

DRAFT
CEQA Initial Study and Mitigated Negative Declaration
For
3200 Walford Avenue

Application PLN-2024-18886
APNs: 017-015-034 and 017-041-008

**3200 Walford Avenue Qualified Combining Zone Removal and General Plan Text
Amendment**

Lead Agency:

Humboldt County Planning Department
3015 H Street
Eureka, CA 95501

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APPENDIX 1

- 1A. Site Plans (NorthPoint Consulting Group, July 2, 2024)
- 1B. Zone Reclassification and General Plan Text Amendment Memorandum, Petition Approval, and Supporting Materials (NorthPoint Consulting Group, January 12, 2024).

APPENDIX 2

- 2A. Humboldt County Ordinance 2078, June 1995
- 2B. CalEEMod Analysis of Residential and Medical Build-Out Scenarios Summary Reports (NorthPoint Consulting Group, October 2024)
- 2C. Biological Scoping Report (Hohman & Associates Forestry Consultants, December 2023)
- 2D. Biological Opinion to the Presence / Absence of Wetlands (Hohman & Associates Forestry Consultants, October 2024)



List of Acronyms

AB	Assembly Bill
AF	Acre-feet
AFY	Acre-feet per year
APCO	Air Pollution Control Officer
APN	Assessor Parcel Number
AWSDAR	Annual Water Supply and Demand Assessment Report (Humboldt CSD, 2024)
BAA	Biological Assessment Area
BAAQMD	Bay Area Air Quality Management District
BACT	Best Available Control Technology
BMPs	Best Management Practices
BSR	Biological Scoping Report
BOS	Board of Supervisors
CalEEMod	California Emission Model (CalEEMod® Version 2022.1.1.22)
CAL FIRE	California Department of Fire and Forestry Protection
Caltrans	California Department of Transportation
Cal/OSHA	Division of Occupational Safety and Health
CARB	California Air Resource Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CERS	California Environmental Reporting System
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CNEL	Community Noise Equivalent Level
CNDDDB	California Natural Diversity Database
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
DEH	Division of Environmental Health
DPW	Department of Public Works
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
ECOS	Environmental Conservation Online System
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FSR	Fire Safe Regulations
GHG	Greenhouse Gas
HBMWD	Humboldt Bay Municipal Water District
HCAOG	Humboldt County Association of Governments
HCC	Humboldt County Code
HCD	California Department of Housing and Community Development
HCP	Habitat Conservation Plans
HMBP	Hazardous Materials Business Plan
HOZ	Housing Opportunity Zone
HUC	Hydrologic Unit Code
HWMA	Humboldt Waste Management Authority



ISMND	Initial Study / Mitigated Negative Declaration
LID	Low Impact Development
LUST	Leaking Underground Storage Tank
MGD	Million Gallons per Day
MS4	Municipal Separate Storm Sewer System
NCAB	North Coast Air Basin
NCRWQCB	North Coast Regional Water Quality Control Board
NCUAQMD/NCAQMD	North Coast Unified Air Quality Management District
NEHRP	National Earthquake Hazards Reduction Program
NHRP	National Register of Historic Places
NRCS	Natural Resources Conservation Service
OES	Office of Emergency Services
OPR	Office of Planning and Research
OWTS	Onsite Wastewater Treatment System
PG&E	Pacific Gas and Electric Company
PGA	Peak Ground Acceleration
PM ₁₀	Particulate matter with a diameter of 10 micrometers or less
Potential Developable Area	Describes the areas on the parcel which could be developed, including the entirety of the (1) already-developed area, and the (2) cleared area under the Less than 3 Acre Conversion that is located outside of the Stream Management Area (SMA)
PRC	Public Resources Code
Q-Zone	Qualifying Zone, specifically referencing the Qualifying Zone put in place by Ordinance 2078
RCAP	Regional Climate Action Plan
RHNA	Regional Housing Needs Assessment
RM	Residential Medium Density General Plan land use designation
RTP	Regional Transportation Plan
R-4	Apartment Professional Zoning Designation
R-4-Q	Apartment Professional Zoning Designation with Q-Zone Overlay Designation
SAA	Streambed Alteration Agreement
SB	Senate Bill
SCP	Stormwater Control Plan
SGMA	Sustainable Groundwater Management Act
SMA	Streamside Management Area
SMARA	State Surface Mining and Reclamation Act
SMAWO	Streamside Management Area and Wetlands Ordinance
Sq. ft.	Square feet
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
THPO	Tribal Historic Preservation Officer
TMDL	Total Maximum Daily Load
UBC	Universal Building Code
USFWS	US Fish & Wildlife Service
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled



1. Background

1. **Project Title:** 3200 Walford Avenue Zone Reclassification and General Plan Text Amendment (removal of Qualified Combining Zone) on a single legal parcel comprised of two Assessor Parcel Numbers (APNs) 017-015-034 and 017-041-008, located at 3200 Walford Avenue in Eureka, CA 95503, in the unincorporated area of Humboldt County.
2. **Lead Agency Name and Address:** Humboldt County Planning & Building Department, 3015 H Street, Eureka, CA 95501-4484; Phone: (707) 445-7541; Fax (707) 445-7446
3. **Contact Person and Phone Number:** Cliff Johnson, Planning Manager; (707) 445-7541; email: cjohnson@co.humboldt.ca.us
4. **Project Location:** The Project location is located at 3200 Walford Avenue in Eureka, California, 95503, on Assessor Parcel Numbers (APNs) 017-015-034 and 017-041-008.
5. **Project Sponsor's Name and Address:**

Applicant	Property Owner	Agent
Dr. Deepak Stokes	MDS Eureka Clinic, LLC	Northpoint Consulting Group, Inc
3200 Walford Avenue	3200 Walford Avenue	1117 Samoa Blvd.
Eureka, CA 95503	Eureka, CA 95503	Arcata, CA 95521

6. **Existing / Proposed General Plan Designation:** Residential Medium Density (RM)
7. **Existing Zoning:** Qualified Apartment Professional (R-4*-Q)
8. **Proposed Zoning:** Apartment Professional (R-4 B-1)
9. **Project Site:** The subject parcel is one legal parcel comprised of two APNs: 017-015-034 and 017-041-008. The parcel is approximately 10.32 acres in size. It is located off Harris Street in Eureka, just outside of the City of Eureka city boundary and within the unincorporated area of Humboldt County (Figure 2). To access the site, take Walford Avenue off of Harris Street across from Safeway. The parcels are located at the end of Walford Ave (Appendix 1A – Site Plans, Sheet C0).

The parcel is developed with existing medical offices and associated parking, located in the north of the property on APN 017-015-034. Onsite impervious surface area currently totals 1.08 acres. The remainder of the parcel is undeveloped and comprised of forested land (Figure 3: Project Aerial Image and Surrounding Uses (Source: Humboldt County Web GIS, 2024). The property is comprised of slopes between 0%-50+%. The property is connected to existing municipal utility systems, including water and wastewater through the Humboldt Community Services District (CSD), electrical through Pacific Gas & Electric Company (PG&E), and telecommunications.

Tree removal occurred onsite in 2024 under an approved Less than 3-acre Conversion (1-23EX-00096-HUM) and associated Humboldt County Grading Permit (BLD-2024-59593). The area that was cleared totaled approximately 2.42 acres of newly disturbed area no longer forested (Appendix 1A – Site Plans, Sheet C1).



The parcel is located within the Freshwater Creek HUC 12 Watershed. A gulch and associated unnamed Class II watercourse runs southwesterly through the property, with several Class III ephemeral drainages feeding the watercourse (Appendix 1A – Site Plans, Sheet C1). This unnamed Class II watercourse is tributary to a tributary of Ryan Creek, which drains to Ryan Slough, then to Freshwater Slough, and eventually to Humboldt Bay. There are no stream crossings onsite. No wetlands, springs, ponds, or vernal pools are present onsite.

The parcel is located in the unincorporated area of Humboldt County, outside of City of Eureka city limits but within the City of Eureka Sphere of Influence (Figure 1) and within the Eureka Community Planning Area. The parcel is located outside of the Coastal Zone (Figure 2). It is located within California Department of Forestry and Fire Protection (CAL FIRE) State Responsibility Area (SRA) and within the Humboldt Fire Protection District. It is identified as a County Housing Opportunity Zone (HOZ), within the designated Eureka South District General Plan Housing Element HOZ. It is surrounded by residential, commercial, and medical uses (Figure 3).

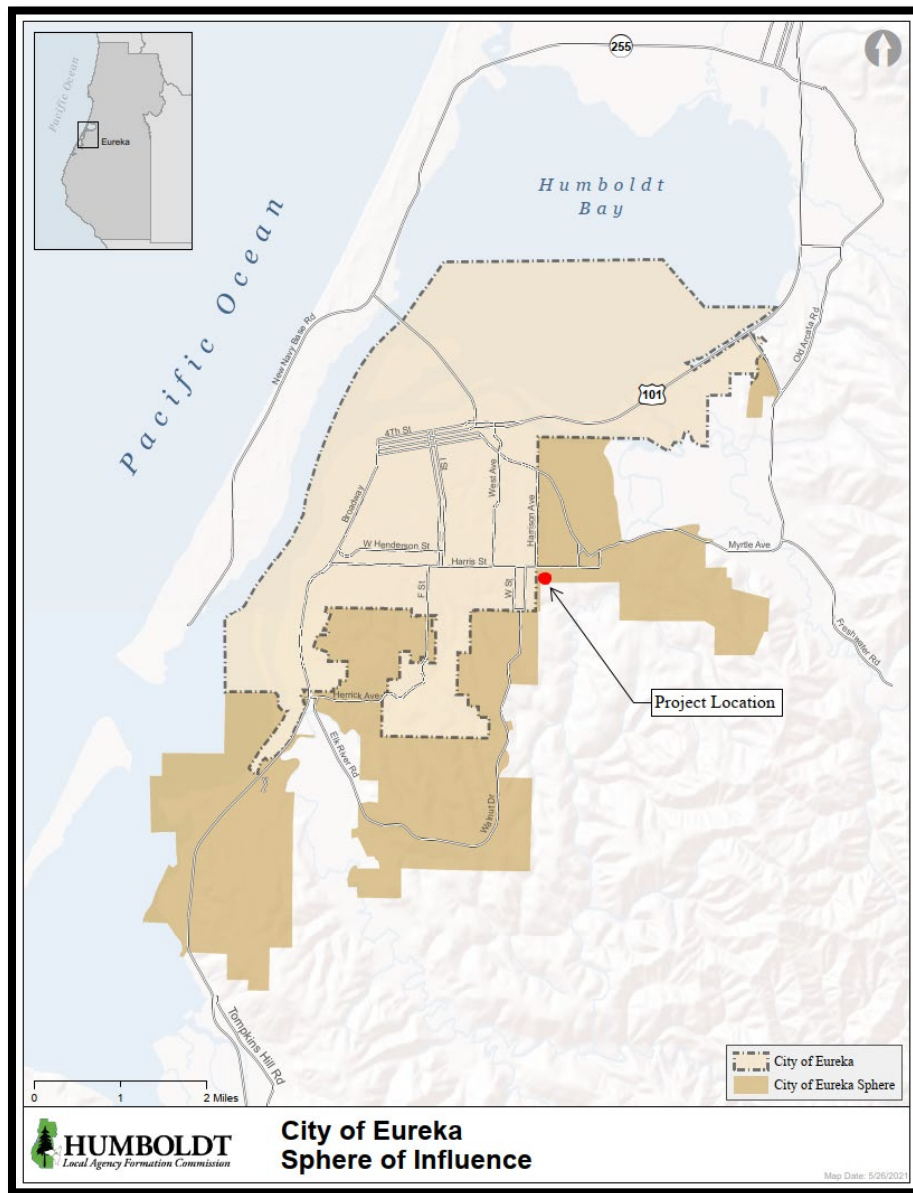


Figure 1: Project Vicinity Map (Source: LAFCO, 2021)





Figure 2: Detailed Project Vicinity Map (Source: Humboldt Web GIS, 2024)



Figure 3: Project Aerial Image and Surrounding Uses (Source: Humboldt County Web GIS, 2024)



10. Project Background: The petition application for the Zone Reclassification was submitted to Humboldt County Planning and Building Department on March 30, 2023 (Application Number PLN-2023-18149). The petition application was approved on September 12, 2023. See Appendix 1B for findings submitted with the Petition Application and for the Board of Supervisors Resolution accepting the General Plan Text Amendment and Zone Reclassification Petition Application (BOS Resolution 23-130).

11. Description of Project: The applicant is applying for a Zone Reclassification and General Plan Text Amendment (“Proposed Project,” “Project”). The Zone Reclassification would remove the Qualifying Combining Zone (“Qualifying Zone,” “Q-Zone”) from the parcels (017-015-034 and 017-041-008). The Proposed Project would also require a General Plan text amendment to remove the Q-zone provision that is embedded in Section 2620.15 of the Eureka Community Plan, a component of the Humboldt County General Plan. No change to the principal zone or the General Plan land use designation is proposed. The Proposed Project would change the zoning designation as follows:

- Current Zoning: R-4*-Q (Apartment Professional) with medical-only Q-Zone restriction
- Proposed Zoning: R-4 B-1 (Apartment Professional, 6,000 sq ft minimum lot size)
- No change to the General Plan land use designation: RM (Residential Medium Density)

11.1 Q-Zone Description

The Q-Zone was approved in June of 1995 under Ordinance 2078 (Appendix 2A). The parcel is under the restrictions of Area 2 in Ordinance 2078, which restricts all property development to medical, dental, and other health-related offices and facilities only. The Q-Zone applied to various parcels within the vicinity (Figure 4), with different rules for each different area. Note that the Proposed Project would only apply to the subject parcel and would not impact the Q-zone on any of the other parcels impacted by Ordinance 2078.



The Q-Zone does not allow non-medical uses in Area 2, even with a Use Permit (Figure 5).

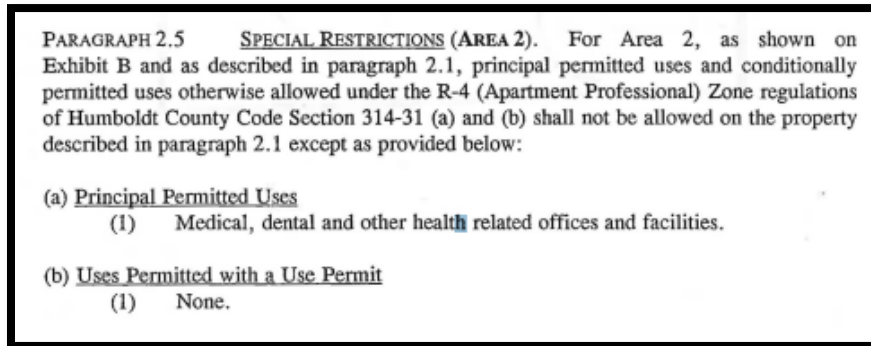


Figure 5: Excerpt from Ordinance 2078, Adopting the Qualified Combining Zone for the Subject Property

11.2 Potential Developable Area

In 2024, the applicant conducted tree removal activities in accordance with an approved Less than 3 Acre Conversion, approved by CAL FIRE (1-23EX-00096-HUM). The total onsite area that could be developed in the future includes the existing developed area and the recently converted area outside of the Streamside Management Areas and Wetlands Ordinance (SMAWO) buffers. In combination, these two areas total 3.5 acres. This area is referred to as the “Potential Developable Area” throughout this document. The entirety of the Potential Developable Area is located outside of stream setbacks (Figure 6).

