explosions would occur as a result of hydrogen leaks. Additionally, crash protection features will be put in place to ensure vehicles do not damage fuel storage tanks or dispensers.

Maintenance of the facility will not be substantially different from maintenance activities for the existing gasoline and diesel fueling infrastructure. Additional tasks include quarterly maintenance of liquid hydrogen pumps. All maintenance will occur during business hours, with the exception of any emergency unscheduled maintenance that may be needed. The majority of maintenance will occur within the existing HTA maintenance yard. Maintenance on the public H70 fueling infrastructure is expected to be minimal, and similar to that which is done for any public fueling infrastructure such as maintenance of POS equipment,

compliance checks by regulatory entities for retail stations, inspection of fittings, and additional minor cleaning and upkeep tasks.

Operation

Existing operations at the Project Site include approximately 40 employee vehicles on site per day, Monday - Friday. On Saturdays, there are approximately 16 employee vehicles present at any one time. These are from office and fleet employees that regularly travel to the Project Site. Post construction vehicles on site will be the same for employees and the bus fleet as there are no proposed changes to the staffing or bus routes as part of the Project.

Estimated vehicle trips for the public fueling station are anticipated to be extremely low for the foreseeable future as the availability of Fuel Cell Electric Vehicles (FCEVs) is limited. Projected fuel consumption is based on HTA's estimate of approximately 15 personal FCEVs in the area in the near future. Assuming one third of those vehicles fuel on any given day, a maximum of five (5) trips per day peak use is reasonable. The public dispenser specification is capable of fueling two (2) medium-duty vehicles per hour or four (4) light-duty vehicles per hour. The dispenser is available 24 hours a day and therefore has the potential to fill a maximum of 96 vehicles per day. However, this is unlikely to occur.

The H35 part of the fueling station will not generate any additional trips as it will be fueling FCEBs that will replace existing diesel bus trips. There is the potential for other heavy-duty vehicles in the area to utilize the station but this use would be extremely rare if it occurs at all.

1.7 Compliance with Existing Regulations and Standard BMPs

The Project would abide by currently adopted regulations and industry-accepted BMPs to reduce or avoid potential adverse effects that could result from construction or operation of the Project. These are noted throughout the document in their corresponding resource sections where applicable.

1.8 Other Public Agencies whose approval is, or may be required

- California Department of Transportation (Caltrans is the funding agency)
- California Coastal Commission (only if City issued CDP is appealed)
- State Historic Preservation Officer (if referred to by Caltrans)
- Regional Water Quality Control Board
- Department of Toxic Substances
- North Coast Unified Air Quality Management District

- Division of Occupational Safety and Health

Tribal Consultation

Have California Native American tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1?

☐ No ☒ Yes

Date Consultation Offered: June 27, 2025

Date Consultation Begun: July 1, 2025

Responses Received: May 14, 2025 (Bear River Band); June 6, 2025 (Wiyot Tribe) requesting the inclusion of inadvertent discovery protocols. Additional outreach occurred during preparation of the Cultural Resources Technical Report which is discussed in Section 3.5.

If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

☐ No ☒ Yes

2.0 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agricultural & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☐ Transportation
☐ Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance
☐ None		

DETERMINATION: On the basis of this initial evaluation:

☐ I find that the proposed Project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION (ND)** will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because either: (1) revisions in the Project have been made by or agreed to by the Project proponent; or (2) mitigation measures have been identified to reduce the impacts to less-than-significant levels. A **MITIGATED NEGATIVE DECLARATION (MND)** will be prepared.

☐ I find that the proposed Project **MAY** have a significant effect on the environment and an **ENVIRONMENTAL IMPACT REPORT (EIR)** is required.

☐ I find that the proposed Project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **EIR** is required, but it must analyze only the effects that remain to be addressed.

☐ I find that the proposed Project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been avoided or mitigated pursuant to that earlier **EIR** or **ND**, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature: Chris Lohoefener Date: July 31, 2025

Printed Name: Chris Lohoefener

2.1 SUMMARY OF POTENTIAL PROJECT IMPACTS:

Below is a table that summarizes the impact potential for each category of impacts discussed and analyzed in this Initial Study:

Resource Category	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Aesthetics			X	
Agriculture & Forestry Resources				X
Air Quality		X		
Biological Resources		X		
Cultural Resources		X		
Energy			X	
Geology/ Soils			X	
Greenhouse Gas Emissions			X	
Hazards & Hazardous Materials			X	
Hydrology/ Water Quality			X	
Land Use/ Planning			X	
Mineral Resources				X
Noise			X	
Population/ Housing				X
Public Services				X
Recreation				X
Transportation			X	
Tribal Cultural Resources		X		
Utilities/ Service Systems			X	
Wildfire			X	
Mandatory Findings of Significance		X		

Each of the resource categories above is expanded upon further under Environmental Analysis. The analysis has been conducted using baseline conditions as they existed in June 2025, as described under Setting.

2.2 RECOMMENDED MITIGATION MEASURES:

Mitigation Measure AQ-1: Measures to Reduce Air Pollution

The following measures shall be implemented during construction:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered in areas of active construction as necessary.
- All haul trucks transporting soil, sand, demolition material, or other loose material off-site shall be covered.
- All vehicle speeds on unpaved surfaces shall be limited to 15 mph, unless the unpaved surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage noting idling time requirements shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.
- A publicly visible sign shall be posted with the telephone numbers of both the City and NCUAQMD regarding dust complaints and to ensure compliance with applicable regulations.

Mitigation Measure AQ-2: Measures to Reduce Diesel Emissions During Construction

Prior to Building Permit Issuance, the applicant shall prepare a Construction Management Plan for review and approval by the Chief Building Official or his/her designee. The Construction Management Plan shall include the following measures to reduce Toxic Air Contaminant (TAC) emissions during construction:

a. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation;

b. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed five minutes;

c. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator; and

d. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89,

Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity, or biodiesel.

Mitigation Measure BIO-1: Migratory Bird Surveys. To avoid potential impacts to nesting birds, in accordance with the Migratory Bird Treaty Act, one of the following shall be implemented if vegetation removal occurs:

- Conduct vegetation removal and other ground-disturbance activities associated with any construction activities between August 16 and March 14, when birds are not typically nesting, or;
- If vegetation removal or ground-disturbing activity is to take place during the nesting season (March 15 to August 15 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Within 7 days prior to disturbance, pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS and CDFW and implemented to prevent abandonment of the active nest.

Mitigation Measure BIO-2: Wetland Protection and Erosion Control Measures to Support Zero Wetland Buffer. Prior to construction, a qualified biologist will review and flag the wetland areas. HTA will ensure a temporary stake and rope fence (or similar fence type) is installed following the flags that demarcate the wetland areas. Temporary signage will also be installed explaining why the area has been fenced off. HTA, through the contractor, will prepare Staging Area A for construction by installing temporary straw waddling around the proposed staging area to help direct any runoff towards 1st Street and the existing stormwater infrastructure. Silt fencing will also be installed downslope to capture any sediment that is not redirected by the straw waddles. The staging area will then be graded with a gentle slope towards 1st Street. Semi-permanent water capture and infiltration features will be installed around the staging area such as a gravel infiltration ditch. Staging Area A will then be covered with porous pavers, crushed aggregate, open pavers with grass or plantings, open pavers with gravel, or solid pavers with adequate spacing for infiltration. This will create a semi-permanent parking surface for buses and/or construction equipment. Fencing, lighting, and a security gate will then be installed. After the Project has been completed, the silt fencing will be removed from the site.

Mitigation Measure BIO-3: Construction-Phase Erosion and Sediment Control Plan and Post-Construction Stormwater Control Plan. HTA will prepare both a construction-phase erosion and sediment control plan and post-construction stormwater control plan that is consistent with the City's Urban Storm Water Quality Management and Discharge Control Ordinance and MS4 permit standards. The construction-phase erosion and

sediment control plan will be prepared and submitted to the City prior to the start of construction. The post-construction stormwater control plan will be prepared and submitted to the City for review and approval with the building permit application.

Mitigation Measure CUL-1: Inadvertent Discovery of Cultural Resources

a. If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist must be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band, Blue Lake Rancheria, and Wiyot Tribe are to be contacted immediately to evaluate the discovery and, in consultation with the Project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structure remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.

b. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Eureka.

Mitigation Measure CUL-2: Inadvertent Discovery of Human Remains

In the event of discovery or recognition of any human remains during construction activities, the landowner or person responsible for excavation will be required to comply with the State Health and Safety Code section 7050.5. Construction activities within 100 feet of the find shall cease until the Humboldt County Coroner has been contacted at 707-445-7242 to determine that no investigation of the cause of death is required. If the remains are determined to be, or potentially be, Native American, the landowner or person responsible for excavation would be required to comply with Public Resources Code (PRC) section 5097.98. In part, PRC section 5097.98 requires that the Native American

Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC would then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the landowner or the person responsible for the excavation work for the appropriate means of treating the human remains and any associated grave goods within 48 hours of being granted access to the site. Additional provisions of PRC section 5097.98 shall be complied with as may be required.

Checklist and Evaluation of Environmental Impacts:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where they are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which

were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

    a. the significance criteria or threshold, if any, used to evaluate each question; and

    b. the mitigation measure identified, if any, to reduce the impact to less than significance

3.0 ENVIRONMENTAL ANALYSIS

3.1 AESTHETICS

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Except as provided in Public Resources Code Section 21009, would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

The proposed Project would be constructed on an already developed site adjacent to other commercial, public facility, and residential sites. Features of the Project that may involve aesthetic considerations include:

- Procurement of a temporary hydrogen fueler placed on-site during construction to fuel buses during construction;
- Demolition of an existing wood frame building that currently serves as office space for HTA staff;
- Retrofit to existing fleet maintenance bays to comply with NFPA 2 and allow HTA to maintain the FCEBs; and
- Construction of a building addition, with space of less than 2,000 sq. ft., to the existing administration and maintenance building to move HTA staff from the demolished building.

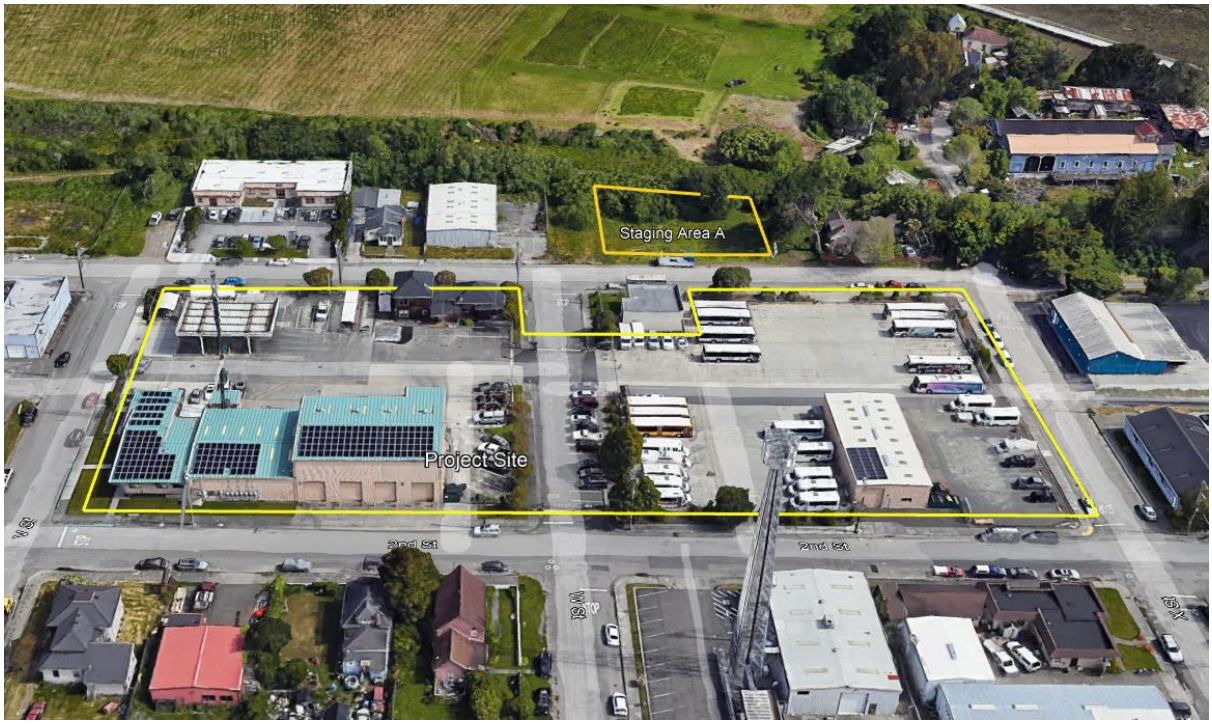
The City's certified Local Coastal Program identifies scenic coastal areas including the City's islands, Second and Third Sloughs, Eureka Slough Wildlife refuge, and City lands northerly of Jacobs Avenue. The nearest public viewpoints to the Project are from the Waterfront Trail, which can be accessed at the northern ends of Y Street and T Street. Although the Project Site sits at a higher elevation, existing development and dense vegetation screen it from these viewpoints.

Existing development on the Project Site includes two story maintenance bays and office buildings, a cell/radio tower (which is visible from the Waterfront trail and has been in existence for several years), and a covered fueling station. The Project will not exceed the height of existing on-site structures or the maximum building height for CS zoning district which is 55 feet.

a) Have a substantial adverse effect on a scenic vista? (No Impact)

For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The Project Site is not located within a City or County mapped or designated scenic vista or scenic resources area. The existing scenic qualities of the Project Site are shown below in Figure 15. It shows the Project Site is on a fully developed parcel surrounded by city streets which offers limited scenic views.

Figure 15: Scenic Qualities of the Project Site



Source: Planwest Partners, 2025. Imagery is from Google Earth Pro.

Staging Area A looks out over a manmade riparian swale with vegetation along the southern toe of the former Northwestern Pacific railroad grade. The scenic view of that site is confined to the immediate area due to the topography of the site as shown below in Figure 16. Its scenic views are similar to many places in the area.

Figure 16: Scenic Qualities of Staging Area A



Source: Planwest Partners, 2025. Imagery is from Google Street View.

The Project Site is within the City's Coastal Design Review Area. The City's design review process will ensure any proposed structures meet the City's development standards for the CS District, which allows a maximum building height of 55 feet. No impact on scenic vistas will occur.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (No Impact)

The Project Site does not contain rock outcroppings. Any trees proposed to be removed as part of the final 100% design plans serve as landscaping and are not considered part of any scenic resources. There is no evidence that they are considered scenic resources, and there is no evidence of other scenic resources on the property that need to be considered for protection. The wood frame office building (Figure 17) that is proposed to be removed from the site is not listed on any national or state historic register, and while it may be old enough to be considered historic, it is not significant in its architectural style or features as outlined in the Cultural Resources Technical Report prepared by Chronicle Heritage in 2025. Additional information regarding the building can be found under Section 3.5 – Cultural Resources.

Figure 17: Wood Frame Structure to be Removed



Source: Planwest Partners, 2025. Imagery is from 2018 Google Street View imagery accessed 6/25/2025.

Additionally, the site is not located near or within view of a proposed or designated state scenic highway (Caltrans, 2024). Highway 101, which is approximately 900 feet south of the property is eligible as a scenic highway but no application to turn it into a scenic highway has been developed so it is too speculative to consider it a proposed scenic highway. Based on the above information, the Project will result in no impact on scenic resources.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality? (Less Than Significant Impact)

The Project Site is within a densely settled census block and is considered an urban area according to the 2020 US Census (Urban Area Census Code # 28198) because it meets minimum population density requirements of at least 5,000 people or 2,000 housing units (US Census Bureau, 2025). The Project Site is within a City's Coastal Design Review Area and the City's design review requirements for new structures will ensure compatibility with the surrounding scenic quality of the neighborhood. While the existing wood framed office building located at 133 V Street will be removed from the site, this change will not substantially alter the scenic quality of this area as there is existing commercial development in the surrounding area with limited scenic views. Additionally, the proposed

office addition of less than 2,000 square feet will not substantially alter the existing aesthetics of the already developed site. As such, a less than significant impact will occur.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Less Than Significant Impact)

The Project Site is currently developed with outdoor security lighting, including flood lights, which illuminate the maintenance bays, bus parking areas, and existing fueling stations, and currently creates a substantial amount of light that impacts the surrounding area at night.

The Project will require outdoor lighting installations for safety and security, such as exterior building lighting, parking lot and pathway lighting, and updated lighting for the fueling facilities. Any lighting improvements to the site would comply with City Municipal Code 10-5.150(i) and 10-5.1604(i), which states that lighting shall be deflected away from abutting residential sites so as to cause no annoying glare.

Exterior lighting would be designed to protect wildlife and night-time views, including views of the night sky. The Project would be designed to be consistent with the recommendations of the International Dark-Sky Association, which includes standards for fixtures, shielding, placement, height, and illumination levels. To comply with these requirements, lighting for the Project would be the minimum lumens necessary, directed downward, shielded, and pedestrian level when feasible. This design feature of the Project would ensure lighting is focused within the site and does not cause significant lighting and glare impacts for surrounding land uses. As such, a less than significant impact would occur.

3.2 AGRICULTURE AND FOREST RESOURCES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

There are no agricultural or forestry zoning or land uses within the Project Area. It is zoned CS – Service Commercial and has a GSC – General Service Commercial land use designation.

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance? (No Impact)

According to the United States Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the Project area has a Farmland Rating of "Prime Farmland if Irrigated" (USDA, 2025). However, the site is currently not irrigated, is covered in concrete and asphalt, and has historically been developed for urban use since the late 1800's. As such, no prime farmland, unique farmland, or farmland of statewide importance would be converted. No impact would result.

b) Conflict with Agricultural Zoning or Williamson Act Contract? (No Impact)

Construction and operation of the Project would have no effect on agricultural zoning or Williamson Act contracts because none exist within or surrounding the Project Area. The nearest Williamson Act land is approximately 2 miles west of the Project area along the Eureka Slough (Humboldt County, 2025). No impact would result.

c) & d) Conflict with forest land zoning or convert forest land? (No Impact)

There are no forest lands, timberland, or associated zoning in the Project Area. Natural Resource (NR) lands exist approximately 320 feet west-northwest of the site along the shores of Humboldt Bay (City of Eureka, 2025). However, no Project activities, including staging areas, will be located in close proximity to these NR lands. As such, no forest land or timberland would be converted to non-forest or non-timberland use. No impact would result.

e) Involve other changes resulting in the conversion of farmland (No Impact)

The Project Area and surrounding land does not include farmland or forest. Thus, the Project does not involve changes in the existing environment, which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would result.

3.3 AIR QUALITY

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

The Project is located within the Humboldt County portion of the North Coast Air Basin (Air Basin), which is managed by the North Coast Unified Air Quality Management District (NCUAQMD). The NCUAQMD monitors air quality; enforces local, State, and Federal air quality regulations for counties within its jurisdiction; inventories and assesses the health risks of TACs; and adopts rules that limit pollution.

