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Addendum to the 2040 GP Environmental  
Impact Report

# Waterfront Eureka Plan

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*Prepared for and by:*

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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
ADT	Average Daily Traffic
ADWF	Average Dry Weather Flow
ALUCP	Airport Land Use Compatibility Plan
BMP	Best Management Practice
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
FAR	Floor Area Ratio
GP	General Plan
GHG	Greenhouse Gas
Harbor District	Humboldt Bay Harbor Recreation and Conservation District
HBMWD	Humboldt Bay Municipal Water District
HCAOG	Humboldt County Association of Governments
LCP	Local Coastal Program
LOS	Level of Service
MGD	Million Gallons Per Day
MS4 Permit	Small Municipal Separate Storm Sewer System Permit
NCUAQMD	North Coast Unified Air Quality Management District
NPDES	National Pollutant Discharge Elimination System
OPR	Governor's Office of Land Use and Climate Innovation
RTP	Regional Transportation Plan
SLR-CIP	Sea Level Rise Vulnerability and Capital Improvement Program
SWMP	Storm Water Management Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRP	Storm Water Resource Plan
THPO	Tribal Historic Preservation Officer
VMT	Vehicle Miles Traveled
WEP	Waterfront Eureka Plan
WWTP	Elk River Wastewater Treatment Plant

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# 1 Introduction

## 1.1 Project Overview

The City of Eureka (City) embarked on the Waterfront Eureka Plan (WEP) to provide a roadmap for development and redevelopment of the vacant and underutilized sites and buildings along and near Eureka’s northern waterfront, to facilitate new mixed-use development and result in the creation of at least 115 housing units in the Plan Area by 2027, in part by streamlining environmental review of subsequent projects. The WEP is a regulatory blueprint and will be used by City leaders, residents, businesses, and developers to implement the 2040 General Plan (GP) and facilitate and inform the Local Coastal Program (LCP) Update, with portions of the WEP included directly in the LCP Update. The WEP outlines community-led visions for the future of the Plan Area, and contains focused regulations, guidelines, strategies, and actions which will govern and shape development in the Plan Area to achieve these visions.

## 1.2 California Environmental Quality Act Compliance

The City prepared an Environmental Impact Report (EIR) for the 2040 GP (SCH # 2016102025; available on the City’s website: <https://www.eurekaca.gov/806/2040-General-Plan-Update-Preparation>). The EIR was certified, and the 2040 GP was adopted, on October 15, 2018. The WEP implements the 2040 GP within the WEP Plan Area, specifically implementing GP Policy LU-2.11 which calls on the City to initiate a specific plan for the Core Area, which includes the WEP Plan Area as well as Downtown. The development identified in the WEP is therefore contemplated by the GP EIR (“prior EIR”). The California Environmental Quality Act (CEQA) provides if a project is adequately described by a prior EIR, and none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred, an addendum to the EIR may be prepared. The decision-making body (the City Council) shall consider the addendum with the prior EIR prior to making a decision on the project.

This proposed Addendum describes the WEP and considers whether any of the conditions described in CEQA Guidelines Section 15162 would apply.

CEQA Guidelines Section 15162(a) states the following:

(a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Guidelines Section 15164(a) and (e) further state:

(a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

## 1.3 Public Review Process

An Addendum to an EIR must be considered along with the proposed adoption of the WEP. While an Addendum is not circulated for a public review period, the City Council must receive public comment on the adequacy of the Addendum at the public hearing where the adoption of the WEP is being considered.

## 2 Project Description

### 2.1 Project Location

The WEP Plan Area encompasses approximately 130 acres in the northern portion of Eureka, between Humboldt Bay and Downtown Eureka. The Plan Area consists of three districts identified in the City of Eureka 2040 GP: the Commercial Bayfront, Old Town, and the Library District, as more specifically described in the WEP.

### 2.2 Project Objectives

The intent of the WEP is to be consistent with the goals of the City of Eureka 2040 GP. While the 2040 GP addresses issues relevant to the entire City, the WEP focuses specifically on the revisioning and buildout of the City's Coastal Core Area, providing detail on regulations, guidelines, strategies, and implementing actions to achieve the community's visions for three Core Area districts: the Commercial Bayfront, Old Town, and Library District. The 2040 GP Land Use Policy LU-2.11 serves as the impetus to develop a specific plan to implement the 2040 GP's vision for the Plan Area.

### 2.3 Project Characteristics

The WEP is a specific plan that provides for the systematic implementation of the 2040 GP within the Plan Area. The prior EIR analyzed gradual buildout of the City over a 20-year period (through 2040), including the addition of up to 1,886 new residential dwelling units to house approximately 3,683 new residents, and up to 1.6 million square feet of new non-residential uses, to accommodate approximately 3,595 new employees. The WEP seeks to facilitate new walkable, infill, mixed-use development, including the redevelopment of underutilized sites, consistent with the growth assumptions of the prior EIR.

## Existing Conditions, Preferred Futures, and Land Use Designation for the Plan Area Districts

WEP Chapter 3, "Existing Conditions and Future Opportunities," describes the current conditions of the three Plan Area districts, presents a vision for each district's future ("Preferred Futures"), and defines land use designations and development intensities in alignment with these visions and the 2040 GP.

### Commercial Bayfront

#### Existing Conditions

The Commercial Bayfront consists of the Eureka waterfront north of 1st Street/ Waterfront Drive, and west-east from C Street to Y Street. The western portion of the district from C Street to F Street is part of the nationally-recognized Old Town Historic District.

This district features a variety of City-owned public access and recreational facilities including the Madaket (C Street) Plaza and Dock; Coast Guard (F Street) Plaza and Dock; the Eureka Boardwalk and other segments of the Eureka Waterfront Trail; the Adorni Recreational Center (Adorni Center), Pier, and Dock; Halverson Park; Bonnie Gool Guest Dock; and the Samoa Boat Launch Facility. Cal Poly Humboldt also maintains the Humboldt Bay Aquatic Center (Aquatic Center) on City-owned waterfront property adjacent to the Adorni Center, and the Humboldt Bay Rowing Association maintains a boathouse and dock on City land and tidelands just west of the Samoa Boat Launch Facility.

The Commercial Bayfront was once home to buildings and facilities that supported Eureka's bustling maritime-industrial activities, but the majority of the legacy maritime structures have been demolished, and much of the district is currently vacant and underutilized. There are a variety of uses on the land that is currently developed, including not only the public access and coastal recreational uses described above, but also visitor-serving commercial uses, artisan manufacturing (including the Dick Taylor Chocolate Factory and Blue Ox Mill Works on the west and east ends of the district, respectively), and a few residences and office buildings.

### Preferred Future

The Commercial Bayfront will transform into a vibrant and dynamic mixed-use district that celebrates its waterfront location and cultural legacy with a diversity of land uses and pedestrian-oriented development, where coastal trails, a shoreline boardwalk, outdoor public spaces, recreational boating and fishing facilities, and other public and commercial recreational facilities are integrated with ground-floor visitor-serving and coastal-related uses. Coastal hazard risks will be minimized through comprehensive, area-wide adaptation strategies. In the western portion of the district, between C and I Streets, development will occur in a manner compatible with the historic character and development pattern of Old Town, with a range of housing and office uses located above and behind active ground-floor uses in mixed-use, multi-story buildings oriented towards 1<sup>st</sup> Street and the Eureka Boardwalk. In the remainder of the district, new development will be more flexible in terms of form, but will also promote physical and visual access to the bayfront, and connect to Waterfront Drive and the Eureka Waterfront Trail with pedestrian pathways.

### Land Use Designation

Visitor-serving retail, restaurants, multi-story lodging, entertainment, cultural and art facilities, recreation, leisure activities and tourist services; commercial fishing facilities, and other coastal-dependent and related commercial, recreational and civic uses; artisan manufacturing; residences; and offices. Intended to prioritize coastal-dependent, coastal-related and visitor-serving commercial and recreational uses in a pedestrian-friendly environment encouraging physical and visual access to the bayfront. New office and residential uses are primarily allowed only as part of mixed-use developments, on upper floors and non-street/trail-facing portions of buildings.

The proposed intensity, expressed as a Floor Area Ratio (FAR) of 4.0, is consistent with the 2040 GP.

## Old Town

### Existing Conditions

Old Town includes historic multi-story buildings from the 1850s and beyond with pedestrian-scaled shops and storefronts, restaurants, museums and cultural facilities, art galleries, theaters, lodging facilities, and other related uses lining the sidewalks, and a range of office and residential uses above the first floor.

Old Town was once the central downtown core of the historic City of Eureka, and the Old Town Historic District is on the National Register of Historic Places (the Historic District includes the majority of Old Town as well as the western portions of the Library District and Commercial Bayfront). Old Town is also the center of the s District. Old Town is a window into Eureka’s rich history and is now a celebrated place, appreciated by visiting tourists and strongly represented in the local identity.

#### Preferred Future

Old Town will continue and grow as a premiere historic and cultural district, and as a primary regional center for tourism, recreation, leisure activities, arts, cultural opportunities, and shopping. New development will continue Old Town’s dense development pattern of multi-story, mixed-use buildings, with historic architecture preserved and celebrated, and new buildings complementing, but not copying, existing historic structures. All development, new and old, will support an active and inviting public realm. To support ground-floor businesses and ensure the presence of people around the clock, additional housing will be added above and behind active local- and visitor-serving ground-floor uses fronting the street. Old Town’s status will grow as a pedestrian district where people park once or arrive by bus, bike, or foot. Potential stormwater drainage capacity and rising groundwater issues in the lower-lying, western-most portion of the district will be preemptively addressed as the climate changes and sea levels rise.

#### Land Use Designation

Prioritizes visitor-serving retail, restaurants, lodging, entertainment, arts, cultural facilities, leisure activities, recreation, and tourist-related uses, and also allows artisan manufacturing, neighborhood-serving commercial retail and services, as well as residential and office uses. Primarily caters to local and non-local visitors in historic and multi-story buildings with pedestrian-scaled storefronts lining the sidewalks that generate visitor and customer foot traffic and provide visual interest, while residential and office uses primarily on upper floors and non-street-facing portions of buildings.

The proposed maximum FAR of 5.0 is consistent with the 2040 GP.

## Library

#### Existing Conditions

East of Old Town, north of Downtown, the Library District is one of the earliest residential neighborhoods in Eureka, and includes multiple historic single-family homes and multi-family residential structures, as well as residential structures that have been converted into professional offices, visitor lodging, restaurants, and entertainment and cultural uses, with the Carson Mansion (Ingomar Club) and the Humboldt County Library in the heart of the district. The western portion of the Library District is part of the nationally-recognized Old Town Historic District and the Eureka Cultural Arts District, and the entire Library District is located on a raised terrace above the Commercial Bayfront, outside of areas subject to flood risk.

#### Preferred Future

The Library District will increase in vibrancy as a walkable, self-sufficient, office-residential neighborhood that also includes limited visitor-serving destinations supportive of increased cultural tourism. The Library District will grow through compact, infill development, taking advantage of the District’s prime location outside of the sea level rise hazard area to accommodate additional housing, while preserving historic structures and associated historic neighborhood charm. Retail and service commercial uses will primarily support residents and employees by

providing everyday goods and services such as child daycare and neighborhood markets, and will also include limited visitor-serving uses, such as commercial lodging. In addition to traditional office spaces, the District will host home-based businesses and live/work and coworking spaces. Additional housing will take the form of accessory dwelling units (ADUs), owner-occupied condominiums, artist lofts, townhomes, and mid-rise, mixed-use and residential-only infill opportunities.

### Land Use Designation

An eclectic mix of housing, small-scale offices, commercial retail shops and services, artisan manufacturing, and other compatible local- and visitor-serving uses that support both neighborhood self-sufficiency and cultural tourism. Intended to generally retain the human-scaled character and form of the historic residential neighborhood, while accommodating growth and adaptive reuse.

The proposed maximum FAR of 2.5 is consistent with the 2040 GP.

## Zoning and Development Standards

WEP Chapter 4 includes zoning regulations and development and design standards to implement the Preferred Futures and land use designations for the three Plan Area districts. Once incorporated in the LCP Implementation Plan and certified by the California Coastal Commission, this zoning will replace the existing coastal zoning regulations for the WEP Plan Area. In addition to required, objective design standards, WEP Chapter 4 also includes non-binding design guidelines, meant to enhance the area's overall visual quality while strengthening visual continuity and reinforcing a human-scaled, pedestrian-friendly environment.

## Visions, Strategies, and Actions

The major driver of implementing the WEP is development that is consistent with, and incorporates and encompasses, the WEP's vision. In many cases, however, public projects, programs, and other actions are needed to supplement and entice new development. These implementing actions are grouped under overarching vision statements and strategies included in the Housing, Mobility & Access, Community & Culture, Economy & Infrastructure, and Coastal Hazards & Climate Change Chapters 5-9 of the WEP. The five overarching vision statements are as follows:

1. A diverse mix of housing options serving all income levels.
2. A connected and walkable community that is welcoming and accessible to all.
3. A hub for recreation, arts, and culture with a strong identity rooted in a rich history and connection to the waterfront.
4. A vibrant and safe destination for residents, businesses, and tourists.
5. A resilient and adaptive community that proactively plans for climate change.

WEP Chapter 10 includes an Implementation Matrix listing all implementing actions covered in WEP Chapters 5-9, along with a timeframe and responsible party/City department for each action.