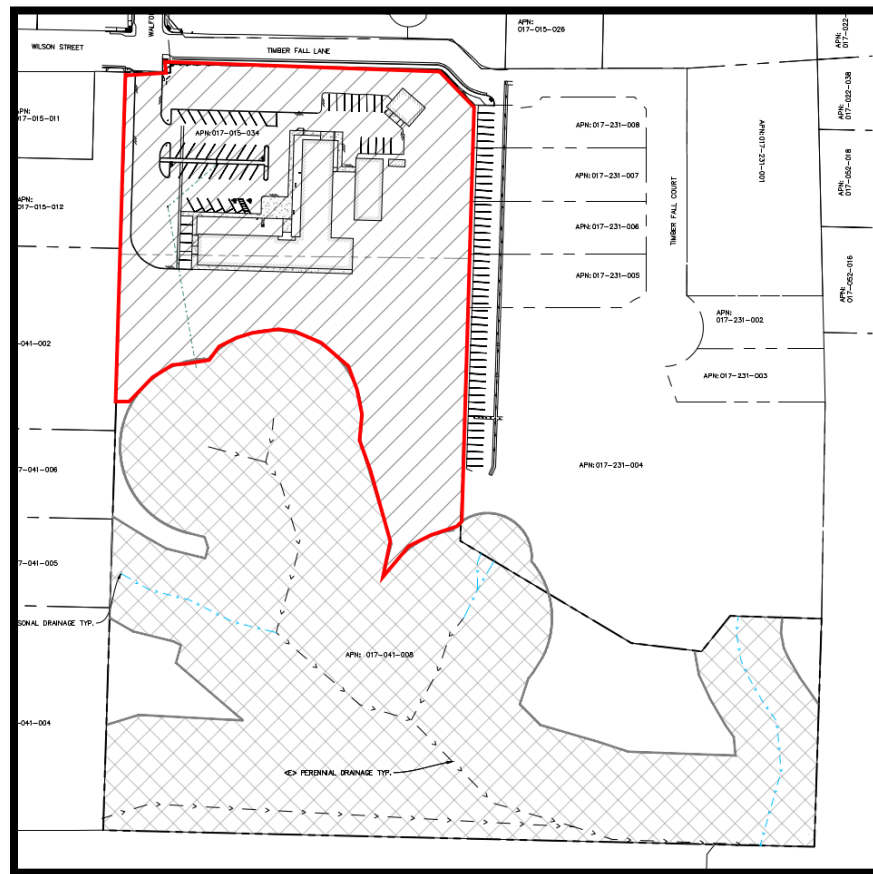


Figure 6: Potential Developable Area outlined in red (Source: Appendix 1A - Site Plans, Sheet C2)

11.3 Scope and Methods of Analysis

The Proposed Project is a Zone Reclassification and General Plan text amendment. Removal of the Q-zone overlay would allow principally permitted uses in the R-4 zone, including residential uses, to move forward onsite, within the Potential Developable Area, without further discretionary or CEQA review.

No specific project has been designed or is currently proposed. As no specific project is currently proposed, for the purpose of analysis, this document relies on the following methods:

- a) A qualitative analysis of the impacts of removing the medical-only Q-Zone overlay from the parcel, including potential future development facilitated by the Zone Reclassification that would be principally permitted in the R-4 and would not require additional discretionary review. Principally permitted uses within the R-4 zone include multiple dwelling units and other allowable residential uses (see Figure 7 for a complete list). These uses are referred to throughout the document as “potential future development projects facilitated by the Proposed Project,” or similar reference. Conditionally permitted uses in the R-4 zone are not included in this qualitative analysis, as they would require additional discretionary review and subsequently additional review under CEQA.
- b) A quantitative analysis, where appropriate in certain impact sections (e.g., Air Quality, Greenhouse Gases, Traffic, etc.), of a conceptual residential build-out scenario that could be principally permitted under the R-4 zone once the Q-Zone is removed (“Residential Build-Out Scenario”). See Section 11.4, for a detailed description of the Build-Out Scenarios.
- c) A qualitative / quantitative analysis of the Residential Build-Out Scenario compared to the existing permissible build-out scenario of medical facilities under the current R-4-Q Zone (“Medical Build-Out Scenario”), where appropriate. See Section 11.4, Build-Out Scenario Descriptions, for details.

314-6.5 R-4: APARTMENT PROFESSIONAL
Principal Permitted Uses
Two (2) family dwellings and multiple dwellings, accessory dwelling units accessory to multifamily dwellings, and dwelling groups. (Amended by Ord. 2166 , Sec. 13, 4/7/98)
Emergency dependent unit villages.
Supportive housing and transitional housing subject only to restrictions that apply to other residential dwellings of the same type in the same zone.
Professional and business offices.
Commercial instruction.
Boarding and rooming houses.
Keeping of no more than two (2) household pets for each dwelling unit.
Manufactured home parks.
Single-room occupancy facilities.

Figure 7: Principal Permitted Uses within the R-4 Zone (Source: Humboldt County Code §314-6.5 R-4)



Any development onsite, whether currently permissible or permissible in the future, would be limited by the R-4 Principal Zoning Development Regulations, including the Maximum Ground Coverage of 60%, the Maximum Building Height of 45 feet, the Maximum Density of 7 to 16 (Eureka Community Plan) units per acre, and the maximum Floor Area Ratio (FAR) of 1.0, per the General Plan Land Use Element (2017) and §314-6.5 of the Zoning Code. Additionally, both scenarios are limited by the Potential Developable Area of approximately 3.5 acres (Appendix 1A – Site Plans, Sheet C2).

11.4 Build-Out Scenario Descriptions

The two (2) potential build-out scenarios are further described below, and detailed in *Table 1*. The Residential Build-Out Scenario represents a potential highest-intensity, larger-scale residential development project that could be permitted onsite if the Q-zone was removed, potentially without any further discretionary review. The Medical Build-Out Scenario represents a highest-intensity, larger-scale medical development project that could occur onsite under the current zoning, with the Q-zone in place, potentially without further discretionary review.

11.3.1 Residential Build-Out Scenario under Proposed Zoning (“Residential Scenario”)

Under the proposed R-4 zone, most residential uses are principally permitted, and thus a multi-story residential building (e.g., apartment complex) could be built on the parcel without requiring further discretionary review. For analysis purposes, the highest-intensity building and associated use is assumed to be 112 residential units, based on the maximum density allowed under the R-4 zone of 7 - 16 units per acre, plus an assumed density bonus of 100% due to the project location in a Housing Opportunity Zone (per HCC 314-112.1.8.1.3). The highest intensity of units is assumed to be 4-story, apartment-style housing units. This scenario is limited by the maximum density in the R-4 zone and the existing Potential Developable Area of 3.5 acres. For the purposes of this analysis and other project estimates, the maximum build-out scenario will be 105 residential units.

Residents: Assuming approximately half of the units are 1-bedroom and half of the units are 2 bedroom (BR), there would be approximately 52 1-BR units and 53 2-BR units.

Parking: §313-109.1.4.1 of the Zoning Code for residential parking requires one (1) parking space per 1-BR unit and two (2) parking spaces per 2-BR units. Based off of 52 1-BR units (52 parking spaces) and 53 2-BR units (106 parking spaces), a total of 158 parking spaces would be required.

Traffic: Assuming four (4) trips per parking space per day, approximately 632 trips per day would be expected under the Residential Scenario.

11.3.2 Medical Build-Out Scenario under Existing Zoning (“Medical Scenario”)

Under the current R-4-Q zone, a large, multi-story medical building could be built on the parcel. In the medical maximum build-out scenario, the highest-intensity building and associated use is assumed to be a 4-story medical facility building with a 38,000 sq. ft. building footprint (total floor area of 152,000 sq. ft.). Note that this maximum build-out scenario is limited by a FAR of 1.0 and the existing Potential Developable Area of 3.5 acres.

Employees: Based on the size of the medical facility building, the medical facility would have 100 staffed patient beds¹ and would employ approximately three (3) nurse staffers per bed². Thus, there

¹ Based off of a reference of St. Joseph’s Providence Hospital Main Campus, which is of similar size to the Medical Scenario developable area and has 144 staffed beds (https://www.ahd.com/free_profile/050006/Providence_Saint_Joseph_Hospital_Eureka/Eureka/California/)

² Based off of the California average range of 1 to 3.6 nurses per bed (<https://www.trustednursestaffing.com/nurse-patient-ratios-by-state/>)



would be up to approximately 300 employees.

Parking: §313-109.1.4.2.1 of the Zoning Code for required parking for medical facilities (e.g., hospitals) requires one (1) parking space per patient bed, plus one (1) parking space for every three (3) employees. Based on 100 beds and 300 employees, required parking for the Medical Scenario would be 400 parking spaces.

Traffic: Assuming two (2) trips per patient per day (200 trips), and four (4) trips per employee per day (1,200 trips), projected trips per day for the Medical Scenario would be approximately 1,400.

Table 1: Summary Table of Medical and Residential Maximum Build-Out Scenarios under the Existing and Proposed Zoning

Zoning	Maximum Build-Out Scenario Type	Maximum Build-Out Scenario	Maximum Build-Out Scenario Assumptions	Estimated Parking Spaces	Estimated Daily Trips
<u>Existing:</u> R-4*-Q (Apartment Professional, Medical-Only)	Medical	4-story, 38,000-sq. ft. footprint medical facility with parking on ground floor	- 100 patients - 300 employees	400	1,400
<u>Proposed:</u> R-4 B-1 (Apartment Professional)	Residential	105 units (30 units per 3.5 acres of developable area)	- 52 1-BR units, 53 2-BR units	158	632

12. Surrounding Land Uses and Setting: The subject parcel is located in the unincorporated area of Humboldt County, outside of the City of Eureka limits but within the City Sphere of Influence. Surrounding land uses consist of residences, commercial buildings, medical offices, care facilities, and undeveloped forestland (Figure 3: Project Aerial Image and Surrounding Uses (Source: Humboldt County Web GIS, 2024). The property is zoned Apartment Professional (R-4-Q) and has a General Plan land use designation of Residential Medium Density (RM). Surrounding properties are zoned Neighborhood Commercial (C-1) and Residential One-Family (R-1) (Figure 8: Zoning of Project Parcel (outlined in black) and Surrounding Areas (Source: Humboldt County Web GIS, 2024). Surrounding land use designations adjacent to the property are Commercial (CG) and Residential Low Density (RL 1-7) (Figure 9).



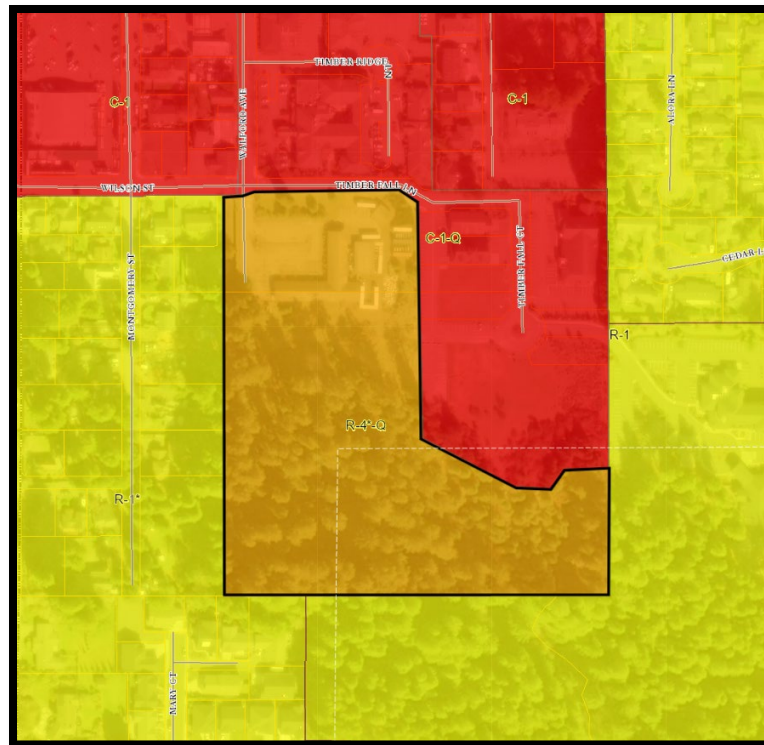


Figure 8: Zoning of Project Parcel (outlined in black) and Surrounding Areas (Source: Humboldt County Web GIS, 2024)

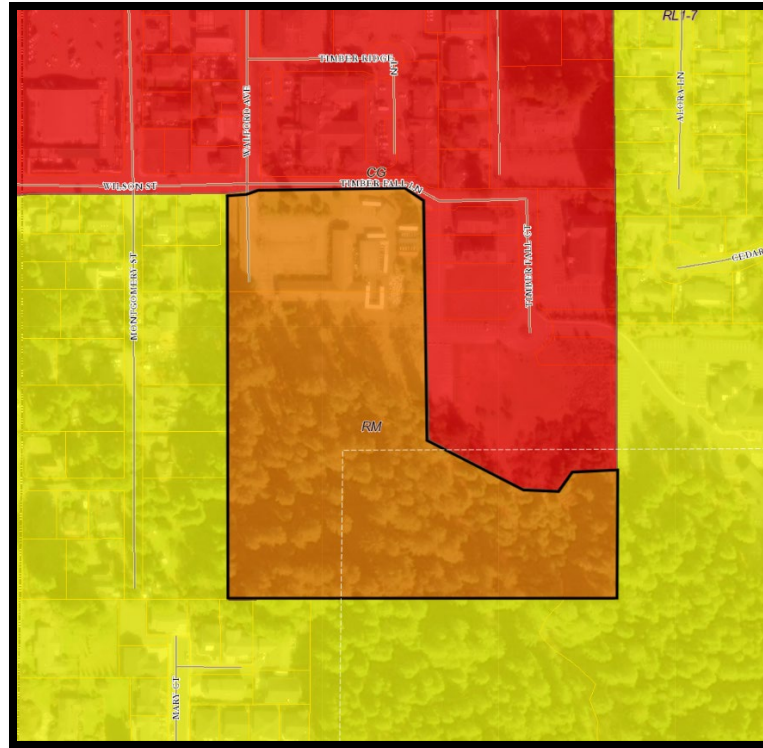


Figure 9: General Plan Land Use Designations of Project Parcel (outlined in black) and Surrounding Areas
(Source: Humboldt Web GIS, 2024)

13. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreements). No other public agencies are required to approve the Zone Reclassification and General Plan Text Amendment, however, future development facilitated by the Zone Reclassification could require public agency approval. The Humboldt County Building Department would be required to sign off on any future building or grading permit associated with potential development facilitated by the Proposed Project. Humboldt County Department of Public Works (DPW) would be required to sign off on potential stormwater or encroachment permits. In addition, permits and/or approval from the State Water Resources Control Board (SWRCB), California Department of Fish & Wildlife (CDFW), North Coast Regional Water Quality Control Board (NCRWQCB), and/or the North Coast Unified Air Quality Management District (NCUAQMD) could be required for future onsite development.

14. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☒ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☒ Energy |
| ☒ Geology/Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards & Hazardous Materials |
| ☐ Hydrology / Water Quality | ☐ Land Use / Planning | ☐ Mineral Resources |
| ☒ Noise | ☐ Population / Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation/Traffic | ☒ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☒ Mandatory Findings
of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the project COULD have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Signature

Cliff Johnson
Printed name

Date

Humboldt County Planning & Building Department
For



EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take into account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addresses. Identify which effects from the above checklist were within the scope of and adequately analyze in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plan, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats, however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue identify:
 - a) The significant criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant.



2. Introduction

This project-level Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the **3200 Walford Avenue Proposed Qualified Combining Zone Removal** (Proposed Project) to satisfy the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] 21000 et seq.) and State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.). The County of Humboldt (County) is the lead agency for this Proposed Project under CEQA.

2.1. INITIAL STUDY PURPOSE

CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects. An Initial Study is a public document used by the decision-making lead agency to determine whether a project may have a significant impact on the environment. If the agency finds that the Proposed Project may have a significant impact on the environment, but that these impacts will be reduced to a less-than-significant level through revisions to the project and/or implementation of specific mitigation measures, a Mitigated Negative Declaration shall be prepared.

This IS/MND is a public information document that describes the Proposed Project, existing environmental setting at the project site, and potential environmental impacts of construction and operation of the Proposed Project. It is intended to inform the public and decision-makers of the Proposed Project's potential environmental impacts and to document the lead agency's compliance with CEQA and the State CEQA Guidelines.

2.2. REVIEW PROCESS

This IS/MND is being circulated for public and agency review as required by CEQA. Because state agencies will act as responsible or trustee agencies, the County will circulate the IS/MND to the State Clearinghouse of the Governor's Office of Planning and Research for distribution and a 30-day review period.