Currently, the HTA bus fleet includes 32 city buses, 8 large cutaways, 17 small cutaways and vans, and 1 shop road call truck. These vehicles are a mix of diesel, gasoline, and diesel hybrid vehicles. The Project will construct the necessary fueling infrastructure to support conversion to hydrogen fuel which will result in an overall decrease of emissions over time.

a) Conflict with or obstruct implementation of the applicable air quality plan? (Less than Significant Impact with Mitigation)

The primary purpose of an air quality plan is to achieve attainment with federal and state air quality standards. The air district has the responsibility for assuring that national and state ambient air quality standards are attained and maintained in the air basin. CEQA requires that proposed projects be analyzed for conflicts with applicable air quality plans.

An air quality plan describes air pollution control strategies to be implemented in an air district where the air basin is classified as being in non-attainment with standards for one or more air pollutants. The primary goal of the air quality plan is to identify measures needed to bring the air basin into compliance with the requirements of federal and state ambient air quality standards.

The NCAQUMD air basin is in non-attainment for state standards for PM_{10} emissions. On May 11, 1995, the district released the Particulate Matter (PM_{10}) Attainment Plan ("air quality plan"), which presents information on the nature and causes of exceedances of the PM_{10} standards and identifies control measures to reduce ambient PM_{10} levels to meet state standards. Vehicle travel on paved and unpaved roads represents approximately 63 percent of PM_{10} emissions in the County so it is a primary target in attaining compliance with state standards. The applicable air quality plan control measures to reduce PM_{10} emissions are listed below:

Transportation Control Measures:

- Public transit;
- Traffic flow improvements; and
- Bicycling programs.

Land Use Measures:

- Land uses that involve mixed uses and/or more dense development that enable people to walk or use public transportation for shopping or employment rather than relying on their car.

Open Burning Measures:

- Encourage efficient operation of wood stoves; and
- Prohibition of wood burning stoves in new homes unless they are EPA certified or equivalent.

The Project would result in a significant impact on the implementation of an air quality plan if it were to:

- omit one or more applicable control measures,
- disrupt or hinder implementation of any control measures, or
- not support the primary goal of the air quality plan to reduce PM_{10} emissions to meet state standards.

By facilitating the transition of HTA's public transit bus fleet to hydrogen, the Project will reduce transportation PM_{10} emissions consistent with the Transportation and Land Use control measures in the air district's air quality plan. The bus fleet also supports bicycling programs by installing bike racks on the vehicles so bicyclists have access to all the areas served by the bus fleet. By supporting the transition to cleaner hydrogen fuel and

encouraging the use of public transportation, the Project will encourage fewer single passenger vehicle trips and potentially decrease traffic.

The Open Burning Measures of the air district's air quality plan are not applicable to the Project because it does not involve construction of new homes or use of wood stoves.

Rule 104, Section D – Fugitive Dust Emissions is used by the NCUAQMD to address non-attainment for PM_{10}. Pursuant to Rule 104 Section D, the handling, transporting, or open storage of materials in such a manner which allows or may allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including, but not limited to, covering open bodied trucks when used for transporting materials likely to give rise to airborne dust and the use of water during the grading of roads or the clearing of land.

During earth moving activities, fugitive dust (PM_{10}) would be generated. The amount of dust generated at any given time would be highly variable and dependent on the size of the area disturbed at any given time, amount of activity, soil conditions, and meteorological conditions. Unless controlled, fugitive dust emissions during construction of the Project could have a potentially significant impact; therefore, Mitigation Measure AQ-1 would be incorporated to comply with NCUAQMD's Rule 104 Section D.

Mitigation Measure AQ-1: Measures to Reduce Air Pollution
The following measures shall be implemented during construction:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered in areas of active construction as necessary.
- All haul trucks transporting soil, sand, demolition material, or other loose material off-site shall be covered.
- All vehicle speeds on unpaved surfaces shall be limited to 15 mph, unless the unpaved surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage noting idling time requirements shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.

- A publicly visible sign shall be posted with the telephone numbers of both the City and NCUAQMD regarding dust complaints and to ensure compliance with applicable regulations.

With implementation of Mitigation Measure AQ-1, the Project would implement relevant fugitive dust (PM_{10}) controls during construction and would not conflict with applicable air quality plans. The potential impact would be reduced to a less-than-significant level with mitigation.

b) Result in a cumulatively considerable net increase in any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard? (Less Than Significant Impact With Mitigation)

As noted above, Humboldt County is designated as a "non-attainment area" under the State's PM_{10} standard but is otherwise designated "in attainment" for all other State and federal standards. With respect to the Project, potential impacts of concern would be exceedances of State or federal standards for PM_{10}. Localized PM_{10} is of concern during construction because of the potential to emit fugitive dust during earth-disturbing activities.

Project Construction Emissions

The Project would include clearing, grading, asphalt paving, building construction, and landscaping activity. Generally, the most substantial localized air pollutant emissions would be dust generated from site clearing, demolition, and grading. If uncontrolled, these emissions could lead to both health and nuisance impacts. Construction activities would also temporarily generate emissions of equipment exhaust and other air contaminants. The Project's potential impacts from equipment exhaust are assessed separately below.

The NCUAQMD does not have formally adopted thresholds of significance for fugitive, dust-related particulate matter emissions above and beyond Rule 104, Section D, which does not provide quantitative standards. This analysis therefore uses the Bay Area Air Quality Management District's (BAAQMD) approach to determining significance for fugitive dust emissions from Project construction. The BAAQMD bases the determination of significance for fugitive dust on the control measures to be implemented. If all appropriate emissions control measures recommended by BAAQMD are implemented by the Project, then fugitive dust emissions during construction are not considered significant (BAAQMD, 2023). BAAQMD recommends a specific set of "Basic Construction Measures" or "Best Management Practices" (BCMs or BMPs) to reduce emissions of construction generated PM_{10} to less than significant levels. These are the same as those incorporated as part of Mitigation Measure AQ-1. Without incorporation of these BCMs/BMPs, the Project's construction-generated fugitive PM_{10} (dust) would result in a potentially significant impact.

Therefore, with incorporation of BAAQMD's uniformly applicable BCMs/BMPs as mitigation, construction of the Project would result in a less than significant impact for construction-period PM_{10} generation and would not violate or substantially contribute to an existing or projected air quality violation.

Regional Criteria Pollutants

The NCUAQMD does not have established CEQA significance criteria to determine the significance of impacts that would result from projects such as the Project; however, the NCUAQMD does have criteria pollutant Best Available Control Technology (BACT) thresholds for new or modified stationary source projects proposed within the NCUAQMD's jurisdiction. For construction emissions, the NCUAQMD has indicated that emissions are not considered regionally significant for projects whose construction would be of relatively short duration, lasting less than one year. NCUAQMD has indicated that it is appropriate for lead agencies to compare proposed construction emissions that last more than one year to their BACT thresholds for stationary sources identified in Rule 110(E)(1), which are:

- Nitrogen Oxides – 40.0 tons per year, 50.0 pounds per day
- Reactive Organic Gases – 40.0 tons per year, 50.0 pounds per day
- PM_{10} – 15.0 tons per year, 80.0 pounds per day
- Carbon Monoxide – 100 tons per year, 50.0 pounds per day

The BAAQMD Screening Tool[2], which incorporates CalEEMod version 2020.4.0 parameters, was used to estimate air pollutant emissions from Project construction. The screening tool was also used to estimate mobile source emissions based on factors from the California Air Resources Board's (CARB) EMFAC2021 model. The commercial office and retail hydrogen fueling land use category were modeled to determine the project size at which any criteria air pollutant or precursor threshold of significance may be exceeded. Construction-related fugitive dust was not included in the development of the screening table because these emissions are controlled through BMPs described above and below.

The screening tool was run with the following data:

Land Use Category	Land Use Type	Unit	Project Land Use Size
Retail	Gas Service Station	# Pumps	4.0

[2] https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/tools/baaqmd-screening-tool_050622_final-xlsm.xlsm?rev=9b1a2d9e625b4c3e991f0f6c06aef706&sc_lang=en accessed July 2025

As shown in the tables below, the Project would not exceed the NCUAQMD's thresholds of significance. Therefore, the Project's construction emissions are considered to have a less than significant impact.

Table 2: Annual Construction Regional Pollutant Emissions

Land Use	ROG (tons/yr)	NOx (tons/yr)	PM_{10} (tons/yr)	CO (tons/yr)
Hydrogen Fueling Station	0.1	0.1	0.1	0.001
Maximum Allowed	**40.0**	**40.0**	**15.0**	**100.0**

Source: Planwest Partners, 2025

Table 3: Daily Construction Regional Pollutant Emissions

Land Use	ROG (lb/day)	NOx (lb/day)	PM_{10} (lb/day)	CO (lb/day)
Hydrogen Fueling Station	0.3	0.3	0.4	0.01
Maximum Allowed	**50.0**	**50.0**	**80.0**	**50.0**

Source: Planwest Partners, 2025

Project Operational Emissions

Operations at the Project Site will continue to reflect baseline conditions except that some gas and diesel bus fueling activities will be replaced by hydrogen fueling activities.

In the future, when public hydrogen fueling services become available, an estimated five vehicles per day are anticipated to use the facilities. This will potentially increase the number of vehicle trips and vehicle miles travelled (VMT) by those using the facility to fuel their private vehicles. This is not expected to result in increased PM_{10} emissions because the use of hydrogen fuel does not result in any PM_{10} emissions. Also, the site is served by paved streets, so very little dust will be created from private vehicles using the facility.

In terms of regional pollutant emissions, the Project will generate emissions from vehicle trips, as well as from landscaping activity. Project operational emissions were estimated using the BAAQMD Screening Tool which incorporates CalEEMod version 2020.4.0 and CARB's EMFAC2021 model. Emissions were modeled for year 2026. As shown in Table 4, the Project's operational emissions will not exceed NCUAQMD's stationary sources emission thresholds. Therefore, the Project's operational emissions are considered to have a less than significant impact.

Table 4: Operational Regional Pollutant Emissions for the Project (2026)

Land Use	ROG (tons/yr)	NOx (tons/yr)	PM_{10} (tons/yr)	CO (tons/yr)
Hydrogen Fueling Station	0.3	0.3	0.4	0.01
Maximum Allowed	**40.0**	**40.0**	**15.0**	**100.0**

Source: Planwest Partners, 2025

Hydrogen gas would be delivered to the site by tanker trucks during the operational life of the Project. Like construction equipment, tanker trucks also generate diesel exhaust. Initially, delivery would occur approximately three times per week to support the use of FCEBs. Delivery frequency could increase as FCEVs become more common and the demand for hydrogen fuel increases. Maximum delivery frequency, based on maximum possible demand, would be once, daily. A daily increase of a single tanker truck trip on Highway 101 would not generate substantial pollutant concentrations. For the above reasons, the Project will likewise not have any cumulatively considerable net increase of any criteria air pollutant. This impact is considered less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations? (Less Than Significant Impact With Mitigation)

New development within the Project Site has the potential to expose existing and future sensitive receptors to localized health risks associated with TAC emissions from construction equipment exhaust. Existing sensitive receptors located adjacent to or in the vicinity of the Project Site include limited surrounding residential uses and an animal care facility to the east.

Temporary and limited localized TAC emissions would be generated from diesel equipment used to construct the Project and associated infrastructure. Emissions from construction diesel engines are subject to control under regulations adopted by both the California Air Resources Board (CARB) and U.S. EPA. U.S. EPA set emission standards for off-road engines in 1998, with the CARB adopting parallel standards in 2000. In 2004, Tier 4 emission standards were adopted and were phased in for new engines between 2011 and 2014. In 2007, CARB adopted an off-road equipment regulation to accelerate reductions of NOx and diesel PM from existing off-road engines. Beginning in 2012 and through 2023, the off-road regulation requires operators of older equipment to either install abatement devices, upgrade to Tier 3 and eventually Tier 4 engines, or to retire older equipment.

Construction emissions are expected to occur at the beginning of the development and exposure of existing off-site receptors and future on-site receptors to TACs from heavy equipment diesel exhaust during construction is a potentially significant impact.

Implementation of the following mitigation measure would ensure that the health risks from potential exposures to construction TAC emissions would be reduced by requiring BMPs and compliance with diesel engine regulations designed to reduce diesel emissions.

Mitigation Measure AQ-2: Measures to Reduce Diesel Emissions During Construction

Prior to Building Permit Issuance, the applicant shall prepare a Construction Management Plan for review and approval by the Chief Building Official or his/her designee. The Construction Management Plan shall include the following measures to reduce TAC emissions during construction:

a. Heavy-duty diesel vehicles will have 2010 or newer model year engines, in compliance with the California Air Resources Board's Truck and Bus Regulation;
b. Idling of construction equipment and heavy-duty diesel trucks will be avoided where feasible, and if idling is necessary, it will not exceed five minutes;
c. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications and will be checked by a certified visible emissions evaluator; and
d. All non-road diesel construction equipment will, at a minimum, meet Tier 3 emission standards listed in the Code of Federal Regulations Title 40, Part 89, Subpart B, §89.112. Further, where feasible, construction equipment will use alternative fuels such as compressed natural gas, propane, electricity, or biodiesel.

Significance After Mitigation

Implementation of this mitigation measure would reduce exposure of sensitive receptors to construction TACs to a less than significant level by requiring cleaner engines, limiting idle times, and restricting non-compliant equipment**.**

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (No Impact)

The Project is not anticipated to create significant new sources of odors. The maintenance bays currently service existing fleet vehicles (diesel, gasoline, and battery electric) and that use will continue. Use of the maintenance bays involves all the following air quality impacts:

- Activities that involve open flames, arcing/sparking tools, and welding.

- Use of gasoline, diesel, lubricants and other chemicals used to operate gas, diesel and electric buses.

To mitigate exposure to harmful chemicals associated with gas, diesel, and electric bus maintenance, the following Project design features are in place and will continue:

- Ventilation systems, both steady-state and under alarm conditions.
- Gas detection and alarm, including CO and NOx.
- HVAC systems, including heaters approved for use with battery-electric, gasoline, and diesel-powered buses and other vehicles.
- Architectural features, such as low or high spots, where fugitive gas or vapors may accumulate or concentrate.
- Emergency detection systems, alarms, and notification appliances.
- New hydrogen detection systems, alarms, and notification appliances will be installed.

Additionally, the new hydrogen fueling station will not create a new source of odors. Hydrogen is considered non-toxic, odorless, and does not “spill” like traditional fossil fuels. Hydrogen gas is lighter than air and quickly dissipates into the atmosphere if leaked. Liquid hydrogen is similar in that once it contacts ambient air, it immediately volatizes to a gas and quickly dissipates.

Demolition of the wood framed office building locate at 104 W Street could result in the release of TACs as lead-based products and asbestos are present in the building. Demolition and removal of these materials will follow applicable local, state, and federal regulations to ensure proper removal and disposal. Additional discussion is provided in Section 3.9 – Hazards and Hazardous Materials.

Construction and delivery vehicles such as a backhoes and tanker trucks, would require use of diesel equipment and diesel exhaust may be described by some as an adverse odor. However, construction would be temporary and the mitigation measures stated above would be applied to reduce temporary construction effects. Therefore, impacts would be less than significant. Based on the above discussion, the Project will involve no new odor impacts.

3.4 BIOLOGICAL RESOURCES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		X		
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

The City of Eureka's Coastal Land Use Plan (LUP) is the foundational policy document for areas of the City located in the Coastal Zone. It establishes farsighted policy that forms the basis for and defines the framework by which the City's physical and economic resources in the Coastal Zone are to be developed, managed, and utilized. Particularly relevant to

this Biological Resources evaluation are established Goals and Policies of Section 6: Natural Resources of the LUP related to development in close proximity to wetlands and other environmentally sensitive habitat areas, which are largely repeated within Title 10, Chapter 5 (Coastal Zoning Code) of the Eureka Municipal Code (EMC). Applicable policies include:

- LUP Policy 6.A.3: The City shall maintain and, where feasible, restore biological productivity and the quality of coastal waters, streams, wetlands, and estuaries appropriate to maintain optimum populations of aquatic organisms and for the protection of human health through, among other means, minimizing adverse effects of wastewater and stormwater discharges and entrainment, controlling the quantity and quality of runoff, preventing depletion of groundwater supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.
- LUP Policy 6.A.6 and EMC §10-5.2942.3 declares the following environmentally sensitive habitat areas (ESHA) within the City of Eureka's coastal zone:
  a) Rivers, creeks, sloughs, gulches and associated riparian habitats, including, but not limited to Eureka Slough, Fay Slough, Cut-Off Slough, Freshwater Slough, Cooper Slough, Second Sloughs, Third Slough, Martin Slough, Ryan Slough, Swain Slough, and Elk River.
  b) Wetlands and estuaries, including that portion of Humboldt Bay within the City's jurisdiction, riparian areas, and vegetated dunes.
  c) [Tuluwat] Island, Daby Island, and Woodley Island wildlife area.
  d) Other unique habitat areas, such as waterbird rookeries, and habitat for all rare or endangered species on State or Federal lists.
  e) Grazed or farmed wetlands (i.e., diked former tidelands).
- LUP Policy 6.A.7 and EMC §10-5.2942.4: Within the Coastal Zone, the City shall ensure that environmentally sensitive habitat areas are protected against any significant disruption of habitat values, and that only uses dependent on such resources shall be allowed within such areas. The City shall require that development in areas adjacent to environmentally sensitive habitat areas be sited and designed to prevent impacts which would significantly degrade such areas and be compatible with the continuance of such habitat areas.

- LUP Policy 6.A.8 and EMC §10-5.2942.5: Within the Coastal Zone prior to the approval of a development, the City shall require that all development on lots or parcels designated NR (Natural Resources) on the Land Use Diagram or within 250 feet of such designation, or development potentially affecting an environmentally sensitive habitat area, shall be found to be in conformity with the applicable habitat protection policies of the General Plan. All development plans, drainage plans, and grading plans submitted as part of an application shall show the precise location of the habitat(s) potentially affected by the proposed project and the manner in which they will be protected, enhanced, or restored.
- LUP Policy 6.A.19 and EMC §10-5.2942.15: The City shall require establishment of a buffer for permitted development adjacent to all environmentally sensitive areas. The minimum width of a buffer shall be 100 feet, unless the applicant for the development demonstrates on the basis of site-specific information, the type and size of the proposed development, and/ or proposed mitigation (such as planting of vegetation) that will achieve the purposes(s) of the buffer, that a smaller buffer will protect the resources of the habitat area. As necessary to protect the environmentally sensitive area, the City may require a buffer greater than 100 feet. The buffer shall be measured horizontally from the edge of the environmental sensitive area nearest the proposed development to the edge of the development nearest to the environmentally sensitive area. Maps and supplemental information submitted as part of the application shall be used to specifically define these boundaries.
- LUP Policy 6.A.20 and EMC §10-5.2942.16: To protect urban wetlands against physical intrusion, the City shall require that wetland buffer areas incorporate attractively designed and strategically located barriers and informational signs.

In addition to consideration of the City's Coastal Land Use Policies, the Project will also be subject to the City's Urban Storm Water Quality Management and Discharge Control Ordinance as well as the local Municipal Storm Water Program small municipal separate storm sewer system (MS4) permit standards.