## 2.4 Project Approvals

The WEP, as a specific plan, must be approved by the City Council and found consistent with the City's 2040 GP. The WEP contemplates slightly changing the 2040 GP land use designation descriptions (but not intensity maximums) based on community feedback. Any modifications to the existing land use designations of the 2040 GP will be made prior to implementation of the WEP. In addition, the LCP must be updated to reflect the provisions of the WEP as appropriate, with the LCP update requiring certification by the California Coastal Commission before going into effect.

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## 3 Initial Study

This Section evaluates the proposed WEP and its potential environmental effects in light of the prior EIR (SCH # 2016102025), certified October 15, 2018.

### 3.1 Aesthetics

a) *Would the project have a substantial adverse effect on a scenic vista?*

Prior EIR Determination

The prior EIR determined impacts related to scenic vistas from implementation of the 2040 GP would be **less than significant** with compliance with 2040 GP policies and the City's development standards and permitting processes. The prior EIR specifically cited GP Policy LU-1.12, which aims to preserve Eureka's unique charm and character by applying design guidance that promotes attractive and well maintained development that carefully integrates the new with the best of the old, and GP Policy LU-1.16, which seeks to maintain and improve physical linkages from the community to the coastline, gulches, forests and Eureka's other distinct recreational resources where feasible in part by creating/preserving view corridors. According to the prior EIR, the 2040 GP would result in gradual physical changes that would be distributed broadly and incrementally over a 20-year period across the 16.4-square-mile City and would not constitute a substantial intensification or concentration of physical development.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the 2040 GP. The WEP includes design standards and guidance, which are consistent with, and implement, GP Policy LU-1.12. The WEP also seeks to connect the Plan Area both visually and physically with Humboldt Bay including through Strategy 2.1 (improve public access to and along the waterfront), and specifically through Implementing Action 2.1d (ensure waterfront views), consistent with GP Policy LU-1.16. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Prior EIR Determination

The prior EIR determined the 2040 GP did not include any areas within designated state scenic highways, and, therefore, did not adversely affect scenic resources within a state scenic highway (i.e., **no impact**).

WEP Finding

The proposed WEP Plan Area is within the area evaluated by the 2040 GP and no scenic highways have been designated since the prior EIR was adopted. Therefore, the proposed WEP would not result in any new or substantially more severe significant environmental impact.

*c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

Prior EIR Determination

The prior EIR determined impacts to visual character or quality would be **less than significant** with implementation of 2040 GP policies designed to protect and enhance the visual character and quality of the Plan Area, including GP Policy LU-1.12, which seeks to preserve Eureka's unique charm and character by applying design guidance that promotes attractive and well maintained development that carefully integrates the new with the best of the old; GP Policy LU-1.14, which promotes safe, clean, and pedestrian friendly streetscapes and public spaces through careful design and active maintenance of sidewalks, street trees, landscaping, street furnishings, lighting, public art and other elements; GP Policy LU-1.16, which seeks to maintain and improve physical linkages from the community to the coastline, gulches, forests and Eureka's other distinct recreational resources where feasible by creating/preserving view corridors; and GP Policy LU-1.19, which promotes the creation of a strong and visually appealing pedestrian environment by requiring the use of transparent commercial storefronts (i.e., windows and doors) and continuous and compatible building facades, while prohibiting the creation of blank walls and discontinuity in building facades, in the downtown, commercial core, mixed use, and neighborhood commercial areas. The prior EIR also indicated development under the 2040 GP would be subject to development and design standards and permitting processes which would ensure new development is of high visual quality and is compatible with the surrounding environment.

WEP Finding

The proposed WEP would accommodate new walkable, infill, mixed-use development consistent with the type and intensity of development described by the 2040 GP. The proposed WEP includes design standards and guidance which is consistent with, and implements, GP Policy LU-1.12. The WEP also includes a number of implementing actions related to providing safe, clean, and pedestrian-friendly streetscapes (e.g., WEP Actions 2.1a-f, 2.2a-g, 2.3a-d, 3.2c, 3.3b, 3.3c, 3.3d, 3.3f-h, 4.1c, 4.2b, 4.2d, 4.2f, 4.2g) which are consistent with, and carry out GP Policy LU-1.14. Additionally, the WEP seeks to connect the Plan Area both visually and physically with Humboldt Bay including through WEP Action 2.1d, consistent with GP Policy LU-1.16. And the WEP designates pedestrian-focused frontages which require transparent commercial storefronts, and maximum setback standards to ensure continuous building facades along the street, aligning with and implementing GP Policy LU-1.19. Furthermore, WEP Actions 1.2f and 2.2d call for comprehensively updating the Coastal Zoning Code, including adding development standards that protect and enhance visual resources, such as standards requiring alley access for parking and prohibiting surface parking lots between buildings and the street. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

*d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Prior EIR Determination

The prior EIR concluded lighting impacts on day or nighttime views would be **less than significant** with GP Policy LU-1.13, which minimizes obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary, and requires light for development to be directed downward to minimize spill-over onto adjacent properties and reduce vertical glare. Implementation of the 2040 GP was determined to result in

minor increases in ambient light; however, the City is already urbanized and subject to substantial amounts of existing nighttime ambient light. As a result, the increase in light from new development under buildout of the 2040 GP would not significantly affect nighttime views of the sky.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the 2040 GP. The WEP development standards require compliance with City lighting standards, consistent with 2040 GP Policy LU-1.13. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.2 Agriculture and Forestry Resources

Impacts to agricultural and timber resources resulting from build-out of the land uses identified in the GP were analyzed in the prior EIR Section 3.2 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G:

- a) *Would the project result in conversion of Important Farmland to non-agricultural use?*
- b) *Would the project conflict with zoning for agriculture, aquaculture-supporting, or timber uses?*
- c) *Would the project conflict with zoning for aquaculture-supporting uses?*
- d) *Would the project conflict with zoning for forest land or timber land?*
- e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use, aquaculture-supporting uses to non-aquaculture-supporting uses, or conversion of forest land to non-forest use?*

### Prior EIR Determination

The prior EIR concluded impacts to agriculture and timber resources would be **less than significant** with the implementation of 2040 GP policies, including, but not limited to, those calling for the protection and conservation of important farmland, and the conservation of existing zoning for agriculture and timber uses (Policies AG-1.1, AG-1.7, AG-1.9, NR-3.1).

### WEP Finding

The WEP Plan Area has been developed with urban uses since the late 1800s (Old Town was established in 1850). The area is not zoned for agricultural or timber production and does not contain Farmland or forest land. The proposed WEP allows for commercial fishing and aquaculture, a form of agriculture, in the Commercial Bayfront. The City also has extensive shoreline outside of the Plan Area zoned specifically for coastal-dependent industry where commercial fishing and aquaculture are further prioritized. Consistent with the 2040 GP, the proposed WEP plans for growth within an existing developed area, away from agricultural and forest resources. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

### 3.3 Air Quality

a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Prior EIR Determination

As discussed in the prior EIR, the City is in attainment of all federal and state criteria air pollutant standards, except for state 24-hour particulate matter (PM<sub>10</sub>) levels, for which the entire North Coast Air Basin, including Humboldt County, is currently designated as a non-attainment area and for which the North Coast Unified Air Quality Management District (NCUAQMD) prepared a draft PM<sub>10</sub> Attainment Plan in 1995. The PM<sub>10</sub> Attainment Plan identifies control strategies that can be implemented to bring PM<sub>10</sub> to within California standards, including transportation measures (e.g., public transit, ridesharing, and bicycle incentives, etc.), land use measures (infill development), and combustion measures (hearth/wood burning stove limitations) (NCUAQMD, 1995).

The prior EIR concluded impacts related to conflicting with or obstructing implementation of the PM<sub>10</sub> Attainment Plan would be **less than significant** with the implementation of 2040 GP policies that support implementation of the PM<sub>10</sub> Attainment Plan and other NCUAQMD regulations. These policies address issues including, but not limited to, encouraging efficient land use patterns, promoting alternative modes of transportation, and reducing vehicle miles traveled (VMT) (GP Policies LU-1.2, LU-1.3, LU-1.19, LU-5.4, LU-6.2, AQ-1.3, AQ-1.4, AQ-1.9, M-1.1, M-1.2, M-1.3, M-1.6, M-1.7, M-2.4, M-3.5, M-3.8, M-3.9, M-4.1, M-4.2, M-4.3, M-4.4, M-4.5, M-4.6).

WEP Finding

The proposed WEP would comply with the PM<sub>10</sub> Attainment Plan measures and furthers a number of the 2040 GP policies cited as mitigation for air quality impacts. The proposed WEP promotes compact, mixed-use, infill development, including through adaptive reuse and redevelopment of vacant and underutilized properties, furthering GP Policies LU-1.2, LU-1.3, LU-5.4, LU-6.2, and M-1.6. In addition, WEP Strategies 2.1, 2.2, 2.3, and 2.4 and associated implementing actions focus on improving public access to and along the waterfront; promoting complete streets and pedestrian-friendly urban design; enhancing bicycle infrastructure and connectivity; and strengthening public transit and shared mobility options, respectively, setting a clear path towards reducing auto-dependence (furthering GP Policies AQ-1.9, M-1.1, M-1.2, M-1.3, M-1.7, M-2.4, M-3.5, M-3.8, M-4.1, M-4.3, M-4.5, and M-4.6). WEP Chapter 4 zoning regulations, development standards, and design guidelines also require and encourage pedestrian-friendly development, such as by imposing maximum front setbacks, and requiring public passageways through large developments, furthering GP Policies LU-1.19 and M-3.9. For all these reasons, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*
- c) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?*

Prior EIR Determination

As noted above, Humboldt County is non-attainment for the state PM<sub>10</sub> standard. The prior EIR determined operation of the GP would have the potential to contribute to the continuing violation of the PM<sub>10</sub> emissions air quality standard and a cumulatively considerable net increase in PM<sub>10</sub> emissions, and these impacts from buildout under the 2040 GP would be **significant and unavoidable**.

Construction: As discussed in the prior EIR, construction-related emissions will arise from a variety of activities including grading, excavation, exhaust from construction equipment and employee vehicles, architectural coatings and asphalt paving. While the prior EIR concluded that buildout under the 2040 GP would result in violation of the PM<sub>10</sub> air quality standard and a cumulatively considerable net increase in PM<sub>10</sub>, impacts related to construction were identified as being less than significant with the implementation of 2040 GP Policy AQ-1.3, which requires new discretionary developments to incorporate mitigation measures that utilize best management practices (BMPs) and reduce emissions from construction activities, consistent with NCUAQMD requirements and State regulations.

Operation: As noted in the prior EIR, the increase in PM<sub>10</sub> emissions resulting from 2040 GP buildout would be predominantly attributable to woodstoves and fire places, as well as mobile sources resulting from a net increase in VMT. The prior EIR notes the 2040 GP includes a number of policies which would provide for modest reductions in VMT and associated PM<sub>10</sub> emissions including, but not limited to, policies supporting efficient land use patterns, promoting alternative modes of transportation, and reducing VMT (Policies LU-1.2, LU-1.3, LU-1.19, LU-5.4, LU-6.2, AQ-1.3, AQ-1.4, AQ-1.9, M-1.1, M-1.2, M-1.3, M-1.6, M-1.7, M-2.4, M-3.5, M-3.8, M-3.9, M-4.1, M-4.2, M-4.3, M-4.4, M-4.5, M-4.6). Although the prior EIR anticipated these policies would reduce the generation of PM<sub>10</sub>, there were no mitigation measures identified that would reduce impacts to a less-than-significant level.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP and would implement applicable GP policies related to air quality and VMT reduction. Future development under the WEP would be required to adhere to standard dust control measures to reduce fugitive dust generation during excavation and earthmoving construction activities, consistent with GP Policy AQ-1.3. As described under 3.3(a) above, the proposed WEP furthers a number of the policies identified by the prior EIR as mitigating PM<sub>10</sub> emissions by promoting compact, walkable urban form, reducing auto-dependence through improved transit, pedestrian, and bicycle infrastructure (WEP Strategies 2.1-2.5), and encouraging mixed-use development that shortens trip lengths. These measures can reduce vehicle emissions, a primary contributor to PM<sub>10</sub> emissions. The WEP also encourages adaptive reuse, which reduces construction-related emissions and waste. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

*d) Would the project expose sensitive receptors to substantial pollutant concentrations?*

Prior EIR Determination

The prior EIR concluded impacts to sensitive receptors from pollutant concentrations from implementation of the 2040 GP would be **less than significant** with the implementation of rules and regulations of the NCUAQMD, California Air Resources Board (CARB), and 2040 GP policies including, but not limited to, those calling for reduction of localized points of concentrated emissions (Policy AQ-1.8), consultation with the NCUAQMD (Policy AQ-1.5), buffering of land uses that produce toxic or hazardous air pollutants (Policy AQ-1.6), and implementation of BMPs to reduce emissions from both construction and operational activities and minimize hazardous material use and waste generation (Policies AQ-1.3, HS-3.7).

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP and would implement applicable GP policies related to air quality.

Construction: Toxic air contaminant emissions from construction activities under the proposed WEP would be related to diesel particulate emissions associated with heavy equipment operations during grading, excavation, and transportation activities. As discussed in the prior EIR, construction emissions under the GP would occur intermittently and vary from day to day and year to year – this holds true for the WEP. Due to the limited scale and duration of construction activities, and the rapid dissipation of diesel particulate emissions with distance, it is not anticipated that sensitive receptors would be exposed to substantial diesel particulate concentrations due to construction activities. Additionally, CARB requires engine manufacturers to meet increasingly stringent exhaust emission standards (CARB, 2022). As a result, construction would be increasingly less likely to expose sensitive receptors to substantial emissions of toxic air contaminants as the vehicle fleet is replaced.