During the review period, written comments may be submitted to:

Cliff Johnson, Planning Manager
Planning and Building Department
County of Humboldt
3015 H Street
Eureka, CA 95501
cjohnson@co.humboldt.ca.us



3.Environmental Checklist

3.1.EXPLANATION OF INITIAL STUDY CHECKLIST

The California Environmental Quality Act (CEQA) Guidelines Appendix G recommends that lead agencies use an Initial Study (IS) checklist to determine the potential impacts of the Proposed Project on the physical environment. The checklist provides a list of questions concerning a comprehensive array of environmental issue areas potentially affected by the Proposed Project. This section of the IS incorporates the Appendix G environmental checklist form, contained in the State CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 17 environmental topic areas. There are four possible answers to the checklist questions on the following pages. Each possible answer is explained below:

- A *Potentially Significant Impact* is appropriate if there is enough relevant information, as well as reasonable inferences from that information, that a fair argument can be made to support a conclusion that a substantial or potentially substantial adverse change may occur to any of the physical conditions within the area affected by the Proposed Project. When one or more of these entries are made, an Environmental Impact Report (EIR) is required.
- A *Less-than-Significant Impact with Mitigation Incorporated* is appropriate when the lead agency incorporates mitigation measures to reduce an impact from a potentially significant level to a less-than-significant level. For example, floodwater impacts could be reduced from a potentially significant level to a less-than-significant level by relocating a building to an area outside the floodway. The lead agency must describe the mitigation measures and briefly explain how the measures would reduce the impact to a less-than-significant level.
- A *Less-than-Significant Impact* is appropriate if there is evidence that one or more environmental impacts may occur, but the impacts are determined to be less than significant or the application of development policies and standards to the Proposed Project would reduce the impact(s) to a less-than-significant level. For example, the application of the City's stormwater improvement standards would reduce potential erosion impacts to a less-than-significant level.
- A *No Impact* is appropriate where it can be demonstrated that the impact does not have the potential to adversely affect the environment. For example, a proposed in the center of an urbanized area with no agricultural lands on or adjacent to the project area clearly would not have an adverse effect on agricultural resources or operations.

All answers must take into account the whole action involved, including potential off- and on-site, indirect, direct, construction, and operation, except as provided for under State CEQA Guidelines Section 15183 and State CEQA Statute Section 21083. The setting discussion under each resource section in this chapter is followed by a discussion of impacts and applicable mitigation measures.



3.2. CHECKLIST, DISCUSSION OF CHECKLIST RESPONSES, AND PROPOSED MITIGATION

3.2.1. AESTHETICS

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

Setting

The Proposed Project site is located at 3200 Walford Avenue in the greater Eureka area, outside of City limits. The parcel is a 10.32-acre site that has historically been and is being used for medical and commercial offices and timber management purposes. The property is developed with medical offices and associated parking. The remaining parcel area is forested.

Humboldt County has a wide range of scenic and visual resources, including coastline, mountains, hills, ridgelines, inland water features, forests, agricultural features, and rural communities (Humboldt County General Plan, 2017). Humboldt County has no officially designated State Scenic Highways, though it has



numerous segments eligible for designation due to their scenic qualities (Caltrans State Scenic Highway System Map, 2024):

- State Highway 36 from State Highway 101 near Fortuna to the Trinity County Line
- State Route 254 in Avenue of the Giants
- State Route 299 from Arcata to Willow Creek
- State Route 96 from State Route 299 at Willow Creek north to Siskiyou County

Standard SR-S6 of the Humboldt County General Plan states that, “until such time as a General Plan Scenic Highway Roadway Map is prepared and adopted, Humboldt County Highways listed in Sections 263.1 through 263.8 of the California Streets and Highways Code shall be considered to be Scenic Highways pursuant to Policy SR-P3, Scenic Highway Protection, and the County shall address the potential for significant impacts to scenic resources during ministerial and discretionary permit review” (General Plan, Part 3, Chapter 10. Conservation and Open Space, pg. 10-50). Per Caltrans, the Humboldt County Highways listed in Sections 263.1 through 263.8 of the California Streets and Highways Code are the same segments of highways listed above as being eligible for designation due to their scenic qualities, per Caltrans. Therefore, for the purposes of this analysis, the above highways are functionally considered to be scenic highways.

In addition, the Humboldt County General Plan contains standards relevant to aesthetics. Relevant goals, policies, and standards from the Conservation and Open Space Chapter of the Humboldt County General Plan to the Proposed Project include:

Standard SR-S4 **Light and Glare.** New outdoor lighting shall be compatible with the existing setting. Exterior lighting fixtures and street standards (both for residential and commercial areas) shall be fully shielded, and designed and installed to minimize off-site lighting and direct light within the property boundaries.

Analysis

- a) **Finding:** The project will not have a substantial adverse effect on a scenic vista. *No impact.*

Discussion: For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. There are no officially designated scenic vista points in the Project Area. No Wild, Scenic, and Recreational Rivers are designated near the Project Site (Humboldt County General Plan, 2017). The Project Site is located in the developed area of the City of Eureka, though outside of city limits. The site is surrounded by residences, medical offices, and timberland.

As there are no scenic vistas within the vicinity of the Project Site, the Proposed Project would not have a substantial adverse effect on a scenic vista, and no impact would occur.

- b) **Finding:** The project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. *No impact.*

Discussion: The Proposed Project is located off of Walford Avenue in the developed area of Eureka, California. It is not located adjacent to any of the highways eligible to be designated as state scenic highways, considered to be scenic highways per SR-6 of the Humboldt County General Plan. The nearest scenic highway is Highway 101, which is located approximately 2 miles north of the Project Site, out of line of sight of the Proposed Project. The property is already developed with existing buildings and parking. The existing L-shaped building is about 60 years old and the structure behind it is about 54 years old, according to aerial imagery from the City of Arcata Historical Imagery/Survey Map Viewer (2023). The Proposed Project does not propose changing the



existing buildings. However, future building demolition and/or remodeling would require a Building Permit from the Humboldt County Building department, and this process would include a historical review to determine potential historical significance at that time. Therefore, the Proposed Project would not substantially damage scenic resources, including trees, rock outcropping, and historic buildings within a state scenic highway, and no impact would occur.

- c) Finding: The project will not substantially degrade the existing visual character or quality of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? *Less than significant impact.*

Discussion: Per CEQA Guidelines 15387, an urbanized area is one that has a population of 50,000 (CEQA Statute and Guidelines, 2023). According to the US Census Bureau (2024), the nearest city of Eureka has approximately 26,129 people, and is therefore not considered an urbanized area per CEQA definitions. As such, the Proposed Project is located in a non-urbanized area. The existing visual character of the site is an L-shaped building containing medical offices, associated parking, landscaping, parking lot lights, and signage, against a backdrop of forest land to the south of the medical offices (Figure 10).



Figure 10: Existing Site Visual Conditions (Source: Google Earth, 2023)

The Project site is currently visible from the public roads that access the site, including Walford Avenue, Timber Fall Lane, and Wilson Street. The Project site is also currently visible from surrounding offices, including Planned Parenthood, Timber Ridge Assisted Living Facility, and the Redwood Podiatry Group, and from surrounding residences on the Walford Avenue side of Wilson Street.

The Proposed Project is a Zone Reclassification, which would not inherently impact the aesthetics of the site. However, site development facilitated by the Zone Reclassification could significantly impact the site's visual characteristics by adding additional buildings or increasing the height of additional buildings. The R-4 zone allows for buildings of up to 45 ft. in height, allowing for multiple stories. A multi-story medical building could currently be built onsite under the existing zoning with a maximum height of 45 feet. If the Proposed Project is approved, a multi-story residential structure, or multiple structures, could be constructed onsite with a maximum height of 45 feet.

Any residential multi-story structures would be required to be consistent with the existing development regulations of the R-4 zone and General Plan regulations of the RM land use designations. Additionally, any

proposed onsite development facilitated by the Zone Reclassification (e.g., residential) would be consistent with medical, residential, and commercial surrounding uses of the site. Therefore, the Proposed Project, and future redevelopment project facilitated by the Zone Reclassification, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. A less than significant impact would occur.

- d) Finding: The project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. *Less than significant impact.*

Discussion: The subject parcel is bounded by existing residences and commercial / medical businesses. Lights are already existing on the subject property in the parking lot and on the building exterior. There are existing street lamps on Wilson Street and Walford Street. New sources of light associated with any new development (medical or residential) could include additional security lighting in the parking lot and on the building exterior.

Any future development proposing to utilize exterior lighting would be required to conform with SR-4 of the Humboldt County General Plan, which establishes standards for outdoor lighting to minimize light pollution, including requirements that lighting be downcast, shielded, and dark-sky compliant. Therefore, the Proposed Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and impacts would be less than significant.

Mitigation Measures

None.



3.2.2. AGRICULTURE AND FORESTRY RESOURCES

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

Setting

The Proposed Project site is located at 3200 Walford Avenue in the greater Eureka area, outside of city limits in unincorporated Humboldt County. The site is zoned Apartment Professional (R-4) and has a land use designation of Residential Medium Density (RM). The parcel is a 10.32-acre site that has historically been and is used for medical and commercial offices and timber management purposes.

There is no farming on the property and no historical agricultural activities have occurred onsite. Per aerial imagery, the site was developed sometime between 1948 and 1965 per aerial imagery from the City of Arcata Historical Imagery/Survey Map Viewer (2023).

The property is developed with medical offices, landscaping, and associated parking. The remainder of the property is forested. A Less Than 3-Acre Conversion was approved on the property by CAL FIRE (1-23EX-00096-HUM). This Conversion was prepared by a Registered Professional Forester. Onsite logging occurred during 2023 and cleared an approximately 2.42-acre area (Figure 11).



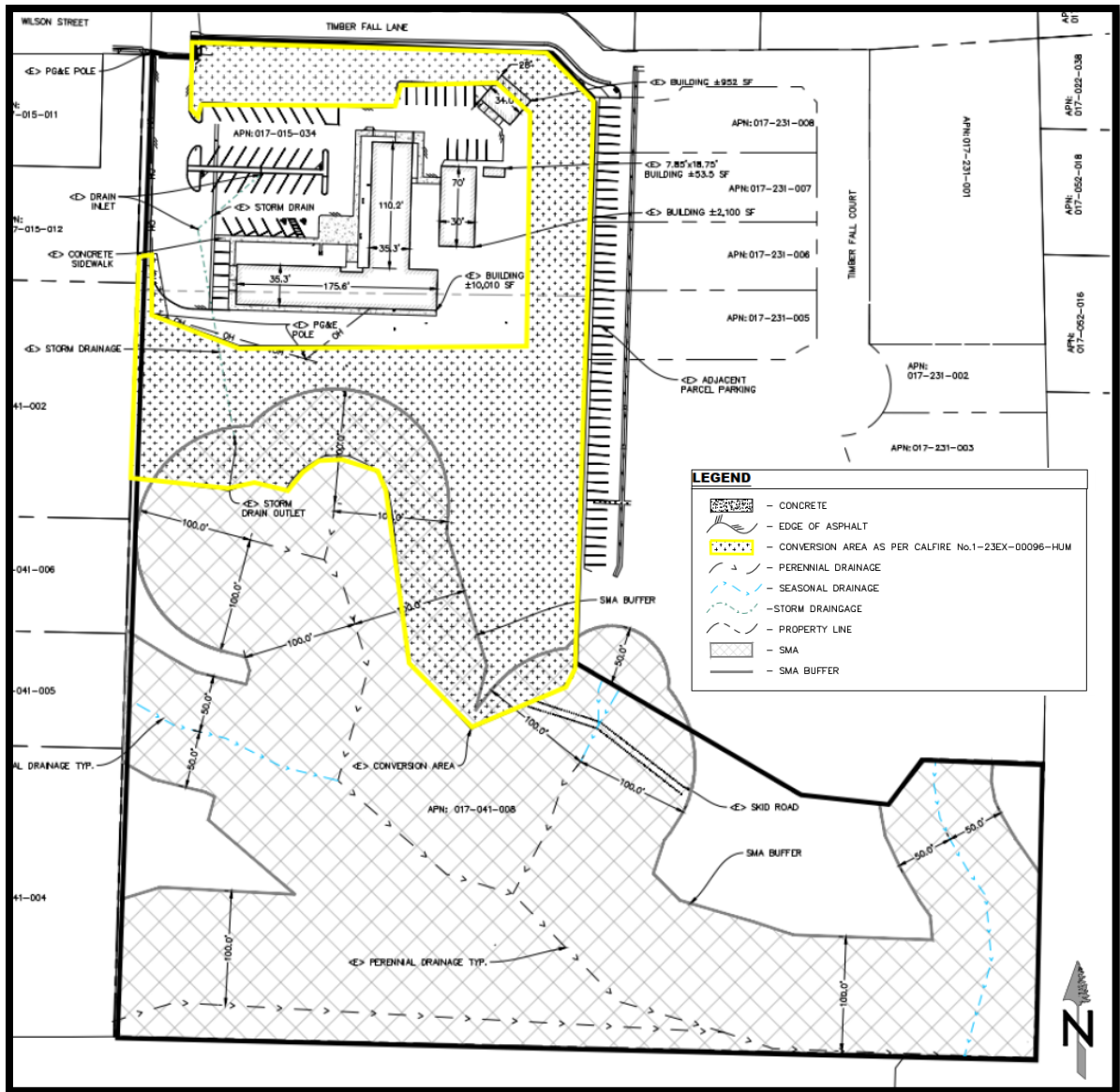


Figure 11: 2023 Timber Conversion Area per Approved CAL FIRE 3 Acre Conversion No. 1-23EX-00096-HUM
(Source: Appendix 1A - Edited Site Plans, Sheet C1)

Analysis

- a) **Finding:** The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. *Less than significant impact.*

Discussion: The Farmland Mapping and Monitoring Program of the California Resources Agency has not mapped farmland in Humboldt County. However, according to the County of Humboldt's Web GIS portal and Web Soil Survey (NRCS, 2024), the site is primarily comprised of soils considered to be Farmland of Statewide Importance (Figure 12). Although the site is designated as Farmland of Statewide Importance, it has never been used for agricultural purposes and would not be suitable for agricultural purposes. The entire site is either developed with medical offices and parking areas or is forested.

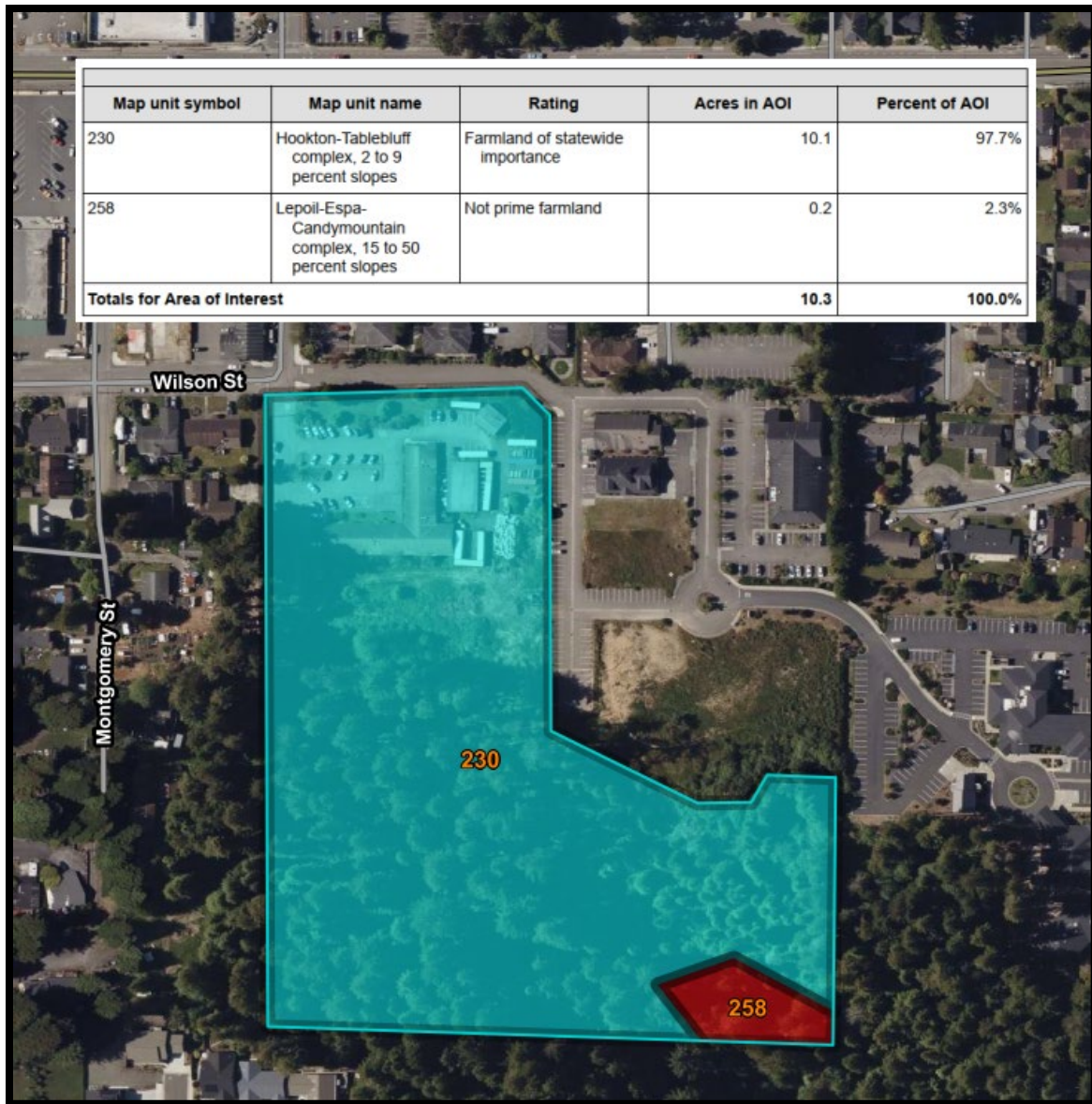


Figure 12: Farmland of Statewide Importance on the Project Site (Source: NRCS Web Soil Survey, 2024)

The site is already developed with medical offices, a paved parking lot, and is surrounded by residences and commercial/medical offices in the developed Eureka Area. The parcel is not suitable for farming, and is not zoned for agriculture, forest, or timberland uses. Therefore, the Proposed Project, and any future redevelopment facilitated by the Proposed Project, would not convert farmland to a non-agricultural use, and a less than significant impact would occur.