For projects less than one acre, during the permitting process the City may require an Erosion and Sediment Control Plan if the project appears to have a reasonable pollution risk. All public works inspectors inspect projects to ensure adequate BMPs are in place to prevent pollutants from leaving the construction site and entering public waterways.

A list of threatened and endangered species that may occur within the vicinity of the Project Site was requested from the US Department of the Interior, Fish and Wildlife Service. The provided list, dated January 13, 2025, notes that there is the potential for

nine (9) various threatened, endangered, or candidate species within the vicinity of the Project. It was noted that there are no critical habitats in the vicinity of the Project Site. A list of potential Endangered Species Act species to be considered was also obtained from the National Marine Fisheries Service for the Eureka quadrangle. While a number of species were listed, including multiple anadromous fish, sea turtles and whales, these will not be considered for this Project, as there is no direct connection with open waterways in the vicinity of the Project Site.

If tree removal is planned during the migratory bird nesting season (Feb. 15-September 15) the Project is required to have a contract-supplied biologist within 7 days of planned tree trimming and removal conduct a nesting survey in accordance with the federal Migratory Bird Treaty Act.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Less Than Significant Impact With Mitigation)

Special status plant species under State jurisdiction include those listed as endangered, threatened, or as candidate species by the CDFW under the California Endangered Species Act (CESA). Plant species on the California Native Plant Society (CNPS) California Rare Plant Ranking (CRPR) Lists 1A, 1B and 2A and 2B are considered eligible for State listing as endangered or threatened pursuant to the California Fish and Game Code; CDFW has oversite of these special status plant species as a trustee agency. As part of the CEQA process, such species should be considered as they meet the definition of Threatened or Endangered under Sections 2062 and 2067 of the California Fish and Game Code. There are occasions where CRPR List 3 or 4 species area be considered of special concern for populations at the periphery of a species range, or in areas where the taxon is especially uncommon or has sustained heavy losses, or from populations exhibiting unusual morphology.

Additionally, CDFW maintains lists of special plants. These lists include a species conservation ranking status from multiple sources, including Federal Endangered Species Act (FESA), CESA, federal departments with unique jurisdictions, CNPS, and other non-governmental organizations. Based on these sources, CDFW assigns a heritage rank to each species according to their degree of imperilment (as measured by rarity, trends, and threats).

Table 5: Potential Plant Species of Concern in the Vicinity of the Project Site

Scientific Name	Common Name	CRPR
Sulcaria spiralifera	twisted horsehair lichen	1B.2
Hesperevax sparsiflora var. brevifolia	short-leaved evax	1B.2
Lasthenia californica ssp. macrantha	perennial goldfields	1B.2
Layia carnosa	beach layia	1B.1
Erysimum menziesii	Menzies wallflower	1B.1
Silene scouleri ssp. scouleri	Scoulers catchfly	2B.2
Spergularia canadensis var. occidentalis	western sand-spurrey	2B.1
Carex arcta	northern clustered sedge	2B.2
Carex lyngbyei	Lyngbyes sedge	2B.2
Carex praticola	northern meadow sedge	2B.2
Astragalus pycnostachyus var. pycnostachyus	coastal marsh milk-vetch	1B.2
Lathyrus japonicus	seaside pea	2B.1
Lathyrus palustris	marsh pea	2B.2
Erythronium revolutum	coast fawn lily	2B.2
Lilium occidentale	western lily	1B.1
Sidalcea malviflora ssp. patula	Siskiyou checkerbloom	1B.2
Sidalcea oregana ssp. eximia	coast checkerbloom	1B.2
Monotropa uniflora	ghost-pipe	2B.2
Montia howellii	Howells montia	2B.2
Abronia umbellata var. breviflora	pink sand-verbena	1B.1
Oenothera wolfii	Wolfs evening-primrose	1B.1
Castilleja ambigua var. humboldtiensis	Humboldt Bay owls-clover	1B.2
Castilleja litoralis	Oregon coast paintbrush	2B.2
Chloropyron maritimum ssp. palustre	Point Reyes salty birds-beak	1B.2
Collinsia corymbosa	round-headed collinsia	1B.2
Gilia capitata ssp. pacifica	Pacific gilia	1B.2
Gilia millefoliata	dark-eyed gilia	1B.2
Viola palustris	alpine marsh violet	2B.2

Publicly available data accessed from the California Natural Diversity Database (CNDDB) through the BIOS 6 Viewer was utilized to assess species potentially located within the general vicinity of the greater Eureka area. Table 5 provides species on the CRPR Lists 1A, 1B or 2A and 2B. Of the plants listed, three are noted as being either Federally and/or

State listed as threatened or endangered including Beach layia (*Layia carnosa*), Menzies wallflower *(Erysimum menziesii*), and Western lily (*Lilium occidentale*).

Table 6: List of Potential Species of Concern in the Vicinity of the Project Site

Scientific Name	Common Name	Federal Status	State Status	CDFW Status
Rana aurora	northern red-legged frog			SSC
Circus hudsonius	northern harrier			SSC
Elanus leucurus	white-tailed kite			FP
Chaetura vauxi	Vauxs swift			SSC
Charadrius montanus	mountain plover			SSC
Charadrius nivosus nivosus	western snowy plover	T		SSC
Passerculus sandwichensis alaudinus	Bryants savannah sparrow			SSC
Coturnicops noveboracensis	yellow rail			SSC
Rallus obsoletus obsoletus	California Ridgways rail	E	E	FP
Asio flammeus	short-eared owl			SSC
Athene cunicularia	burrowing owl		CE	SSC
Acipenser medirostris pop. 1	green sturgeon - southern DPS	T		SSC
Acipenser medirostris pop. 2	green sturgeon - northern DPS			SSC
Acipenser transmontanus	white sturgeon		CT	SSC
Eucyclogobius newberryi	tidewater goby	E		SSC
Thaleichthys pacificus	eulachon	T		SSC
Entosphenus folletti	northern California brook lamprey			SSC
Entosphenus tridentatus	Pacific lamprey			SSC
Lampetra richardsoni	western brook lamprey			SSC
Oncorhynchus clarkii	coast cutthroat trout			SSC
Oncorhynchus mykiss irideus pop. 49	steelhead - northern California DPS winter-run	T		SSC
Oncorhynchus tshawytscha pop. 17	chinook salmon - California coastal ESU	T		SSC
Enhydra lutris nereis	southern sea otter	T		FP
Taxidea taxus	American badger			SSC
Actinemys marmorata	northwestern pond turtle	PT		SSC

Federal: T = Threatened PT = Proposed Threatened E= Endangered
State: T = Threatened CT = Candidate Threatened E= Endangered
CDFW: SSC = Species of Special Concern FP = Federally Protected

Table 6 provides a list of non-plant species that have been reported in the Eureka quadrangle and are either Federally or State listed Threatened/Endangered species or ranked by CDFW as species of special concern. Many of the species listed are unlikely to

occur in the Project area as there is no suitable habitat. It has also been noted that no milkweed is present or has been identified within the Project area that would support Monarch Butterflies (Caltrans, 2025).

The majority of the Project Site is highly disturbed and urbanized. Much of the ground is covered with asphalt or concrete. The limited vegetation existing onsite is landscaped and regularly maintained. As such, the likelihood of disturbing any special status species is low. However, Staging Area A is largely open space and could provide potential habitat for various plant species.

Staging Area A is located on the northern side of 1st Street and was formerly the location of multiple houses. The last existing houses on the site, located at 2203 1st Street, was demolished sometime between 2005 and 2009 based on historical imagery (Google, 2004). The former existence of buildings on this site suggests that the area is highly disturbed and likely utilized fill material for past grading and building projects.

A wetland delineation report prepared for Staging Area A in 2015, and confirmed in 2025, identified multiple habitat types in the vicinity. It was noted that the majority of herbaceous vegetative cover consisted of exotic grass and forb species typical of grazed pasturelands and/or urban lawns in the Humboldt Bay vicinity. Additionally, the site includes communities that generally contain moderately invasive exotic species such as velvet grass (*Holcus lanatus*), sweet vernal grass (*Anthozanthum odoratum*), and tall fescue (*Festuca arundinacea*), in addition to limited invasives such as creeping bentgrass (*Agrostis stolonifera*) (J.B. Lovelace & Associates, 2015).

Since the Project area, including Staging Area A to the north for 1st Street, is highly urbanized and has historically been regularly disturbed and filled for urban residential, commercial, and light industrial uses, there is a low probably that the Project will have a substantial adverse impact on any special status species. However, disturbances to unknown species and potentially sensitive habitat such as wetland areas during the construction phase of the Project, may result in a potentially significant impact.

Mitigation Measure BIO-1: Migratory Bird Surveys.

To avoid potential impacts to nesting birds, in accordance with the Migratory Bird Treaty Act, one of the following shall be implemented if vegetation removal occurs:

- Conduct vegetation removal and other ground-disturbance activities associated with any construction activities between August 16 and March 14, when birds are not typically nesting, or;
- If vegetation removal or ground-disturbing activity is to take place during the nesting season (March 15 to August 15 for most birds), a qualified biologist shall conduct a

pre-construction nesting bird survey. Within 7 days prior to disturbance, pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS and CDFW and implemented to prevent abandonment of the active nest.

Significance after mitigation. With incorporation of mitigation measure BIO-1, it is anticipated that the Project will have a less than significant impact.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Less Than Significant Impact with Mitigation)

Within the Project area, no stream habitat occurs. However, wetland areas have been identified adjacent to Staging Area A. This area is considered an ESHA and will be discussed further under subsection c. Vegetation in the area is limited and has been actively cleared and managed by HTA and mostly consists of non-native grasses. While use of Staging Area A would potentially impact adjacent wetlands, mitigation measures, as discussed below, will provide for protection of this ESHA. Beyond the local designation, the site has not been identified by federal or state governments as a habitat area of concern. As such, a less than significant impact with mitigation would occur.

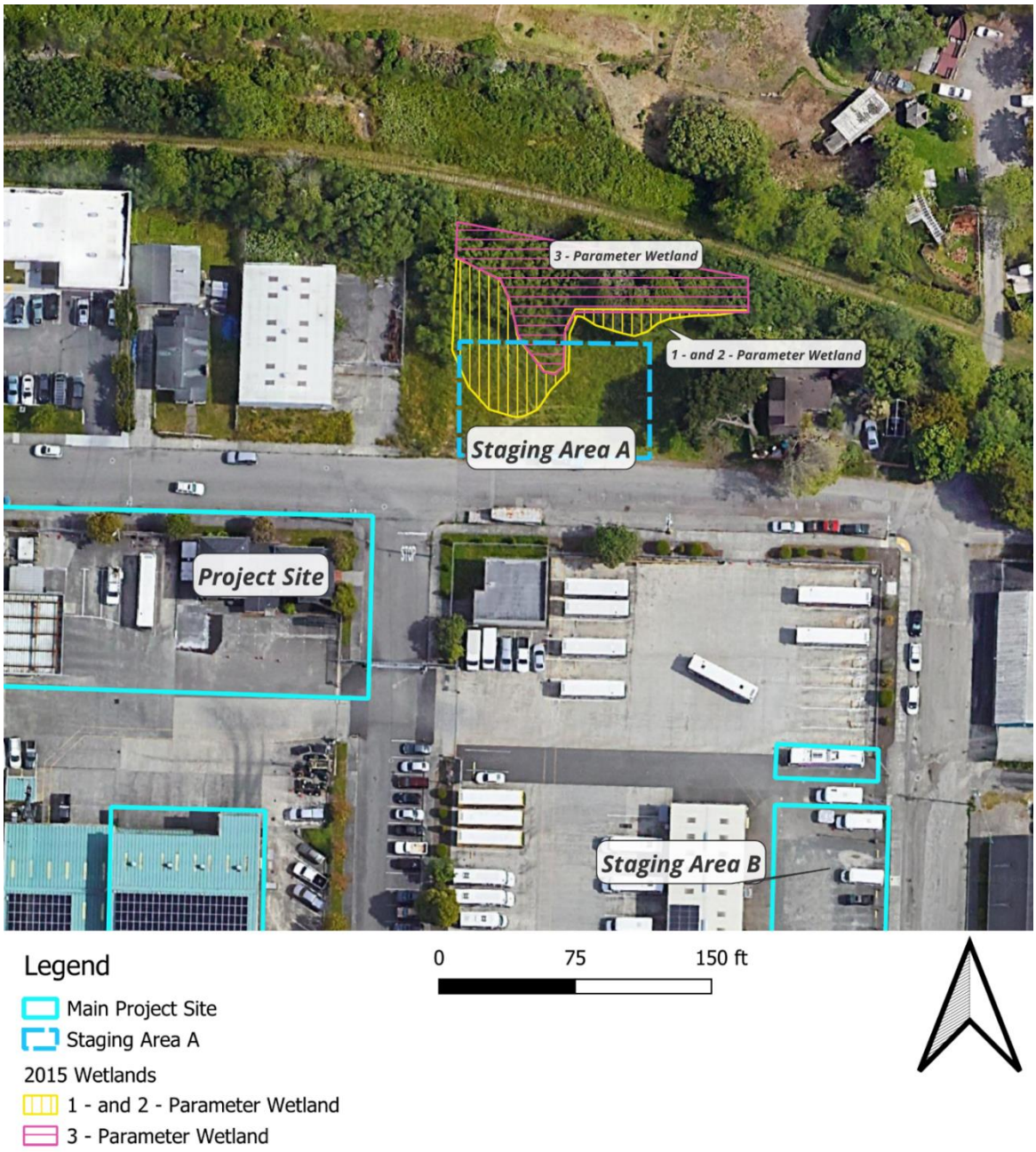
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Less Than Significant Impact With Mitigation)

The Project Site is generally located on graded and paved substrate that does not include any watercourses, riparian environments, or wetland conditions. Runoff from the site generally flows into City maintained stormwater systems. However, Staging Area A is located in an area that exhibits wetland features. Staging Area A is intended to be utilized during the Project for overflow bus parking and/or staging construction equipment. Post construction, HTA will retain the area as part of its operations for overflow bus parking.

Directly north of 1st Street and Staging Area A is the former Northern Railroad train tracks which are now owned by the GRTA. To accommodate the railway, grading was completed that created a depression on the southern edge of the tracks. This depression is influenced by the shallow water table and overtime has created a wetland environment. Similarly, depressions created by the former dwelling units and vegetation management on

Staging Area A have created slopes and depressions that have allowed water to gather and create wetland habitat (Figure 18).

Figure 18: Location of Wetlands Near Project Area



A wetland delineation report was prepared for Staging Area A in 2015 and confirmed by the lead biologist in 2025. The report identified one, two, and three parameter wetlands in the area that may be subject to local and federal permit requirements (J.B. Lovelace & Associates, 2015). However, as part of National Environmental Policy Act (NEPA) consultation, Caltrans provided a no effect clearance that summarized the Section 7

review. It was noted in the determination that while three parameter wetlands could be impacted as a result of the Project, no jurisdictional waters are present within the vicinity of the Project Site (Caltrans, 2025). Additionally, the site is heavily disturbed from past uses, and has limited connectivity to nearby habitats.

The wetland habitats identified within the Project Site are considered to be palustrine (freshwater) wetlands. Two classes of wetlands occur including Palustrine Forested/Scrub-Shrub Wetlands and Palustrine Emergent Wetlands. Regular and periodic impacts (i.e., clearing) on the forested/scrub-shrub area have impacted and influenced the habitat over time. Both classes of wetlands are generally subject to extensive flooding early in the growing season, likely associated with ponding from storm events, and varying degrees of soil saturation by the end of the growing season.

As noted previously, one-, two-, and three-parameter coastal wetlands were identified on the site. Habitat in the three-parameter wetlands were described with forested/scrub-shrub habitat *Salix hookeriana*, "coastal willow" (FACW) and *Alnus rubra*, "red alder" dominating the woody overstory, with *Morella californica*, "wax myrtle"; *Lonicera involucrata var. ledebourii*, "twinberry"; *Rubus ursinus*, "California blackberry"; *R. armeniacus*, "Himalayan blackberry"; and *Hedera helix*, "English ivy" comprising most of the understory. The emergent wetland habitat noted numerous wetland species including invasives as previously mentioned. Soil sampling in these wetlands revealed soils composed of silt loams with organic material and clays with occasional gravel and anthropogenic construction debris and refuse (J.B. Lovelace & Associates, 2015).

One- and two-parameter coastal wetlands were observed at higher elevations. These “coastal wetlands” represent transitional wetland habitats that experience less frequent and prolonged periods of inundation and/or soil saturation than the adjacent three-parameter wetlands, yet still provide some of the important ecosystem functions associated with wetland habitats. Soil sampling within these areas revealed a complicated mixture of historic fill material and (presumed) underlying native soils. Soil encountered included a mixture of silt loam, clay loam, sandy clay, and clay as well as gravel and construction debris (J.B. Lovelace & Associates, 2015).

Upland areas were noted on historically deposited fill material along First Street and in the southeast and south-central portions of Staging Area A. Vegetation observed in these upland areas is similar in species composition to those in adjacent one-/two-parameter coastal wetland habitats dominated by herbaceous vegetation Soils sampled in upland habitats were composed of heterogeneous mixtures of historic fill and included sandy clay, clay loam, and gravel as well as construction debris and other unidentified anthropogenic refuse (J.B. Lovelace & Associates, 2015).

Due to the history of the site, which has largely been influenced by human activities such as railroad construction and residential development, and the urbanized nature of the surrounding area, it is not anticipated that the Project will have a substantial adverse impact on the environment. However, in order to comply with current City land use policies and LCP requirements, the wetlands adjacent to Staging Area A will require additional protection measures. Additionally, in order to comply with the City's Urban Storm Water Quality Management and Discharge Control Ordinance and MS4 permit, the Project will need to prepare a construction-phase erosion control plan and post-construction stormwater control. As part of the Project and ongoing operations after the Project, HTA is requesting a zero buffer around the established wetlands adjacent to Staging Area A. This has the potential to cause a potentially significant impact.

Mitigation Measure BIO-2: Wetland Protection and Erosion Control Measures to Support Zero Wetland Buffer.

Prior to construction, a qualified biologist will review and flag the wetland areas. HTA will ensure a temporary stake and rope fence (or similar fence type) is installed following the flags that demarcate the wetland areas. Temporary signage will also be installed explaining why the area has been fenced off. HTA, through the contractor, will prepare Staging Area A for construction by installing temporary straw waddling around the proposed staging area to help direct any runoff towards 1st Street and the existing stormwater infrastructure. Silt fencing will also be installed downslope to capture any sediment that is not redirected by the straw waddles. The staging area will then be graded with a gentle slope towards 1st Street. Semi-permanent water capture and infiltration features will be installed around the staging area such as a gravel infiltration ditch. Staging Area A will then be covered with porous pavers, crushed aggregate, open pavers with grass or plantings, open pavers with gravel, or solid pavers with adequate spacing for infiltration. This will create a semi-permanent parking surface for buses and/or construction equipment. Fencing, lighting, and a security gate will then be installed. After the Project has been completed, the silt fencing will be removed from the site.

Mitigation Measure BIO-3: Construction-Phase Erosion and Sediment Control Plan and Post-Construction Stormwater Control Plan.