Operation: The proposed WEP would result in mixed-use development that brings new sensitive receptors (such as residents and children in parks and schools) in close proximity to commercial operations where the largest source of pollutants/emissions is vehicle exhaust. Air districts in California typically require an analysis of health impacts from highways or major roadways which have an Annual Average Daily Traffic (ADT) greater than 30,000 (CARB, 2017). Although no nearby roadways exceed 30,000 ADT (4th Street at G Street was at 27,800 ADT in 2022; Caltrans, 2022), there is the potential for cumulative impacts from proximity to a number of streets. As outlined in WEP Appendix E (CEQA Streamlining), future development in the Plan Area would be evaluated for potential air quality impacts, and projects with potentially significant impacts would be required to produce an air quality report following NCUAQMD guidance to evaluate and implement mitigation measures as necessary to minimize and mitigate impacts to sensitive receptors.

Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

e) *Would the project create objectionable odors affecting a substantial number of people?*

Prior EIR Determination

The prior EIR concluded impacts related to odors affecting a substantial number of people would be **less than significant** with the implementation of 2040 GP policies. Specifically, GP Policy AQ-1.6 addresses odor impacts by requiring buffering of uses, facilities, and operations that may produce toxic or hazardous air pollutants and/or odors (e.g., commercial and industrial uses, highways, etc.) to provide an adequate distance from sensitive receptors such as housing and schools, consistent with CARB recommendations.

The prior EIR also noted implementation of the 2040 GP may expose people to odors generated from the operation of diesel-powered construction equipment and/or asphalt paving during the construction period of individual projects. However, these odors would be short-term in nature and would not result in permanent impacts to surrounding land uses and would not affect a substantial number of people.

WEP Finding

The WEP focuses on residential, commercial, and visitor serving uses that are less likely to produce objectionable odors and other emissions. The proposed WEP would accommodate development consistent with the type and intensity described by the GP and would implement applicable GP policies related to air quality. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.4 Biological Resources

Impacts to biological resources resulting from buildout of the land uses identified in the GP were analyzed in the prior EIR Section 3.4 using the following significance criteria, which are adapted from the CEQA Guidelines Appendix G:

- a) *Would the project 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 Wildlife or U.S. Fish and Wildlife Service?*
- b) *Would the project 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 Wildlife or U.S. Fish and Wildlife Service?*
- c) *Would the project 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?*
- d) *Would the project 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?*
- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

### Prior EIR Determination

The prior EIR analysis considered locations where potential development consistent with the land use designations of the GP could occur in known habitat types or in locations where species have been recorded to occur, and assessed the potential for impacts from permitted activities on species' persistence or activities (foraging, nesting, estivating, or movement), or impacts to their habitats. The prior EIR concluded impacts to biological resources would be **less than significant** with the implementation of agency consultation (e.g., required consultation with the National Marine Fisheries Service, U.S. Fish and Wildlife Service, and California Department of Fish and Wildlife), applicable permitting requirements, and 2040 GP policies, including, but not limited to, those promoting the avoidance of sensitive habitat areas and provision of buffers around such areas, and those restricting development in areas of riparian habitat, sensitive natural communities, and wetlands (GP Policies NR-1.3, NR-2.1, NR-2.2, NR-2.4, NR-2.5, NR- 2.6, and NR-3.2).

### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. The WEP would encourage compact, infill development within an existing urban area, reducing pressure on undeveloped land. The Plan Area consists almost entirely of land that is developed and/or was previously developed with urban uses, as shown in WEP Figure 9-5 (Plan Area shoreline shown in 1870 US Coast Survey Map, 1958 imagery, and 2023 imagery). However, the Plan Area is located directly adjacent to Humboldt Bay, and there are vacant properties within the Plan Area that could include wetlands or other

environmentally sensitive habitat area. The City's certified LCP includes policies and regulations that protect wetlands and environmentally sensitive habitat areas and require buffers and other minimization/mitigation measures consistent with the California Coastal Act and the GP Policies cited above. Individual projects under the WEP would be required to comply with the City's LCP as well as other applicable State and federal regulations that require consultation and permitting to protect Humboldt Bay and other natural resources. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

*f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Prior EIR Determination

The prior EIR determined the GP would have **no impact** on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan because no Habitat Conservation Plans or Natural Community Conservation Plans applied to any part of the City.

WEP Finding

The proposed WEP is within the City limits, and no Habitat Conservation Plan or Natural Community Conservation Plan has been adopted since the prior EIR. Therefore, the proposed WEP would not result in any new or substantially more severe significant environmental impact.

## 3.5 Cultural Resources

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

### Prior EIR Determination

The prior EIR determined implementation of the GP could cause a substantial adverse change in the significance of a historical resource. The City includes hundreds of historic resources that are listed on or eligible for listing on the National Register of Historic Places, the California Register of Historical Resources, and/or the City's Local Register of Historic Places, including numerous resources in the Old Town Historic District (which is within the WEP Plan Area), the Clark Addition, and other neighborhoods throughout the City (including the Eddy Tract, which partially overlaps the Plan Area). Development under the GP could lead to the demolition of historic or potentially significant historic buildings and structures.

The GP includes measures and incentives aimed to preserve both publicly and privately owned historic and cultural resources, such as Goal HCP-1 and its associated policies that identify the City's responsibilities with regards to staff and preservation programs within the City and provide the means for preservation, including enforcement of applicable laws and regulations and maintenance and treatment of resources. Additionally, GP Policy HCP-1.4 directly reduces the probability of demolition by requiring the City to consider demolition of historic resources as a last resort, to be permitted only if rehabilitation is not feasible, and where demolition is necessary to protect health, safety, and welfare, or the public benefit.

The GP policies, as well as the Historic Preservation Ordinance (Eureka Municipal Code Chapter 157), encourage the preservation of the City's historic resources. These policies and regulations reduce the likelihood that a historic resource will be demolished. However, a plan-level analysis cannot account for all circumstances, and compliance with federal, state, and local regulations does not guarantee that a historic resource will not be demolished. Therefore, the prior EIR concluded this impact would be **significant and unavoidable**, as well as a significant cumulative impact.

### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. The WEP identifies the historic character of the Plan Area as a valuable asset, and encourages historic preservation consistent with GP Goal HCP-1 and associated policies, including through strategies and actions focused on maintenance and adaptive reuse of existing structures (e.g., Action 1.3c [Promote the Mills Act]), as well as WEP Chapter 4 Design Guidelines which provide recommendations for making thoughtful modifications to existing structures that preserve historically valuable features, materials, and finishes while enhancing the structures' overall design integrity. Any individual project under the WEP located on a property listed on the Local Register of Historic Places would be required to comply with the City's Historic Preservation Ordinance, and any project triggering review under CEQA would be required to evaluate and address potential substantial adverse impacts on historic resources both listed and eligible for listing. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 or a tribal cultural resource as defined in Public Resources Code Section 21704 or disturb human remains, including those interred outside of formal cemeteries?*

Prior EIR Determination

The prior EIR concluded implementation of the GP could cause a substantial adverse change in the significance of archeological resource, tribal cultural resource, or human remains. The City is considered sensitive for the presence of subsurface prehistoric, Native American, and historic-period cultural resources and human remains, and construction ground disturbance resulting from buildout under the GP has the potential to expose previously unrecorded resources. The GP includes policies and implementation programs designed to identify and protect archaeological and tribal cultural resources that could be adversely affected by development activities, including GP Policy HCP-2.7, which requires discretionary development projects to be designed to avoid potential impacts to significant archaeological and cultural resources whenever feasible; Policy HCP-2.1, which aims to identify, protect, and preserve significant archaeological sites and conduct good-faith government-to-government consultation with local tribes to identify and protect tribal Cultural Resources; and Policy HCP-2.9, which facilitates consultation with local tribes, governments, and landowners to protect tribal cultural resources. However, the prior EIR acknowledged that at the plan level, there remains the potential for ground-disturbing construction activities to inadvertently damage or destroy archaeological resources, tribal cultural resources, or human remains. Therefore, the prior EIR determined this impact would be **significant and unavoidable**, as well as a significant cumulative impact.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP, and development of the WEP would be consistent with applicable GP policies. On September 22, 2022, the City sent consultation letters and emails to the Tribal Historic Preservation Officers (THPOs) of the Wiyot Tribe, Blue Lake Rancheria, and Bear River Band, inviting consultation on the specific plan pursuant to AB 52 and SB 18. As the project progressed, the City emailed notifications to various public entities, including the three THPOs, on June 9, 2023, in accordance with California Government Code Section 65352, which requires outreach for General Plan amendments. The Planning Commission reviewed the draft WEP at its July 10, 2023 meeting, and recommended the Wiyot History section be specifically shared for tribal input. In response, the City sent a follow-up email on August 31, 2023, to the Wiyot Tribe and Blue Lake Rancheria, requesting feedback on the first Public Review Draft of the specific plan—posted to the project website in May 2023—as well as on the Wiyot History section. No responses were received to this follow-up request. However, the Bear River Band THPO responded to the City’s original outreach and initiated formal consultation. City staff met with the Bear River Band THPO on September 13, 2023, to consult on the WEP, and this discussion resulted in updates to the Wiyot history section as well as addition language supporting cultural tourism and bicycle safety improvements.

The WEP acknowledges the importance of protecting cultural resources and indicates that future development would comply with CEQA and tribal consultation requirements. Additionally, the City’s Development Services Department would continue to refer all building permits that involve ground disturbance in the Coastal Zone (including the WEP Plan Area) to the local-area tribal historic preservation officers (THPOs) for review and comment, regardless of whether the development triggers CEQA. In compliance with 2040 GP Policy HCP-2.5, projects under the WEP involving ground disturbance would be

conditioned to follow the City's standard inadvertent discovery protocol during construction activity. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.6 Energy

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

### Prior EIR Determination

The prior EIR determined the GP would not result in wasteful, inefficient, or unnecessary consumption of energy resources, nor conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The prior EIR asserted that future development associated with the 2040 GP would primarily occur in, adjacent to, or in the vicinity of existing developed urban areas, allowing for the logical extension and utilization of existing utilities; and any changes related to energy demand under the proposed 2040 GP buildout would likely be gradual, intermittent, and widespread across the City. The prior EIR concluded impacts to energy resources would be **less than significant** with implementation of 2040 GP policies including, but not limited to, those calling for energy conservation and energy conserving land use practices, incorporation of energy efficient practices into the design process for both private and public buildings, and encouragement of installation of renewable energy systems and facilities (GP Policies U-5.1 through U-5.7, U-5.9, U-5.11).

### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP, and would not interfere with measures or GP policies intended to increase the provision of renewable energy, promote energy conservation, and increase overall energy efficiency throughout the City. The proposed WEP implements energy-conserving land use practices by promoting compact and mixed-use development in an already developed urban area, the provision of bikeways and pedestrian paths, and the enhancement of transit facilities, consistent with GP Goal U-5 and associated GP Policy U-5.2 (Energy conserving land use practices). New development under the WEP would be in accordance with California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations). These requirements regulate insulation, window space and type, and other building features to maximize structural energy efficiency. These standards also require the installation of solar panels on new buildings to offset electricity use. Compliance with these standards restricts unnecessary energy consumption. The proposed WEP also includes Action 1.3a (Promote building weatherization) which promotes energy efficiency and conservation in existing buildings within the WEP Plan Area, calling for the City to prepare and distribute educational materials explaining how residents and building owners can make weatherization retrofits, including through the Redwood Coast Energy Authority's existing rebate programs, and calling for the City to explore grant funding opportunities to address barriers to weatherization of historically significant buildings, including buildings on the Local Register of Historic Places. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.7 Geology and Soils

- a) *Would the project 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.*
  - ii) *Strong seismic ground shaking?*
  - iii) *Seismic-related ground failure, including liquefaction?*
  - iv) *Landslides?*
- c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

### Prior EIR Determination

The prior EIR concluded impacts related to geology and soils would be **less than significant** with the implementation of building codes, geotechnical and seismic design standards, and GP policies, including, but not limited to, 2040 GP Policy HS-1.1, which calls for appropriate siting and design of new structures intended for human occupancy consistent with limitations imposed by seismic and geological hazards.

As discussed in the prior EIR, there are no active faults within City limits as determined by California Geological Survey mapping, and therefore no impact related to fault rupture (CDC, 2025). However, there is a potential for strong to very strong intensity ground shaking within the City limits from a large regional earthquake. The GP results in new land uses and development being located in portions of the City where strong ground-shaking could result in liquefaction, differential settlement, and structural damage. These risks are most likely to occur in areas where the soils contain muds and sands.

As outlined in the prior EIR, the State of California provides minimum standards for building design through the California Building Code (CBC). Specific minimum seismic safety and structural design requirements are set forth in CBC Chapter 16. The CBC and local building code require structural elements of projects to undergo appropriate design-level geotechnical evaluations prior to final design and construction, and implementation of any resulting measures to address seismic and geologic hazards consistent with the CBC and local building code.

### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP, and projects in the WEP Plan Area would be required to comply with the CBC and local building

codes, including demonstrating compliance with geotechnical and seismic design standards through geotechnical investigations and soil engineering reports. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

***b) Would the project result in substantial soil erosion or the loss of topsoil?***

GP EIR Determination

The prior EIR concluded impacts related to soil erosion and topsoil will be **less than significant** with implementation of local and state regulations requiring erosion and sediment control during construction and land disturbance activities. State and City regulations require construction projects to prepare and implement either a Stormwater Pollution Prevention Plan (SWPPP; for projects disturbing one or more acres of land) or an Erosion and Sediment Control Plan (for projects that disturb less than one acre but involve over 50 cubic yards of earthwork).

