Humboldt Transit Authority Hydrogen Fueling Station

Final Initial Study / Mitigated Negative Declaration

SCH No. 2025080239

City of Eureka

September 10, 2025

Prepared by:

City of Eureka
531 K Street
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Attachment 1: Comment Letter – CA Coastal Commission (received August 4, 2025)

1. Purpose of the Final IS/MND

This Final Initial Study/Mitigated Negative Declaration (IS/MND) for the Humboldt Transit Authority Hydrogen Fueling Station consists of the Public Circulation IS/MND, comments received during public circulation, City of Eureka (City; Lead Agency) responses to comments, and minor revisions to the IS/MND via errata. The Public Circulation IS/MND identified the likely environmental consequences associated with the Project and recommended mitigation measures to reduce potentially significant impacts.

2. Environmental Review Process

The City, serving as the California Environmental Quality Act (CEQA) Lead Agency, prepared an IS/MND for the Humboldt Transit Authority Hydrogen Fueling Station (hereafter referred to as the Project). The IS/MND was circulated for 30 days between August 6, 2025 and September 5, 2025 to allow agencies and the public the opportunity to review and comment on the document. The IS/MND was submitted to the State Clearinghouse for review by state agencies and to agencies with jurisdiction by law over resources affected by the Project.

In accordance with the requirements of CEQA, the City provided a Notice of Intent to Adopt a Mitigated Negative Declaration to the public, responsible agencies, trustee agencies, Humboldt County Clerk, and State Clearinghouse. The Notice of Intent to Adopt was filed with the Humboldt County Clerk Recorder on July 31, 2025. Pursuant to CEQA Guidelines Section 15072 (b) (3), the Notice of Intent was mailed to surrounding property owners. The City posted the IS/MND on its website at https://www.eurekaca.gov and made a hardcopy available for public review at the City Clerk's Office at 531 K Street, Eureka City Hall, Eureka, CA 95501.

As included in the Notice of Intent to Adopt, the Eureka Planning Commission will hold a hybrid virtual and in-person meeting in Eureka City Council Chambers on Wednesday September 10, 2025 at 5:30 p.m. to consider adoption of the IS/MND and approval of the Project. Noticing and review periods required by CEQA have been satisfied. The IS/MND was completed under the direction and supervision of the City with support from HTA's consultant and reflects the City's independent judgement and analysis of the potential environmental effects of the Project.

The contact person for the City is:

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3. Comments and Responses

a) **Comments Received:** During the public comment period for the IS/MND, the City received one comment letter from California Coastal Commission staff (Coastal Commission), included as Attachment 1 to this document. Comments were primarily concerned with the wetland area adjacent to Staging Area A, and potential impacts that might occur during the temporary construction period of the Project as well as the post-construction, longer-term use of Staging Area A for overflow parking proposed by the Applicant.

b) **Response to Comment**: In 2015 a wetland delineation was completed by J.B. Love and Associates and showed varying wetland areas (one-, two-, and three-parameter wetlands) on the property planned as Staging Area A. Given that the study was approximately 10 years old at the time the Applicant applied for a Coastal Development Permit, the City requested the Applicant update the report to reflect any changes that may have occurred on the property. In July 2025, the City received communication from J.B. Love and Associates that the wetland delineation from 2015 remained consistent with existing conditions. As site conditions have remained steady, the Applicant is still planning to use the upland portion of the property (the area that does not delineate as wetlands) as Staging Area A during Project construction. In the event that wetland boundaries expand such that Staging Area A becomes infeasible for use, alternative staging or parking areas will be identified and evaluated at that time through the appropriate permitting process, such as a new Coastal Development Permit (CDP), CDP exemption, or modification to the existing CDP.

   To address the Coastal Commission's concerns regarding the construction staging's proximity to wetlands, the City, with concurrence from the Applicant, has updated the IS-MND Mitigation Measure BIO-2 to require, in addition to the mitigation measures and best management practices (BMPs) already identified in the IS/MND:

   - A minimum 5-foot buffer between Staging Area A and the wetland boundary; and
   - A qualified biologist to monitor the wetland bi-annually during project construction and at completion of construction, to ensure that site conditions have not changed and that the adjacent wetlands are adequately protected from Project activities.