HTA will prepare both a construction-phase erosion and sediment control plan and post-construction stormwater control plan that is consistent with the City's Urban Storm Water Quality Management and Discharge Control Ordinance and MS4 permit standards. The construction-phase erosion and sediment control plan will be prepared and submitted to the City prior to the start of construction. The post-construction stormwater control plan will be prepared and submitted to the City for review and approval with the building permit application

Significance after mitigation. Implementation of mitigation measures BIO-2 through BIO-3 will help ensure that any impacts to identified wetlands in the Project area will be minimal. Protection measures will be put in place to ensure that there is no substantial runoff or contamination associated with Staging Area A. As such, impacts are anticipated to be less than significant with mitigation.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Less than Significant Impact)

Project construction and operations do not include in-water work or any other activity that might impede fish migration. No waterways exist within the Project area. Project construction and operations will include fences and gates around and within the Project Site to provide privacy, security, and direct access. The Project Site is located within a developed city area and is not located within or adjacent to sloughs, rivers, creeks, gulches and greenways, and other naturalized areas. Areas adjacent to Staging Area A have been identified as wetlands but they do not directly connect to any other surface water features. Additionally, the Project Site is not located within essential habitat for wildlife connectivity. Common terrestrial wildlife would be able to move around the Project Site through existing corridors such as the GRTA ROW. As such, a less than significant impact would result.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less than Significant Impact With Mitigation)

The City of Eureka's adopted Local Coastal Program (LCP) requires that ESHA's including wetlands, be protected as noted in LCP Policy 6.A.19 listed above[3].

The Project area includes Staging Area A which would potentially impact wetlands that were created by grading for the former railroad just north of the site. These manmade wetland areas were also previously disturbed by housing units that existed prior to 2005. Since then, the area has been graded and actively maintained to reduce vegetation growth on the site. While this area has been highly disturbed, the wetlands are still considered an ESHA.

[3] "**Environmentally Sensitive Habitat Areas** - Any area in which plant or animal life, or their habitats, are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Appendix A – Policy Document Glossary, 1997 Eureka General Plan Policy Document

As discussed under subsection c), potentially significant impacts may occur to the wetlands adjacent to Staging Area A. However, implementation of mitigation measures BIO-2, and BIO-3 would help ensure that appropriate BMPs are put in place to reduce site runoff and erosion, and adequately project the delineated wetlands.

The Project would require grading and building permits from the City of Eureka's Building Division, and the application would be reviewed by Building, Planning and Public Works to ensure consistency with all applicable provisions of the City of Eureka General Plan and Municipal Code.

Potential Project impacts would be less than significant with mitigation and adherence to City codes and policies.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (No Impact)

There are no adopted Habitat Conservation, Community Conservation, or approved local, regional, or State habitat conservation plans that apply to the Project Area. No impact would result.

3.5 CULTURAL RESOURCES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resources pursuant to §15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Disturb any human remains, including those interred outside of formal cemeteries?		X		

A Cultural Resources Technical Report (CRTR) was prepared for the Project by Chronicle Heritage in June 2025 (Chronicle Heritage, 2025). The area of interest for the report is limited to the city block bounded by 1st and 2nd Streets, and V and W Streets. The investigation assessed the potential for archaeological and historical resources in the Project Site through the completion of the following:

- Records and literature search request to the Northwest Information Center (NWIC) of the California Historical Resources Information Center (CHRIS) dated May 1, 2025;
- Review of United States Geological Survey (USGS) topographic maps, Bureau of Land Management GLO maps, and aerial images;
- Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities dated May 1, 2025;
- Contact with the appropriate local Native American Tribes (10 contacts in total) dated March 12, 2025; and
- Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information.

Study results were used as a technical basis for evaluating potential impacts to historic and cultural resources under CEQA.

Pursuant to Public Resources Code section 21080.3.1, the City offered consultation with tribes on June 27, 2025. Consultation officially began on July 1, 2025. The Bear River Band and Wiyot Tribe both requested the inclusion of inadvertent discovery protocols for the Project.

a) Cause a substantial adverse change in the significance of a historical resources pursuant to §15064.5? (Less than Significant Impact)

The Project Site has been developed and highly disturbed over the last several decades. The potential for discovery of unknown historical resources is low. Based on the records search requested by Chronicle Heritage for the Project Site, four previously recorded cultural resources were found within the search area, none of which are in the Project area. Adjacent to the Project area, is the former Northwestern Pacific Railroad which has been recorded as a historic resource since 1983 (Chronicle Heritage, 2025). However, the railroad has not been in operation since 1998 and has since been transferred to the GRTA.

The building located at 104 W Street that is proposed for demolition has been identified as a potential historical resource. It is noted as being constructed in 1896 but the builder is unknown. The residence was owned by private individuals from approximately 1930 to the 1980's. Ownership then passed to Utility Tree Service around 1985 at which point the structure was remodeled and converted to commercial use.

The building was identified as a potential historical resource due to the age of the structure and is identified in the Eureka Heritage Society's Green Book (Eureka: An Architectural View) and on the City of Eureka's Historic Mapper web map[4]. The Cultural Resources Technical Report (CRTR) (Appendix B) provides a detailed review of state and local regulatory framework for historic resource preservation per CEQA and the City of Eureka General Plan. The CRTR also outlines the criteria established for eligibility for listing in the California Register of Historical Resources (CRHR).

Based on the evaluation conducted by an Architectural Historian from Chronical Heritage, the building has been substantially altered with additions, new siding, new windows, and a new porch. The historic resources evaluation determined the building does not retain sufficient integrity to convey an association with the early period of development in Eureka. Persons who made demonstrably significant contributions to the history of the nation, state, or region are not known to be associated with the subject property. The building is vernacular and does not possess high artistic value. The building has been substantially altered and does not embody distinctive characteristics of a type, period, or method of construction. No architect is known to be associated with the design of the building; therefore, the building is not the work of a master. The building on the subject property

[4] https://eurekahistory.com/history_post/eurekahistory5066/

does not meet one or more eligibility criteria and does not possess integrity. Therefore, it is ineligible for listing in the NRHP, the CRHR, and the Local Register of Historic Resources and subsequently is not considered a historical resource pursuant to Section 15064.5(a) of the CEQA Guidelines. Demolition of the building would not result in a substantial adverse change to a historical resource. As such, demolition of the building will result in a less than significant impact.

Figure 19: View of 104 W Street Facing Northeast



Figure 20: Primary Building Entrance from Interior



Figure 21: View of Modified Porch Facing West



b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less than Significant with Mitigation)

There are no known archaeological resources located within the property. The cultural resources investigation prepared by Chronicle Heritage notes that the Wiyot had numerous villages and hunting camps along Humboldt and Arcata Bays. While no sites were directly identified within or near the Project Site, and much of the City of Eureka is built on fill material, there is still a possibility of unearthing archaeological resources during construction.

Local tribes were notified of the Project in March 2025. Chronicle Heritage received responses from the Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe. The City also offered consultation under Public Resources Code section 21080.3.1 in June 2025. It was noted that the area does not appear to pose significant impacts on cultural resources but both tribes requested that inadvertent discovery protocols be put in place prior to construction. Based on the potential for inadvertent discovery of archaeological resources, there could be a significant impact.

Mitigation Measure CUL-1: Inadvertent Discovery of Cultural Resources

a. If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist must be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation

plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band, Blue Lake Rancheria, and Wiyot Tribe are to be contacted immediately to evaluate the discovery and, in consultation with the Project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structure remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.

b. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Eureka.

Significance after Mitigation: With incorporation of Mitigation Measure CUL-1 potential impacts within the Project area would be reduced to a less than significant level through the production of the monitoring plan, monitoring during construction, and proper handling of potential archaeological resources that could be inadvertently discovered.

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less than Significant with Mitigation)

The Project Site has not historically been used as a place of burial and there are no known human remains onsite. However, this does not preclude the inadvertent discovery of remains during construction. As such, there could be a significant impact.

Mitigation Measure CUL-2: Inadvertent Discovery of Human Remains

In the event of discovery or recognition of any human remains during construction activities, the landowner or person responsible for excavation would be required to comply with the State Health and Safety Code section 7050.5. Construction activities within 100 feet of the find shall cease until the Humboldt County Coroner has been contacted at 707-445-7242 to determine that no investigation of the cause of death is required. If the remains are determined to be, or potentially be, Native American, the landowner or person responsible for excavation would be required to comply with Public Resources Code (PRC) section 5097.98. In part, PRC section 5097.98 requires that the Native American Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that

the remains are Native American. The NAHC would then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the landowner or the person responsible for the excavation work for the appropriate means of treating the human remains and any associated grave goods within 48 hours of being granted access to the site. Additional provisions of PRC section 5097.98 shall be complied with as may be required.

Significance after Mitigation: Implementation of Mitigation Measure CUL-2 would reduce the potential impacts to a less-than-significant level during construction because a plan would be implemented to address discovery of unanticipated human remains and to preserve and/or record those resources consistent with appropriate laws and requirements.

3.6 ENERGY RESOURCES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less Than Significant Impact)

The proposed demolition and construction associated with the Project would require the consumption of fuel energy, primarily in the form of diesel and gasoline used to power construction equipment and vehicles. However, the Project Site is nearly flat and would require minimal use of grading equipment for Project construction. Demolition and construction would be short-term (10 weeks) and would not require substantial quantities of equipment. It is assumed the demolition and construction under the Project will require two backhoes, a bulldozer, a concrete saw, a crane, two forklifts, four cement/mortar mixers, a paver and a pavement roller, and a diesel air compressor. Therefore, Project construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

Operation of the Project would require electricity to power hydrogen fuel facilities, upgrades to maintenance bays and other Project components. The energy required to power the hydrogen fueling station is estimated to be roughly 150,000 kWh to 200,000 kWh annually, which is the equivalent of 15 – 19 single family homes. The hydrogen fueling facilities will be on a separate new electricity meter. The fueling facilities will add an additional 300kW - 350kW of load to the overall energy requirements at the Project Site. There will be a +/- 350kW diesel generator serving this new meter and load that will be used as emergency backup.

No electrical transmission or distribution upgrades are anticipated. Per the PG&E Grid Resource Integration Panel (grip.pge.com), the Eureka Bank A substation has 10MW+

available, and the feeder line on 1st St has 600kW+ available, about twice as much power as needed for the Project.

The construction of new offices will be subject to the energy efficiency standards of Title 24 – the State of California Building Energy Efficiency Standards under the CBC. Additionally, the Project would facilitate the use of FCEVs, which utilize less energy to operate than traditional gasoline-powered vehicles. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Less Than Significant Impact)

The City's 2040 General Plan has policies pertaining to energy, including the following three policies:

- *Policy U-5.1 Energy Conservation. Promote energy conservation, and development of alternative, nonpolluting, renewable energy sources for community power in both the public and private sectors.*
- *Policy U-5.2 Energy Conserving Land Use Practices. Implement energy conserving land use practices that include compact and mixed-use development, provision of bikeways and pedestrian paths, and the incorporation and enhancement of transit routes and facilities.*
- *Policy U-5.3 Design Process. Engage with property owners and developers early in the design process to incorporate energy saving strategies into appropriate projects.*

The applicant has been working with the City of Eureka to help implement these policies with this Project. Hydrogen fuel is an alternative, nonpolluting energy source consistent with Policy U-5.1. The Project enhances transit facilities consistent with Policy U-5.2 and the applicant has been and will continue to engage with the City to incorporate additional energy saving strategies into the Project.

Electricity required for operation of the Project would be provided by the Redwood Coast Energy Authority (RCEA). RCEA is the electricity provider for most residents and businesses in the City of Eureka. RCEA sources the electricity, and Pacific Gas and Electric (PG&E) Company delivers it to customers over their existing utility lines. RCEA customers are anticipated to be provided with electricity comprised of 82% total renewable and carbon free electricity in 2025 which is higher than the State average. Therefore, energy used for operation of the Project would be largely from renewable sources.

Additionally, HTA has been awarded a $38.7M grant from the California State Transportation Agency's Transit and Intercity Rail Capital Program[5] that will launch HTA's transition to a zero-emission fleet. HTA and Project partners have bought one and will procure 10 - 15 more new zero-emission hydrogen fuel cell electric buses (FCEBs), implement this Project to install a hydrogen fueling station to provide fuel for the buses and for private and other fleet vehicles, and HTA will design and construct an intermodal transit and housing center in Old Town Eureka. The buses will serve the Redwood Transit System as well as a new inter-city route to Ukiah, connecting riders to Mendocino County. The provision of hydrogen fueling facilities would facilitate the use of FCEVs, potentially reducing gasoline consumption consistent with State and local plans for renewable energy and energy efficiency including the City's 2040 Plan policies discussed above, and the statewide goal of SB 32 to reduce GHG emissions to 40% below 1990 levels by 2030. Therefore, the Project would not conflict with State or local plans for renewable energy or energy efficiency. Impacts would be less than significant.

[5] https://calsta.ca.gov/subject-areas/transit-intercity-rail-capital-prog

3.7 GEOLOGY AND SOILS

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?			X	
ii. Strong seismic ground shaking?			X	
iii. Seismic related ground failure, including liquefaction?			X	
iv. Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks of life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

Regional geology is likely influenced by seismic activity as a result of the relatively close proximity of the Mendocino Triple Junction which is approximately 34 miles to the southwest of the Project Site.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving i) rupture of a known earthquake fault, ii) strong seismic ground shaking, iii) ground failure such as liquefaction, or landslides? (Less Than Significant Impact)

i) The Project Site is more than two miles from the nearest mapped earthquake fault to the north which runs along the Indianola Cutoff[6]. And the Project Site is more than four miles to the nearest mapped earthquake fault to the south which runs along Elk River. The large distance between the Project Site and the nearest earthquake faults indicate there are not likely to be substantial adverse effects from the Project, including the risk of loss, injury, or death involving rupture of a known earthquake fault because the large distance makes it unlikely there would be surface rupture at the Project Site. A less than significant impact would result.

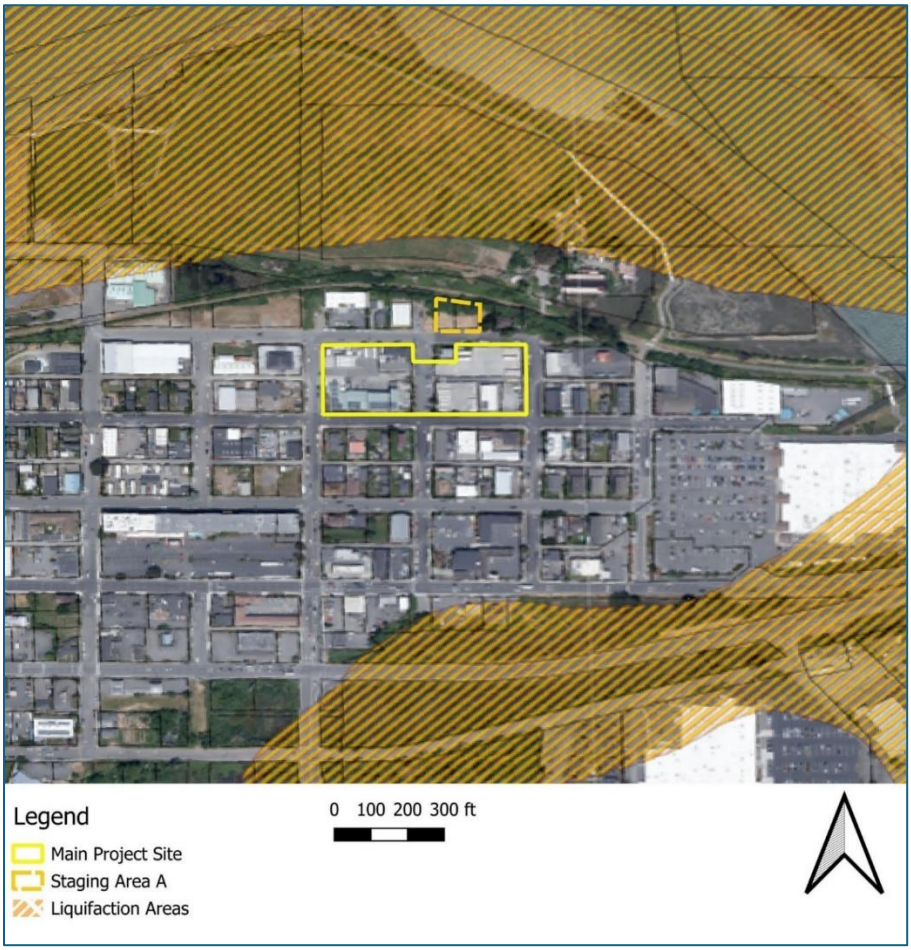
ii) The Project is situated within a seismically active area with several seismic sources within two to five miles capable of generating moderate to strong ground motions. Because the Project is located within a seismically active area, the probability that strong ground shaking associated with large magnitude earthquakes would occur during the design life of the Project is high. The Humboldt County coast is a highly active tectonic region that has been subjected to numerous earthquakes of low to moderate strength and occasionally very strong earthquakes. Seismicity in the region is attributed primarily to the Mendocino Triple Junction, or the interaction between the Pacific, Gorda, and North American plates.

Project implementation would not increase the risk of strong seismic ground shaking or exposure to strong seismic ground shaking above existing conditions. Risk of damage to the Project from larger magnitude earthquakes (7.5 or greater) is low because current building codes require new construction be built to withstand such events. The Project would also be designed and constructed in conformance with site-specific recommendations contained in the geotechnical report required by current building codes to be prepared for the Project. By following the recommendations contained in the geotechnical report, the construction and operation of the Project would result in a less than significant impact. Therefore, the impact on people and structures from strong seismic ground shaking would be less than significant.

iii and iv) According to the City's GIS system, the Project Site is near mapped liquefaction areas as shown below in Figure 22.

[6] Earthquake fault locations are from the Department of Conservation website: https://www.conservation.ca.gov/cgs/Documents/Publications/Geologic-Data-Maps/GDM_006_FAM_750k_v2_GIS.zip, accessed 1/3/2025

Figure 22: Liquefaction Areas Near the Project Site



Source: Planwest Partners, 2025. Liquefaction Areas are from the City of Eureka GIS Web Application: https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604 accessed 6/17/2025.

Although nearby areas are subject to liquefaction hazards, the Project Site is not located in an area where liquefaction is anticipated. Project construction would therefore not likely result in loss injury or death due to liquefaction. A less than significant impact would occur.

The Project Site is also located in an area characterized by slopes of less than five percent. No impact would occur related to potential landslides because of the flat topography.

b) Result in substantial soil erosion or the loss of topsoil? (Less Than Significant Impact)

Construction activities, including cut, fill, removal of vegetation, and operation of heavy machinery will disturb soil and, therefore, have the potential to cause erosion. Since the Project Site is almost entirely paved and covered by existing structures, the potential erosion is minimal. Staging Area A is undeveloped but no grading activities are proposed

in that area. Erosion and sediment control provisions prescribed in Eureka Municipal Code (EMC §15.200), the City's MS4 permit which requires adherence to Humboldt Low Impact Design manual, and North Coast Regional Water Quality Control Board's regulations, would be required as part of the Project. BMPs may include silt fences, straw wattles, soil stabilization controls, site watering for controlling dust, and sediment detention basins which will be important to protect the wetlands near Staging Area A. These mandatory ordinance requirements and permits will be applied at the building permit phase before grading and construction activities have started and are designed to maintain potential water quality impacts at a less than significant level during and post construction. Therefore, the potential soil erosion impact would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project? (No Impact)

The Project Site is gently sloped under five percent, and well away from any significant slopes. The closest steep slope is along 4th Street, more than 800 feet to the south. The Humboldt County General Plan classifies the soils at the Project Site as "Relatively Stable"[7].There is no evidence of slope instability. Thus, it is unlikely the Project Site is on soil that is unstable, or that would become unstable as a result of the Project. The Project would result in no impact in this category.