WEP Finding

Construction projects under the WEP would be required to prepare a SWPPP and/or Erosion and Sediment Control Plan pursuant to the State Water Resources Control Board’s Construction Stormwater General Permit and the City’s Grading Ordinance (Municipal Code Chapter 150, Section 150.200 et seq.). Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

***e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

Prior EIR Determination

The prior EIR identified **no impact** related to septic tanks or alternative wastewater disposal systems, since development within the City is required to connect to the City’s wastewater collection and treatment (i.e., sewer) system pursuant to GP Policy U-2.5.

WEP Finding

Development under the proposed WEP would connect to the City’s sewer system via sewer laterals within the Plan Area’s streets and alleyways, and would not be permitted to use septic or other alternative disposal systems. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

***f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Prior EIR Determination

The prior EIR concluded impacts to paleontological resources would be **less than significant** with the implementation of GP Policy HS-1.7, which requires the protection of paleontological resources through inadvertent discovery protocols.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. In compliance with 2040 GP Policy HS-1.7, projects under the WEP involving ground disturbance

would be conditioned to follow the City's standard inadvertent discovery protocol during construction activity. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.8 Greenhouse Gas Emissions

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

### Prior EIR Determination

The prior EIR concluded impacts related to greenhouse gas (GHG) emissions would be **less than significant** with the implementation of NCUAQMD and state regulations and GP policies including, but not limited to, those requiring incorporation of BMPs for reducing emissions in project construction and operation; promoting efficient land use patterns and walkable, infill development; promoting transit and other less carbon-intensive modes of transportation; and encouraging waste reduction, energy and water conservation, energy efficiency, and renewable energy facilities (Policies AQ-1.2, AQ-1.3, AQ-1.4, AQ-1.9, AQ-1.10, LU-1.2, LU-1.3, LU-1.19, LU-5.4, LU-6.2, M-1.1, M-1.2, M-1.3, M-1.6, M-1.7, M-2.4, M-3.5, M-3.8, M-3.9, M-4.1, M-4.2, M-4.3, M-4.4, M-4.5, M-4.6, U-5.1, U-5.2, U-5.3, U-5.4, U-5.5, U-5.6). The prior EIR also concluded that with implementation of these measures, buildout under the 2040 GP would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

### WEP Finding

The proposed WEP promotes compact, walkable urban form; reduces auto-dependence through improved transit, pedestrian, and bicycle infrastructure (WEP Strategies 2.1-2.5); and encourages mixed-use development that shortens trip lengths. Relevant WEP implementing actions include, but are not limited to, WEP Actions 2.4d (Study the feasibility of car, bike, and scooter share), 2.5a (Require transportation demand management plans), and 4.5e (Pursue funding for EV chargers in the Plan Area). These measures can reduce vehicle emissions, a primary contributor to local GHGs. The WEP also encourages adaptive reuse, which reduces construction-related emissions and waste.

Ultimately, the proposed WEP would accommodate development consistent with the type and intensity described by the GP. The prior EIR analyzed the impacts of constructing up to 1.6 million square feet of new non-residential uses and creating 1,886 additional housing units in the City by 2040. The GHG emissions that would be generated by development under the WEP are within the scope of those analyzed in the prior EIR because the WEP is consistent with the overall residential and non-residential growth projections in the prior EIR. The WEP would comply with all applicable GP policies discussed in the prior EIR, in addition to all other applicable local, regional and state law requirements that reduce GHG emissions, such as Title 24 of the California Code of Regulations. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.9 Hazards and Hazardous Materials

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, disposal, or release of hazardous materials?*

Prior EIR Determination

The prior EIR determined impacts from implementation of the GP related to the routine transport, use, disposal, or release of hazardous materials would be **less than significant** with the implementation of federal, state, and local laws governing transportation, handling, and disposal of hazardous materials and 2040 GP policies, including policies under GP Goal HS-3 (Safe production, use, storage, transport, treatment, and disposal of hazardous materials and hazardous waste).

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. Development of the WEP would be consistent with applicable regulations and GP policies. The uses envisioned for the plan area would not be expected to handle or store any hazardous materials other than those for routine commercial and residential use. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- b) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Prior EIR Determination

The prior EIR indicated many projects associated with the GP would likely be located within one-quarter mile of one or more schools and construction and operation of these projects could include the use of hazardous materials. However, as discussed under a) above, the prior EIR determined impacts would be **less than significant** due to required compliance with the numerous laws and regulations that govern the transportation, use, handling, and disposal of hazardous materials.

WEP Finding

The WEP Plan Area does not currently include any public and private elementary, junior high, high schools, or higher education institutions; the closest school is Eureka Community School at 1820 6<sup>th</sup> Street, less than a quarter mile from the Plan Area. Under WEP Chapter 4, Table 4-1 (Allowed uses in the WEP Zoning Districts), Instructional Services, Day Care Facilities (including nursery schools), Family Day Care Homes, Colleges and Trade Schools, and Public and Private Schools would be allowed in all zoning districts, and therefore a school could open in the Plan Area. However, the uses envisioned for the plan area would not be expected to handle or store any hazardous materials other than those for routine commercial and residential use, and would be required to comply with application laws and regulations. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- c) *Would the project be located on a site that 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?*

Prior EIR Determination

The prior EIR found that, although both active and closed hazardous material investigation and cleanup sites are located within the City limits, impacts related to projects being located on sites with soil and/or groundwater contamination would be **less than significant** through implementation of GP Goal HS-3 and associated policies which require soil and groundwater contamination assessments and remediation consistent with county, regional, state, and federal regulations (GP Policies HS-3.2, HS-3.3, and HS-3.4).

WEP Finding

WEP Chapter 9 (Coastal Hazards & Climate Change) addresses the presence of brownfields and legacy contamination within the WEP Plan Area. As outlined in WEP Chapter 9, there are both open and closed cleanup sites in the Plan Area, and there are likely additional sites with soil and/or groundwater contamination where the presence of contamination is unknown (DTSC, 2025; SWRCB, 2025). As outlined in WEP Appendix E (CEQA Streamlining), when development is proposed under the WEP, the City would review the project site for presence on the “Cortese List” (Government Code Section 65962.5); would notify applicable county/state/federal regulatory agencies; and would require Phase I and II environmental site assessments, remediation, and adherence to soil/groundwater management plans and land use restriction covenants as applicable to avoid significant impacts to the public and environment from exposure to and mobilization of soil and groundwater contamination, consistent with GP Goal HS-3 and associated policies. The proposed WEP also attempts to proactively address contamination through WEP Action 5.4a which calls on the City to apply for a United States Environmental Protection Agency Brownfields Program Grant and work with property owners on environmental assessment and cleanup activities along the City’s northern waterfront, incorporating “climate-smart” planning for sea level rise. As a result, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- d) *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?*

Prior EIR Determination

The prior EIR determined impacts related to airport noise would be **less than significant**. Murray Field and Samoa Field Airports are the only airports located within two miles of Eureka City limits. The prior EIR discussed how Murray Field has an Airport Land Use Compatibility Plan (ALUCP), and per the requirements of the ALUCP, new non-conforming land uses or major new development projects would be subject to review for compatibility by the County’s Airport Land Use Commission. By law, the Commission is vested with the legal authority to require modification of proposed projects that could conflict with safe and efficient airport operations. At the time of GP adoption, the Samoa Field Airport did not have an adopted ALUCP, but, according to the prior EIR, the airstrip is oriented in a north-south direction, and approach and departure flight paths do not occur over populated areas. As a result, the prior EIR determined development associated with the GP would not place people or structures in such a manner as to create a safety hazard or excessive noise exposure.

WEP Finding

The Plan Area is over two miles from the Samoa Field Airport and over one mile from the Murray Field Airport. Since the adoption of the 2040 GP, the ALUCP has been updated and the new ALUCP covers both Samoa Field and Murray Field Airports (ESA, 2021). The eastern-most extent of the Commercial Bayfront is within the Airport Influence Area for the Murray Field Airport and thus proposed development in this area will be referred to the County's Airport Land Use Commission for review and approval (Humboldt County, 2025). As a result, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- e) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Prior EIR Determination

The prior EIR determined impacts related to interference with an adopted emergency response or evacuation plan would be **less than significant** with implementation of GP Policies HS-4.1 (Emergency Services Planning), HS-4.2 (Emergency and Disaster Preparedness), HS-4.5 (Evacuation Routes), and HS-4.7 (Emergency Access) that require the City to ensure emergency planning and designated safe evacuation routes, and require projects to provide adequate road standards, driveway widths, and road clearances around structures consistent with local and state requirements to ensure adequate emergency access.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. Proposed WEP Chapter 9 (Coastal Hazards & Climate Change) includes Strategy 5.3 to enhance disaster preparedness and community awareness, with associated implementing actions requiring the City to create a comprehensive tsunami readiness campaign for Old Town with the help of the Redwood Coast Tsunami Work Group (Action 5.3b); add Coastal Zoning Code regulations that require preparation and implementation of a Tsunami Evacuation Plan for structures intended for human occupancy in the tsunami hazard zone (Action 5.3c); and establish protocols for anticipated flooding events to minimize safety risks and disruptions (Action 5.3d). Strategy 5.3 and associated implementing actions are consistent with and further GP Goal HS-4 and associated policies described above. The WEP also supports multi-modal circulation improvements that can enhance disaster response efficiency. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- f) *Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*

Prior EIR Determination

The prior EIR acknowledged that portions of the City are located within moderate to high fire hazard severity zones, but concluded impacts related to exposing people and structures to wildland fires would be **less than significant**, with compliance with all applicable fire protection and prevention regulations specified in the California Fire Code, Hazardous Materials Transportation regulations, and Cal/OSHA regulations; and with implementation of GP Policies HS-4.7 (Emergency Access) and 4.10 (Wildland Fire Preparedness).

WEP Finding

None of the Plan Area is located in a high or moderate fire hazard severity zone as mapped by Figure 3.7-3 in the prior EIR. The proposed WEP promotes infill development and reuse of existing buildings and infrastructure, which reduces exposure to fire hazards associated with peripheral growth in areas with higher wildfire risk. Proposed development under the WEP would be required to comply with all applicable fire protection and prevention regulations. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.10 Hydrology and Water Quality

- a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality?*

Prior EIR Determination

The prior EIR concluded impacts related to violations of water quality standards and waste discharge requirements would be **less than significant** due to existing regulatory requirements (the National Pollutant Discharge Elimination System [NPDES] Construction General Permit, the City's MS4 Permit, etc.) and 2040 GP goals and policies including Policies NR-1.1 and NR-1.4, which aim to maintain surface water resources in their natural, high-quality state; and Policy NR-1.6, which seeks to ensure adherence to stormwater pollution prevention measures.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. Development of the WEP would be consistent with applicable regulations and GP policies. To address potential construction-phase impacts, construction projects throughout the City, including within the WEP Plan Area, are required to prepare and implement either a SWPPP (for projects disturbing one or more acres of land) or an Erosion and Sediment Control Plan (for projects that disturb less than one acre but involve over 50 cubic yards of earthwork). In addition, projects that create or replace 2,500 square feet or more of impervious surface are regulated under the City's NPDES Discharge of Storm Water from a Small Municipal Separate Storm Sewer System (MS4) Permit from the State Water Board and must prepare a post-construction Stormwater Control Plan to ensure stormwater runoff is adequately managed consistent with the Humboldt Low Impact Development Stormwater Manual for the life of the development. Therefore, the proposed WEP would not result in any new or substantially more severe significant environmental impact.

- b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater basin?*

Prior EIR Determination

The prior EIR concluded the 2040 GP buildout would result in **less than significant** impacts to groundwater supplies and groundwater recharge. The prior EIR concluded impacts would be less than significant due to existing policies, laws, and regulations protecting critical groundwater supplies, including the Humboldt Bay Municipal Water District (HBMWD) Groundwater Management Plan, and due to 2040 GP policies including, but not limited to, those addressing protecting groundwater quantity and quality (Policy U-1.4), preserving important groundwater recharge areas (Policy NR-1.2), preventing groundwater contamination from septic systems and onsite disposal of toxic substances (Policy NR-1.11), and encouraging installation of pervious pavement and surfaces (Policy NR-1.7). Additionally, the prior EIR discussed how the 2040 GP's policies of directing growth towards densification within existing urban areas would help minimize potential expansion of impervious surfaces.

As discussed in the prior EIR, the City has a water right to 8.0 million gallons per day (MGD) from the Mad River; the HBMWD supplies this water to the City. The HBMWD draws water from the unconfined Holocene

River Channel Deposits aquifer at a depth of 60 to 90 feet below the bed of the Mad River through Ranney wells situated in or in close proximity to the Mad River. Water is extracted from this aquifer instead of directly from the river since percolation through surface ground layers help to naturally filter water and improve quality of the drinking water supply. The amount of water supplied to the City under existing conditions is less than one percent of the annual yield of the Mad River. The HBMWD Groundwater Management Plan indicates that groundwater recharge is achieved by inundation of the recharge areas in the Mad River channel through the District's operation of Matthews Dam and Ruth Lake. As a result, additional development within the City would not have a direct impact on the volume of groundwater available to HBMWD. Additionally, the HBMWD has indicated that there is sufficient supply for currently forecasted development. Furthermore, the HBMWD is required to comply with the applicable requirements intended to protect and preserve groundwater and groundwater recharge including its Groundwater Management Plan.