- b) Finding: The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. *No impact.*

Discussion: The site is not zoned for an agricultural use and is not proposed to be zoned for an agricultural use. The site is not in a Williamson Act contract. Therefore, the Proposed Project and any future redevelopment facilitated by the Proposed Project would not conflict with any existing zoning for agricultural use, or a Williamson Act contract. No impact would occur.

- c) Finding: The project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526). *No impact.*

Discussion: The Proposed Project is not zoned for timberland. The Project site is zoned Apartment Professional (R-4). Prior timber conversion activities occurred under a permitted Less Than 3-Acre Conversion (1-23EX-00096-HUM) that was developed by a Registered Professional Forester and approved by CAL FIRE. Any development facilitated by the Proposed Project would occur on already-converted or already-developed areas of the parcel (Figure 11). The Proposed Project would not prevent or create any future timber conversions. Therefore, the Proposed Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland, and no impact would occur.

- d) Finding: The project will not result in the loss of forest land or conversion of forest land to non-forest use. *Less than significant impact.*

Discussion: The Proposed Project is a Zone Reclassification to remove the qualifying zone from a parcel zoned Apartment Professional (R-4), with a General Plan land use designation of Residential Medium Density (RM). No components of this Zone Reclassification would result in the loss of forest land or the conversion of forest land to non-forest use, as all potential development associated with the Zone Reclassification would occur in the 3.5-acre Potential Developable Area, which is comprised of the already-converted or already-developed northern area of the property (Appendix 1A – Site Plans, Sheet C2). No potential development facilitated by the Proposed Project would occur within the forested areas of the property and no trees are proposed to be removed. Therefore, the Proposed Project would not result in the loss of forestland or conversion of forest land to non-forest use and a less than significant impact would occur.

- e) Finding: The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. *Less than significant impact.*

Discussion: The Proposed Project involves a Zone Reclassification to remove the medical-only Q-Zone overlay onsite. With the removal of the Q-zone, a residential project could be constructed onsite. Although the site contains Farmland of Statewide Importance, the site has never been used for agricultural purposes. Any onsite construction would occur within the already cleared or developed area onsite, the Potential Developable Area, totaling 3.5 acres. Within the Potential Developable Area, site soils would not be suitable for farming purposes, as they were either recently cleared forest land soils, or are developed with pavement, buildings, or gravel. No trees would be allowed to be removed for the purposes of developing a future residential site, and therefore the Proposed Project would not directly convert farmland or forest land. Furthermore, the site is already connected to existing water and sewer services, so any onsite residential development would not be considered significantly growth-inducing in a way that could indirectly result in the conversion of farmland or forestland. Therefore, the Proposed Project is not anticipated to directly or indirectly convert farmland to non-agricultural land or forest land to non-forest land and a less than significant impact would occur.

Mitigation Measures

None.



3.2.3. AIR QUALITY

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

The Proposed Project site is located off Walford Avenue in the greater City of Eureka area, within Humboldt County jurisdiction. Eureka and Humboldt County are located within the North Coast Air Basin (NCAB). The NCAB extends for 250 miles from Sonoma County in the south to the Oregon border in the north. The climate of NCAB is influenced by two major topographic units: the Klamath Mountains and the Coast Range provinces. The climate is moderate with the predominant weather factor being moist air masses from the ocean. Annual average precipitation is approximately 42 inches per year (PRISM, 2024). Dominant winds in the NCAB exhibit seasonal patterns. In the coastal areas, strong north to northwesterly winds are common in the summer whereas southwest winds occur during storm events in the winter months.

Any onsite development, whether current or facilitated by the Proposed Project, would be subject to the authority of the North Coast Unified Air Quality Management District ("District" or NCUAQMD) and the California Air Resources Board (CARB). The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards except for the state 24-hour particulate (PM₁₀) standard, which relates to concentrations of suspended airborne particles that are 10 micrometers or less in size. Due to the "nonattainment" status for PM₁₀, the NCUAQMD prepared a draft PM₁₀ Attainment Plan in 1995. The PM₁₀ Attainment Plan identifies cost effective control strategies that can be implemented to bring PM₁₀ to within California standards. Methods include transportation measures (e.g., public transit, ridesharing, and bicycle incentives, etc.), land use measures (infill development), and combustion measures (hearth/wood burning stove limitations).

In determining whether a project has significant air quality impacts on the environment, agencies often apply their local air district's thresholds of significance to projects in the review process. The District has not formally



adopted specific significance thresholds, but rather utilizes the Best Available Control Technology (BACT) emissions rates for stationary sources as defined and listed in the NCUAQMD Rule and Regulations, Rule 110 – New Source Review and Prevention of Significant Deterioration, Section 5.1 – BACT (pages 8-9) (www.ncuaqmd.org).

Locally, the Humboldt County General Plan contains standards relevant to air quality analysis. Goals, policies, and standards from the Humboldt County General Plan that are relevant to the Air Quality analysis include:

Goal AQ-G1	Improved Air Quality. Air quality that meets state and federal ambient air quality standards.
Goal AQ-G2	Particulate Emissions. Successful attainment of California Ambient Air Quality Standards for particulate matter.
Goal AQ-G3	Other Criteria Pollutants. Maintain attainment of Ambient Air Quality Standards for ozone and other criteria pollutants which may be subject to tightening standards.
Policy AQ-P2	Reduce Localized Concentrated Air Pollution. Reduce or minimize the creation of "hot spots" or localized places of concentrated automobile emissions.
Policy AQ-P4	Construction and Grading Dust Control. Dust control practices on construction and grading sites shall achieve compliance with NCAQMD fugitive dust emission standards.
Policy AQ-P5	Air Quality Impacts from New Development. During environmental review of discretionary permits, reduce emissions of air pollutants from new commercial and industrial development by requiring feasible mitigation measures to achieve the standards of the NCAQMD.
Policy AQ-P7	Interagency Coordination. Coordinate with the NCAQMD early in the permit review process to identify expected regulatory outcomes and minimize delays for projects involving: A. CEQA environmental review; <u>and</u> B. Building demolition projects that may involve removal of asbestos containing material subject to National Emission Standards for Hazardous Air Pollutants (NESHAP); and C. Grading and mining operations subject to State Airborne Toxic Control Measures (ATCM) for naturally occurring asbestos. Rely on the air quality standards, permitting processes, and enforcement capacity of the NCAQMD to define thresholds of significance and set adequate mitigations under CEQA to the maximum extent allowable.
Policy AQ-P17	Preservation and Replacement of On-site Trees. Projects requiring discretionary review should preserve large trees, where possible, and mitigate for carbon storage losses attributable to significant removal of trees.
Standard AQ-S1	Construction and Grading Dust Control. Ground disturbing construction and grading shall employ fugitive dust control strategies to prevent visible emissions from exceeding NCAQMD regulations and prevent public nuisance.



Standard AQ-S3 Evaluate Air Quality Impacts. During environmental review of discretionary projects, evaluate new commercial and industrial sources of emissions using analytical methods and significance criteria used, or recommended by, the NCAQMD.

The Humboldt County Regional Climate Action Plan (RCAP) public draft was prepared by Humboldt County in July 2024 and is currently in the public review stage. The RCAP guides towards long-term GHG reduction in accordance with California's goals to reduce GHG emission by 40 percent below 1990 levels by 2030 and achieve carbon neutrality by 2045.

The Proposed Project site is a 10.32-acre property currently developed with medical offices and associated parking. It is accessed from Walford Avenue, which is accessed from Harris Street, a designated Urban Principal Arterial Street per the Humboldt County General Plan Circulation Element (2017). The site is surrounded by residential, commercial, medical offices, care facilities, and undeveloped forestland uses.

The nearest sensitive receptors are offsite residences located to the west of the site, and the assisted living facility, Timber Ridge Senior Living Center, located to the north of the site. Per Google Earth and Google Maps Imagery (2024), there are approximately 18 residences located within 500 feet of the 3.5-acre Potential Developable Area (Figure 13, symbolized by the green circle). The nearest residence is located approximately 30 feet to the west of the property driveway. The facilities of Timber Ridge at Eureka are located across Timber Fall Lane, the street bounding the Project Site to the north (Figure 13, symbolized by the blue circle). The facilities are approximately 50 feet from the property line to the north. There are approximately five (5) commercial/medical buildings within 500 feet of the Potential Developable Area to the east and northeast (Figure 13, symbolized by the purple circle).

As the site is located within a developed, populated area, there are other several medical facilities, daycares, schools, and other retirement/care facilities within the project vicinity, determined to be a 1-mile radius around the Potential Developable Area. Hospice of Humboldt, an end-of-life care facility, is located 0.11 miles east of the site. Nearby emergency medical facilities to the Project site include Providence St. Joseph Hospital (0.37 miles northwest), Redwood Urgent Care (0.48 miles northwest), and St. Joseph's General Hospital Campus (0.61 miles north). There are seven (7) known daycare and family learning centers within the area include Teacher's Pet Preschool & Afterschool (0.33 miles northwest), Little People's Corner (0.47 miles southwest), Powell Family Child Care (0.49 miles southwest), Sweet Peas Learning Center (0.60 miles east), Maria's Family Daycare (0.61 miles northeast), Little Learners (0.62 miles northeast), and Stepping Stones Daycare (0.67 miles northwest). Nearby schools include Washington Elementary School (0.23 miles west), Pacific View Charter School (0.45 miles north/northwest), Von Humboldt High School (0.68 miles north/northwest), Zane Middle School (0.74-mile northwest), and Glen Paul School and Winship Middle School (0.78 miles south). There are no known community centers within 1 mile of the Project.



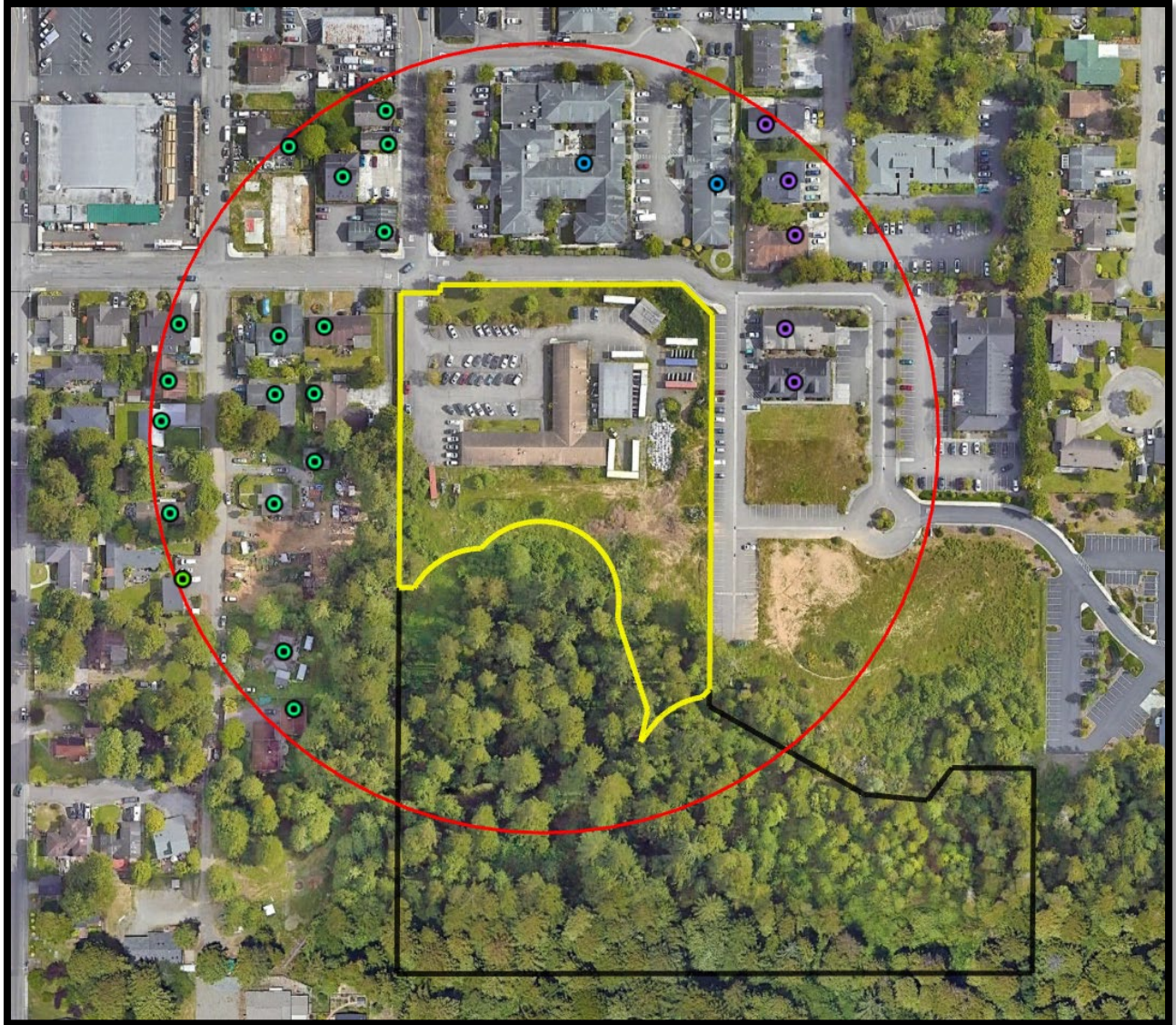


Figure 13: Surrounding residences (green), medical facilities (purple), and assisted living facilities (blue) within 500 feet (red circle) of the Potential Developable Area (yellow) on the Project Site (black) (Source: Google Earth, 2024)

Analysis

- a) Finding: The project would not conflict with or obstruct implementation of the applicable air quality plan. *Less than significant impact with mitigation incorporated.*

Discussion: A potentially significant impact to air quality would occur if the Proposed Project would conflict with or obstruct the implementation of an applicable air quality management or attainment plan. Although the Proposed Project would represent an incremental increase in air emissions within the district, of primary concern is that Proposed Project-related impacts have been properly anticipated in the regional air quality planning process and reduced whenever feasible. Therefore, it is necessary to assess the Proposed Project's consistency with the applicable district air quality management or attainment plan(s).

As mentioned above, the NCUAQMD is currently listed as being in “attainment” or is “unclassified” for all federal health protective standards for air pollution (ambient air quality standards). However, under State ambient air quality standards, the air district has been designated “nonattainment” for particulate matter less than ten microns in size (PM₁₀). PM₁₀ emissions include, but are not limited to, smoke from wood stoves, dust from traffic on unpaved roads, vehicular exhaust emissions, and airborne salts and other particulate matter naturally generated by ocean surf.