   This buffer and monitoring will help ensure that construction activities avoid wetland resource impacts. These minor refinements to Mitigation Measure BIO-2 only affect construction staging and do not alter the Project design, layout, or intensity.

   With respect to long-term use of Staging Area A, the City, with concurrence from the Applicant, has updated the IS-MND Mitigation Measure BIO-2 to clarify that any post-construction or ongoing operational use of the area for overflow bus parking or other activities will require HTA to submit a long-term site plan and obtain the appropriate

permits, such as a modification to the existing CDP, a new CDP, or a CDP exemption, before occupying or converting the area for such purposes. This process will allow for a full assessment of potential environmental impacts and ensure that future uses of Staging Area A are consistent with biological resource protection policies of the Coastal Act and City LCP, and local requirements.

4. Errata

The purpose of this errata is to document revisions to the IS/MND that are intended to address the comment received through minor refinements and clarifications of project details since the IS/MND was submitted to the Office of Planning and Research State Clearinghouse on August 6, 2025, and publicly circulated between August 6, 2025 and September 5, 2023. The fundamental analysis, conclusions, and mitigation measures presented in the draft IS/MND remain the same.

The errata include excerpts of text from the IS/MND that are proposed for modification and does not include the entire IS/MND. Specifically, the entire subsection that contains the text proposed for modification is copied into the errata.

Deleted text from the original IS/MND is stricken with single ~~strikethrough~~ and newly proposed text in the errata is <u>underlined</u>. Unchanged text remains in normal font. Only the subsection of the original IS/MND that is proposed for modification is copied into the errata.

<u>ORIGINAL IS/MND SECTION 3.4 BIOLOGICAL RESOURCES, SUBSECTION C AND MITIGATION MEASURE BIO-2</u>

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).

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~~ a 5-foot Wetland Buffer.

Prior to construction, a qualified biologist will review and flag the wetland areas and a 5-foot buffer between the wetland areas and Staging Area A. HTA will ensure a temporary stake and rope fence (or similar fence type) is installed following the flags that demarcate the outer edge of the wetland ~~areas~~ buffer. 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. Wetland monitoring by a qualified biologist will be performed bi-annually during construction and at the completion of construction to ensure conditions remain stable and wetlands are appropriately protected from Project activities.

With respect to long-term use of Staging Area A, any post-construction or ongoing operational use of the area for overflow bus parking or other activities will require HTA to submit a long-term site plan and obtain the appropriate permits, such as a modification to the existing Coastal Development Permit CDP, a new CDP, or a CDP exemption, before occupying or converting the area for such purposes. This process will allow for a full assessment of potential environmental impacts and ensure that future uses of Staging Area A are consistent with biological resource protection policies of the Coastal Act and City LCP.

Chris Lohoefener

From: McNamara, Cade@Coastal <Cade.McNamara@coastal.ca.gov>
Sent: Thursday, August 14, 2025 11:27 AM
To: Caitlin Castellano; Chris Lohoefener
Cc: Leavitt, Amber@Coastal
Subject: CDP-25-4; Humboldt Transit Authority Hydrogen Fueling Station

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Hi Caitlin and Chris,

We reviewed the proposal for the Hydrogen Fueling Station and have the following questions and comments regarding Staging Area A, given the wetland delineation we have on file for the parcels along First Street:

- We notice that the wetland delineation was executed 10-years ago. Has the City considered the possibility that wetland conditions have changed or that mapped areas have grown to an extent that could significantly affect the use of that area for staging? We understand that prior to construction a qualified biologist will review and flag wetland areas; however, it is unclear whether the site will still be used for staging if wetlands have expanded to an extent that makes it difficult or impossible to use this area for staging while maintaining an appropriate buffer.

- It is our understanding that there would likely be a zero-foot buffer from wetlands around the staging area. Given the nature of the construction site and future ongoing use proposed, a zero-foot buffer area could result in impacts to surrounding wetlands, both with construction for Staging Area A, and plans to install "semi-permanent water capture and infiltration features". We recommend requiring a larger buffer from wetlands and clarifying where alternative staging will occur if wetlands have expanded to make Staging Area A unusable. *"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."* -We recommend that proposals for this area, and their potential associated impacts, be considered and analyzed as permanent as ongoing activities are called out to convert this area to parking to serve HTA.

Attachments for context:
MMBIO-2 from ISMND:

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.

Wetland Delineation Map (2015):



Thank you,

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