#### WEP Finding

The proposed WEP would accommodate infill development within an existing urban area consistent with the type and intensity described by the GP, and consistent with applicable regulations and GP policies. Much of the Plan Area is already paved/developed, and development under the WEP would be connected to the City's water supply system and would not rely directly on groundwater, and would be required to manage stormwater consistent with the City's MS4 General Permit and the Humboldt Low Impact Development Stormwater Manual for the life of the development. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

- c) ***Would the project substantially alter the existing drainage pattern of the site or area through the alteration of the course of a stream or river, or by other means, in a manner which would result in substantial erosion or siltation on- or off-site or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?***

#### Prior EIR Determination

The prior EIR determined impacts related to changes in drainage patterns would be **less than significant** due to the existing previously-altered condition of the City's drainage system, and with implementation of GP policies designed to prevent alterations to natural drainage systems, including GP Policy NR-1.3, which seeks to preserve undeveloped non-urban areas such as gulches and other drainage areas; Policy NR-1.5, which requires implementation of BMPs to minimize erosion and sedimentation from construction of new impervious surfaces; Policy NR-1.9, which requires incorporation of all feasible BMPs for any project that involves substantial alterations to rivers and streams; Policy U-3.4, which calls for maintaining the use of natural stormwater drainage systems; and Policy U-3.12, which encourages new projects to minimize impervious surfaces and maintain natural site drainage conditions.

#### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP, and would be consistent with applicable regulations and GP policies. The Plan Area, like the rest of the City, is within the Eureka Plain Watershed. The Plan Area is almost entirely within the West Side Eureka sub-watershed, which is highly urbanized with limited natural drainage features. The Plan Area is principally a developed, urban landscape with drainage patterns altered through historic grading and paving. As

discussed in other sections of this Addendum, to address potential construction-phase impacts, construction projects throughout the City, including within the WEP Plan Area, are required to prepare and implement either a SWPPP (for projects disturbing one or more acres of land) or an Erosion and Sediment Control Plan (for projects that disturb less than one acre but involve over 50 cubic yards of earthwork). In addition, projects that create or replace 2,500 square feet or more of impervious surface are regulated under the City's MS4 Permit and must prepare a post-construction Stormwater Control Plan to ensure stormwater runoff is adequately managed consistent with the Humboldt Low Impact Development Stormwater Manual for the life of the development. Projects that follow these requirements would not be expected to have any new or more severe impacts on drainage and stormwater runoff, than those analyzed in the prior EIR. Therefore, the proposed WEP would not result in any new or substantially more severe significant environmental impact.

- d) *Would the project create or substantially contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

Prior EIR Determination

The prior EIR determined impacts to existing or planned stormwater drainage systems and water quality of runoff as a result of buildout of the GP would be **less than significant** with compliance with existing regulations and GP policies, including GP Policy U-3.4, which directs use of natural stormwater drainage systems; Policy U-3.8 which requires new development to prepare drainage studies to understand how stormwater runoff can be retained and infiltrated; Policy U-3.12, which encourages new projects to minimize impervious surfaces and retain natural site drainage; Policy U-3.11, which requires new development and redevelopment to incorporate low impact development measures and appropriate BMPs to minimize stormwater runoff and pollutants entering drainage facilities; Policy U-3.1, which seeks, as funding permits, to continue efforts to improve the storm drainage system to prevent future flooding events; Policy U-3.2, which calls for regularly updating the City's Storm Drain Master Plan to ensure adequate capacity and maintenance of the stormwater system; and Policy U-3.3 which calls for consideration of establishing a new funding mechanism to pay for the aforementioned stormwater drainage improvements. The prior EIR acknowledged implementation of the GP has the potential to increase impervious surfaces which in turn could alter drainage patterns and increase stormwater runoff, but concluded this potential increase in impervious area would be minimized as the GP focuses on increasing development density within already developed areas.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP, minimizing increases in impervious surfaces by focusing increased development density within an already developed area. Stormwater drainage in the Plan Area involves a system of drainage inlets and stormwater mains that direct runoff from impervious surfaces to a series of stormwater outfalls along the northern bayfront (shown in WEP Figure 9-3). To address potential impacts of development on stormwater management, projects in the City of Eureka (including in the WEP Plan Area) that create or replace 2,500 square feet or more of impervious surface are regulated under the City's MS4 Permit and must prepare a post-construction Stormwater Control Plan to ensure stormwater runoff is adequately managed consistent with the Humboldt Low Impact Development Stormwater Manual for the life of the development. This

requirement for post-construction Stormwater Control Plans ensures development of the WEP would be consistent with applicable regulations and GP policies such as GP Policies U-3.8, U-3.11, and U-3.12.

Humboldt County, the City of Eureka, and the Humboldt Community Services District collaborated on a Storm Water Resource Plan (SWRP), published in 2018, to protect the region's waters that receive storm water and dry weather runoff, and set regional priorities for improving storm water systems. The SWRP is required as a condition of receiving funds for storm water and dry weather runoff capture projects (Water Code Section 10563 [c][1]). The impetus of an SWRP is to prioritize projects that address the water quality impacts from storm water discharges while providing multiple benefits such as public education and ecological enhancement within a local watershed. Additionally, the SWRP provides a framework that facilitates watershed-based management.

The City has secured over 9 million dollars in grant funding (from the California Governor's Office of Emergency Services and the U.S. Department of Homeland Security's Federal Emergency Management Agency, the California Department of Water Resources, and the California Natural Resources Agency) for the Eureka Flood Reduction & Sea Level Rise Resiliency Project, to implement priority projects under the SWRP to increase the capacity and resilience of the City's stormwater drainage system, including upsizing stormwater facilities, installing flap gates within the system and on bay outfalls, and adding rain gardens and other low-impact-development features upstream of storm drain improvements. The western portion of Old Town would benefit from this project; therefore, the proposed WEP calls for construction of the project under WEP Action 5.1a.

In 2023, the City adopted a Sea Level Rise Vulnerability and Capital Improvement Program (SLR-CIP) Adaptation Plan, providing a detailed vulnerability assessment and adaptation plan for all City-owned assets and infrastructure, including stormwater infrastructure. In 2024, the City secured over \$1 million in grant funding from the State Coastal Conservancy for a Coastal Resilience Plan to build on the SLR-CIP Adaptation Plan work, including performing additional vulnerability analysis looking further into the future; developing a strategy for near-term and long-term adaptation planning efforts for City infrastructure, including establishment of acceptable exposure, vulnerability, and risk thresholds; and identifying adaptation pathways and strategies for each planning horizon. WEP Chapter 9 (Coastal Hazards & Climate Change) relies on these planning efforts to discuss the vulnerability of the stormwater system to storm and tidal flooding in the lower-lying portions of the Plan Area, and presents adaptation solutions, including the aforementioned Eureka Flood Reduction and Sea Level Rise Resiliency Project (WEP Action 5.1a), as well as monitoring and maintaining tide gates on stormwater outfalls (WEP Action 5.1b). The WEP also calls for coordination with other Humboldt County jurisdictions on the ongoing update to the Humboldt Stormwater Low Impact Development Manual to provide specific guidance on stormwater management alternatives for low-lying areas (Action 5.4e). As a result of these implementing actions, the WEP is not only consistent with, but also furthers the aforementioned GP policies cited by the prior EIR as mitigating impacts of stormwater runoff.

For all these reasons, the proposed WEP would not result in any new or substantially more severe significant environmental impact.

- e) ***Would the project place housing or other improvements within a 100-year flood hazard zone as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard map or impede or redirect flood flows?***

Prior EIR Determination

The prior EIR concluded impacts related to placing improvements within a flood hazard zone or impeding or redirecting flood flows would be **less than significant** due to the City's development review process and 2040 GP policies including Policy HS-2.1, which prohibits the construction of new land uses within the 100-year floodplain unless the structure and subsequent road access is elevated above the base flood elevation; Policy HS-2.4, which ensures the determination of what constitutes the 100-year floodplain is based on the most recent flood hazard data available from regional, state and federal sources; and Policy HS-2.7 which promotes continued regional cooperation with surrounding communities and the County of Humboldt in implementing flood management facility improvements.

WEP Finding

The Federal Emergency Management Agency released an updated Flood Insurance Rate Maps for the City of Eureka in 2017. Based on these maps, portions of the Commercial Bayfront would be subject to inundation during the 100-year flood event with base flood elevations ranging from 10 to 15 feet (FEMA, 2017; elevations referenced to NAVD88). The western-most portion of Old Town (A to C Streets) also includes areas mapped within the 100-year flood zone with a base flood elevation of 10 feet. Future WEP development within the floodplain would be evaluated under the City's Flood Hazard Area Regulations (Municipal Code Chapter 153), which require a Flood Development Permit and adherence to flood hazard reduction standards for all new construction and substantial improvements to existing structures to minimize hazard risks and ensure development does not obstruct flood flows.

Development of the WEP would be consistent with applicable regulations and GP policies, and the proposed WEP furthers GP Goal HS-2 (Reduced risk of loss of life, injury, damage to property and economic and social dislocations resulting from flood hazards) and associated policies with a variety of implementing actions focused on strengthening resilience to flooding through improved infrastructure planning, regulatory updates, community preparedness, and hazard mitigation (under WEP Vision 5). Therefore, the proposed WEP would not result in any new or substantially more severe significant environmental impact.

- f) ***Would the project expose people or structures to a significant loss, injury or death from flooding due to levee failure, sea level rise, or inundation by seiche, or tsunami?***

Prior EIR Determination

The prior EIR concluded impacts related to exposure of people or structures to levee failure, sea level rise, or inundation by seiche or tsunami would be **less than significant** with adherence to 2040 GP policies discussed below.

Levee Failures: The prior EIR discussed how most of the Humboldt Bay shoreline is artificial and is highly vulnerable to breaching or being overtopped, and thus maintaining and shoring up shoreline protective devices such as levees is necessary to providing an adequate level of flood protection through at least 2050. The prior EIR referenced as mitigation GP Policy HS-2.2, which calls for

maintaining and enlarging existing flood protection structures; and GP Policy HS-1.2, which calls for ensuring that new development does not contribute to shoreline erosion.

Sea Level Rise: The prior EIR discussed how additional areas of the City would be inundated under a 100-year high water event with sea level rise. The prior EIR referenced as mitigation GP Policy SL-1.1, which call for maintaining and enlarging existing flood protection structures; Policy SL-1.2, which calls for design of shoreline protective structures to achieve multiple objectives including shoreline stability, connection to public access systems, and ensuring limited impact to costal resources and aesthetics; Policy SL-1.4, which calls for raising structures located in areas that are not protected from coastal flooding; and Policy SL-1.10, which calls for abandoning developed areas if it is determined that it is no longer feasible to construct and maintain shoreline structures from the effects of sea-level rise.

Seiches: The prior EIR discussed how geologic-induced seiche events are not widely documented in Humboldt Bay. The prior EIR referenced as mitigation GP Policy HS-2.2, which calls for maintaining and enlarging existing flood protection structures; and Policy SL-1.11, which calls for encouraging innovative solutions to reduce damage from peak tidal and storm events.

Tsunamis: The prior EIR discussed how the City is vulnerable to tsunamis, and cites as mitigation GP Policy HS-4.4, which aims to continue the City's tsunami awareness program to minimize the risk of potential damage caused by a tsunami.

#### WEP Finding

Much of the Commercial Bayfront shoreline from C to T Streets is armored with rock slope protection. The G & R Metals site (the waterfront north of G to I Streets) appears to be an earthen/vegetated shoreline, but is actually protected by rock-filled metal containers buried beneath fill material inboard of the high tide line. The eastern-most portion of the Commercial Bayfront from T to Y Streets is an earthen/vegetated shoreline, composed of legacy fill and naturally higher elevation areas fringed by saltmarsh habitat. As discussed in the proposed WEP, flooding and coastal erosion are significant hazards for the low-lying and bayfront portions of the Plan Area, and these hazards are expected to increase exponentially with time given anticipated sea level rise and increased storm intensity with climate change.

In 2023, the City adopted a SLR-CIP Adaptation Plan, providing a detailed vulnerability assessment and adaptation plan for all City-owned assets and infrastructure, and in 2025, the City is currently preparing a Coastal Resilience Plan to build on the SLR-CIP Adaptation Plan work, including performing additional vulnerability analysis looking further into the future; developing a strategy for near-term and long-term adaptation planning efforts for City infrastructure, including establishment of acceptable exposure, vulnerability, and risk thresholds; and identifying adaptation pathways and strategies for each planning horizon. The WEP calls for furthering these planning efforts (WEP Actions 5.2a and 5.2b).

A major component of the proposed WEP is to respond to the anticipated threats of sea level rise. Consideration of sea level rise is incorporated into the scenario sketches and preferred futures included in WEP Chapter 3, and sea level rise vulnerabilities and potential adaptations are discussed further in WEP Chapter 9 (Coastal Hazards & Climate Change). Chapter 9 includes a vision statement, strategies, and implementing actions focused on creating a resilient and adaptive community that proactively plans for

coastal hazards and climate change, including a number of actions specifically focused on investments, planning, funding, and partnerships around sea level rise adaptation.

The Commercial Bayfront and western portion of Old Town are also in the tsunami hazard zone (CGS, 2022). These areas are all well within a 10-minute, or half-mile, walk to higher ground outside of the hazard zone. The proposed WEP furthers GP Policy HS-4.4 identified by the prior EIR as mitigating tsunami hazards through WEP Strategy 5.3 (enhance disaster preparedness and community awareness) with implementing actions to strengthen community engagement and outreach on sea level rise resiliency (Action 5.3a), create a comprehensive tsunami readiness campaign for Old Town with the help of the Redwood Coast Tsunami Work Group (Action 5.3b), add Coastal Zoning Code regulations that require preparation and implementation of a Tsunami Evacuation Plan for structures intended for human occupancy in the tsunami hazard zone (Action 5.3c), and establish protocols for anticipated flooding events to minimize safety risks and disruptions (Action 5.3d). The WEP also supports multi-modal circulation improvements that can enhance disaster response efficiency.