The California Clean Air Act (CCAA) requires the NCUAQMD to achieve and maintain State ambient air quality standards for PM₁₀ by the earliest practicable date. The NCUAQMD prepared the Particulate Matter Attainment Plan, Draft Report, in May 1995 (Attainment Plan). This report includes a description of the planning area (North Coast Unified Air Quality District), an emissions inventory, general attainment goals, and a listing of cost-effective control strategies. The NCUAQMD’s attainment plan established countywide goals to reduce PM₁₀ emissions and eliminate the number of days in which standards are exceeded. The plan does not include project specific related requirements. However, NCUAQMD Rule 104, Section D – Fugitive Dust Emissions is used to address non-attainment for PM₁₀ by prohibiting specific activities and providing reasonable precautions to prevent particulate matter from becoming airborne. Under Rule 104, Section D “no person shall allow handling, transporting, or open storage of materials in such a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.” Rule 104, Section D provides the following reasonable precautions that shall be taken to prevent particulate matter from becoming airborne, including, but not limited to, the following provisions:

- a. Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.
- b. The use of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- c. The application of asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.
- d. The prompt removal of earth or other track out material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

This Proposed Project site is accessed from paved roads only, and the existing onsite roads are paved. However, as the site is in close proximity to sensitive receptors, it is important to minimize potential for small travel particle from building materials, potential gravel construction roads, material transport, etc. Therefore, to comply with the General Plan and NCUAQMD Rule 104, Section D – Fugitive Dust Emissions, the Proposed Project design incorporates relevant control measures identified in the PM₁₀ Attainment Plan appropriate to incorporate into construction and operational activities. These measures are included as **Mitigation Measure AQ-1**.

The Proposed Project would not conflict with the applicable goals, policies, and standards from the Humboldt County General Plan Air Quality Element listed above. As described above, and in b), below, the Proposed Project would not significantly increase particulate matter emissions or result in a cumulatively considerable net increase of any criteria pollutant (in compliance with Goals AQ-G1, AQ-G2, and AQ-G3). The Proposed Project is not located within a known “hot spot” of automobile emissions (Policy AQ-P2). **Mitigation Measure AQ-1** would ensure that air quality impacts from construction, grading, and new development remain less than significant (consistent with Policies AQ-P4 and AQ-P5, and Standard AQ-S3). The County’s referral process and the CEQA process allows for interagency coordination with NCUAQMD (consistent with Policy AQ-P7). No trees are proposed to be removed (in compliance with Policy AQ-P17). Lastly, the CalEEMod Analysis conducted for the Proposed Project (Appendix 2B) quantifies potential emissions associated with Proposed Project, consistent with Standard AQ-S3.



Therefore, the Proposed Project would not conflict with or obstruct implementation of the NCUAQMD Attainment plan for PM₁₀, or the Humboldt County General Plan Air Quality Element, and the impacts would be less than significant with mitigation incorporated.

- b) Finding: The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. *Less than significant impact with mitigation incorporated.*

Discussion: As noted above, the NCUAQMD is currently listed as being in “attainment” or is “unclassified” for all federal health protective standards for air pollution and has been designated “nonattainment” for PM₁₀. In determining whether a project has significant air quality impacts on the environment, agencies often apply their local air district’s thresholds of significance to projects in the review process. The NCUAQMD and the City have not formally adopted thresholds of significance for air quality pollutants. The NCUAQMD recommends using the Best Available Control Technology (BACT) emission rates for stationary sources as defined and listed in the NCUAQMD Rule and Regulations, Rule 110 – New Source Review and Prevention of Significant Deterioration (PSD), Section 5.1 – BACT (pages 8-9), updated in 2015. The BACT emissions rates include significance thresholds for reactive organic compounds (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and total particulate matter (PM₁₀, and PM_{2.5}). Significance thresholds from BACT include both daily (pounds per day) and annual (tons per year) limits.

Potential future site development facilitated by the removal of the Q-Zone has the potential to create PM₁₀ emissions from construction and operational activities:

Construction: Construction of *any* potential future use allowed in the R-4 zone would generate particulate emissions during construction. During construction, scraping, grading, tilling, excavating, building construction, landscaping, and vehicle traffic could generate emissions and dust. Heavy equipment, including backhoes, excavators, etc., would be utilized. The NCUAQMD has advised that, generally, an activity that individually complies with the state and local standards for air quality emissions would not result in a cumulatively considerable increase in the countywide PM₁₀ air quality violation. Potential particulate matter could be generated during construction activities and build-out of the site, in general; however, short-term construction activities that use standard quantities and types of construction equipment are not required to be quantified and are assumed to have a less than significant impact. In addition, the Proposed Project design incorporates control measures identified in the PM₁₀ appropriate to this type of project to reduce fugitive emissions. These measures are included in **Mitigation Measure AQ-1**.

Daily and annual emission rates for air quality and greenhouse gas emissions (GHGs) for the Proposed Project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.28. CalEEMod quantifies direct emissions from construction and operation activities, including vehicle use, as well as indirect emissions, such as GHG emissions from energy use and water use. The CalEEMod analysis and results can be found in Appendix 2B. Due to lack of a specific project associated with removal of the Q-zone, the model utilized potential impacts associated with the “Residential Build-Out Scenario”, described in the Project Description of this document (§11.1.4). Within the model, the most fitting Land Use Type was used. Specifically, approximately 105 units of the Land Use Type “Apartment – Mid Rise” was used. “Apartment – Mid Rise” is a residential development type that has between 3 to 10 levels and a housing density of 38 dwelling units / acre. The “Residential Build-Out Scenario” would have a maximum of 105 dwelling units / 3.5 acres of developable area, or approximately 30 dwelling units / acre. Therefore, this Land Use Type was determined to be most appropriate. Notably, any onsite development would have a maximum height of 45 feet, or a maximum of four (4) stories, as limited by the R-4 Zoning Development Regulations in the Zoning Code. Therefore, the “Apartment – Mid Rise” land use category likely provides an over-estimate of emissions associated with a potential residential build-out scenario.



For the CalEEMod Analysis, default values were used where appropriate. Non-default values were sourced from the “Residential Build-Out Scenario” description or were determined using best available information.

The resulting estimated emissions from construction are shown in Table 2, and are compared to the NCUAQMD BACT Thresholds, where applicable, for average daily and annual volumes of criteria pollutants. Table 2 demonstrates that construction-related emissions are less than the significance thresholds, and, as noted above, the emissions levels in the table are likely an over-estimation of emissions associated with a residential build-out scenario. Therefore, emissions from construction facilitated by the Proposed Project’s would have a less than significant impact.

Table 2: Construction Residential Build-Out Scenario Air Quality Pollutant Emissions Compared to NCUAQMD BACT Significance Thresholds (Source: Appendix 2B - CalEEMod Analysis, 2024)

Pollutant	Proposed Construction Project Emissions - Unmitigated		NCUAQMD (BACT) Significance Thresholds		Exceeds Threshold?
	Maximum Tons/year	Average Lbs./day	Tons/year	Lbs./day	
ROG	0.62	3.37	40	50	No
NO _x	0.99	5.45	40	50	No
CO	1.43	7.82	100	500	No
SO _x	<0.005	0.01	40	80	No
PM ₁₀ (Total)	0.08	0.46	15	80	No
PM _{2.5} (Total)	0.04	0.23	10	50	No

Operation: Due to lack of a specific project associated with removal of the Q-zone, the CalEEMod analysis utilized potential impacts associated with the “Residential Build-Out Scenario,” described in the Project Description.

During operation of the “Residential Build-Out Scenario,” the primary activities that would generate pollutant emissions would be daily vehicle traffic from residents and visitors. Since the Proposed Project would result in an increase in operational trips (employees and delivery trucks), operational analysis includes emissions from these mobile sources. Operational trips were determined from assuming four (4) trips per day per parking space, or 632 trips per day. Baseline emissions and daily trips from the existing onsite medical offices and services were not accounted for in the CalEEMod analysis, leading to a conservative estimate of onsite increased emissions.

The estimated operational emissions along with the NCUAQMD BACT significance thresholds are summarized in Table 3. As shown in Table 3, all operational-related emissions would be less than the significance thresholds. As noted above, the emissions levels in the table are likely an over-estimation of emissions associated with a residential build-out scenario due to the conservative choice of “Apartment – Mid Rise” Land Use Category and other default values. Considering that resulting emissions values are significantly below BACT thresholds, emissions from construction facilitated by the Proposed Project’s would have a less than significant impact.



Table 3: Operational Residential Build-Out Scenario Air Quality Pollutant Emissions Compared to NCUAQMD BACT Significance Thresholds (Source: Appendix 2B - CalEEMod Analysis, 2024)

Pollutant	Proposed Operation Project Emissions - Unmitigated		NCUAQMD (BACT) Significance Thresholds		Exceeds Threshold?
	Maximum Tons/year	Average Lbs./day	Tons/year	Lbs./day	
ROG	7.19	39.4	40	50	No
NOx	0.46	2.51	40	50	No
CO	10.4	57.1	100	500	No
SOx	0.02	0.10	40	80	No
PM10 (Total)	1.31	7.18	15	80	No
PM2.5 (Total)	1.17	6.41	10	50	No

Therefore, the Proposed Project impacts would be less than significant with **Mitigation Measure AQ-1** incorporated.

- c) Finding: The project would not expose sensitive receptors to substantial pollutant concentrations. *Less than significant impact with mitigation incorporated.*

Discussion: Sensitive Receptors as defined by the NCUAQMD are any Class I Area (National Parks and Wilderness) and/or any other areas deemed sensitive by the Air Pollution Control Officer (APCO) including, but not limited to preschools and daycare centers, K-12 schools, senior retirement housing, and hospitals. Additionally, there are groups of people (e.g., children, senior citizens, and acutely or chronically ill people) who are more likely to be susceptible to the effect of air pollution than the general population. Locations that likely have a high concentration of sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

The nearest sensitive receptors near the Proposed Project site are off-site residences located directly to the west and northwest of the project site, and the Timber Ridge Senior Living Center, located directly north of the site. Per Google Earth, there are approximately 18 off-site residences within 500 feet of the Potential Developable Area. This area was used rather than the entirety of the parcel because all potential site development facilitated by the Proposed Project would occur within the Potential Developable Area in the north of the parcel. Timber Ridge Senior Living Center has between 75-100 patient beds for senior citizens, which are considered to be a population highly susceptible to potential pollutants (US News & World Report, 2024). Hospice of Humboldt, an end-of-life care facility, is located 0.11 miles east of the site. Hospice of Humboldt has at least 12 beds for patients who are suffering from illness or treatment and would be considered sensitive to potential pollutants (Hospice of Humboldt, 2024).

Additionally, as described above, Providence St. Joseph Hospital is located 0.37 miles northwest, in close proximity to two other emergency medical facilities (Redwood Urgent Care and the St. Joseph General Hospital Campus). There are seven (7) known daycare and family learning centers within the vicinity, three (3) of which are located within a 0.5-mile radius of the Potential Developable Area. There are six (6) known schools within



the vicinity, two (2) of which are located within a 0.5-mile radius. There are no known community centers within 1 mile of the Project.

As indicated by the Air Quality impact analysis under subsection b), the Proposed Project would not produce significant quantities of criteria pollutants (e.g., PM₁₀) during short-term construction activities or long-term operation. However, there is potential for fugitive dust emissions to impact sensitive receptors, especially due to the Project's proximity to residences and to a high number of senior citizens in care homes, in addition to other potential sensitive receptors located nearby. To reduce fugitive dust generation during any future demolition, excavation, or earthmoving construction activities at the site, standard dust control measures have been included as **Mitigation Measure AQ-1**.

With the implementation of **Mitigation Measure AQ-1**, the Proposed Project would not conflict with any applicable air quality management plan, and would not result in any construction-phase adverse impacts to nearby sensitive receptors. Impacts would be less than significant with mitigation incorporated.

- d) **Finding:** The project would not result in emissions (such as those leading to odors adversely affecting a substantial number of people). *Less than significant impact.*

Discussion: Removal of the medical-only qualifying zone would not directly result in any emissions, such as adverse odors. Regarding operational impacts of future redevelopment facilitated by the Zone Reclassification, there are numerous potential land uses allowed in the R-4 zone that are currently restricted by the Q-zone that could move forward once that Q-zone is removed. Conditional uses would require additional review under CEQA; however, principally permitted uses may not require additional review under CEQA. Principally permitted uses that could be allowed without further review, depending on project specifics, at this site under the existing Principal Zone of R-4 include the following: two-family dwellings and multiple dwellings, accessory dwelling units, dwelling groups, emergency-dependent unit villages, supportive housing and transitional housing, professional and business offices, commercial instruction, boarding and rooming houses, manufactured home parks, and single-room occupancy facilities. None of those activities are typically associated with land uses that emit excessive objectionable odor (e.g., industrial processing, waste processing, livestock projects, agricultural, etc.). Any other uses requiring a Conditional Use Permit within the R-4 zone would require additional discretionary review and would therefore trigger subsequent CEQA review. Therefore, the Proposed Project would not directly or indirectly result in adverse emissions, including odors adversely affecting a substantial number of people. Impacts would be less than significant.

Mitigation Measures

AQ-1. During construction and operation, the following dust control measures shall be implemented:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day in areas of active construction.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.
- All construction and operation equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.



3.2.4. BIOLOGICAL RESOURCES

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

Setting

The Proposed Project is located on Walford Avenue on one legal parcel comprised of APNs 017-015-034 and 017-041-008, just outside of the City of Eureka city boundary, in the unincorporated area of Humboldt County. Existing medical offices and on-site paved parking are in the north portion of the property and the rest of the parcel is mostly forested land and partially cleared area.

The property is approximately 131 feet above mean sea level (Google Earth, 2024), within the Freshwater Creek HUC-12 Watershed and Eureka Plain Planning Watershed (Humboldt County Web GIS, 2024). The Freshwater Creek Watershed area drains into Humboldt Bay. Average annual precipitation is approximately 42 inches per year (PRISM, 2024). The site is located outside of the Coastal Zone, outside of mapped wetlands, and is not within a mapped Federal Emergency Management Agency (FEMA) flood zone (Humboldt County Web GIS, 2024).



A gulch and associated intermittent Class II and ephemeral Class III flow southwest through the property, exiting the parcel and draining to Ryan Creek, a tributary of Humboldt Bay. No mapped wetlands or vernal pools are located onsite (Appendix 2D).

The northern area of the property where the Potential Developable Area is located is characterized by moderate slopes and low-quality, non-native habitat. The vegetative community is primarily a shrub layer dominated by non-native and invasive plants; scotch broom, pampas grass, Himalayan blackberry, English ivy, and English holly. Redwood forest dominates the riparian corridors and the understory contains slough sedge intermixed with skunk cabbage, red elderberry, salmon berry, red flowing currant, salal, and other native herbaceous species (Biological Scoping Report, 2023, Appendix 2C).

The approximate 3.5-acre Potential Developable Area includes the existing developed area (~1.08 acres) and the cleared area (~2.42 acres). The Potential Developable Area is located outside of the SMA buffers and stream setbacks. The cleared area involved tree removal under a Less Than Three Acre Conversion Exemption approved by CAL FIRE (1-23EX-00096-HUM) and grading activities under a Humboldt County Grading Permit (BLD-2024-59593). The Proposed Project would not remove additional trees. CDFW issued a Streambed Alteration Agreement Notification (Environmental Permit Information System #40254) for the installation and removal of one Class III temporary crossing associated with the Conversion Exemption. The area of conversion requiring use of the temporary crossing was never cleared or converted, the temporary crossing was never built, and this area is not included as part of the Potential Developable Area analyzed herein. No stream crossings exist onsite.

The property is within the Myrtle town Area of Humboldt County's Municipal Separate Storm Sewer System (MS4) permit area, which is subject to the SWRCB MS4 General Permit and administered by the Humboldt County DPW, Water Management Division.

A Biological Scoping Report (BSR) was prepared for the property by Hohman & Associates Forestry Consultants in December of 2023 for a potential future medical or residential project within the Potential Developable Area (Appendix 2C). Scoping methods within the BSR included a site visit and desktop review using the California Natural Diversity Database (CNDDDB). The area queried included the Biological Assessment Area (BAA), which was defined as the property boundary and a 1.3-mile radius (Figure 14). The CNDDDB results were cross-referenced with the following lists from CDFW in November 2023: "State and Federally Listed Endangered and Threatened Animals of California", "State and Federally Listed Endangered, Threatened, and Rare Plants of California", "Special Animals List", and Special Vascular Plants, Bryophytes, and Lichens List. The biological scoping report described species for which known range overlaps the project area and BAA. Out of the 80 sensitive species, 31 were wildlife and 49 were plant species (Figure 14). No suitable habitat for any of these species was identified as having high potential to be present within the Potential Developable Area.