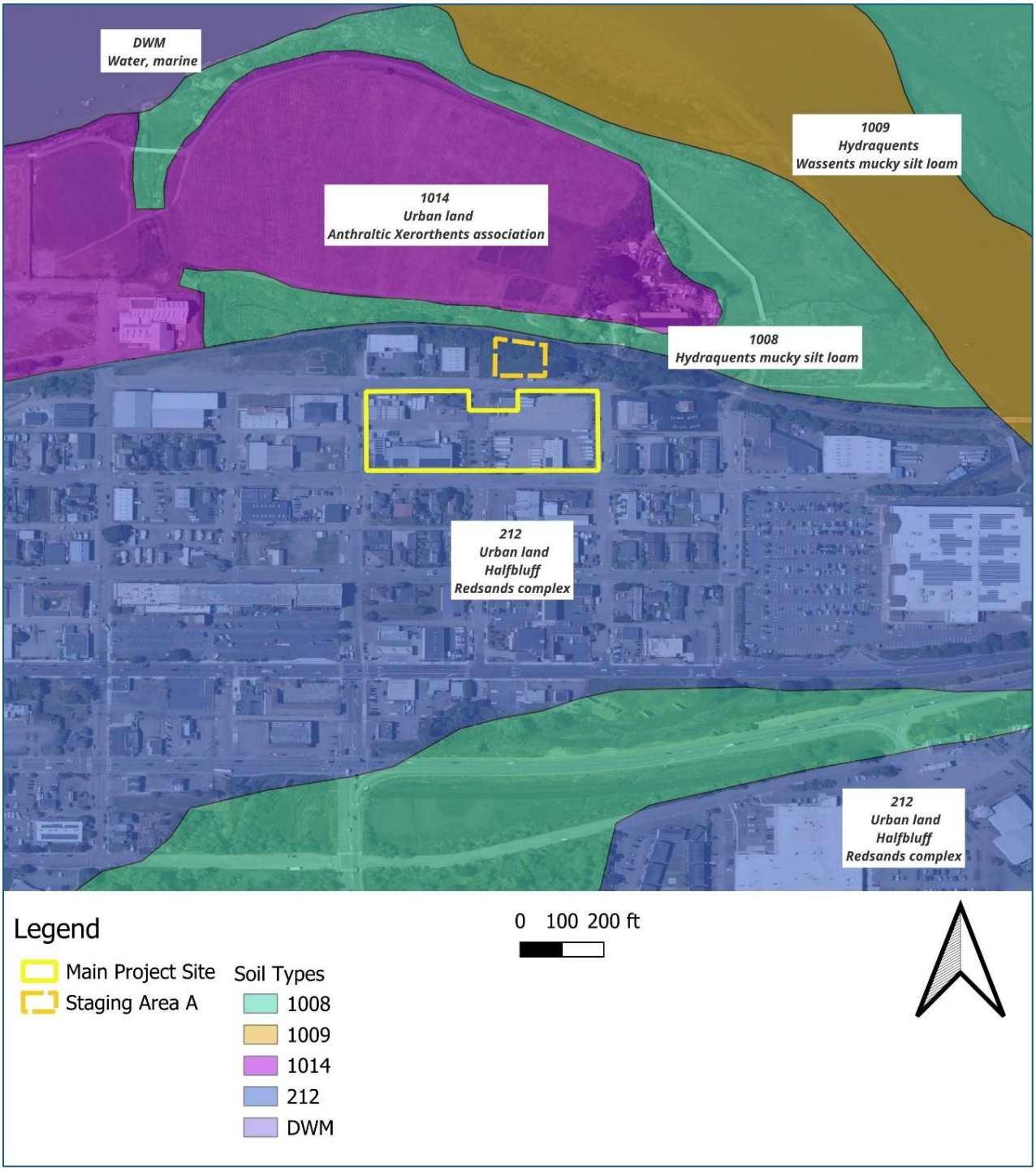
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks of life or property? (No Impact)

Expansive soils can cause considerable distress to roads and building foundations as they "rise-and-fall" in accordance with the cycles of soil wetting (swelling) and drying (shrinking). Soils with high percentages of silicate clays are those that have the potential for shrinking and swelling. Mapping by the NRCS shows the Project Site to be located on the Halfbluff Redsands soils complex, as shown in Figure 23 below. These soils have a percentage of clay content of 17 percent with a Plasticity Index value of 13. Soils with Plasticity Index values of less than 20 are considered to have low swell potential[8]. Thus, those soils are considered to have a low potential for expansion. The Project is not anticipated to encounter expansive soils and a geotechnical report will be prepared prior to construction. No impact would result.

[7] https://humboldtgov.org/DocumentCenter/View/1752/Seismic-Safety-and-Relative-Slope-Stability-PDF accessed July 28, 2025

[8] https://www.edtengineers.com/blog-post/expansive-soils-and-construction-implications accessed 6/17/2025

Figure 23: Soils Classifications in the Vicinity of the Project Site



Source: Planwest Partners, 2025. Soils information is from the United States Department of Agriculture Natural Resources Conservation Service and University of California Davis Web Soil Survey, Website: https://casoilresource.lawr.ucdavis.edu/gmap/ accessed 6/17/2025.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal of wastewater? (No Impact)

The Project would utilize the City of Eureka sewer system and does not propose the installation or modification of septic tanks or alternative wastewater disposal systems. Therefore, construction and operation of the Project would have no impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less Than Significant With Mitigation)

Paleontological resources are the remains or traces of prehistoric animals and plants, as well as fossilized bone, teeth, shell, tracks, trails, casts and the like. Paleontological resources, which include fossil remains and geologic sites with fossil-bearing strata, are non-renewable and scarce and are a sensitive resource afforded protection under environmental legislation in California. State law requires reasonable mitigation of adverse environmental impacts that result from development of public land and affect paleontological resources (PRC § 30244).

It is unlikely that Project construction will impact potentially significant paleontological resources because most of the Project Site is paved or covered by existing structures, and it occurs in relatively newly deposited alluvium and fill material that was placed during the original development of the City. There is no evidence that previous subsurface excavation revealed any paleontological resources. However, this does not preclude the potential for discovery of paleontological or archaeological resources during construction. As such, there could be a potential impact.

Significance after Mitigation: With incorporation of Mitigation Measures CUL-1 and CUL-2, as described in Section 3.5, potential impacts within the Project area would be reduced to a less than significant level through the production of the monitoring plan, monitoring during construction, and proper handling of paleontological or archaeological resources that could be inadvertently discovered.

3.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less Than Significant Impact)

This section discusses the Project's potential impacts related to the release of GHG emissions for both construction and Project operation.

Construction GHG Emissions. Construction activities associated with the Project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO2, CH4, and N2O. Furthermore, CH4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The NCUAQMD does not have an adopted threshold of significance for construction-related GHG emissions. However, emissions that would occur during construction were quantified and are disclosed for informational purposes. Using CalEEMod, it is estimated that construction of the Project would generate 23.2 metric tons of CO2e which is consistent with construction of similar sized projects in the State. Construction-related GHG emissions would be temporary in nature and would only occur for the duration of construction.

Operational GHG Emissions. Because the NCUAQMD does not have adopted thresholds or guidelines, this analysis uses the Bay Area Air Quality Management District's (BAAQMD). The BAAQMD CEQA Guidelines identify thresholds of significance for use in determining whether a Project would have a significant impact related to climate change. As a proxy for climate change impacts, these thresholds described in the following

paragraphs evaluate a project based on its effect on California's efforts to meet the State's long-term climate goals: reducing GHG emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045.

Applying this approach, the BAAQMD identifies and provides supporting documentation, outlining the requirements for new land use development projects necessary to achieve California's long-term climate goal of carbon neutrality by 2045. Based on its analysis, the BAAQMD found that new land use development projects need to incorporate design elements to do its "fair share" to implement the goal of carbon neutrality by 2045. If a project is designed and built to incorporate the identified design elements, then it will contribute its portion of what is necessary to achieve California's long-term climate goals - its "fair share" - and an agency reviewing the project under CEQA can conclude that the project will not make a cumulatively considerable contribution to global climate change. The document concludes that if a project does not incorporate these design elements, then it should be found to make a significant climate impact because it will hinder California's efforts to address climate change.

According to the BAAQMD CEQA Guidelines, a project maintains a less than significant impact related to GHG emissions if it would:

1. Include, at a minimum, the following project design elements:
   a. Buildings

      1) The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).

      2) The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines.*

2. Transportation
   a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted SB 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA:*

      1) Residential projects: 15 percent below the existing VMT per capita
      2) Office projects: 15 percent below the existing VMT per employee
      3) Retail projects: no net increase in existing VMT

   b. Achieve compliance with off-street EV requirements in the most recently adopted version of the California Green Building Standards Code (CALGreen) Tier 2.

3. Or be consistent with a local GHG reduction strategy that meets the criteria under *State CEQA Guidelines* Section 15183.5(b) – a "Qualified Climate Action Plan" (CAP).

The City of Eureka is working towards approval of a Qualified CAP but it has not yet been adopted. Therefore, this section evaluates the Project's consistency with the BAAQMD's project design element thresholds.

Natural Gas Usage. According to the BAAQMD, a less than significant GHG impact would occur if the Project does not include natural gas appliances or natural gas plumbing. The Project would be all-electric and would not include natural gas. Since the Project would not include natural gas, it would be consistent with this design element.

Energy Usage. The Project must not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines*.

As discussed in Section 3.6, Energy, the Project would facilitate use of alternative and cleaner modes of transportation. Based on the nature of the Project, implementation would not result in a substantial increase in electricity or transportation-related energy such that it would result in a wasteful, inefficient, or unnecessary consumption of energy resources.

Therefore, the Project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy. Construction- and operation-period impacts related to consumption of energy resources would be less than significant, and the Project would therefore be consistent with this design element.

Vehicle Miles Traveled. To meet the BAAQMD's VMT threshold, the Project must achieve a reduction in Project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan or meet a locally adopted SB 743 VMT target. As discussed in Section 4.17, Transportation, the OPR published the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory). The Technical Advisory indicates that projects generating or attracting fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact. As discussed in Section 4.17, Transportation, the Project is anticipated to generate an additional 10 trips per day compared to the existing land use. Further, the Project would be all-hydrogen, resulting in a decrease in gasoline and diesel vehicle trips. Because the Project's trip generation is below an applicable threshold of significance and the Project itself promotes alternative-fuel vehicle use, the Project would have a less than significant VMT impact. As such, the Project would be consistent with this design element.

Electric Vehicle Requirements. This criterion requires that the Project achieve compliance with off-street EV requirements in the most recently adopted version of the CALGreen Tier 2 measures. CalGreen Tier 2 measures do not require electric charging

stations for hydrogen fueling stations and the Project does not include any electric charging stations, so it would be consistent with this design element.

As demonstrated above, the Project would be consistent with the BAAQMD's project design elements related to natural gas, energy, VMT, and EVs. Therefore, the Project would be consistent with the BAAQMD's GHG emission thresholds. This analysis supports the finding the Project would not result in the generation of GHG emissions that would have a significant impact on the environment. This impact would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Less Than Significant Impact)

Applicable plans adopted for the purpose of reducing GHG emissions include the City's 2040 General Plan and the State's 2022 Scoping Plan. The Project was evaluated for consistency with those plans to determine whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the GHG emissions.

2040 General Plan

The City's adopted 2040 General Plan explicitly supports Statewide efforts to curb GHG emissions through Air Quality Element Goal AQ-1.2 GHG Reduction, as well as other policies associated with improving air quality and reducing GHG emissions throughout the City of Eureka, and are as follows:

- Policy AQ-1.2. *GHG Reduction*. Continue to work with Redwood Coast Energy Authority to implement appropriate measures to reduce regional greenhouse gas emissions in Eureka, such as incentivizing the use of alternative energy sources, and periodically updating the City's greenhouse gas inventory and reduction plan, consistent with State reduction targets and regulations.
- Policy AQ-1.3. *New Development*. Require new discretionary developments to incorporate mitigation measures that utilize Best Management Practices and reduce emissions from both construction and operational activities, consistent with the NCUAQMD requirements and State regulations.
- Policy AQ-1.4. *Off-Street Parking*. Encourage and incentivize premium parking spaces for carpool, vanpool, and alternative energy vehicles, and encourage the development and addition of electric vehicle charging stations in parking lots.
- Policy 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, electric vehicles, carpooling, and non-motorized transportation.

- Policy U-5. *Renewable Energy.* Encourage new development to install renewable energy systems and facilities (e.g., solar and wind energies) consistent with the City's greenhouse gas emission reduction goals.
- Policy LU-1.3. *Beneficial Development.* Support development that affords benefits to all segments of the community that… applies practices that help to reduce development's carbon footprint.

Additionally, Implementation measure AQ-IM1 directed the City to prepare a Climate Action Plan, and the City partnered with County of Humboldt for the 2024 Draft Humboldt Regional Climate Action Plan which is still in the process of being reviewed by jurisdictions.

Since the proposed hydrogen fueling station incentivizes the use of alternative energy sources (hydrogen), the Project is consistent with the City's 2040 General Plan.

2022 Scoping Plan

The following discussion evaluates the Project according to the goals of the 2022 Scoping Plan, Executive Order (EO) B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reduction target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving the 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions.

The 2022 Scoping Plan assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035 and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel combustion vehicles.

The 2022 Scoping Plan contains GHG reduction measures that work toward reducing GHG emissions, consistent with the targets set by EO B-30-15 and codified by SB 32 and

AB 197. The measures applicable to the Project include energy efficiency measures and transportation and motor vehicle measures, as qualitatively discussed below.

Energy efficient measures are designed to expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings. The elimination of natural gas in new development would help projects implement their "fair share" of GHG emission reductions necessary to achieve carbon neutrality by 2045, consistent with State goals. As discussed above, the Project would not include natural gas. Therefore, the Project would contribute to its "fair share" of GHG emission reductions necessary to support achieving the State goals of long-term GHG emission reductions and carbon neutrality by 2045.

The goal of transportation and motor vehicle measures is to increase zero-emission vehicles and decrease VMT. The Project would encourage buses and cars that use zero emission hydrogen as a fuel source instead of fossil fuels and would contribute to reducing VMT by supporting HTA's transition to a 100% zero-emission fleet, thereby enhancing the attractiveness and reliability of public transit and encouraging a shift from single-occupancy vehicle use. Onsite hydrogen fueling and upgraded maintenance facilities would reduce non-revenue miles by eliminating the need for offsite fueling and repairs, while expanded operational capacity would support more consistent and far-reaching service. Improved fleet reliability and longer-range hydrogen buses would make regional transit more competitive with private vehicles, ultimately reducing reliance on long-distance car travel within the Eureka–Arcata–Fortuna area and lowering overall VMT. Therefore, the Project would reduce gasoline-based vehicle trips and VMT, and would not conflict with the transportation and motor vehicle measures.

As discussed above, the Project would comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in EO B-30-15, SB 32, and AB 197, and would be consistent with the City of Eureka's applicable plans and programs designed to reduce GHG emissions. The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and this impact would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less Than Significant Impact)

Hazardous materials are chemicals that could potentially cause harm during an accidental release and are defined as being toxic, corrosive, flammable, reactive, an irritant, or a strong sensitizer. Hazardous substances include all chemicals regulated under the United States Department of Transportation (DOT) “hazardous materials” regulations and the United States Environmental Protection Agency (EPA) “hazardous waste” regulations. Hazardous wastes require special handling and disposal because of their potential to damage public health and the environment. The severity of any such exposure is dependent upon the type, amount, and characteristics of the hazardous material involved; the time, location, and nature of the event; and the sensitivity of the individual or environment affected.

Construction. Potentially hazardous materials, such as construction materials, fuels, lubricants, and solvents, would be used during the demolition, grading and site preparation, and construction phases of the Project. However, the amount of hazardous chemicals present during construction would be minor and would be used in compliance with existing government regulations.

Construction of the Project would also require demolition of existing site structures, and potential removal of any remaining additional residual contaminated soil following relocation of the existing gasoline and diesel fuel storage and dispensing facilities. In preparation of demolition, an Asbestos Survey and Lead Paint Sampling was conducted for the building located at 104 W Street. The survey identified Lead Based Paint (LBP) on several building components on the interior and exterior of the east half of the building which is the “Original Building Section”. These include window trim, door trim, porch ceiling planks and trim, and wood lap siding. The survey also identified three type of materials containing asbestos. These included the undercoat of a sink pan, sheet flooring, and remnant sheet flooring at the base of a cabinet (Burnelle & Clark Consulting, 2023).

The removal of hazardous building materials prior to demolition of structures is governed by federal and State laws and regulations described in the following paragraphs. Federal regulations require that LBP be removed prior to demolition if the paint is loose and peeling. Loose and peeling paint must be disposed of as a State and/or federal hazardous waste if the concentration of lead exceeds applicable waste thresholds. State and federal construction worker health and safety regulations require air monitoring and other protective measures during demolition activities where lead-based paint is present, as well as notification to the California Division of Occupational Safety and Health (DOSH) for abatement activities.

Workers who conduct hazardous materials abatement and demolition activities must be trained in accordance with Occupational Health and Safety Administration (OSHA) and California OSHA (Cal- OSHA) requirements. Hazardous building materials removed during construction must be transported in accordance with DOT regulations and disposed of in accordance with the federal Resource Conservation and Recovery Act (RCRA), the California Code of Regulations, and/or the California Universal Waste Rule at a facility permitted to accept the wastes.

Section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. Since asbestos has been identified at the site, the Northcoast Unified Air Quality Management District (NCUAQMD) requires notification prior to demolition activities.

Other hazardous building materials, such as electrical equipment and fluorescent light ballasts containing PCBs, and fluorescent tubes or thermostats containing mercury, must be removed from buildings prior to demolition and disposed of in accordance with the California Universal Waste Rule and other federal and State regulations. Compliance with these regulations would ensure that demolition and removal of existing structures on the Project Site would be less than significant.

As outlined in the Project Description, one of the existing gasoline dispensing facilities will need to be rotated approximately 90 degrees prior to the installation of the hydrogen fueling facilities. No subsurface excavation will be needed for this work so there is no potential for any soil disturbance. All the remaining existing gasoline and diesel infrastructure will stay in its current location. Should any unplanned subsurface excavation be necessary to relocate the existing gasoline and diesel facilities, a contingency plan is included in the Project Description to analyze the excavated soil for fuel contaminants and cleanup of the contaminants if they are found.