As described above, the proposed WEP would accommodate development consistent with the type and intensity described by the GP and consistent with applicable GP policies. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.11 Land Use and Planning

### a) *Would the project physically divide an established community?*

#### Prior EIR Determination

The prior EIR concluded impacts related to physically dividing an established community would be **less than significant** because the 2040 GP was designed as a cohesive plan that builds upon existing neighborhoods and developed areas, targeting new development primarily in infill areas. In making this conclusion, the prior EIR referenced 2040 GP policies promoting a compact pattern of mixed land uses, growth through infill, and development of high-density housing in proximity to jobs, services and infrastructure (Policies LU-1.2, LU-5.3, LU-5.4, and LU-6.2).

#### WEP Finding

The proposed WEP would accommodate development by building upon existing neighborhoods consistent with the type, location, and intensity of uses described by the GP. The proposed WEP is consistent with and furthers the GP policies mentioned above, supporting a compact pattern of mixed-land uses at densities/intensities that make efficient use of the City's limited remaining developable lands and promote walkability and urban growth; encouraging high-density housing in the Plan Area in close proximity to commercial and community services, employment opportunities, major transportation corridors, and where City infrastructure can accommodate increased densities; and promoting the development of vacant infill properties and redevelopment/reuse of economically underutilized sites and buildings to accommodate new growth and internal densification. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

### b) *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?*

#### Prior EIR Determination

Land use plans and policies applicable to future development under the GP include the policies, regulations, and requirements of the California Coastal Conservancy, the California State Lands Commission, the California Coastal Commission, the Airport Land Use Commission, the Humboldt Bay Harbor Recreation and Conservation District (Harbor District), the Humboldt County Local Agency Formation Commission, the NCUAQMD, and the Humboldt County Association of Governments (HCAOG).

The prior EIR concluded impacts would be **less than significant** because the 2040 GP was designed to reflect local and regional principles and strategies to mitigate potential impacts to the environment, and includes policies to ensure its implementation is consistent and compatible with applicable land use plans, policies, and regulations of agencies with jurisdiction over the City and adjacent lands. The prior EIR specifically identifies GP Policy LU-6.7 which directs the City to participate in regional planning efforts with surrounding jurisdictions, including the Harbor District, HCAOG, and other local and regional agencies; and Policy LU-6.8 which directs the City to review, comment, and coordinate on plans and projects of overlapping and neighboring agencies to ensure compatibility with the City's GP, and to ensure impacts are fully mitigated.

WEP Finding

The WEP is a specific plan for the three Coastal Core Area districts initiated to implement GP Goal LU-2, and specifically GP Policy LU-2.11 (Core Area Specific Plan). The WEP would accommodate development consistent with the type and intensity described by the GP, and would further a number of GP policies specifically identified in the prior EIR as policies that are intended to mitigate environmental effects of buildout under the GP, including policies intending to reduce impacts related to air quality, VMT, GHG emissions, utility/service extensions, and population and housing. The City sent a notification about the proposed WEP to public entities pursuant to California Government Code Section 65352(a), including the agencies listed above as having policies, regulations, and requirements applicable to future development under the GP, and feedback from those agencies was incorporated into the WEP. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.12 Mineral Resources

- a) *Would the project 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?*
- b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local GP, specific plan, or other land use plan?*

### Prior EIR Determination

The prior EIR concluded **no impacts** to mineral resources including, but not limited to, loss of availability of a known mineral resource that would be of value to the region and residents of the state, and loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. As outlined in the prior EIR, California Geological Survey classifies the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975 (Public Resources Code §§2710-2796), and California Geological Survey has not designated any Mineral Resource Zones in the City, indicating the City is not considered an area of importance when it comes to mineral resources. In addition, there are no current mining operations and limited available area for mining operations within the City.

### WEP Finding

No Mineral Resource Zones have been designated or mining operations commenced within the City since the adoption of the prior EIR. The proposed WEP is consistent with the 2040 GP and would not result in any new or substantially more severe significant environmental impact.

## 3.13 Noise

- a) *Would the project 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 GP or noise ordinance, or applicable standards of other agencies?*

### Prior EIR Determination

Construction: The primary source of temporary noise from the GP would be from construction. However, construction noise is a major source of temporary noise within the City and would have continued to be so regardless of the GP. The GP's Noise Element contains Policy N-1.13, Construction Noise, which limits construction noise to the hours of 7:00 a.m. to 7:00 p.m. when construction activities occur within 500 feet of a sensitive land use. Compliance with GP Policy N-1.13 was determined by the prior EIR to ensure that impacts associated with construction activities would be **less than significant**.

Operation: The prior EIR acknowledge that buildout of the GP would add noise-producing uses, such as commercial and industrial uses, that increase noise exposure at existing or proposed noise-sensitive uses in the vicinity. However, the prior EIR determined that the GP contains goals and policies to ensure that noise impacts on noise-sensitive uses would be less than significant. This includes Policy N-1.5, New Stationary Noise Sources, which requires new stationary noise sources (e.g., HVAC units, loading docks, generators, etc.) to mitigate noise impacts on noise-sensitive uses when the noise from that source alone exceeds exterior levels specified in the GP Noise Element; and Policy N-1.8, Acoustical Analysis, which requires an acoustical analysis be prepared for projects that involve development of sensitive land uses to ensure noise standards specified in the GP Noise Element are not exceeded. Based on the requirements of GP Policies N-1.5 and N-1.8, the prior EIR determined impacts associated with stationary noise sources would be **less than significant**.

The prior EIR identified on-road traffic associated with full buildout of the GP as the primary source that would contribute to the cumulative noise environment. Based on traffic noise projections, the prior EIR determined traffic noise in the City would remain essentially unchanged from existing conditions under GP buildout (none of the roadways that the prior EIR analyzed would exceed a 3 dB increase with GP buildout, which is considered barely perceptible to the average human being). Therefore, the prior EIR concluded that the increase in vehicular traffic along roadways associated with the GP would not result in significant impacts.

### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. Future development in the Plan Area would be required to restrict construction and operational noise and implement noise mitigation as necessary to comply with GP Policies N-1.5, N-1.8, and N-1.13. Furthermore, the proposed WEP promotes compact, walkable, mixed-use development that would likely help reduce per capita VMT and associated traffic noise. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

**b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

Prior EIR Determination

The prior EIR determined implementation of the GP would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels with the implementation of GP Policy N-1.14, which requires assessments of vibration potential when projects are proposed in the vicinity of sensitive receptors, historic buildings, and archaeological sites, and requires that all feasible mitigation measures be implemented to ensure no damage would occur. The prior EIR concluded compliance with this policy would minimize the impacts related to vibration to **less than significant**.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. Future development in the Plan Area would be required to comply with GP Policy N-1.14 as applicable. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

**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?***

Prior EIR Determination

The prior EIR identified the Murray Field and Samoa Field Airports as the only airports located within two miles of City limits, and concluded impacts related to exposure to excessive noise levels resulting from proximity to these airports would be **less than significant** due to the lack of sensitive land uses proposed within the airports' 65 CNEL contours.

WEP Finding

The Plan Area is over two miles from the Samoa Field Airport and over one mile from the Murray Field Airport, and is not within the Murray Field airport's 65 CNEL noise contour as shown on GP Figure N-1. The arguments for a less than significant impact outlined in the prior EIR apply to the Plan Area. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

## 3.14 Population and Housing

- a) *Would the project 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)?*

Prior EIR Determination

The prior EIR analyzed the impact of creating 1,886 additional housing units in the city and up to 1.6 million square feet of nonresidential uses, and determined there would be a **less than significant** impact, in part because growth would occur gradually over a 20-year period and would be distributed broadly and incrementally across the City, and because anticipated growth is not considered substantial in comparison to the existing population levels.

WEP Finding

From 2019-2024, the City has issued building permits for an average of 44 new housing units per year, which is well below the rate of growth anticipated by the prior EIR. The WEP includes an objective of constructing 115 housing units by 2027, which is consistent with the type and intensity described by the GP. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

Prior EIR Determination

The prior EIR concluded impacts related to displacement of existing people and housing would be **less than significant** with the implementation of 2040 GP policies including, but not limited to, those calling for a compact pattern of mixed land uses radiating out from the Core Area and other commercial/employment areas (Policy LU-1.2); promoting development of vacant infill properties and redevelopment/reuse of economically underutilized sites and buildings (Policy LU-6.2); and supporting increased development of high-density housing in proximity to commercial and community services, employment opportunities, major transportation corridors, and where City infrastructure can accommodate increased densities (Policies LU-5.3 and LU-5.4).

WEP Finding

The WEP would accommodate development by building upon existing neighborhoods consistent with the type, location, and intensity of uses described by the GP. The proposed WEP is consistent with and furthers the GP policies mentioned above, providing a pathway for greater density through infill development in the Coastal Core Area districts, both by updating zoning regulations and through strategies and implementing actions intended to better optimize use of existing parking (WEP Strategy 2.1 and associated actions) and encourage adaptive reuse and redevelopment of vacant and underutilized properties (WEP Strategy 4.3 and associated actions). WEP Chapter 4 (Regulations, Standards, and Guidelines) provides updated regulations to replace existing outdated regulations that present a barrier to housing development as outlined in WEP Chapter 5 (Housing). The proposed WEP also includes strategies and implementing actions specifically focused on facilitating housing production in the Plan Area by forming collaborative partnerships and undertaking strategic funding initiatives (WEP Strategy 1.1) and identifying and eliminating regulatory

barriers while actively promoting housing opportunities and incentives (WEP Strategy 1.2). The WEP also includes implementing actions specifically intended to combat displacement under WEP Strategy 1.4, as well as an Affordable Housing and Anti-Displacement Strategies Report (WEP Appendix A). Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

## 3.15 Public Services

- 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 any of the following public services:*

### *Fire and police protection?*

#### Prior EIR Determination

The City is served by Humboldt Bay Fire and the Eureka Police Department. The prior EIR concluded impacts to fire and police protection services would be **less than significant** under the 2040 GP with implementation of GP policies, including, but not limited to, those designed to protect and enhance fire protection resources and ensure adequate fire facility standards, ISO ratings, and response times (Policies CS-2.1, CS-2.2, CS-2.3, CS-2.4); and those designed to protect and enhance law enforcement funding, services, staffing, facilities, equipment, and response times (Policies CS-1.1, CS-1.3, CS-1.4, CS-1.5, CS-1.6). In addition, the prior EIR determined future growth and development over the course of 20 years would potentially generate the need for new fire and police facilities, vehicles, equipment, and additional personnel to maintain adequate response times; however, this would not result in substantial impacts to fire and police protection services, as changes would be gradual and distributed broadly and incrementally.

#### WEP Finding

The proposed WEP is consistent with the growth assumptions underlying the prior EIR. The proposed WEP would concentrate growth in an already-serviced central area, minimizing the need for expanded services with increased response times. The nearest Humboldt Bay Fire Station to the Plan Area is located at 533 C Street and the Eureka Police Department Headquarters is located at 604 C Street, both within a quarter mile of the Plan Area. New development in the City, including in the Plan Area, would be required to pay a development impact fee to assist in funding Humboldt Bay Fire operations and facilities and to maintain adequate levels of fire protection. In addition, new buildings would be required to meet the building code standards and all fire safety standards adopted into the Eureka Municipal Code. Furthermore, the WEP includes a variety of strategies and implementing actions to improve safety in the Plan Area, both by maintaining Eureka Police Department staffing levels (WEP Action 4.1a), and through alternative means of crisis intervention and crime deterrence that reduce burden on Eureka Police Department staff, such as by expanding the City's CARE Division and Old Town Stewards Program, and promoting crime prevention through environmental design by increasing sanctioned activity in public areas, activating streetscapes, and encouraging 24/7 uses. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

### *Schools?*

#### Prior EIR Determination

The Eureka City School District provides services to the Plan Area and most of the City. The prior EIR analyzed the impacts of creating 1,886 additional housing units in the city resulting in approximately 3,683 additional residents. The prior EIR determined future growth and development over the course of 20 years (through 2040) would potentially generate the need for new or upgraded facilities and personnel; however,

it would not result in substantial changes to educational resources, as changes are anticipated to be distributed broadly and incrementally across the 16.4-square-mile City. The prior EIR concluded impacts to the School District would be **less than significant** with a modest, gradual, and broadly distributed program of physical development, and with implementation of 2040 GP policies, including, but not limited to, those designed to protect and enhance educational resources (GP Policies CS-3.1, CS-3.2, CS-3.3, CS-3.4, and CS-3.5).

#### WEP Finding

The proposed WEP includes an objective of constructing 115 housing units at an infill location by 2027, which is consistent with the growth assumptions underlying the prior EIR. The WEP would allow for new schools in the Plan Area and would not conflict with GP Policies CS-3.1 through CS-3.5. Therefore, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

#### *Parks?*

#### Prior EIR Determination

As discussed in the prior EIR, significant environmental effects occur if population growth and park use outpace improvements to parks and recreation facilities, resulting in the overuse and deterioration of existing facilities. The prior EIR specified that neighborhood parks should have a ratio of park space to population of 1 acre per 1,000 persons and for community parks, the prior EIR specified a ratio of 3 acres per 1,000 residents. Based on the existing population of about 27,226 residents at the time of the prior EIR, the ratio of community and neighborhood park space to residents was approximately 4.9 acres per 1,000 residents; therefore, the prior EIR concluded no additional parks and recreational facilities would be required to be developed as a result of the GP, even with the estimated 3,683 net new residents under full GP buildout. The prior EIR concluded impacts to parks and recreation facilities would be **less than significant** with implementation of 2040 GP policies related to parks and open space (Policies PR-1.1 and PR-1.2).

#### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the 2040 GP. The Plan Area has a variety of parks and recreational facilities, as described in WEP Chapter 7 (Culture & Community), and the WEP includes strategies and implementing actions for maintaining and enhancing these assets, including WEP Strategy 3.1, which is focused on direct City investment in recreational infrastructure, amenities, and programming; and WEP Strategy 3.2, which is focused on private activation of public spaces. The WEP's plan for Halvorsen Park, the largest park in the Plan Area, includes adding a playground (WEP Action 3.1a), restoring and upgrading the Halvorsen Park Trail (Action 2.1a), and continuing to retain ample open space for community events and informal recreation, with upgrades to infrastructure to better serve events, such as ensuring adequate electrical and potable water access and potentially adding a stage (WEP Action 3.2a). Eureka's population was counted at 26,512 during the 2020 Census, and the latest population estimate for 2023 was 25,734 – below the 27,226 population estimate of existing conditions used in the prior EIR. No parkland has been lost since the prior EIR. For all these reasons, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

*Other public facilities?*

Prior EIR Determination

The prior EIR concluded impacts to other public facilities would be **less than significant** with implementation of 2040 GP policies, including, but not limited to, policies related to libraries (Policies CS-4.1, CS-4.2, CS-4.3), the Sequoia Park Zoo (Policy PR-1.12) and community centers (Policy AC-2.9).

WEP Finding

Humboldt County Library is within the WEP Plan Area, and the proposed WEP supports the library indirectly by improving walking, biking, and transit access to and through the Plan Area, including to and from the Library (directly in support of GP Policy CS-4.2). The City's Adorni Recreational Center is also within the Plan Area, and the proposed WEP includes Action 3.1c to make planned repairs and upgrades to the Adorni Center, furthering GP Policy AC-2.9. The proposed WEP would accommodate development consistent with the type and intensity described by the GP and consistent with the applicable GP policies referenced above. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

## 3.16 Recreation

- a) *Would the project 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?*

### Prior EIR Determination

The prior EIR determined the GP would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of a facility would occur or be accelerated. As described in impact 3.15(a), parks, above, the current ratio of community and neighborhoods park space to residents is 4.9 acres per 1,000 residents, well above the recommended 1 acre per 1,000 persons for neighborhood parks and 3 acres per 1,000 residents for community parks. The prior EIR determined the anticipated 3,683 net new residents in the City by 2040 under GP buildout would utilize the existing 133 acres of neighborhood and community parks, and no additional parks and recreation facilities would be required to maintain minimum ratios of park space to population. Because of the modest, gradual, and broadly distributed program of physical development that occurs under the GP, combined with policies designed to protect and enhance parks and recreational resources such as GP Policies PR-1.1 and PR-1.2, the prior EIR concluded that impacts to parks and recreational resources would be **less than significant**.

### WEP Finding

The proposed WEP would accommodate infill development consistent with the type and intensity described by the GP. The WEP Plan area includes a myriad of parks and recreational facilities including the Clara May Berry Park & Playground next to the Humboldt County Library, the Samoa Bridge Boat Launch, Halvorsen Park (which includes the Bonnie Gool Guest Dock), the Adorni Recreation Center (which includes a public pier and dock), the Eureka Boardwalk and Waterfront Trail, Coast Guard Plaza/ F Street Dock, Madaket Square/ C Street Dock, the Old Town Gazebo Plaza, and Clark Plaza. The proposed WEP aims to protect and enhance existing public plazas, parks, and recreational facilities within the Plan Area consistent with GP Policies PR-1 and PR-2 referenced above. WEP Chapter 7 (Culture & Community) is focused on enhancing the Plan Area as a hub for recreation, arts, and culture with a strong identity rooted in a rich history and connection to the waterfront (WEP Vision 3), including through WEP Strategy 3.1, which is focused on direct City invest in recreational infrastructure, amenities, and programming; and through WEP Strategy 3.2, which is focused on private activation of public spaces. The proposed WEP includes implementing actions that apply broadly throughout the Plan Area to enhance the parks and recreational system, such as Action 3.2b to attract recreational rentals on City-owned property, as well as implementing actions focused on specific parks and recreational facilities, such as Action 3.1d to reimagine the Old Town Square and Gazebo. For all these reasons, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

## 3.17 Transportation

- a) *Would the project conflict with a program, plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, mass transit, and vehicle miles traveled?*

### Prior EIR Determination

Intersection Level of Service: For the prior EIR, quantitative roadway impact analyses were conducted for 2040 conditions, with the assumption of full buildout of the GP. The traffic impacts were evaluated using the latest Humboldt County Travel Demand Model, which estimated a relatively small increase in vehicle trips generated under the 2040 buildout scenario versus the 2040 “no project” scenario analysis. With buildout of the GP, population increase was predicted to be 13.5 percent over existing conditions; however, total trips were predicted to increase by only 4.1 percent. Therefore, the GP was predicted to result in a change in generated trips that would be substantially less than the growth in population. The prior EIR determined 2040 conditions with vehicle trips associated with buildout of the GP were similar to those for the 2040 no project scenario, and therefore the GP’s impact to intersection Level of Service (LOS) would be **less than significant**.

However, while the 2040 GP and prior EIR do include policies and evaluation regarding LOS, 2040 GP Policy M-2.4 calls for the City to consider the applicability of using transportation performance metrics such as VMT and associated thresholds for measuring transportation system impacts consistent with the CEQA Guidelines and state law, as well as for making GP consistency determinations. In addition, in a recent amicus brief filed by the California Attorney General Rob Bonta in a CEQA case involving the City, the Attorney General confirmed LOS impacts can be disregarded in further CEQA analysis related to the City’s GP EIR:

*If an agency has a certified EIR that used the LOS method before the VMT mandate, and then prepares an addendum to that EIR after the VMT mandate, the agency can choose to use the old LOS method rather than the new VMT method to compare the environmental impacts. (Olden Properties Corp. v. City of Newport Beach (2023) 93 Cal.App.5th 270, 280–281.) Otherwise, the agency would be required to conduct a new traffic analysis from scratch, or compare “LOS apples to VMT oranges,” instead of relying upon the analysis in the original EIR. (Ibid.) But LOS is no longer ever required. An agency should shift exclusively to a VMT analysis in environmental documents when possible including, as here, when the prior EIR analysis used both methods. (See OPR, Technical Advisory on Evaluating Transportation Impacts in CEQA, Dec. 2018, p. 18–19.) Here, the City appropriately shifted to using the VMT method in furtherance of CEQA and state policy.*

As a result, the analysis in this Addendum only uses the VMT method.

Other Transportation Modes (Public Transit and Bicycle and Pedestrian Facilities): The prior EIR concluded impacts on other modes of transport and mobility, such as pedestrian circulation, bicycle paths, and transit, would be **less than significant** under 2040 GP buildout with implementation of 2040 GP policies, including safety and mobility-related Complete Streets Policies M-1.1. through M-1.9,

pedestrian and bicyclist related Policies M-3.1 through M-3.12, and transit operations and accessibility related Policies M-4.1 through M-4.1. Additionally, the prior EIR pointed to the 2040 GP's overall concept of infill and densification within and around the City's Core Area which would serve to enhance opportunities for development that is compact, walkable, and transit-friendly (Policy M-1.6).

Vehicle Miles Traveled: The prior EIR concluded that although the 2040 GP contains a number of policies that are directed towards lessening impacts from VMT, per-capita VMT is projected to decrease only slightly over the next 20 years, while buildout under the 2040 GP is projected to include 1,886 additional dwelling units and 1.6 million square feet of new non-residential uses. As such, the prior EIR concluded VMT impacts under 2040 GP buildout would be **significant and unavoidable**. According to the prior EIR, the largest contributor to VMT reduction would be the land use plan, which provides for increases in densification, infill development, and provisions for housing and employment within the central core of the City. However, the reductions in VMT resulting from these policies would be relatively modest and would not point towards a decrease in per-capita VMT that would be substantially different from what is occurring presently.

The prior EIR determined implementation of the GP would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. However, implementation of the GP would create an unmitigable adverse effect with respect to VMT.

#### WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP and would be consistent with applicable GP policies. The proposed WEP emphasizes a walkable urban fabric, with shared streets, safe crossings, and improved connections across modes. WEP Chapter 6 (Mobility & Access) aligns with and applies the City's Complete and Green Streets Policy, envisioning a connected and walkable community that is welcoming and accessible to all (WEP Vision 2). Proposed WEP Strategies 2.1, 2.2, and 2.3 and associated implementing actions focus on improving public access to and along the waterfront; promoting complete streets and pedestrian-friendly urban design; and enhancing bicycle infrastructure and connectivity, respectively, setting a clear vision for reducing auto-dependence. These strategies include implementing actions to add and improve bicycle and pedestrian facilities at specific locations (e.g., WEP Actions 2.1f, 2.2b, 2.2c, 2.2e, 2.2g, 2.3a, 2.3b, and 2.3c), as well as actions that apply more broadly, such as actions to implement the City's Complete and Green Streets Policy when roadwork is proposed (Action 2.2a), add bicycle and pedestrian route wayfinding (Action 2.2f), install bicycle amenities (Action 2.3d), and study the feasibility of car, bike, and scooter share (Action 2.4d). Other chapters of the proposed WEP also include implementing actions that promote complete streets, traffic safety, and bicycle and pedestrian access by adding art, parklets, neighborhood-based mini-libraries, twinkle lights and other pedestrian-scale improvements to the public realm (e.g., WEP Actions 3.3f, 3.3g, 3.3h, 3.2c, 3.2d, 3.2f); promoting wayfinding (WEP Action 4.5f); and maintaining, improving, and activating the Waterfront Trail and Boardwalk (WEP Actions 3.1e, 3.1f, 3.3a, 5.4d). WEP Chapter 4 zoning regulations, development standards, and design guidelines also require and encourage pedestrian-friendly development, such as by imposing maximum front setbacks; requiring ground-floor, street-facing storefront transparency on pedestrian-focused frontages; and requiring publicly accessible pedestrian passageways in large private developments.

The WEP also supports transit, indirectly by promoting increased density at a central location, and directly through WEP Strategy 2.4 (Strengthen public transit and shared mobility options) and implementing Actions 2.4a (Construct the EaRTH Center), 2.4b (Improve bus stop infrastructure), and 2.4c (Support Humboldt Transit Authority in implementation of expanded service goals). Also, WEP strategies and actions discussed above that improve pedestrian and bicycle connectivity also support transit by getting people safely to and from bus stops. Additionally, WEP Action 4.5d aims to support expanded bus service from the Plan Area to Cal Poly Humboldt and College of the Redwoods as an economic development strategy to increase college student spending.

The WEP also minimizes increases in VMT by encouraging densification, infill development, and housing and employment within the central core of the City. The Plan Area includes a relatively high employment density, and is located in the largest and densest City in Humboldt County with more persons and jobs per square mile than any other city in Humboldt, where, according to the Governor's Office of Land Use and Climate Innovation's (OPR's) Site Check Tool, per capita VMT is 15% or more below the regional average (Census; OPR, 2025). The proposed WEP supports a variety of projects that the 2018 OPR Technical Advisory on Evaluating Transportation Impacts in CEQA suggests can be presumed to cause a less-than-significant impact on transportation, such as transit, bicycle, and pedestrian enhancement projects; mixed-use projects in areas with low VMT; and projects that add affordable residential units near transit (OPR, 2018). Furthermore, CEQA Guidelines Section 15064.3(b)(1) states that generally projects within one-half mile of an existing major transit stop should be presumed to cause a less than significant transportation impact, and a large portion of the Plan Area is within one-half mile of the 3rd and H Street bus stop, which has been identified by HCAOG's Regional Transportation Plan (RTP) as a major transit stop (HCAOG, 2022).

For all these reasons, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

- b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of services standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Prior EIR Determination

The prior EIR determined the GP would not conflict with an applicable congestion management program. The Regional Transportation Planning Agency for Humboldt County is HCAOG. There is no regional congestion management agency in the County. At the time the prior EIR was prepared, the HCAOG RTP was adopted in 2014 and did not establish LOS standards for roadway or multi-modal facilities.

The prior EIR referenced 2014 RTP Policy HR-11 which stated that LOS standards were to be used to measure the performance of all regionally significant roadways that contributed to the regional transportation network. The prior EIR concluded implementation of the GP would not result in an adverse impact to the operation of the circulation network and would not conflict with the regional standards associated with transportation; therefore, this impact would be **less than significant**.