A Biological Opinion to the Presence/Absence of Wetlands was written by Hohman & Associates Forestry Consultants (Appendix 2D). The report indicated that there are no wetland features onsite.

In addition, per the CNDDDB and United States Fish and Wildlife Service (USFWS) mapping databases, no wildlife corridors, critical habitat areas, habitat conservation plans, wetlands, or other sensitive areas are mapped onsite (CNDDDB, 2024; USFWS, 2024).



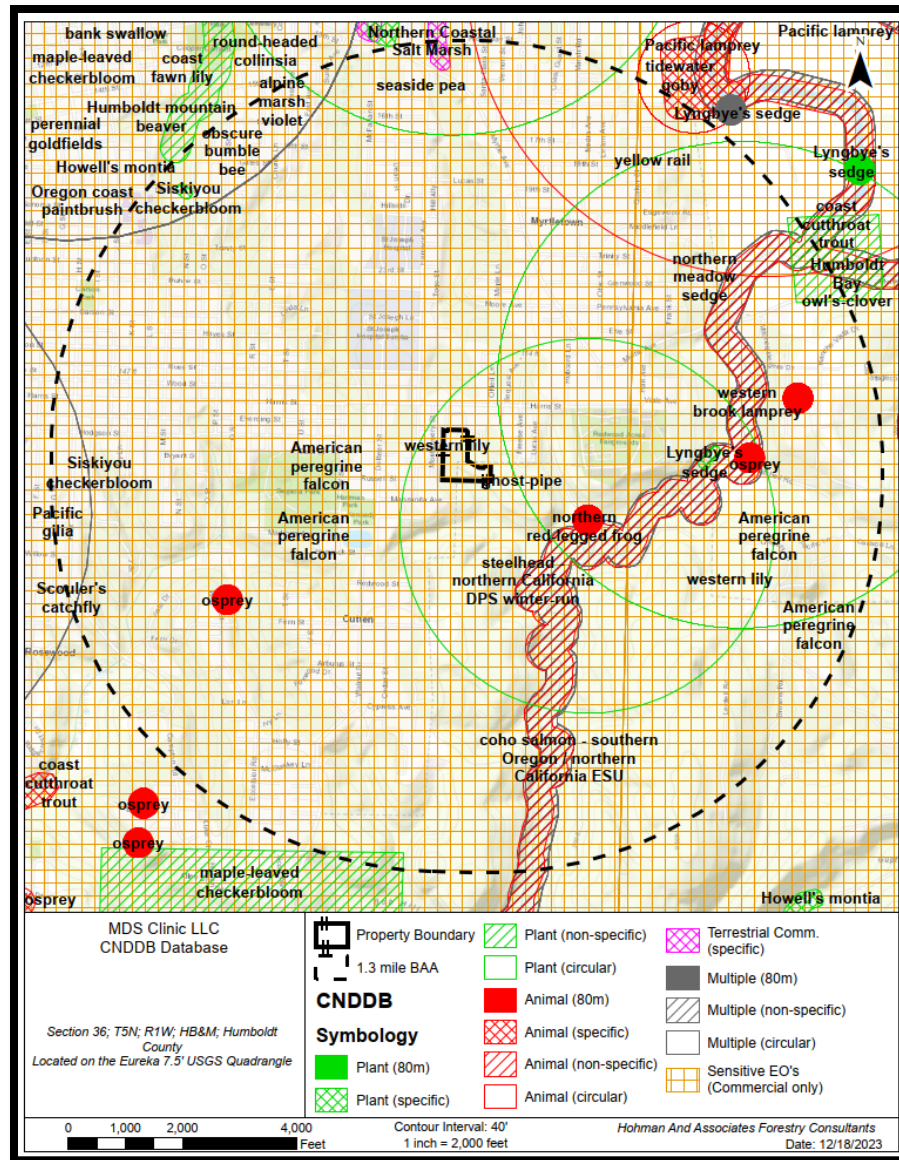


Figure 14: CNDDDB Database Query of the Subject Parcel and BAA (Source: Appendix 2C - Biological Scoping Report, Hohman & Associates Forestry Consultants, 2023)

Applicable goals, policies, and standards of the Humboldt County General Plan Conservation and Open Space Element (2017) are as follows:

Goal BR-G3

Benefits of Biological Resources. Fish and wildlife habitats protected on a sustainable basis to generate long-term public, economic, and environmental benefits.

Policy BR-P5

Streamside Management Areas. To protect sensitive fish and wildlife habitats and to minimize erosion, runoff, and interference with surface water flows, the County shall maintain Streamside Management Areas, along streams including intermittent streams that exhibit in-channel wetland characteristics and off-channel riparian vegetation.



- Policy BR-P7** **Wetland Identification.** The presence of wetlands in the vicinity of a proposed project shall be determined during the review process for discretionary projects and for ministerial building and grading permit applications, when the proposed building development activity involves new construction or expansion of existing structures or grading activities. Wetland delineation by a qualified professional shall be required when wetland characterization and limits cannot be easily inventoried and identified by site inspection
- Policy BR-P11** **Biological Resource Maps.** Biological resource maps shall be consulted during the ministerial and discretionary permit review process in order to identify habitat concerns and to guide mitigation for discretionary projects that will reduce biological resource impacts to below levels of significance, consistent with CEQA.
- Policy BR-P12** **Agency Review.** The County shall request the California Department of Fish and Wildlife, as well as other appropriate trustee agencies and organizations, to review plans for development within Sensitive Habitat, including Streamside Management Areas. The County shall request NOAA Fisheries or U.S. Fish and Wildlife Service to review plans for development within critical habitat if the project includes federal permits or federal funding. Recommended mitigation measures to reduce impacts below levels of significance shall be considered during project approval, consistent with CEQA.
- Standard BR-S5** **Streamside Management Areas Defined.** Streamside Management Areas (SMA) are identified and modified as follows:
- D. The Streamside Management Area may be reduced or eliminated where the County determines, based on specific factual findings, that the mapping of the SMA is not accurate, there are no in-channel wetland characteristics or off-channel riparian vegetation, the reduction will not significantly affect the biological resources of the SMA on the property. When the prescribed buffer would prohibit development of the site for the principal use for which it is designated, measures shall be applied that result in the least environmentally damaging feasible project.

Analysis

- a) and b) Finding: The project will not 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 CDFW or USFWS, or a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. *Less than significant impact.*

Discussion: The Proposed Project is to remove a Qualifying Combining Zone, which would not directly impact the current biological resources on the property. Indirect impacts to sensitive species could occur from potential future site development facilitated by the Zone Reclassification.

The Biological Scoping Report (Appendix 2C) queried the CNDDB database for sensitive plant and animal species. The query resulted in 80 sensitive plant and wildlife species (Figure 14). The database query resulted in 49 potential sensitive plant species with potential presence within the BAA. The BSR did not identify any rare plant species onsite or within the Potential Developable Area. According to the BSR, vegetation onsite in the Potential Developable Area is comprised of non-native and invasive plants, including scotch broom, pampas



grass, Himalayan blackberry, English ivy, and English Holly. The database query resulted in 31 potential sensitive wildlife species within the BAA. Out of the 31 sensitive wildlife species for which known range overlaps the property and BAA, there were four (4) amphibian species, twelve (12) bird species, eight (8) fish species, two (2) insect species, four (4) mammal species, and one (1) reptile species. The full list of species and status within the property is available in Appendix 2C.

Onsite trees could provide habitat for some bird or mammal species; however, no trees would be impacted by potential future onsite development, as all potential development would occur within the already-cleared or already-developed Potential Developable Area. The BSR concluded that any future development should be located outside of SMAs and adhere to low impact development (LID) standards. In addition, the BSR concluded that the existing low-quality nature of onsite habitat, current site conditions, proximity to existing residential and commercial development, continued human presence, and absence of nesting/denning structure, the assessed species or their key habitat would unlikely be significantly impacted by a proposed residential/medical development project.

However, nesting and migratory birds could migrate into the vicinity. If so, these species could be impacted by construction activities (e.g., noise, vibration of earthwork, etc.). As such, **Mitigation Measure BIO-1** is incorporated to require avoidance of noise or vibration-generating construction activities within 100' of the edge of riparian and tree area during nesting bird season (mid-March to mid-August), or, if avoidance of construction during this time is infeasible, a pre-construction survey would be conducted for nesting bird pairs, nests, and eggs within 100 feet of construction limits.

In addition, the Proposed Project and any future redevelopment of the site facilitated by removing the Qualifying Combining Zone from the parcels would be required to avoid water quality and hydrological impacts on nearby sensitive habitats during construction and post-construction activities consistent with the MS4 General Permit. The MS4 General Permit requires that the County require projects to comply with post-construction stormwater requirements based on low-impact development standards. Any potential future project facilitated by the Proposed Project that creates or replaces greater than 5,000 sq. ft. of impervious surface would be required to adhere to the LID standards. These low-impact development standards are enumerated in the Humboldt Low Impact Development Stormwater Manual Version 3.0 ("Humboldt LID Manual") (2021).

The exact type of project would depend on the nature of future site development, however, in the case of the Residential Build-Out Scenario, it is almost certainly the case that greater than an acre of impervious surface would be created or replaced. In this case, the Residential Build-Out Scenario would be considered a "Hydromodification Project", which would be required to submit a Stormwater Information Sheet, develop a Preliminary and Final Stormwater Control Plan (SCP), and design stormwater features such that the post-project runoff does not exceed the estimated pre-project flow rate of the two-year, 24-hour precipitation event. The County would be required to sign off on this plan prior to implementation.

In addition, if any future site development facilitated by the Proposed Project would disturb more than one acre of the site, the Proposed Project would be subject to the requirements of the SWRCB's Construction General Permit (CGP) Waste Discharge Program. Potential future development, disturbance, and construction would require development of a Stormwater Pollution Prevention Plan (SWPPP), which documents the stormwater dynamics at the site, the Best Management Practices (BMPs) and water quality protection measures that are used, and the frequency of inspections. BMPs are activities or measures determined to be practicable, acceptable to the public, and cost effective in preventing water pollution or reducing the amount of pollution generated by non-point sources. Development and continued implementation of the SWPPP would ensure that the riparian habitat along the onsite intermittent and ephemeral drainages, and subsequently Ryan Creek, are protected during construction activities and long-term operation of the Proposed Project.



Due to the conclusions of the BSR and comments received from CDFW, the location of the Potential Developable Area outside of riparian setbacks and SMA buffers, the restriction of onsite tree removal, adherence to the CGP and SWPPP for construction sediment prevention and implementation of BMPs to protect water quality, implementation of LID standards for stormwater treatment and likely development of a Stormwater Control Plan (SCP), and implementation of **Mitigation Measure BIO-1**, the Proposed Project and any future development facilitated by the Proposed Project would not 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 CDFW or USFWS, or a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Impacts would be less than significant with mitigation incorporated.

- c) **Finding:** The project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. *Less than significant impact.*

Discussion: The site does not contain any mapped wetlands (USFWS National Wetland Inventory, 2024). The nearest mapped wetland is associated with Ryan Creek, approximately 2,300 feet southeast of the site. The entirety of the Potential Developable Area is either already developed or was recently cleared during approved timber activities. A report conducted by Hohman & Associates Forestry Consultants (Appendix 2D) indicated that there were no wetland areas onsite within the Potential Developable Area prior to or after timber operations were conducted onsite. The report included a site visit and an analysis of site soils, which were not hydric, indicating a lack of wetlands (Appendix 2D). The entirety of the Potential Developable Area is located outside of stream buffers. Any onsite construction would be required to follow regulatory requirements for water quality protection and stormwater treatment.

Therefore, the Proposed Project would not have a substantial adverse effect on federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Impacts would be less than significant.

- d) **Finding:** The project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. *Less than significant impact with mitigation incorporated.*

Discussion: Wildlife movement corridors connect suitable wildlife habitat areas in an otherwise fragmented region. The Proposed Project is located in unincorporated Humboldt County, outside of City of Eureka boundaries, and within the City of Eureka Sphere of Influence. The Project parcel is surrounded by residential, commercial, and medical uses. No wildlife corridors are located onsite and therefore the Proposed Project would not directly impact wildlife movement. The 3.5-acre Potential Developable Area would be outside of the Class II and Class III stream setbacks and riparian areas.

According to the BSR, there were no observed signs of nests, roosting, or perching during a stand search or evidence of suitable habitat on the property. As the Project site is within an MS4 area, any future redevelopment of the site facilitated by the Proposed Project would be required to adhere to LID standards and grading permit/construction BMP measures for stormwater treatment, erosion prevention, and sediment control, at the approval of the County Building Department, DPW, SWRCB, and NCRWQCB. This would minimize potential impacts on habitat downstream off-site at Class I drainages. Therefore, with implementation of **Mitigation Measure BIO-1**, the Proposed Project would not 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. Impacts would be less than significant with mitigation incorporated.



- e) **Finding:** The project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. *Less than significant impact.*

Discussion: The Proposed Project would not involve the removal of any trees. In addition to the general biological resources policies in the County General Plan, the County maintains SMAs to protect sensitive fish and wildlife habitats and to minimize erosion, runoff, and other conditions detrimental to water quality. The Potential Developable Area, where a potential residential build-out scenario would be constructed, is located outside of all SMA buffers, and no trees would be removed.

In addition, the Proposed Project, and potential future development facilitated by the Proposed Project, would comply with the above-referenced Goals, Policies, and Standards of the Humboldt County General Plan. Consistent with Goal BR-G3, the Proposed Project would not impact any sensitive species, either directly or indirectly, according to analysis in this section and this document, as no sensitive species are known to occur onsite. Onsite SMAs have been mapped, consistent with Standard BR-S5, and any future development would be located outside of SMAs, consistent with Policy BR-P5. The BSR and Wetland Delineation document prepared for this site are consistent with Policy BR-P7 and Policy BR-P11. Lastly, the Zone Reclassification process allows for agency review and comment on projects, consistent with Policy BR-P12.

Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, and the impact would be less than significant.

- f) **Finding:** The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. *No impact.*

Discussion: According to the U.S. Fish & Wildlife Service Environmental Conservation Online System (ECOS) (2024), the Proposed Project site is not located within the boundaries of an adopted or proposed Habitat Conservation Plan. Habitat Conservation Plans (HCP) in Humboldt County include the following: 1) Green Diamond Resource Company California Timberlands & Northern Spotted Owl (formerly Simpson Timber Company); 2) Humboldt Redwood Company (formerly Pacific Lumber, Headwaters); 3) Regli Estates; and 4) Humboldt Bay Municipal Water District Habitat Conservation Plan. These Habitat Conservation Plans primarily apply to forest lands in the County. The Proposed Project would not occur on forested lands. According to CDFW (2023), the Proposed Project site is not located within the boundaries of an adopted or proposed Natural Community Conservation Plan. The Project is not identified as being located within a local, regional, or state habitat conservation plan.

In addition, the Proposed Project is located on private property. All potential onsite development facilitated by the Proposed Project would occur outside of SMA buffers, and no tree removal would occur as result of the Proposed Project. Therefore, the Proposed Project would not conflict with any applicable Habitat Conservation Plan or Natural Community Conservation Plan.

Mitigation Measures

BIO-1. Avoidance and Minimization Measures to Protect Special Status and Nesting Birds.

No noise- or vibration-generating construction activities within 100 feet of the edge of riparian and tree area shall occur between March 15th to August 15th, when birds may be nesting on the adjacent property. If construction during this time is unavoidable, a qualified biologist shall conduct a pre-construction survey for nesting bird pairs, nests, and eggs within 100 feet of the construction limits. If an active nest is encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS or CDFW, as applicable, and implemented to prevent abandonment of the active nest.



3.2.5. CULTURAL RESOURCES

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

The Project site is a 10.32-acre parcel currently developed with medical facilities, a parking lot, and accessory buildings. The existing L-shaped building is about 60 years old and the structure behind it is about 54 years old, according to aerial imagery from the City of Arcata Historical Imagery/Survey Map Viewer (2024). The remainder of the parcel is undeveloped forest land. The site is located in the developed area of Eureka, outside of city limits, in the unincorporated area of Humboldt County.