During construction of proposed improvements, hazardous materials (e.g., fuel, oils, and paints) would be routinely transported, stored, and used at the Project Site. As described in detail under Section 3.10, Hydrology and Water Quality, management of hazardous materials during construction activities would be subject to the requirements of the Eureka Municipal Code (EMC §94.45 and EMC §150.304.110), which requires implementation of BMPs that include hazardous materials storage requirements, and the requirements of Humboldt County Department of Environmental Health (HCDEH). For example, construction site operators must store chemicals in watertight containers (with appropriate secondary containment to prevent any spillage or leakage) or in an enclosed storage shed.

Compliance with existing regulations, including the requirements of HCDEH, during construction would ensure that potential impacts associated with hazardous material use,

transport, and disposal would be less than significant. However, in the unlikely event that soil excavation is needed for relocation of existing gas and diesel storage and dispensing facilities, the applicant will be required to cleanup contaminated soils consistent with State requirements as stated in the Project Description.

Operation. The routine transport, use, and disposal of hazardous materials is a normal part of the existing operation and maintenance of the HTA fueling facility. The Project Site regularly receives deliveries of gasoline and diesel fuel. Delivery complies with all applicable federal, State, and local laws and regulations designed to protect the public from both health risks and environmental hazards including the Code of Federal Regulations 75.1906 (Transport of diesel fuel), California Air Resources Board (CARB), California Department of Motor Vehicles (DMV), California Department of Transportation (Caltrans).

The Project would result in the addition of a hydrogen fueling facility that would include three dispensers within two covered fuel dispensing areas, one of which is existing. The Project would result in a slight increase in the routine transport associated with hydrogen deliveries, and may require minor quantities of lubricants, paints, solvents, and other products to maintain the hydrogen fueling equipment and enclosures. Additional materials would be like those currently kept and managed on site for existing maintenance and operations.

Normal operations will store more than 10,000 pounds of hydrogen which is classified as a Category 1 flammable gas and liquid per OSHA Process Safety Management (PSM) Standard 29CFR 1910.1200(c). Therefore, the PSM Standard as defined in 29CFR 1910.119 applies to HTA. HTA will be required to develop and maintain a OSHA-compliant Process Safety Management Plan to mitigate risks of hazards to HTA employees and the public.

Potentially hazardous materials such as fuels and solvents may be used during routine maintenance activities during operation of the Project. California law requires all facilities that use or store more than 55 gallons liquid, 500 pounds of solid, and/or 200 cubic feet of gas hazardous materials on site to file hazardous materials business plans with the HCDEH that list and map the location of on-site hazardous materials storage and use and that describe procedures in the event of an accident. The existing gasoline and diesel bus fleet fueling facilities would continue to comply with all applicable federal, State, and local laws and regulations, and the new hydrogen fueling facility will also be required to comply with all applicable federal, State, and local laws and regulations as described earlier in this section. For these reasons, operation of the Project would not produce hazardous emissions or require handling, transport, or disposal of hazardous materials, substances,

or waste in a manner that creates a significant hazard to the public. Therefore, this impact would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less Than Significant Impact)

Exposure to hazardous materials during the construction and operation of the proposed hydrogen fueling facility could result from: (1) the improper handling or use of hazardous substances; (2) a transportation accident; or (3) inadvertent release resulting from an unforeseen event (e.g., fire, flood, or earthquake). Reasonably foreseeable upset and accident conditions involving the release of hazardous materials to the environment would consist of the potential for hydrogen equipment to leak, rupture, or malfunction, leading to the risk of fire or explosion. Hydrogen is a colorless, odorless, tasteless, highly flammable diatomic gas with the molecular formula H2. The vapors are lighter than air, and it is flammable over a wide range of vapor/air concentrations. Hydrogen is not toxic but can be an asphyxiation risk by displacing oxygen in the air. Hazardous events associated with hydrogen gas releases would include jet fires, flash fires, and vapor cloud explosions.

The new office addition will replace the existing office that is being demolished. The existing gasoline/diesel fueling facilities will remain in their existing location except one of the gasoline pumps will be rotated approximately 90 degrees. Operation of the offices and gasoline/diesel fueling facilities will continue as it has in the past and is not anticipated to resulted in any significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Construction. As described above under section a), construction of the Project would require demolition and removal of existing structures and may require removal of residual contaminated soil from the Project Site, as well as use of hazardous materials (e.g., oils, fuels, solvents, paints) associated with construction of proposed improvements. An accidental release of these hazardous materials during Project construction could result in exposure of construction workers, the public, and/or the environment to hazardous materials.

In accordance with the Eureka Municipal Code and HCDEH regulations described earlier in section a), the Project would be required to implement BMPs to reduce the risk of spills or leaks from reaching the environment, including procedures to address minor spills of hazardous materials. Measures to control spills, leakage, and dumping must be addressed through structural as well as nonstructural BMPs. For example, equipment and materials for cleanup of spills must be available on site, and spills and leaks must be cleaned up immediately and disposed of properly. BMPs also include treatment requirements,

operating procedures, and practices to control site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

The transportation of hazardous materials is subject to both federal Resource Conservation and Recovery Act (RCRA) and Department of Transportation (DOT) regulations. Hazardous materials would be transported by a licensed hazardous waste hauler and disposed of at facilities that are permitted to accept such materials. If a discharge or spill of hazardous materials occurs during transportation, the transporter is required to take appropriate immediate action to protect human health and the environment (e.g., notify local authorities and contain the spill), and is responsible for the discharge cleanup.

As provided in the Project Description, consistent with regulatory requirements, the Project applicant would prepare and implement a Health and Safety Plan, Soil Management Plan, Stormwater Pollution Prevention Plan, Air Monitoring Plan, Traffic Control Plan, and Construction Management Plan to ensure any contaminated soils and materials are appropriately handled, removed from the site, and disposed of in compliance with federal, State, and local regulations. Compliance with these regulatory requirements would ensure that impacts associated with the accidental release of hazardous materials during Project construction would be less than significant.

Operation. The proposed hydrogen fueling system design has hydrogen fuel storage tanks of more than 10,000 pounds of hydrogen and is required to conform to the National Fire Protection Association (NFPA) 2 – Hydrogen Technologies Code [2023]. The purpose of NFPA 2 is to provide fundamental safeguards for the generation, installation, storage, piping, use, and handling of hydrogen in compressed gas (GH2) form or cryogenic liquid (LH2) form. One of the requirements of NFPA 2 is that radiant impacts greater than 1,500 British thermal units per hour per square foot (Btu/hr· ft2) are not allowed off site. It is this requirement that necessitates the installation of solid barrier walls designed to prevent flame or explosion hazards around the hydrogen equipment enclosure area, if they were to occur, from extending off site.

The NFPA 2 also provides setback standards to prevent hydrogen hazards from affecting adjacent uses or groups. The Project has been designed to achieve these standards, and fire hazard exposure would not extend beyond on-site setback areas. The design, installation and testing of the hydrogen fueling station in accordance with NFPA 2, applicable safety regulations, and professional engineering standards of care means that the risk of fire or explosion from hydrogen equipment would be low.

Furthermore, the Project would include safety precautions to prevent such accidents from occurring and to minimize the consequence of such an accident. Accident prevention

measures included in Project plans consist of the installation of guard posts to protect appurtenant facilities from being struck by vehicles and provision of adequate ventilation systems and pressure release valves. The hydrogen fueling facilities would also include hydrogen-specific flame detectors and gas detectors, and emergency shutoff switches, designed to stop the flow or release of hydrogen gas if ignited. Given that the risk of accident and upset conditions associated with the Project would be low, and not more severe than that associated with the existing site, and that the Project would implement numerous safety, accident prevention, and response measures, the risk of exposure to hazardous materials from accident conditions associated with operation of the Project would be low.

Aside from flammable hydrogen fuel described above, the Project would continue existing operations and will not modify the storage or use of other hazardous materials or generate significant hazardous wastes. In addition, the existing gasoline and diesel fuel storage and fueling infrastructure would not be modified except for one of the existing gasoline fuel dispensing facilities which will be rotated approximately 90 degrees as required by building code, with oversight from HCDEH. Given these requirements and procedures, potential significant impacts related to a foreseeable upset associated with operation of the proposed hydrogen fueling facility would not be expected. This impact would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Less Than Significant Impact)

No schools are located within one-quarter mile of the Project Site. The Humboldt County Office of Education is located approximately 1/3 of a mile to the southeast of the Project Site. As described in the Project Description, if contaminated soils are found during work on the existing gasoline and diesel fuel storage and dispensing facilities, HTA will be required to prepare and implement a Health and Safety Plan, Soil Management Plan, Stormwater Pollution Prevention Plan, Air Monitoring Plan, Traffic Control Plan, and Construction Management Plan to ensure contaminated soils and materials are appropriately handled, removed from the site, and disposed of in compliance with federal, State, and local regulations.

As described in section a), the proposed hydrogen fueling system design has hydrogen fuel storage tanks of more than 10,000 pounds of hydrogen. Solid barrier walls designed to prevent flame or explosion hazards will be installed around the hydrogen equipment enclosure area.

The NFPA 2 also provides setback standards to prevent hydrogen hazards from affecting adjacent uses or groups. The Project has been designed to achieve these standards, and fire hazard exposure would not extend beyond on-site setback areas. The design, installation and testing of the hydrogen fueling station in accordance with NFPA 2, applicable safety regulations, and professional engineering standards of care means that the risk of fire or explosion from hydrogen equipment would be low.

Given that the risk of accident and upset conditions associated with the Project would be low, and not more severe than that associated with the existing site, and that the Project would implement numerous safety, accident prevention, and response measures, the risk of handling hazardous materials associated with operation of the Project would be low.

Aside from flammable hydrogen fuel described above, operation of the Project would not involve storage or use of hazardous materials (except for small quantities for routine maintenance as described above) or generation of significant hazardous wastes. Compliance with these regulatory requirements would ensure that impacts associated with the emission or handling of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (No Impact)

The Project Site is not listed on any hazardous materials sites compiled pursuant to Government Code §65962.5, as confirmed by a review of the California Department of Toxic Substances Control (DTSC) EnviroStor database (EnviroStor, 2025). Additionally, the GeoTracker database does not identify the Project Site as a cleanup site (EPA, 2025; California State Water Board, 2025). A portion of the Project Site along V-Street is listed as a LUST cleanup site that has been completed and the case is closed as of 1998. Therefore, the Project would not create a significant hazard to the public or the environment as a result of cleanup of an existing site with hazardous materials, and no impact would result.

e) For 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, would the project result in a safety hazard or excessive noise for people residing or working in the project area? (No Impact)

The Project Site is not located within an airport land use plan although it is approximately 1.5 miles south the Murray Field Airport, the nearest airport. The Project Site is located more than 3,000 feet from the Murray Field Airport 50 dB CNEL area where noise levels

from the airport would be a concern[9]. Therefore, construction and operation of the Project would not exacerbate existing airport noise. Given the distance from the Project Site and the absence of any airport-related restrictions, the Project would result in no impact related to airport land use compatibility.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (No Impact)

Introducing hydrogen on-site adds new risks that may require updates or coordination with local fire departments, Certified Unified Program Agencies (CUPA), and emergency responders. The Project description describes how it will be developed in compliance with existing fire codes which will ensure installation of key safety features such as ventilation systems, emergency shutoff valves, emergency detection systems, alarms, and notification appliances,

The Hazardous Materials Program of HCDEH is the designated CUPA for this area. The CUPA requires the applicant to develop a Hazardous Materials Business Plan (HMBP) which contains information on the location, type, quantity, and health risks related to hazardous material stored, used, or disposed of Humboldt County. The CUPA will transmit this information to local emergency responders which will use it to guide their approach to the Initial Response Operations as described in the Humboldt County 2015 Emergency Operations Plan. HTA will also be required to develop and maintain an OSHA-compliant Process Safety Management Plan for the Project to mitigate risks of hazards to HTA employees and the public.

Preparation and implementation of the plans described above will ensure the Project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The Project will have no impact in this category.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (No Impact)

The Project Site is an existing bus fleet fueling and maintenance facility in an urbanized area of Eureka. Temporary uses are proposed near significant areas of vegetation and grasslands adjacent to Staging Area A. The site is not in a Cal Fire-designated State Responsibility Area (SRA), but is in a Local Responsibility Area (LRA), where the City is responsible for wildland fire protection. The temporary uses that involve assets of significant monetary value that may be at greatest risk during a wildland fire event would be vehicles parked on the site. However, since those assets can be easily moved to safety

[9] https://humboldtgov.org/DocumentCenter/View/95080/2021-Airport-Land-Use-Compatibility-Plan-adopted-04132021-33-MB

during a potential wildland fire, there are unlikely to be significant losses due to wildland fires.

While the Project Site itself is urbanized, the Project introduces hazardous materials (hydrogen), which adds potential fire risk even if wildland fuels are not present on-site. The Project will be required to comply with applicable fire safety codes, including the installation of fire suppression systems, and coordination with local emergency response agencies will occur during the permit review process. Based on these considerations, there would be a less than significant impact.

3.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?			X	
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
iv. Impede or redirect flood flows?				X
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X

The Project Site is generally flat, already developed, surrounded by urban uses and City streets, and does not include any watercourses. Runoff from the site flows into City maintained stormwater systems which generally consist of gutter flow by gravity that is

discharged at numerous points into Humboldt Bay, sloughs and drainages in and around the City. Eureka Slough is approximately 500 feet east of the Project Site and Humboldt Bay is approximately 1,000 feet to the north. The Project is not located within a FEMA 100-year or 500-year flood zone; the northeast corner of the Project Site (corner of X and 1st Streets) and a portion of Staging Area A are within a tsunami evacuation zone. Staging Area A has mapped wetlands and associated riparian vegetation.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less than Significant Impact)

The Project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Construction activities, such as site clearing, demolition, grading, excavation, material stockpiling, placement of aggregate base, staging, and other related construction activities, could leave soils exposed to rain or surface water runoff that may carry soil contaminants (e.g., nutrients or other pollutants) into storm drain systems or wetland areas. The greatest potential for Project construction impacts to water quality would result from sediment mobilization.

During construction, measures will be taken to ensure that no material or debris enters the City stormwater system or wetlands within/near Staging Area A, including perimeter control BMPs. A construction Erosion and Sediment Control Plan, including a site map with locations of proposed BMPs, will be developed and submitted to the City for approval prior to construction.

As discussed under the Biological Resources Section 3.4, classified and mapped wetlands exist within Staging Area A, north of 1st Street. Implementation of BMPs summarized under the Biological Resources section and in the Erosion and Sediment Control Plan described above would reduce potential water quality impacts during Project construction activities to a less-than-significant level by requiring measures to minimize erosion, sediment, and pollutant contribution to wetland areas.

The site is located within the MS4 General Permit Boundary within the City of Eureka, per the SWRCB's MS4 General Permit area. The MS4 General Permit requires projects to comply with post-construction stormwater requirements based on low-impact development standards. In the City of Eureka, these low-impact development standards are enumerated in the Humboldt Low Impact Development Stormwater Manual Version 3.0 ("Humboldt LID Manual") (2021). The Project is not expected to substantially change existing stormwater flows because the site is already developed. Impervious area will increase by approx. 2,000 sq. ft. and is designed to comply with the City's post-construction requirements.

Following construction, operation and maintenance of the Project would not result in a new point discharge. Stormwater runoff would be detained and infiltrated within existing City stormwater features and the project is designed to comply with the City's MS4 requirements. Therefore, less than significant operational impact would result.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (No Impact)

The Project is located within the Eureka Plain Groundwater Basin, which is designated as a Low Priority Basin per the State Groundwater Management Act. A significant portion of the Project Site is already developed with impermeable surfaces, and neither construction nor operation would require the use of local groundwater, as the facility is connected to the City of Eureka's municipal water supply and no change in the provision of this service is proposed. Any water used during or post-construction would be taken from the City of Eureka's municipal water supply. No significant impact to groundwater recharge from infiltration would take place because the total area of impervious surfaces at the site would increase by a small amount as discussed above (approx. 2,000 sq. ft.). As a result, the proposed Project would not decrease water supplies, interfere with groundwater recharge, or impeded sustainable groundwater management of the basin. No impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site? (Less than Significant Impact)

The Project Site is already developed and consists of mostly impervious surfaces except for minor landscaping around the existing office building and Staging Area A, which is undeveloped. Project construction would not alter existing topography in a manner that would result in a substantial change to the existing drainage pattern or contribute to substantial erosion or siltation on- or off-site. A construction Erosion and Sediment Control Plan, including a site map with locations of proposed BMPs, will be prepared and implemented to avoid and minimize impacts.

Erosion and sedimentation measures will be implemented during construction to avoid impacts to water quality, including those related to Staging Area A. As noted above, the Project will adhere to measures and conditions included in the Erosion and Sediment Control Plan to prevent erosion-related impacts during construction and is designed to comply with post-construction standards. As such, substantial on- or off-site erosion and

siltation would not result, and the potential impacts from erosion and siltation would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Less than Significant Impact)

The Project includes construction of additional office space which will slightly expand the footprint of the existing office building in the southwest corner of the Project Site. This will result in approximately 2,000 square feet of additional impervious surfaces. Any stormwater not infiltrated onsite will be discharged to the City's stormwater system, similar to existing conditions and in compliance with the City's post-construction standards. Off-site drainage patterns will not be altered. The Project is not located within a FEMA 100-year or 500-year flood zone (City of Eureka, 2025).

Aside from the increased impervious surface area, the Project does not include elements that would increase surface runoff or necessitate significant design features to accommodate flooding. LID features will be incorporated into the Project design where possible to support stormwater infiltration. Additionally, the Project is designed to meet the City's MS4 permit storm water requirements and would not cause on- or off-site flooding. The potential impact would be less than significant.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Less than Significant Impact)

As discussed previously, the site is already largely developed with impervious surfaces and the Project will not create a substantial new source of runoff. Additionally, the Project will develop and implement an Erosion and Sediment Control Plan and be designed to meet MS4 and NCRWQCB stormwater requirements. As such, the Project would not create or contribute stormwater runoff that would exceed the capacity of the City's existing stormwater drainage system, nor would it be a source of polluted runoff. The potential impact would be a less than significant.

iv. Impede or redirect flood flows? (No Impact)

The Project will not impede or redirect flood flows. The Project Site is not located within a FEMA 100-year or 500-year flood zone. There is not a watercourse on the Project Site that could contribute to flooding. Eureka Slough is approximately 500 feet east of the Project Site and Humboldt Bay is approximately 1,000 feet to the north. Under existing conditions, the Project Site does not experience flood flows and the Project will not create any new structures or features that may impede or redirect flood flows. All surface waters would be

limited to stormwater flow during precipitation events and any water not infiltrated onsite would be discharged to the City's stormwater system. As such, there would be no impact.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Less than Significant Impact)

The majority of the Project Site is not located within the Tsunami Evacuation Zone for Humboldt Bay (California, 2021). The northeast corner of the Project Site (corner of X and 1st Streets) and a portion of Staging Area A are within a tsunami evacuation zone. The existing conditions at the site include fossil fuel storage and distribution for the current HTA fleet of buses and vehicles. In the event of a tsunami, there is existing potential for pollutants to be released into the environment. The proposed Project will not change these existing conditions.