WEP Finding

HCAOG has adopted a new RTP, Variety in Rural Options of Mobility (VROOM) 2022-2042 (HCAOG, 2022). The current RTP explains lead agencies may no longer deem automobile delay a significant impact under CEQA:

*Senate Bill 743 (Steinberg, 2013) ushered in a new approach to addressing and mitigating environmental impacts of traffic through the California Environmental Quality Act. The legislative intent is to “more appropriately balance the needs of congestion management with statewide goals related to infill development,” active transportation, and GHG emissions. SB 743 aims to reduce GHG emissions by removing barriers to infill development, and multiplying projects that increase walking and biking and public transportation infrastructure and facilities. To that end, the State amended CEQA Guidelines to replace LOS with vehicle miles traveled (VMT) as the most appropriate measure of project transportation impacts. Lead agencies may no longer deem automobile delay a significant impact under CEQA. The amended Guidelines also advise that projects for roadway rehabilitation, transit, bicycle and pedestrian infrastructure, or that propose development near transit, should be considered to have a less than significant transportation impact (CEQA Statute, Public Resources Code §15064.3). The new regulations became mandatory statewide on July 1, 2020.*

As a result, the current RTP does not include any policy about vehicle LOS standards. The proposed WEP would accommodate development consistent with the type and intensity described by the GP. Development of the WEP would be consistent with applicable GP policies. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

- c) ***Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?***

Prior EIR Determination

The prior EIR determined impacts related to changes in air traffic patterns would be **less than significant**. As discussed in section 3.9(d) above, Murray Field and Samoa Field airports are the only airports located within two miles of the City. The prior EIR discussed how Murray Field’s ALUCP contains designated zones within which certain off-airport activities would be deemed incompatible; if any off-airport project were proposed within these zones, they would be required to undergo review and approval by the County’s Airport Land Use Commission. As such, new projects in the vicinity of the airport would be required to be consistent with the ALUCP, and safety hazards would be avoided.

At the time of GP adoption, the Samoa Field Airport did not have an adopted ALUCP, but, according to the prior EIR, the airstrip is oriented in a north-south direction, and approach and departure flight paths do not occur over populated areas. As a result, the prior EIR determined development associated with the GP would not place people or structures in such a manner as to create a safety hazard.

WEP Finding

The Plan Area is over two miles from the Samoa Field Airport and over one mile from the Murray Field Airport, and the analysis included in the prior EIR for the entire City applies to the Plan Area. The eastern-most extent of the Commercial Bayfront is within the Airport Influence Area for the Murray Field Airport and thus proposed development in this area will be referred to the County’s Airport Land Use Commission for

review and approval (Humboldt County, 2025). The Samoa Field Airport is now included in the County's ALUCP (adopted in 2021), and none of the Plan Area is within its Airport Influence Area (ESA, 2021). The proposed WEP would accommodate development consistent with the type, location, and intensity described by the GP. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

- d) *Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- e) *Would the project result in inadequate emergency access?*

Prior EIR Determination

The prior EIR concluded transportation impacts from inadequate emergency access and from increased hazards due to geometric design features or incompatible uses would be **less than significant** with the implementation of engineering and design standards, and 2040 GP policies, including, but not limited to, those addressing Complete Streets directives (Policies M-1.1 through M-1.9), design standards (Policy M-2.5), improved circulation for pedestrians and bicyclists (Policies M-3.1 through M-3.12), and enhancement in goods movement (Policies M-7.1 through M-7.3). According to the prior EIR, changes associated with the GP would result in nominal changes to traffic operation and delays, and in some cases traffic operations would improve and delays would decrease, providing improved timeliness for emergency access.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. The Plan Area is built out with a grid pattern of streets and alleys. Development of the WEP would be consistent with applicable engineering standards and GP policies, and would further a number of the GP policies related to complete streets and bicycle/pedestrian circulation cited as mitigation by the prior EIR. As part of the entitlement process for future development under the WEP, proposed changes to the street and alley network and access thereto would be reviewed by the Engineering Department, Building Official, and Fire Marshall to ensure safe conditions, adequate emergency access, and compliance with standard engineering and design requirements. For all these reasons, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

Prior EIR Determination

The prior EIR determined implementation of the 2040 GP would enhance programs associated with multi-modal transportation operation and effectiveness, as discussed under 3.17(a) above; therefore, this impact would be **less than significant**.

WEP Finding

The proposed WEP would accommodate development consistent with the type and intensity described by the GP. As described in further detail under 3.17(a) above, the WEP includes vision statements, strategies, and actions to enhance public transit, bicycle, and pedestrian facilities providing access to/from and through the Plan Area. Many of these measures directly implement adopted policies, plans, and programs,

including but not limited to the 2024 Eureka Bike Plan, the Humboldt County 2023-2028 Transit Development Plan, the RTP, and the 2040 GP. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

## 3.18 Utilities and Service Systems

- a) *Would the project have sufficient water supplies available to serve the City from existing entitlements and resources?*
- b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*
- c) *Would the project exceed wastewater treatment requirements of the Department of Water Resources and applicable Regional Water Quality Control Board?*
- d) *Would the project 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?*

### Prior EIR Determination

Water: The prior EIR concluded impacts related to water supply and the relocation or construction of new or expanded water facilities (a and b above) would be **less than significant** given the capacity of the City's water source and with the incorporation of 2040 GP policies calling for the continued provision of high-quality water through a cost-effective distribution system (Policy U-1.1); regular review and updating of the City's Urban Water Management Plan and capital improvement plans (Policy U-1.2); and collaboration with federal, state, and local water agencies and providers to create and enhance long-term water conservation programs (Policy U-1.7).

The prior EIR states that 1,886 additional dwelling units and 1.6 million square feet of new non-residential uses are projected to be developed within the City during the 2040 GP planning period, and it is expected demand for water will continue to increase with projected population and job growth. The City is one of several Public Water Systems reliant on the HBMWD for water service. The City's average annual daily system demand is roughly 4.0 MGD, while HBMWD has existing water supply sufficient to provide 17.9 MGD to domestic water customers. According to the prior EIR, HBMWD has indicated there is sufficient supply to service existing water demand and accommodate new water demand at the full, 20 year expected build-out under the 2040 GP both in normal and multiple dry years. The prior EIR estimated an increase of approximately 21.5 percent in residential connections, as a worst-case scenario, assuming that number would be lower due to multi-family residential structures. The 21.5 percent increase in connections would result in an increase in average daily demand of 0.59 MGD to approximately 3.34 MGD.

Wastewater: The prior EIR concluded impacts related to wastewater treatment capacity and the relocation or construction of new or expanded wastewater treatment facilities (b, c, and d above) would be **less than significant** due to the capacity of the City's wastewater treatment plant (WWTP) and with the incorporation of 2040 GP policies calling on the City to ensure sufficient wastewater system capacity to meet the needs of industrial, agricultural, and other high-impact users (Policy E-5.7); to maintain and improve the City's wastewater collection and treatment system capacity for all segments of the community to satisfy dry and wet weather conditions while also detecting and correcting

infiltration/inflow issues (Policy U-2.1); and to regularly review and update the City's Sewer System Management Plan and other wastewater planning tools and capital improvement plans to ensure adequate wastewater collection, treatment, infrastructure, maintenance, rehabilitation, and funding (Policy U-2.2).

The prior EIR states that 1,886 additional dwelling units and 1.6 million square feet of new non-residential uses are projected to be developed within the City during the 2040 GP planning period, and it is expected demand for wastewater treatment will continue to increase with projected population and job growth. The City owns and operates a wastewater collection and treatment system that collects and conveys between 1.6 and 1.8 billion gallons of wastewater per year. According to the prior EIR, the City's WWTP was designed and permitted to treat an average dry weather flow (ADWF) of 8.6 MGD and is currently reporting an ADWF of 3.6 MGD. The City estimates there is remaining available capacity at the WWTP for approximately 2,160 Estimated Dwelling Units, or new single-unit wastewater connections within the City service area. In addition, as noted in the prior EIR, the WWTP was designed so that its treatment capacity could be increased in the future to accommodate both the City's planned growth within its sphere of influence and Humboldt Community Services District's growth in the future.

#### WEP Finding

The proposed WEP is consistent with the growth assumptions underlying the prior EIR and would comply with applicable 2040 GP requirements. The City has public improvement requirements and standards that would ensure new development is connected to, and adequately served by, the water supply and wastewater collection/treatment systems, and pays its fair-share contribution to the systems through water and sewer connection and impact fees. New development would also be required to comply with current state requirements for water-efficiency in landscaping, appliances, etc. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

- e) *Would the project require or result in the construction of new storm drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

#### Prior EIR Determination

As described in the prior EIR, the City manages and maintains the existing stormwater drainage system with stormwater flowing by gravity through piping to numerous discharge points along Humboldt Bay, sloughs, and drainages in and around the City. The City currently holds an NPDES stormwater permit issued by the North Coast Regional Water Quality Control Board and has an adopted Storm Water Management Plan (SWMP), as required for the Federal Storm Water Phase II Final Rule Permit. The SWMP describes certain BMPs the City is required to implement. As discussed in the prior EIR, the City would continue to update its SWMP, and as such, would remain in compliance with the implementation of its NPDES permit. The prior EIR determined impacts on the stormwater drainage system as a result of the 2040 GP will be modest, gradual, and broadly distributed based on any physical development that would occur.

The prior EIR concluded impacts to the stormwater system would be **less than significant** with implementation of 2040 GP goals and policies designed to protect utilities and service systems, including creation of a comprehensive stormwater collection and conveyance system (Goal U-3), provision of adequate infrastructure for the City's stormwater drainage system (Policy U-3.1), and regular review and update of the Storm Drain Master Plan (Policy U-3.2).

WEP Finding

Stormwater drainage in the Plan Area involves a system of drainage inlets and stormwater mains that direct runoff from impervious surfaces to a series of stormwater outfalls along the northern bayfront (shown in WEP Figure 9-3). To address potential impacts of development on stormwater management, projects in the City of Eureka (including in the WEP Plan Area) that create or replace 2,500 square feet or more of impervious surface are regulated under the City's MS4 Permit and must prepare a post-construction Stormwater Control Plan to ensure stormwater runoff is adequately managed consistent with the Humboldt Low Impact Development Stormwater Manual for the life of the development.

WEP Chapter 9 (Coastal Hazards & Climate Change) discusses the vulnerability of the stormwater system to storm and tidal flooding in the lower-lying portions of the Plan Area, and presents adaptation solutions, including monitoring and maintaining tide gates on stormwater outfalls (WEP Action 5.1b) and constructing the Eureka Flood Reduction and Sea Level Rise Resiliency Project (WEP Action 5.1a). In 2023, the City adopted a SLR-CIP Adaptation Plan, providing a detailed vulnerability assessment and adaptation plan for all City-owned assets and infrastructure, including stormwater infrastructure. In 2024, the City secured over \$1 million in grant funding from the State Coastal Conservancy for a Coastal Resilience Plan to build on the SLR-CIP Adaptation Plan work, including performing additional vulnerability analysis looking further into the future; developing a strategy for near-term and long-term adaptation planning efforts for City infrastructure, including establishment of acceptable exposure, vulnerability, and risk thresholds; and identifying adaptation pathways and strategies for each planning horizon. The WEP calls for furthering these planning efforts (WEP Actions 5.2a and 5.2b), as well as coordinating with other Humboldt County jurisdictions on the ongoing update to the Humboldt Stormwater Low Impact Development Manual to provide specific guidance on stormwater management alternatives for low-lying areas (Action 5.4e).

Ultimately, the proposed WEP would accommodate development consistent with the type and intensity described by the GP, and is consistent with applicable GP policies. Therefore, the proposed WEP would not result in a new or substantially more severe significant environmental impact.

- f) *Would the project be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?*
- g) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Prior EIR Determination

The prior EIR concluded impacts related to solid waste would be **less than significant** with sufficient capacity at the Dry Creek landfill facility, continued implementation of waste diversion programs, and implementation of 2040 GP policies related to solid waste, including, but not limited to, those focused on increasing waste diversion rates (Policies U-4.3 and U-4.5). As discussed in the prior EIR, solid waste that cannot be recycled or composted is exported to the Dry Creek Landfill in White City, Oregon, which holds a Title V Operating permit. The Dry Creek Landfill accepts approximately 900 tons of solid waste per day and has an operational life expected to exceed 100 years. The prior EIR analyzed solid waste generation under buildout of the 2040 GP and concluded estimated solid waste would likely be of minimum burden on the permitted capacity of the landfill.

WEP Finding

The proposed WEP is consistent with the growth assumptions underlying the prior EIR, and, as such, the landfill that would serve the WEP Plan Area has adequate permitted capacity to accommodate the Plan Area's solid waste disposal needs. New development within the Plan Area would be required to be designed with secure space for solid waste, recycling, and compost adequate to serve anticipated demand. As a result, the proposed WEP is consistent with the 2040 GP and would not result in a new or substantially more severe significant environmental impact.

## 4 Conclusion

The WEP was prepared to implement the adopted GP in the WEP Plan Area. Based on the environmental analysis presented in Section 3 of this Addendum, the proposed WEP is well within the analysis contained in the prior EIR and none of the conditions outlined in CEQA Guidelines §15162(a) have been met. As noted in this Addendum, the prior EIR analyzed the impact of the creation of up to 1,886 additional housing units and up to 1.6 million square feet of new non-residential uses in the City, and identified significant and unavoidable impacts associated with buildout of GP land uses as follows:

- Increase in operational PM<sub>10</sub> emissions that exceed air district standards, and for which the air basin is in non-attainment;
- Potentially significant direct and cumulative impacts by causing substantial changes in the significance of historic resources;
- Potentially significant direct and cumulative impacts by causing substantial changes in the significance of archaeological and tribal cultural resources, including human remains; and
- Unacceptable increase in VMT that does not meet recommended reduction targets.

The WEP does not result in substantial changes to the 2040 GP which would require major revisions of the prior EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Furthermore, the environmental analysis herein has not revealed that changes in circumstances have occurred since the prior EIR was certified that would introduce new or more severe environmental impacts, and no new information of substantial importance has emerged that indicates the WEP would have new or more severe impacts than were identified in the prior EIR. Correspondingly, there are no mitigation measures or alternatives that were previously found not to be feasible that would in fact be feasible, or that would be considerably different from those analyzed in the prior EIR, which would substantially reduce one or more significant impacts. Therefore, no further environmental review is required under CEQA.

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Figure 1 Plan Area

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