The site is not located within a designated local, state, or national Historic District, and the site and existing structures are not listed on the National Register of Historic Places, the California Register of Historic Resources, or Local Register of Historic Places.

Applicable policies regarding cultural and historical resources from the Humboldt County General Plan Land Use Element and Conservation and Open Space Element include the following:

- Goal CU-G1** **Protection and Enhancement of Significant Cultural Resources.** Protected and enhanced significant cultural resources, providing heritage, historic, scientific, educational, social and economic values to benefit present and future generations.
- Policy UL-P9** **Historic Resources.** Encourage the retention and restoration of designated historic resources to serve as focal points of neighborhoods and communities.
- Policy CU-P1** **Identification and Protection.** The potential for impacts to significant cultural resources shall be identified during ministerial permit and discretionary project review, impacts assessed as to significance, and if found to be significant, protected from substantial adverse change per California Public Resources Code (PRC) §5020.1.
- Policy CU-P3** **Consultation with Other Historic Preservation Agencies and Organizations.** Historic preservation agencies and organizations shall be consulted during discretionary project review for the identification, protection and mitigation of adverse impacts to significant cultural resources. These include, but may not be limited to, the County's Cultural Resources Advisory Committee, Humboldt



County Public Works Department and the Planning and Building Divisions, the Northwest Information Center of the California Historical Resources Information System (NWIC), the California Office of Historic Preservation, the Native American Heritage Commission, local historical societies, museums, colleges and universities, and incorporated cities historic preservation commissions or committees for their respective LAFCO sphere of influence, and local historians, cultural resources consultants and historic preservation staff affiliated with various state and federal agencies.

Policy CU-P4

Avoid Loss or Degradation. Projects located in areas known, or suspected to be archeological sites or Native American burial sites shall be conditioned and designed to avoid significant impacts to significant sites, or disturbance or destruction to Indian burial grounds. Preserving Native American remains undisturbed and in place shall be selected as the preferred alternative unless substantial factual evidence is presented demonstrating that no alternative(s) are feasible. Conditions of approval shall include standard provisions for post review inadvertent archaeological discoveries and discovery and respectful treatment and disposition of Native American remains with or without funerary objects in accordance with state law (Health and Safety Code (HSC) §7050.5 and PRC §5097.98).

Note that Tribal Cultural Resources are discussed in Section 3.2.18.

Analysis

- a) **Finding:** The project would not cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. *Less than significant impact.*

Discussion: A structure must be treated as a historic resource if it is listed in, or determined to be eligible for listing in, the California Register of Historic Resources. Historical significance may be inferred from any of the following factors:

- 1) Association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- 2) Association with the lives of persons important to local, California, or national history.
- 3) Embodiment of the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
- 4) Embodiment, or a likelihood thereof, of information important to the prehistory or history of the local area, California, or the nation.

As mentioned in the setting, above, the site is not in a designated local, state, or national Historic District, and is not listed on the National Register of Historic Places, the California Register of Historic Resources, or Local Register of Historic Places.

The onsite buildings are greater than 50 years old. The Proposed Project would not directly cause an adverse change to these buildings, however, future site development facilitated by the Proposed Project could result in demolition and/or remodeling of the structures. Future demolition or remodeling would include the requirement to obtain a building permit through the Humboldt County Building Department. The Building Permit process would include a historical review of the structures proposed to be demolished or remodeled, and site-specific



constraints would be implemented, if necessary, at that time. Furthermore, neither of the onsite buildings are designated as historical resources, or present features that exhibit a distinctive characteristic of a type, period, region, or method of construction, or display a high artistic value. Therefore, the Proposed Project would have a less than significant impact.

- b) **Finding:** The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. *Less than significant impact with mitigation incorporated.*

Discussion: There are no known archaeological resources located within the property. However, because there is potential to discover a previously unknown sensitive resource during potential future ground-disturbing activities facilitated by the Proposed Project, **Mitigation Measure CUL-1** has been incorporated to ensure potential impacts to archeological resources remain less than significant. With the incorporation of **Mitigation Measure CUL-1**, impacts would be less than significant.

- c) **Finding:** The project would not disturb any human remains, including those interred outside of formal cemeteries. *Less than significant impact with mitigation incorporated.*

Discussion: There are no known human remains locations onsite. However, because there is potential to discover human remains during ground-disturbing activities, **Mitigation Measure CUL-1** has been incorporated to ensure any potential impact would be less than significant. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

CUL-1. If cultural materials, for example: chipped or ground stone, historic debris, building foundations, or bone are discovered during ground-disturbance activities, work shall be stopped within 50-foot buffer of the discovery location, per the Cultural Resources Inventory Report. Work near the archaeological find(s) shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendations for further action.

If human remains are discovered during project construction, work would be stopped at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner would be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner would contact the NAHC. The descendants or most likely descendants of the deceased would be contacted, and work would not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.



3.2.6. ENERGY

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☒	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy and energy efficiency?	☐	☐	☒	☐

Setting

The Project parcel is currently developed with medical offices and facilities that consume energy. Electricity at the Proposed Project site is currently provided by an existing service from PG&E. No off-site or onsite improvements of utility lines or electrical infrastructure would need to occur for the Proposed Project. Future development, whether residential or medical, facilitated by the Proposed Project would need to assess current capacity to determine whether or not PG&E improvements were required for the specific project.

The State of California Building Energy Efficiency Standards under the CBC, known widely as Title 24, outline requirements for all new commercial and residential construction projects. Title 24 is part of California's wider strategy to require all new commercial construction projects to be zero net energy by 2030 (California Energy Efficiency Strategic Plan, 2011). Title 24 standards would apply to any new buildings (e.g., potential new residential structures facilitated by the Proposed Project) or modification of existing buildings (e.g., remodeling the existing medical building) under approved building permits from the Humboldt County Building Department.

The Humboldt County General Plan includes an Energy Element (Humboldt County, 2017). The Energy Element promotes self-sufficiency, independence, and local control in energy management and supports diversity and creativity in energy resource development, conservation, and efficiency. The Energy Element notes that key renewable energy resources include biomass, wind, wave, and small run-of-river hydroelectric. According to the Energy Element, local biomass resources are used to provide about 25% to 30% of the County's electricity needs. Roughly half of the electricity serving Humboldt County is generated at the Pacific Gas and Electric Company Humboldt Bay Generating Station. The County imports about 90% of its natural gas; the rest is obtained locally from fields in the Eel River valley. Humboldt County has an approximately peak electrical demand of 170 MW (Humboldt County General Plan, Energy Element, 2017). Also at the state level, Senate Bill (SB) 100 is California's Commitment to 100% Clean Energy, which requires 60% of the power purchased by California utilities to come from renewable sources by 2030.

Applicable goals and policies from the Energy Element of the Humboldt County General Plan include the following:

Goal E-G1 **Increase Energy Efficiency and Conservation.** Decrease energy consumption through increased energy conservation and efficiency in building, transportation, business, industry, government, water, and waste management.



- Policy E-P3** **Local Renewable Energy Supply.** The County shall support renewable energy development projects including biomass, wind, solar, “run of the river” hydroelectric, and ocean energy, consistent with this Plan that increases local energy supply.
- Policy E-P11** **Energy-efficient Landscape Design.** Encourage and incentivize energy efficient landscape design in development projects, subdivisions, and in new and existing streets and parking areas in order to reduce impervious surfaces, minimize heat and glare, control soil erosion, and conserve water

The draft Humboldt Regional Climate Action Plan (RCAP) was prepared for review in July 2024. The draft RCAP is currently undergoing public and environmental review and has not been adopted as of the writing of this report. The draft RCAP includes strategies and associated measures and actions to decrease fossil-fuel dependent energy use and reduce greenhouse gas emissions within Humboldt County.

Analysis

- a) **Finding:** The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. *Less than significant impact with mitigation incorporated.*

Discussion: The Proposed Project is a Zone Reclassification and General Plan text amendment to remove a medical-only Q-Zone overlay from the subject parcel. The Proposed Project would not directly result in an increase of energy use at the site. Indirectly, energy use would occur from potential future site development facilitated by the Proposed Project. It is unknown at this time what amount of energy a potential future project would consume.

Regardless, any future new structures or existing building modifications – residential, medical, or otherwise – would be subject to Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California designed to reduce wasteful and unnecessary energy consumption. No construction would occur until a commercial building permit, demonstrating compliance with Title 24, is obtained through the County of Humboldt Building Department. For the Residential Build-Out Scenario, Title 24 requirements include the installation of rooftop-mounted solar panels use on new residential structures, which would offset residential energy use.

In addition, inefficient fuel-use associated with future site development facilitated by the Proposed Project would be avoided from the measures included in **Mitigation Measure AQ-1**. Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by Mitigation Measure AQ-1). Because construction would not encourage activities that would result in the use of large amounts of fuel and energy in a wasteful manner, and with the incorporation of Mitigation Measure AQ-1 which would reduce idling time, impacts related to the inefficient use of construction-related fuels would be less than significant with mitigation.

Therefore, the Proposed Project would not result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant with **Mitigation Measure AQ-1** incorporated.

- b) **Finding:** The project would not conflict with or obstruct a state or local plan for renewable energy and energy efficiency. *Less than significant impact.*



Discussion: Locally, the Humboldt County General Plan and the draft Regional Climate Action Plan (RCAP) have goals and standards that outline energy efficiency in Humboldt County. The Proposed Project would not directly conflict with any of these plans for renewable energy and energy efficiency, as a change of zone would not directly impact energy use.

Any future development facilitated by the Zone Reclassification would be required to comply with the General Plan and RCAP, as well as all local and state renewable energy efficiency plans. Any future development would comply with all the building energy efficiency standards for all new commercial buildings set by Title 24, including the requirement to install solar panels on the rooftops of new residential structures, and to install energy efficient equipment within new structures (consistent with Goal E-G1 and Policy E-P3 of the General Plan Energy Element, as well as Strategy 4 and associated Measures BE-5 and BE-6 of the draft RCAP). Any landscaping associated with proposed future site development would be required to follow LID standards and would thus be consistent with Policy E-11 of the General Plan Energy Element.

Additionally, the parcel is well located near a variety of transport modalities, including public transit, bicycle paths, and pedestrian facilities. Public services – including commercial stores, grocery stores, schools, medical facilities, and other services – are located in the Project vicinity. There are two (2) public transit bus stops located 0.2 miles away from the Project site, and the site is served by existing bicycle and pedestrian access. Therefore, the Proposed Project would not be promoting potential future development of a project in a remote area that could significantly increase Vehicle Miles Traveled. As such, proposed future development would not be in conflict with Strategies 5, 6, or 7 and their associated measures of the draft RCAP.

Lastly, the site is served by PG&E. In accordance with SB 100, PG&E currently obtains 38% of its power supply from renewable energy sources and is on track to meet the 60% renewable energy mix by 2030 (PG&E, 2022).

Therefore, the Proposed Project would not conflict with the Humboldt County General Plan Energy Element or the local draft Climate Action Plan, or other local or state plans for renewable energy and energy efficiency. See 3.2.8, Greenhouse Gas Emissions, for further analysis. A less than significant impact would occur.

Mitigation Measures

Implement Mitigation Measure AQ-1



3.2.7. GEOLOGY AND SOILS

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



Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Setting

The subject parcel is a 10.32-acre parcel located in the developed area of Eureka, outside of the city limits, within the jurisdiction of Humboldt County. Humboldt County is a rural area of California, subject to many potential natural hazards including sea level rise, wildfires, landslides, earthquakes, and flooding. Humboldt County is located within Northern California’s Coast Ranges Geomorphic Province, which is a geologically active region at risk for strong ground shaking.

Humboldt County is located within the two highest of five seismic risk zones specified by the Uniform Building Code. The Cascadia Subduction Zone runs north offshore of Humboldt, Del Norte, Oregon, and Washington. Landslides and soil slips are common due to the combination of sheared rocks, shallow soil profile development, steep slopes, and heavy seasonal precipitation (Humboldt County 2025 General Plan Update. Natural Resource and Hazards Report; Pg. 10-9).

Alquist Priolo Fault Zones are regulatory zones surrounding the surface traces of active faults in California (California Department of Conservation, 2024c). No Alquist Priolo Fault Zones are located near the Proposed Project site. The nearest zone is approximately 5 miles to the southwest of the parcel, near Humboldt Hill (Humboldt Web GIS, 2024). The nearest quaternary fault (i.e., non-active fault), is the Little Salmon Fault, located approximately 3.8 miles southwest of the parcel (Humboldt Web GIS, 2024).

The property contains slopes of 0% to greater than 50%. No historic landslides or fires are mapped within the Proposed Project Area. The property is not at risk of flooding from sea level rise or dam failure inundation. The property is not located within a mapped FEMA Flood Zone. The site is not listed as an area of potential liquefaction and is located within a Low Instability/Moderate Instability area for seismic safety (Humboldt Web GIS, 2024). All of the Developable Area onsite is located within a Low Instability Zone.

The Project parcel contains two different soil types, as described in Table 4 and as shown in Figure 15, per the Natural Resources Conservation Service (NRCS) Web Soil Survey (2024).

Table 4: Soils underlying the Project Parcel (Source: NRCS Web Soil Survey, 2024)

Map Unit Symbol	Color in Figure 15	Map Unit Name	Acres in AOI	Percent of AOI
230	Green	Hookton-Tablebluff complex, 2 to 9 percent slopes	10.1	97.7%
402	Yellow	Tannin-Wohly-Rockyglen complex, 50 to 75% slopes	0.2	2.3%
Total for Area of Interest (AOI)			10.3	100%

Existing onsite structures are located entirely on the Hookton-Tablebluff complex soils, identified by Map Unit 230 in the Web Soil Survey Map (Figure 15). Map Unit 230 is comprised of two soil types, Hookton and



Tablebluff. The Hookton-Tablebluff complex soils are classified as Farmland of Statewide Importance. The somewhat poorly drained Hookton soil profile contains loam and clay loam soils. The moderately well-drained Tablebluff soil profile contains silty clay loam, silt loam, and clay loam.



Figure 15: Soils on the Project Parcel (Source: NRCS Web Soil Survey, 2024)

Analysis

- a. i) Finding: The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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. *Less than significant impact.*

Discussion: Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. The magnitude and nature of fault rupture can vary for different faults or even along different strands of the same fault. Surface rupture can damage or collapse buildings, cause severe damage to roads and pavement structures, and cause failure of overhead as well as underground utilities.

There are no earthquake faults delineated on the Alquist-Priolo Fault Zone maps within the Proposed Project Area (California Department of Conservation, 2024a and Humboldt County Web GIS, 2024), or within a 5-mile radius of the Proposed Project. The nearest zone is approximately 5 miles to the southwest of the parcel, near Humboldt Hill (Humboldt Web GIS, 2024). The nearest quaternary fault (i.e., non-active fault), is the Little Salmon Fault, located approximately 3.8 miles southwest of the parcel (Humboldt Web GIS, 2024). No known historic earthquakes have been associated with this fault (USGS, 2017).

The State of California provides minimum standards for building design through the California Building Code (CBC). Where no other building codes apply, CBC Chapter 29 regulates excavation, foundations, and retaining walls. The CBC applies to building design and construction in the State and is based on the Universal Building Code (UBC) used widely throughout the country. The CBC has been modified for California conditions with numerous more detailed and/or more stringent regulations. Specific minimum seismic safety and structural design requirements are set forth in CBC Chapter 16. The CBC identifies seismic factors that must be considered in structural design.

Any buildings associated with site development facilitated by the Proposed Project would be required to be designed to CBC seismic standards. Additionally, since the Project site is not located within or near an Alquist-Priolo Fault zone (e.g., an “active” earthquake zone), surface fault rupture is not considered to be a significant hazard for the project site any more than in other areas of earthquake-prone Humboldt County. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects from a fault rupture and the impact would be less than significant.