The proposed Project includes the installation of hydrogen fuel storage and dispensing facilities for both liquid and gaseous forms. Hydrogen is the lightest of the known gases and is considered lighter than air. In the event of an accidental release, gaseous hydrogen would dissipate into the atmosphere quickly. Hydrogen is also non-toxic and non-poisonous and will not contaminate groundwater or cause atmospheric pollution (USDOE, 2004). In the event of a liquid hydrogen spill, the liquid would volatize quickly into a gas and dissipate.

As there are existing fossil fuel facilities on site and because the Project will comply with applicable California Building and Fire Code requirements to minimize the risk of pollutant release during inundation, the addition of hydrogen fuel facilities would not substantially increase the risk for release of pollutants during inundation, and a less than significant impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)

The relevant water quality control plan is the NCRWQCB's North Coast Basin Plan, which establishes thresholds for key water resource protection objectives for both surface waters and groundwater. The Eureka Plain Basin does not have a groundwater management plan, groundwater ordinances, or basin adjudications. The Project does not involve the use of groundwater resources and would not impact the quantity or quality of groundwater availability in the Eureka Plain Basin. The Project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impact would result.

3.11 LAND USE AND PLANNING

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

The Project is located within the Coastal Zone of the City of Eureka and is therefore subject to the policies and regulations of the certified Local Coastal Program (LCP), including the Coastal Zoning Code and the Coastal Land Use Plan (Appendix B of the 1997 Coastal General Plan), as well as the City's 2040 General Plan.

a) Physically divide an established community? (No Impact)

The site is currently developed with commercial uses, the proposed Project would not divide an existing neighborhood or community. Although not certified by the California Coastal Commission, the Project Site is included in "The Bridge District" as identified by the 2040 General Plan. "Entirely in the Coastal Zone, located to the east of the Library District, south of the Commercial Bayfront district, north of 4th Street, and west of the Eureka Slough, the Bridge District is home to medium-density residential uses as well as a diverse mix of business-serving commercial uses, offices, and light manufacturing. The Bridge District is envisioned to continue to grow as an area of diversely intermixed uses." The Project is consistent with the area's future vision. The Project Site located between 1st Street and 2nd Street and between V Street and X Street, and normal traffic (vehicular, bicycle, and pedestrian) on sidewalks and the local roadways would not be restricted during Project operation. There is no public access through the Project Site and the Project will not change these existing conditions. No sidewalks are present along the portion of 1st Street adjacent to Staging Area A. If Project construction requires encroachment within City right of way (e.g. sidewalks or roads), an encroachment permit will be obtained. No impact would result.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Less Than Significant Impact)

Applicable land use plans, policies, and regulations covering the Project Site include the City of Eureka Local Coastal Program, the 2040 General Plan, and the Eureka Municipal Code. The current land use designation for the Project Site is General Service Commercial (GCS) and the zoning designation is Service Commercial (CS). The Project does not change the site use and is consistent with the intent of the existing land use and zoning designations. The LCP includes policies that protect environmentally sensitive habitat areas, such as wetlands. Biological Resources Section 3.4 of this document describes the potential Project impacts and proposed protection measures and demonstrates compliance with applicable policies. The proposed Project would not directly impact wetlands and requests a reduced buffer in compliance with LCP Policy 6.A.19. The Project will implement standard erosion control measures throughout the construction period to ensure any exposed soil and construction debris remains onsite thereby protecting water quality in nearby ESHA.

The project does not propose any use or development that would conflict with the plans listed above or with policies adopted for the purpose of avoiding or mitigating environmental effects. The 2040 General Plan supports the transition to cleaner energy infrastructure and reduced greenhouse gas emissions, with policies that encourage alternative fuel use and modernization of utility systems (e.g., Policies AQ-1.2, M-3.3, U-5.1). The project is also consistent with the Coastal Zoning Code, which allows for utility and fueling infrastructure at the subject site, subject to Coastal Development Permit review, and HTA previously obtained a CUP for the bus depot use. Furthermore, the Project does not conflict with LCP policies related to the protection of coastal resources, including those addressing wetlands/ESHA, water quality, and hazardous materials management. The fueling infrastructure will be designed and operated in compliance with applicable California Building Code, Fire Code, and spill prevention standards, ensuring that flood and inundation risks do not result in pollutant discharge. Therefore, the project would not result in a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. A less than significant impact would occur.

3.12 MINERAL RESOURCES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

The mineral resource production in Humboldt County is primarily limited to sand, gravel, and other base aggregate. The State Surface Mining and Reclamation Action (SMARA) of 1975 is a State policy for the reclamation of mineral lands. The County of Humboldt Web GIS Portal includes parcels containing mineral resources as reported by SMARA. The proposed Project Site is not designated as containing mineral resources.

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (No Impact)

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (No Impact)

No mineral resources and no mineral resource extraction currently occur within or near the site. The proposed Project would not affect the availability of a known mineral resource that would be of value to the region, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a specific, general plan, or other land use plan because there are no important mineral resources identified in the City's General Plan or Municipal Code. Therefore, the proposed Project would not impact mineral resources.

3.13 NOISE

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Result in generation of excessive groundborne vibration or noise levels?			X	
c) For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels?				X

Several factors influence sound as it is perceived by the human ear, including the actual level of sound, the period of exposure to the sound, the frequencies involved, and the fluctuation in the noise level during exposure. Noise is measured on a “decibel” scale which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness over a range of intensities. Since the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, State, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are almost always expressed using one of several noise averaging methods, such as Leq, DNL, or CNEL. Leq is a measurement of average energy level intensity of noise over a given period of time. DNL is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 p.m. and 7:00 a.m. CNEL includes an additional 5 dB applied to noise occurring between 7:00 p.m. and 10:00 p.m.

As a general rule of thumb, where traffic noise predominates, the CNEL and DNL are typically within 1 dBA of each other. Using one of these descriptors is a way for a location's overall noise exposure to be measured, given that there are specific moments when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and specific moments when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). Lmax is the maximum A-weighted noise level during a measurement period.

Current noise conditions in the vicinity of the project consist of road noise associated with vehicles on the urban streets and heavy commercial uses within 400 feet including an auto repair shop, a towing service and a contractor's yard. The nearest sensitive receptors, consisting of residential homes, are located approximately 50 feet south of the Project Site along 2nd Street and a hotel approximately 350 feet to the southeast.

The City of Eureka General Plan 2040 identifies noise compatibility standards for various land uses in Figure N-2. It shows that noise levels of less than 55 dB CNEL are normally acceptable for single-family residential uses and 60 dB CNEL are normally acceptable for hotels.

a) Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Less Than Significant Impact)

The Project will generate a temporary increase in noise during construction activities through the use of various tools and construction equipment and vehicles. Project operation is not expected to substantially change existing noise levels on or near the Project Site. The City of Eureka General Plan 2040 establishes exterior and interior noise standards for various types of land uses (Figure N-2 and Table N-3), and daytime and nighttime noise level performance standards for stationary noise sources. Applicable policies include, but are not limited to:

- Policy N-1.3: Consider the compatibility of new development with the existing noise environment when reviewing discretionary proposals.
- Policy N-1.5: Require new stationary noise sources to mitigate noise impacts on noise-sensitive uses in which exterior level noises exceed the standards in Table N-4.
- Policy N-1.13: Construction Noise. Minimize construction-related noise and vibration by limiting construction activities within 500 feet of noise-sensitive uses to between 7:00 a.m. to 7:00 p.m., unless further restricted through permitting.

Construction Noise: Construction of the Project would temporarily increase noise in the immediate vicinity of the Project Site. The temporary noise increases would result from the use of construction equipment for the project, as well as from increased traffic as construction workers commute to and from the Project Site. Construction noise levels would vary based on the type of equipment as summarized in Table 6 below.

Table 7: Construction Equipment Reference Noise Levels as Measured at 50 feet

Equipment	Noise Level (dB[1])	Equipment	Noise Level (dB)
Drill rig truck	84	Jackhammer	85
Horizontal Boring Hydraulic Jack	80	Large Generator	82
Front end loader or Backhoe	80	Paver or Roller	85
Excavator	85	Dump truck	84
Source: Federal Highway Administration, 2006			

Sound from a point source is known to attenuate at a rate of -6 dB for each doubling of the distance to the receptor. For example, a noise Equivalent Continuous Level (Leq) of 84 dB as measured at 50 feet from the noise source would attenuate to 78 dB Leq at 100 feet from the source and to 72 dB Leq at 200 feet from the source to the receptor. Based on the reference noise levels in the above table, the noise levels generated by construction equipment at the Project Site may reach a maximum of approximately 85 dB Leq at 50 feet during site excavation and construction.

Noise performance standards for construction activities are included in the General Plan in Policy N-1.13 Construction Noise: **“**Minimize construction-related noise and vibration by limiting construction activities within 500 feet of noise-sensitive uses to between 7:00 a.m. to 7:00 p.m., unless further restricted through permitting.”

The Project Description notes that construction will be limited to the hours of 7:00 a.m. to 7:00 p.m. This will ensure that noise generated from construction activities will not adversely impact nearby residential and hotel uses. As such, a less than significant impact will occur.

Operations Noise: Project operation is not expected to increase noise levels significantly. The new hydrogen fuel dispensers require the use of compressors which can be loud – 80 dB six feet from the compressor location - but these noise levels drop to 60 dB fifteen feet

from the compressor[10] and would drop to 42 dB at 120 feet from the compressors which would be at a level the General Plan considers normally acceptable to residential uses and the nearby hotel. The Project Description shows the location of the temporary and permanent hydrogen fueling dispensers are more than 100 feet from the nearest residence and hotel. The proposed new offices would replace existing offices so they would not increase noise levels from site operations. This analysis demonstrates operational noise impacts from the Project would be similar to existing site uses and would result in a less than significant noise impact to sensitive receptors consistent with policies in the General Plan.

b) Result in generation of excessive groundborne vibration or noise levels? (Less Than Significant Impact)

The City has not established vibration limits to minimize the potential for cosmetic damage to buildings. However, Caltrans recommends a vibration limit of 0.5 inches/second peak particle velocity (PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 inches/second PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 inches/second PPV for ancient buildings or buildings that are documented to be structurally weakened. No known buildings that are documented to be structurally weakened or ancient adjoin the Project Site. Therefore, the 0.5 inches/second PPV limit would apply when considering the potential for groundborne vibration levels to result in a significant vibration impact.

The noise and vibration evaluation assessed typical vibration levels that could be expected from construction equipment at a distance of 25 feet, inclusive of required equipment and methods for construction. Project construction activities, such as drilling, the use of jackhammers, and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.) may generate substantial vibration in the immediate vicinity.

Table 7 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet (Caltrans 2020). High-power or vibratory tools and rolling stock equipment (e.g., tracked vehicles, compactors), may generate substantial vibration in the immediate vicinity. Vibratory rollers typically generate vibration levels of 0.210 inches/second PPV at a distance of 25 feet. Vibration levels are highest close to the source and attenuate with increasing distance. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

[10] H2 Compressors LLC Hy-Press-150 Specifications sheet: https://h2compressors.co/documents/H2Compressors_Hy-Press-150_TearSheet.pdf accessed 6/26/2025

Table 8: Typical Vibration Levels for Construction Equipment used during Project Construction

Equipment	Reference PPV at 25 ft. (in/sec)
Vibratory Roller	0.210
Large Bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003
Crack-and-seat operations (specific pavement rehabilitation process)	2.4

Source: Caltrans 2020

Project-related activities would not involve the use of explosives or other intensive construction techniques that could generate significant ground borne vibration or noise.

Vibration impacts to nearby residences are anticipated to be minor and below the Caltrans advisory of 0.3 inches/second PPV for buildings that are found to be structurally sound but where structural damage is a major concern, as the closest residences are located approximately 50 feet away from the Project Site. Minor vibrations adjacent to mechanized equipment and road treatments during construction work would be generated only on a short-term basis. Therefore, groundborne vibration and noise would have a less than significant impact.

Following construction, operation of the Project would not result in groundborne vibration or groundborne noise. Project operation would not generate vibration, except in instances where larger repairs to the road might be required. These conditions would be short-term and temporary (taking from one to several weeks to complete depending on the extent of damage or other circumstances); therefore, no operational impact would result.

c) For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels? (No Impact)

The nearest airport is Murray Field, which is located approximately 1.5 miles north of the Project Site. Murray Field is covered by the 2021 Airport Land Use Compatibility Plan (ALUCP) prepared for the Humboldt County Airport Land Use Commission (ALUC). As shown below in Figure 24, the Project Site is located more than 3,000 feet from the Murray Field Airport 50 dB CNEL area where noise levels from the airport would be a concern. Therefore, construction and operation of the project would not exacerbate existing airport noise. No impact would result.

Figure 24: Project Site and Murray Field Airport 50 CNEL Noise Contour



Source: Planwest Partners, 2025.

3.14 POPULATION AND HOUSING

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

The Project will not substantially change current HTA operations in terms of number of employees or number of buses and will not extend roads or other infrastructure. The Project Site includes existing commercially zoned parcels of land on which there is no existing housing.

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (No Impact)

The Project will modify the HTA facility by installing a new hydrogen fueling station to serve the new HTA bus fleet vehicles that use hydrogen gas as fuel. The new hydrogen buses replace existing buses that use fossil fuels. To accommodate the new hydrogen fueling facilities, existing offices will be demolished and relocated on-site. The project does not include new housing, generate significant new employment, or extend infrastructure into undeveloped areas. All construction will occur on a previously developed site with existing access and utilities. While the hydrogen fueling station will also be available to the public, estimated public use is limited and insufficient to drive demand for new housing, services, or employment. The Project does not involve any General Plan amendments, zoning changes, or other actions that would increase development potential in the surrounding area. Based on these considerations, the Project will not induce substantial unplanned population growth in the area either directly or indirectly, and the Project will have no impact in this category.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

The Project does not involve any actions that will displace substantial numbers of existing people or housing. The proposed Project will be conducted on an existing commercially zoned parcel of land on which there is no existing housing, and thus, will not displace any existing housing. The existing offices proposed for demolition (104 W Street) will all be relocated on site in newly constructed additions to existing administrative building as shown in Figures 5 and 6. The Project will have no impact on this category.

3.15 PUBLIC SERVICES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?				X
Police Protection?				X
Schools?				X
Parks?				X
Other Public Facilities?				X

The Project Site is located within the City of Eureka limits with fire protection provided by the Humboldt Bay Fire Department, and police protection by the City of Eureka and California Highway Patrol (CHP), who could be assisted by the Humboldt County Sheriff's office (if needed). The Project will not result in population growth or new residential development and will not generate increased demand for schools, parks, or other public facilities.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services? (No Impact)

The Project Site currently receives fire protection services from the Humboldt Bay Fire District. The Project will modify the HTA facility by installing a new hydrogen fueling station to serve the new HTA bus fleet vehicles that use hydrogen gas as fuel. The new hydrogen buses will replace existing fossil fuel buses. The new hydrogen fueling facilities will be safer than the existing fossil fuel dispensers on site, thereby minimizing potential impacts

to fire protection services in the area. The following describes how hydrogen fuel is less likely to cause a fire emergency than fossil fuels:

- All hydrogen fuel equipment is designed and installed to industry standards and will meet all fire code requirements. Crash protection will be installed around all equipment to protect it from damage by vehicles or equipment.
- Fire code and industry design specifications regulating hydrogen infrastructure have been in place for many decades. The likelihood of an explosion is extremely small. While leaks are possible, hydrogen's physical properties make fire spread from a leak unlikely. Unlike propane or gasoline fumes, hydrogen is less likely to accumulate and ignite.
- Additional safety design features are included to minimize potential hazards from leaks. Hydrogen is non-toxic, odorless, and does not "spill." It is much lighter than air and quickly dissipates into the atmosphere if leaked. This is also true for liquid hydrogen, which immediately vaporizes to a gas and quickly dissipates into the air[11].

Police services to the site are provided by the City of Eureka Police Department, consistent with the rest of Eureka. The Project would not result in the need to increase police staffing or personnel in other public agencies, create new hazardous conditions, or result in a modification to the road system that would restrict access to emergency services since the project does not substantially change the intensity or type of use at the site. The Project would not result in population growth or new residential development and would not generate increased demand for schools, parks, or other public facilities. Overall, no impact would occur.

[11] https://www1.eere.energy.gov/hydrogenandfuelcells/pdfs/h2_safety_fsheet.pdf accessed June 22, 2025.

3.16 RECREATION

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				X

Recreational facilities near the Project Site include Halvorsen Park approximately 950 feet to the west, adjacent to Humboldt Bay, the Waterfront Trail, boating facilities at Target and the Adorni Center, and Cooper Gulch and Playground approximately 2,000 feet to the southeast, as shown below in Figure 25.

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (No Impact)

Given the close proximity of Halvorsen Park and other recreational facilities to the Project Site, it is likely that some employees use them for recreation purposes during the day. However, the proposed Project would have no further impact on these facilities since the Project only involves improvements to an existing transit facility and would not generate additional population or activities that would increase the use of such facilities or contribute to their physical deterioration. Construction and operation of the Project also would not modify or impede access to Halvorsen Park, Cooper Gulch and Playground, or other recreation areas. No impact would result.

b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)

The Project does not include or require new or expanded recreational amenities. The Project does not require a need to construct or expand outside recreational facilities. As noted

above, it would not increase the number of employees or introduce new users that would drive the need for additional recreational amenities. Accordingly, no impact would occur.

Figure 25: City of Eureka Parks Near the Project Site



Source: Planwest Partners, 2025. Park Areas are from the City of Eureka GIS Web Application: https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604 accessed 6/17/2025.

3.17 TRANSPORTATION

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

The Project Site is located at 133 V Street and is bordered by 1st and 2nd Streets to the north and south, and V and X Streets to the west and east. W Street runs through the site, a portion of which is owned by HTA and closed to public access. There are existing sidewalks surrounding the Project Site. Highways 101 and 255 (major and minor arterials) and 3rd Street (major collector) are nearby.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (No Impact)

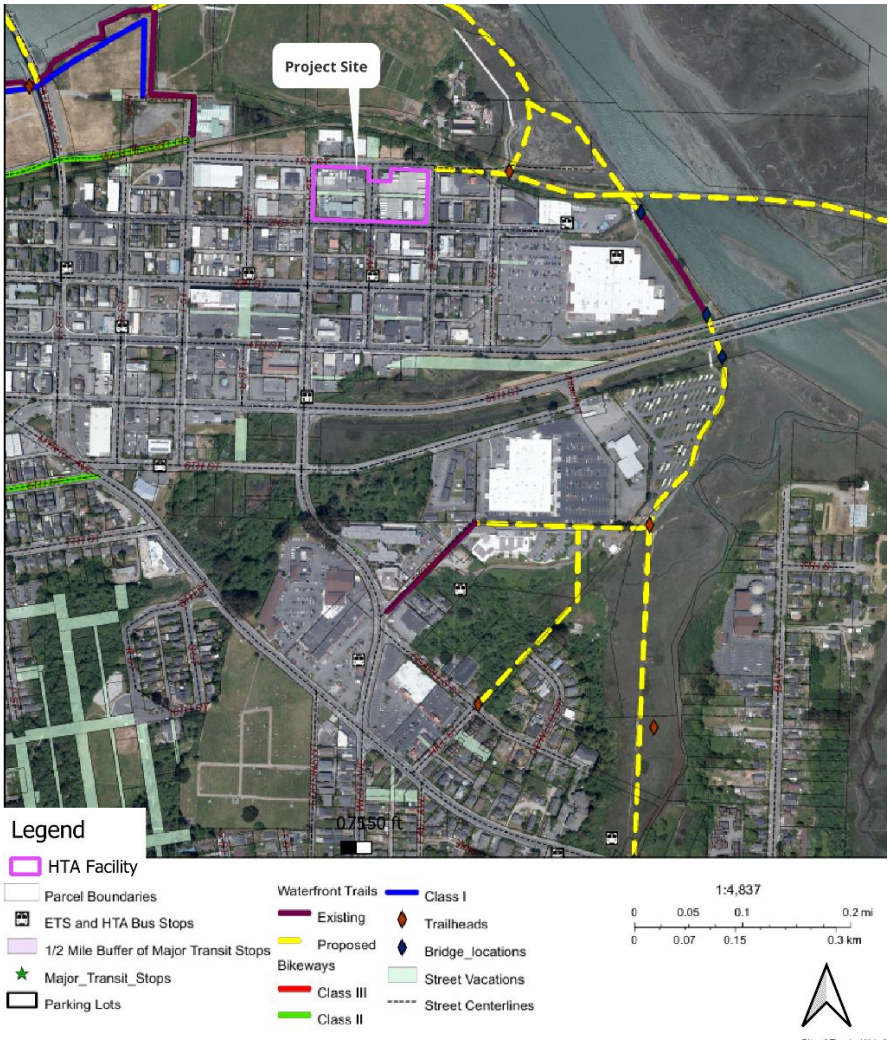
Site access for buses and employees will not substantially change as a result of the Project. The existing bus entrance with security gate on V Street will remain. Future public access to the hydrogen fueling facility will be from 1st Street. Transit facilities in the Project area include a bus stop located 250 feet to the south of the site and several other bus stops within ¼ mile of the site as shown below in Figure 26. The Project would add hydrogen fueling facilities to the existing HTA facilities on the Project Site and would not involve work at any of the nearby bus stops.

The figure below also shows existing bicycle facilities in the Project area which include Class II and Class III bikeways. The Project would not involve work within these bicycle lanes and the proposed hydrogen fueling facilities would not be used by bicycles. Therefore, there would be no change in the number of cyclists using bicycle facilities in the Project area and the Project would have no negative impact on bicycle circulation.

Pedestrian facilities in the Project area consist of sidewalks along the streets in the immediate vicinity of the Project Site which are shown in Figure 27. The Project would not involve changes to sidewalks adjacent to the Project Site and all pedestrian facilities would be retained. Therefore, the Project would have no impact on pedestrian facilities.

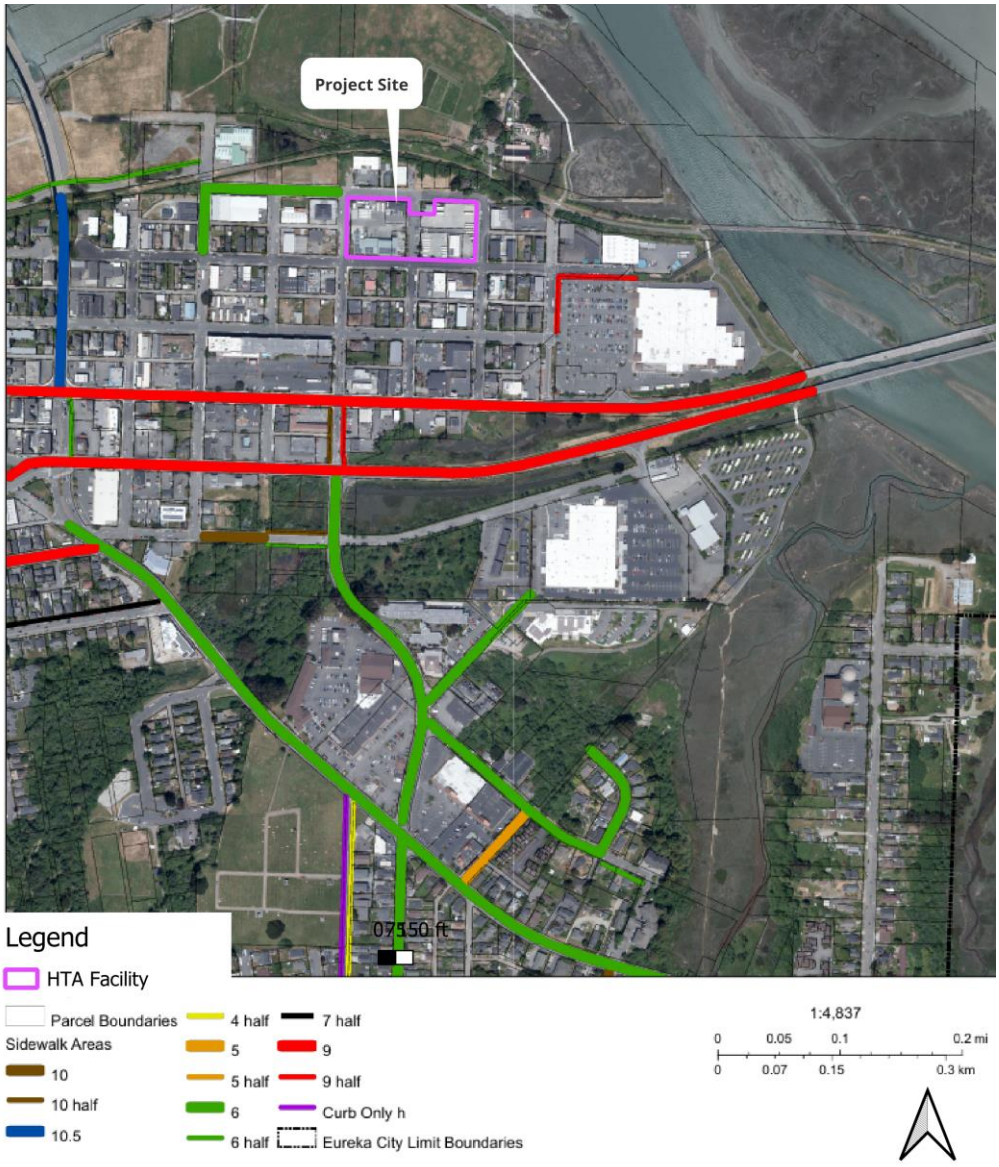
Additionally, HTA buses have bike racks to accommodate cyclists so the hydrogen fueling facilities will indirectly enable both pedestrians and cyclists to meet their transit needs in a way that does not result in any GHG emissions. This is consistent with City of Eureka 2040 General Plan Goal AQ 1.2 which encourages the City to "implement appropriate measures to reduce regional greenhouse gas emissions in Eureka, such as incentivizing the use of alternative energy sources…"

Figure 26: Transportation Facilities Near the Project Site



Source: Planwest Partners, 2025. Transportation facilities are from the City of Eureka GIS Web Application: https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604 accessed 6/17/2025.

Figure 27: Sidewalks Near the Project Site



Source: Planwest Partners, 2025. Sidewalk locations are from the City of Eureka GIS Web Application: https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604 accessed 6/17/2025.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (Less Than Significant Impact)

Section 15064.3 of the *CEQA Guidelines* provides guidance on evaluating a project's transportation impacts. According to Section 15064.3, vehicle miles traveled (VMT) is generally the most appropriate measure of transportation impacts, with the exception of projects consisting of the addition of travel lanes to roadways. VMT refers to the amount and distance of automobile travel attributable to a project, regardless of the type of vehicle

or number of occupants in a vehicle. Section 15064.3(b) establishes metrics and thresholds by which VMT can be evaluated for land use projects and transportation projects.

The Project will add hydrogen dispensers near existing fossil fuel dispensing facilities to serve the HTA fleet. HTA's Zero Emission Bus Rollout Plan (2023) includes current fleet information and planned purchases through 2040. HTA's current fleet totals approx. 47 buses. The replacement schedule is dependent on securing sufficient funding, with a goal of 100% fleet conversion by 2040. The hydrogen fueling facilities would be used exclusively by HTA initially and in the future would allow public use as well. It is expected that as the number of hydrogen-powered vehicles increases, the number of fossil-fuel powered vehicles will decrease proportionately. Therefore, the number of HTA vehicles coming to and leaving the facility will remain unchanged after the Project.

There will be a slight increase in vehicle trips when the HTA facilities are modified to allow public access to the hydrogen fuel dispensers. According to HTA staff, an estimated five vehicles will take advantage of the public hydrogen fuel dispensers on a daily basis. It is assumed that by providing fueling services directly where people live, there is a reduction in travel distance as people can obtain services locally, which would reduce VMT. Additionally, the proposed project would not substantially alter total office square footage, and therefore is unlikely to increase the number of employees driving to the facility on a regular basis.

Based on the information provided above, the project would cause a de-minimis increase in traffic with no additional improvements necessary. Likewise, the project would be screened out of CEQA Transportation analysis. Impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (No Impact)

The proposed Project will generally retain the existing driveways and existing sidewalks for the site. Site access for buses and employees will not substantially change as a result of the Project. The existing bus entrance with security gate on V Street will remain. Future public access to the hydrogen fueling facility will be from 1st Street. The proposed project would not involve substantial changes to traffic circulation patterns, and all construction activities would be contained on the Project Site including Staging Area A. The hydrogen fueling facilities would be used for hydrogen buses/vehicles, which operate and travel at speeds consistent with conventional vehicles on roadways. There would be no impact.

d) Result in inadequate emergency access? (No Impact)

The proposed project would not alter emergency access routes or impair emergency response capabilities. All construction and operational activities would be confined to the existing HTA property and would not require road closures, lane reductions, or changes to public rights-of-way that could impede emergency vehicle movement. Access to adjacent streets, alleys, and driveways would be maintained at all times during construction. The project does not involve changes to the road network, signalization, or circulation patterns and would not increase traffic to a level that could obstruct emergency access. Therefore, there would be no impact.

3.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k)?		X		
b) Cause a substantial adverse change in the significance of a tribal cultural resource that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.		X		

a and b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource? (Less than Significant Impact with Mitigation)

CEQA requires lead agencies to determine if a proposed Project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American Tribe.

A Cultural Resources Technical Report (CRTR) was prepared for the project by Chronicle Heritage in June 2025 that assessed the potential for archaeological and historical resources on the Project Site. There are no known archaeological resources located within the site. Under AB 52, Chronicle Heritage, on behalf of HTA and the City, reached out to

the California NAHC on May 1, 2025, to request a search of the Project area in the Sacred Lands File. The NAHC responded, indicating that the search results were negative and provided a list of 10 contacts representing four tribes with traditional affiliations to the area to contact for any additional findings. Letters were sent to each contact to notify representatives of the project and request any information on known Native American cultural resources in the Project area or vicinity. Responses were received from the Bear River Band of the Rohnerville Rancheria and the Wiyot Tribe indicating that there did not appear to be a significant impact on cultural resources but requesting protocols for inadvertent archaeological discoveries be put in place,

Additionally, the City of Eureka sent a referral and AB 52 request to the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria and the Blue Lake Rancheria in June 2025, and similarly, received requests to maintain inadvertent discovery protocols in place for the Project, which are included as mitigation measures CUL-1 and CUL-2. Therefore, impacts to tribal cultural resources will be less than significant with mitigation.

3.19 UTILITIES AND SERVICES SYSTEMS

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Water and sewer service for the Project is provided by the City. Electric power is be provided by PG&E, and telecommunications utilities by private providers.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (No Impact)

The Project consists of hydrogen fueling facilities that will not require water to operate. Operation of the hydrogen fueling facilities will not generate wastewater or change storm

drainage patterns on the site. All unused sewer laterals resulting from the demolition or otherwise identified will be capped at the main during construction. No new natural gas or telecommunication facilities will be required for the Project. Electrical power will be necessary for the operation of the proposed hydrogen fueling facilities. The Project Site has existing electrical facilities, as it currently operates as a fueling station, bus depot, and office complex for HTA.

The hydrogen fueling station will be on a separate new electricity meter. However, no transmission or distribution upgrades are anticipated. Therefore, the Project would not require the construction of new or expanded utilities that could result in significant environmental effects, the impact would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (No Impact)

The Project consists of hydrogen fueling facilities for HTA's new hydrogen-powered bus fleet. There will also be public access to the hydrogen fuel dispensers in the future. Refueling hydrogen-powered vehicles would generate no additional demand for water. Therefore, the proposed project would have no impact.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (No Impact)

The Project consists of hydrogen fueling facilities for HTA's new buses, and in the future public use. The hydrogen fuel facilities, such as the fuel dispensers, would generate no wastewater. The additional office space would replace existing offices and the administration building already has established wastewater connections to accommodate onsite employees. The City of Eureka's Elk River Wastewater Treatment Plant (ERWTP) provides wastewater services for the City of Eureka. According to the ERWTP 2017 Annual Report, the plant has a permitted capacity of 8.6 million gallons per day (MGD). The plant has an average flow rate of 4.75 MGD and was designed to treat peak dry weather flows of 9.5 MGD. Peak wet weather flow design and permitted capacity is 32.2 MGD. Wastewater generated by the project will be consistent with existing and/or historic uses at the site and other adjacent commercial and residential uses. Accordingly, the proposed project would not generate wastewater in excess of existing treatment capacity. Therefore, the proposed Project would have no impact.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Less Than Significant Impact)

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less Than Significant Impact)

The Project consists of hydrogen fueling facilities for hydrogen-powered vehicles. Refueling vehicles would generate no new sources of solid waste. While stopped at the facility, customers may choose to discard small amounts of solid waste from their vehicles. However, the daily increase in customers, once the public-facing hydrogen fuel dispensers become operational, would not be a substantial generator of solid waste.

Accordingly, the Project would not generate solid waste in excess of State or local standards or the capacity of local infrastructure. The Project will comply with regulations related to solid waste and impacts would be less than significant.

3.20 WILDFIRE

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slop instability, or drainage changes?			X	

The Project Site is located within a Local Responsibility Area (LRA), outside of any mapped State Responsibility Area or Very High Fire Hazard Severity Zone. Therefore, the wildfire significance thresholds in Appendix G do not formally apply. However, the Project would not substantially increase wildfire risk. The site is characterized by flat to gently sloping terrain and limited flammable vegetation, and it is served by existing hydrants and Humboldt Bay Fire Station 4, located approximately 0.5 miles south of the site. The Project would not require the construction of fire-related infrastructure or interfere with emergency response or evacuation plans. Hydrogen storage and fueling infrastructure will comply with applicable California Building and Fire Codes to minimize fire risk.

Figure 28: Fire Stations and Fire Hydrants Near the Project Site



Source: Planwest Partners, 2025.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? (No Impact)

The Project operation would not impair implementation or physically interfere with an established emergency response or evacuation plan; see Section 3.9 (Hazards and Hazardous Materials, Impact (f)) for discussion of the Project's effect on emergency response and evacuation plans. The Project would not impede access to any existing roads or pedestrian ways within the Project Area. No impact would result.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Less than Significant Impact with Mitigation)

The Project Area includes topography that is gently sloped and where windy conditions are common. Fire ignition risk associated with construction activities is low and limited to accidental ignition associated with a potential heavy machinery-related incident. The Project would not otherwise increase exposure to wildlife fire above existing conditions. The impact would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (Less than Significant Impact with Mitigation)

Development of the Project would not result in a need to expand wildfire protection infrastructure to the Project Area or in the immediate vicinity of the Project. New roads for fire defense and expanded water sources would not be required or are proposed. New temporary and permanent hydrogen fuel storage is proposed, but any fire risk would be minimal due to the fire safety measures required by the building codes. A less than significant impact would result.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes? (Less than Significant Impact with Mitigation)

Project construction would not expose people or structures to significant risk. The project area includes topography that is gently sloped and mostly unvegetated. Staging Area A does have some surrounding riparian vegetation, but the fire risk is less than significant because it is a band of vegetation about 100 feet wide that is surrounded by cropland to the north and urban development to the south. A potential wildfire is expected to be quickly extinguished due to the presence of the nearby fire station, fire hydrants and lack of flammable vegetation in the vicinity. A less than significant impact would occur.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact
Does the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		X		
c) Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?		X		

a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Less than Significant Impact with Mitigation)

The Project Site is an existing transit operations and maintenance facility that has been previously developed and is predominantly covered by hardscape (asphalt, concrete, and packed gravel) and buildings, resulting in minimal potential to support sensitive species or environmentally sensitive habitat. Staging Area A contains previously identified wetlands however, vegetation is dominated by non-native, moderately invasive species typical of landscaped or disturbed environments, and no direct impacts to wetlands would occur.

Construction activities would be confined to already disturbed areas, and Staging Area A would be restored to pre-project conditions following construction. Because the project would not introduce new land uses, expand the facility footprint into undisturbed areas, or remove or alter sensitive habitat, potential effects to fish, wildlife, or plant species are minimal. Potential impacts to biological, cultural, and tribal cultural resources are addressed in Sections 3.4, 3.5, and 3.18, respectively. With implementation of the mitigation measures identified in this Initial Study, potential impacts to sensitive biological resources or cultural resources would be reduced to less than significant levels.

b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? (Less than Significant Impact with Mitigation)

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines § 15355). The Project involves upgrades to an existing transit operations and maintenance facility, including construction of a hydrogen fueling station, administrative office improvements, and maintenance bay retrofits, all within a previously developed and highly disturbed site. The Project would not expand the facility footprint into undisturbed areas, introduce new land uses, or generate new population growth that could contribute to cumulative development pressures in the area.

Potential impacts are limited to air quality, biological resources, cultural resources, and tribal cultural resources—each of which has been evaluated in this Initial Study and would be reduced to less than significant levels with implementation of mitigation measures AQ-1, BIO-1, BIO-2, BIO-3, CUL-1, and CUL-2. When viewed in connection with past, present, and reasonably foreseeable future projects in the Eureka area, the project's incremental contribution to environmental impacts would be minor. This is largely due to its location within an existing transportation facility, its lack of off-site construction activities, and its minimal operational changes beyond supporting existing and planned transit services. As such, the Project would not result in a cumulatively considerable impact on air quality, biological resources, or cultural resources. With implementation of the identified mitigation measures, cumulative impacts would be less than significant.

c) Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant Impact with Mitigation)

As evaluated throughout this IS/MND, the Project would not result in environmental effects that would cause substantial adverse direct or indirect impacts on human beings. The project would occur entirely within an existing transit operations and maintenance facility and would not introduce new land uses or activities that would pose health or safety hazards to the public. Potential short-term construction impacts, such as noise, dust, or traffic disruption, would be temporary and managed through standard construction best management practices. In addition, mitigation measures CUL-1 and CUL-2 require procedures for the inadvertent discovery of cultural and tribal cultural resources, which further reduces the potential for adverse effects on people to less-than-significant levels. With implementation of these mitigation measures, and as supported by the more detailed topic-specific analyses provided in this IS/MND, the project would not cause substantial adverse effects on human beings, either directly or indirectly. Therefore, impacts would be less than significant with mitigation.

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