- a. ii) Finding: The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. *Less than significant impact.*

Discussion: Earthquakes on active faults in the region have the capacity to produce a range of ground shaking intensities in the Proposed Project Area. Ground shaking may affect areas hundreds of miles distant from an earthquake’s epicenter. Ground motion during an earthquake is described by the parameters of acceleration and velocity as well as the duration of the shaking. A common measure of ground motion is peak ground acceleration (PGA). The PGA for a given component of motion is the largest value of horizontal acceleration obtained from a seismograph. PGA is expressed as the percentage of the acceleration due to gravity (g). Moderate earthquake hazard areas are defined as areas with ground accelerations of less than .092g and Violent earthquake hazard areas have ground accelerations of 0.65g to 1.24g. The California Geological Survey, Probabilistic Seismic Hazards Mapping Ground Motion Page (conservation.ca.gov) indicates a maximum PGA on the order of 0.61g for a seismic event with a 10 percent probability of exceedance in 50 years (design basis earthquake).

See discussion in Section a i), above. There are no earthquake faults delineated on Alquist-Priolo Fault Zone maps within the Proposed Project Area. For any future site development facilitated by the Proposed Project, an R-2 Soils Report would be required for all proposed buildings during the building and grading permit approval process prior to construction to identify site-specific constraints. The R-2 Soils Report would require sign-off from the Humboldt County Building Department during the Building Permit process. Additionally, any proposed structures would be required to follow all CBC standards. Therefore, the Proposed Project, and potential future development facilitated by the Proposed Project, would not expose people or structures to substantial adverse effects involving strong seismic ground shaking and the impact would be less than significant.

- a. iii) Finding: The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. *No impact.*



Discussion: Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluidlike behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations (NRCS, 2024).

According to the Humboldt County Web GIS (2024), the Proposed Project Area is not designated as an area subject to liquefaction. Therefore, the Proposed Project would not expose people or structures to substantial adverse effects involving seismic-related ground failure, including liquefaction, and no impact would occur.

- a. iv) Finding: The project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. *Less than significant impact.*

Discussion: Slope failures, commonly referred to as landslides, include many phenomena that involve the downslope displacement and movement of material, either triggered by static (i.e., gravity) or dynamic (i.e., earthquake) forces. Earthquake motions can induce significant horizontal and vertical dynamic stresses in slopes that can trigger failure. Earthquake-induced landslides can occur in areas with steep slopes that are susceptible to strong ground motion during an earthquake. The youthful and steep topography of the coast range is known for its potential for landslides.

The Proposed Project Site contains areas designated as “low” instability and “moderate” instability, per Humboldt County Web GIS (Figure 16). The Potential Developable Area is fully within the “low” instability designation (Figure 16). The site contains gentle slopes (0 to 15%) in the northern area of the property where existing development is located, and where future potential development would be located (Figure 17). South of the Potential Developable Area, slopes increase to 15% to 30%, 30% to 50%, and greater than 50% in the gulch in the southern area of the property (Figure 17). No historic landslides are mapped on the entirety of property or in the vicinity of the Proposed Project site (Humboldt County Web GIS, 2024 and California Department of Conservation, 2024b). Therefore, the Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, and the impact would be less than significant.



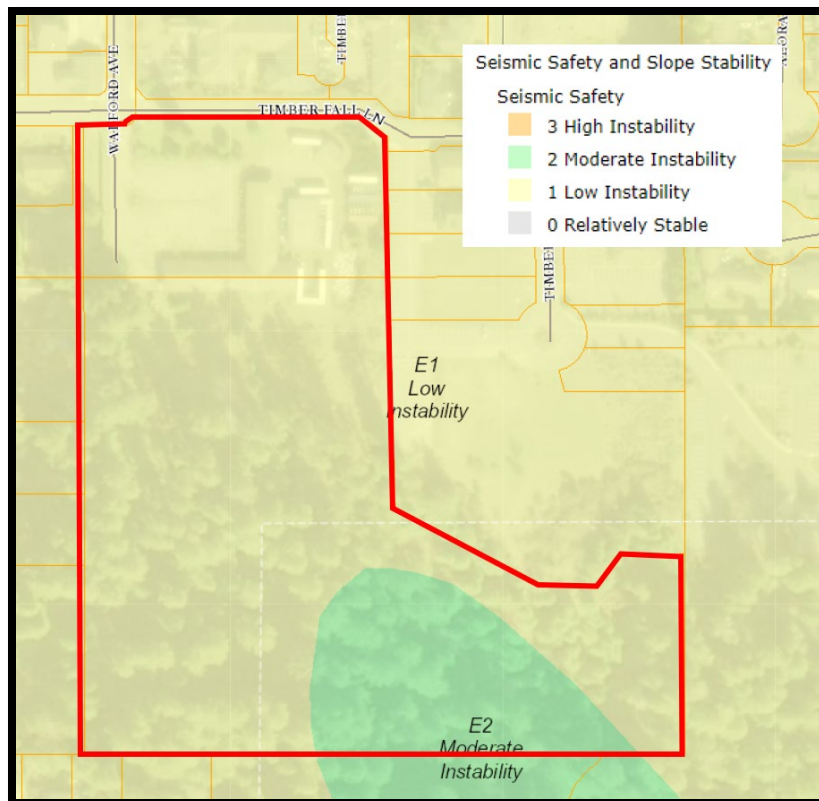


Figure 16. Seismic Safety Map of Proposed Project Site, outlined in red (Source: Humboldt County Web GIS, 2024)

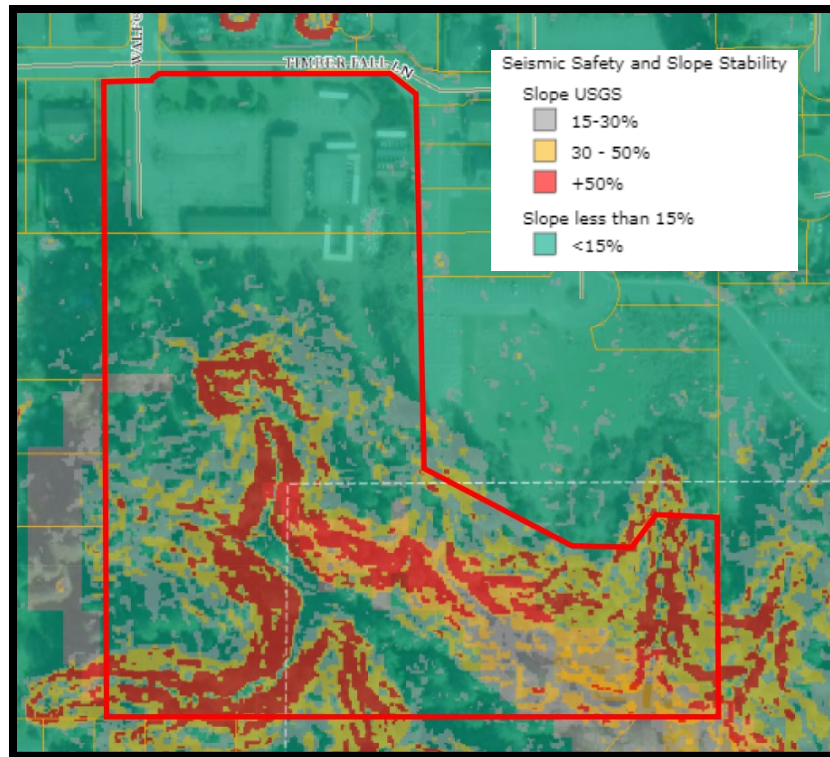


Figure 17: USGS Slopes of Proposed Project Site, outlined in red (Source: Humboldt County Web GIS, 2024)

- b) **Finding:** The project would not result in substantial soil erosion or the loss of topsoil. *Less than significant impact.*

Discussion: The Proposed Project would not directly impact soil or topsoil. Potential scraping, grading, demolition, and future ground disturbance from future development facilitated by the Zone Reclassification could have impacts. However, the entirety of the Potential Developable Area, where future development would occur, has been either developed with existing structures, gravel, or asphalt, or has recently been cleared through a Less than 3 Acre Conversion and associated Grading Permit. No additional vegetation or tree removal would occur from future development. Any future grading would require application and approval of a Grading Permit through the Humboldt County Building Department. The Grading Permit would include an Erosion and Sediment Control Plan and an R2 Soils Report as a required part of the application process, which would be reviewed and approved prior to the commencement of any ground disturbance.

In addition, any land disturbance greater than 1-acre would be required to follow the SWRCB CGP process, which would include development of a SWPPP that would contain erosion control BMPs. Given that California Building Code (CBC) requirements relating to soil stability would be adhered to during construction, as required by an approved Building Permit, the relatively flat topography of the project site, and that the Proposed Project must adhere to the requirements of the SWRCB GCP and SWPPP, along with the standard erosion control measures of the Humboldt County General Plan, the Proposed Project, and any future development facilitated by the Proposed Project, would not result in significant soil erosion or loss of topsoil. Therefore, a less than significant impact would occur.

- c) **Finding:** The project would not 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. *Less than significant impact.*

Discussion: According to Humboldt County GIS data, the parcel is not mapped within an area of potential liquefaction. The National Earthquake Hazards Reduction Program (NEHRP) denotes the Proposed Project soils as Geological Unit C, indicating very dense soil and soft rock (FEMA, 2000). Design and construction of the Proposed Project would incorporate appropriate engineering practices to ensure seismic stability as required by the CBC and Humboldt County standards. Therefore, the Proposed Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse and a less than significant impact would occur.

- d) Finding: The project would not be located on expansive soil, as defined in Table 18-1-B of the UBC (1994), creating substantial risks to life or property. *Less than significant impact.*

Discussion: Expansive soils possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying. Structural damage may occur over an extended period of time due to expansive soils, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils.

Any potential construction onsite would occur on the Hookton-Tablebluff complex. The Hookton-Tablebluff complex soil profile is comprised of loam and clay loam soils, which have the potential to be expansive due to the presence of clay soils. Clay soils are more susceptible to expanding and contracting (NRCS, 2024). Linear extensibility is used to determine the shrink-swell potential of soils. High and Very High shrink-swell potentials are present if soils have linear extensibility ratings of between 6% and 9%, and greater than 9%, respectively (USDA, 2024). Per Web Soil Survey (2024), soils in the developable area have a 4.3% linear extensibility rating (i.e., “moderate” shrink-swell potential) which is indicative of soil features moderately favorable for potential future construction facilitated by the Zone Reclassification.

Any construction would be required to obtain a Building Permit from the Humboldt County Building Department prior to commencement. An R-2 Soils Report would be prepared and submitted as part of the Building Permit application process. If soils were deemed to have expansive qualities deeming further consideration, special design factors would be considered and required at that time, at the recommendation of a qualified geologist or engineer, and proper foundation design would be incorporated into building construction that accounts for the special design factors. No construction would occur without an approved Building Permit, as required by County law. In addition, the site is already developed with no existing issues regarding expansive soils. Therefore, the Proposed Project would not facilitate future development that would be located on expansive soil creating substantial risks to life or property. Impacts would be less than significant, and no mitigation would be necessary.

- e) Finding: The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. *No impact.*

Discussion: The Project site is connected to existing wastewater service through the Humboldt CSD. No onsite wastewater treatment system is proposed. No onsite treatment would be expected for potential future site development facilitated by the Proposed Project, as the site is already connected to an existing wastewater service. Therefore, no impact would occur.

- f) Finding: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. *Less than significant impact with mitigation incorporated.*



Discussion: Regional uplifting and other seismic activity in the area have limited the potential for discovery of paleontological resources. However, there is a potential for fossils to be discovered and inadvertently damaged during construction for future site development facilitated by the Proposed Project, even in an area with a low likelihood of occurrence. As such an inadvertent discovery protocol for paleontological resources has been included as **Mitigation Measure GEO-1**. With the proposed **Mitigation Measure GEO-1**, the Proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, resulting in a less than significant impact with mitigation incorporated.

Mitigation Measures

GEO-1. If paleontological resources are encountered during any future site construction or ground-disturbing activities, ground disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist shall be retained by the developer to make an evaluation of the find. If a significant paleontological resource(s) is discovered on the property, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.



3.2.8. GREENHOUSE GAS EMISSIONS

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

Setting

The Proposed Project site is located within the North Coast Air Basin, which is under the jurisdiction of the North Coast Air Quality Management District (NCAQMD). The NCAQMD applies air pollution regulations to all major stationary pollution sources and monitors air quality. GHGs are emitted into the atmosphere from a variety of sources, including the combustion of fuel for energy and transportation, cement manufacturing, and refrigerant emissions. GHGs are gases that have the ability to trap heat in the atmosphere, a process that is analogous to the way a greenhouse traps heat. GHGs are emitted from human activities, as well as through natural processes. Increasing GHG concentrations in the atmosphere are leading to global climate change.

The primary GHGs that are of concern for development projects include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. Emissions of CO₂ are largely by-products of fossil fuel combustion and CH₄ results from off-gassing associated with agricultural practices and landfills (California Air Resources Board, 2024; Humboldt County General Plan, 2017).

Greenhouse gases are regulated on federal, state, and local levels. At the state level, Assembly Bill (AB) 32 Scoping Plan (2017 Update) contains the main strategies California will use to reduce GHG emissions. AB 32 was originally passed by the California Global Warming Solutions Act of 2006 and details strategies and greenhouse gas reduction goals for projects across the state, including the now-achieved requirement to reduce statewide GHG emissions to 1990 levels by 2020 (a 28% reduction). In 2016, AB 32 was amended to require California to reduce GHG emissions to 40% below 1990 levels by 2030, and in 2022, the updated Scoping Plan was released to obtain carbon neutrality by 2045, which would be an 85% reduction in GHG emissions below 1990 levels (California Air Resources Board, 2022).

Locally, Humboldt County is complying with AB 32 to reduce GHG emissions to 40% below 1990 levels by 2030. The County has been coordinating with other local agencies to finalize a Regional Climate Action Plan (RCAP) to reduce GHG emissions throughout Humboldt County. The first draft of the RCAP was released in 2012 and an updated draft in August 2024. The newly released Humboldt RCAP Draft undergoing environmental review and has not yet been adopted. The RCAP explores locally oriented strategies to reduce emissions from vehicle travel, electricity consumption, natural gas use, and other sources of GHGs.

The County has existing programs and policies in place that reduce and minimize GHG emissions:



- Air Quality Element, Humboldt County General Plan (2017)
- California Air Resources Board Climate Change Scoping Plan (2022)
- NCUAQMD Particulate Matter Attainment Plan (1995)

Although not certified at the time of writing, the Humboldt County Regional Climate Action Plan (RCAP) public draft was prepared by Humboldt County in July 2024 and is currently in the public review stage. Once certified, the RCAP would provide guidance towards long-term GHG reduction in accordance with California's goals to reduce GHG emission by 40 percent below 1990 levels by 2030 and achieve carbon neutrality by 2045.

Sources of greenhouse gas emissions from the Proposed Project would include indirect emissions associated with potential future development facilitated by the Zone Reclassification.

Analysis

- a) **Finding:** The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. *Impacts are less than significant.*

Discussion: The Proposed Project would significantly impact GHG emissions if it were to generate substantial GHG emissions exceeding the CEQA thresholds of significance adopted by the NCAQMD and Humboldt County. NCAQMD and Humboldt County have not adopted thresholds of significance for GHG emissions from non-stationary sources. However, the Bay Area Air Quality Management District (BAAQMD) has established GHG thresholds that can be used in for significance determination. These thresholds are used by other counties in California without adopted thresholds of significance. Thus, for the analysis of GHG emissions, BAAQMD's GHG thresholds are used to evaluate the significance of the Proposed Project's GHG emissions. For land use development projects, the BAAQMD GHG threshold is "annual emissions less than 1,100 metric tons per year (MT/yr) of CO₂e" (BAAQMD, 2022).

There are no direct sources of GHG emissions from the Proposed Project. Indirect GHG emissions would occur from potential site development facilitated by the Proposed Project. Construction and operation of *any* potential future use allowed in the R-4 zone would generate greenhouse gas emissions. As no specific potential site development is currently proposed, it is unknown what quantities of GHG emissions would be associated with a potential future project. As such, for the purpose of quantitatively estimating emissions associated with the Proposed Project, a greenhouse gas emissions analysis was conducted for the Residential Build-Out Scenario described in the Project Description section of this document (§11.1.4).

The Residential Build-Out Scenario represents a potential higher-impact, larger-scale residential development project that could occur onsite if the Q-zone was removed without further discretionary review. Mobile sources of GHGs from this scenario could include equipment and vehicular traffic from short-term construction, and vehicle/truck traffic from residents and visitors of the site. Any future buildings would be required to meet or exceed Title 24 requirements, in accordance with the California Building Code.

To estimate emissions associated with the Residential Build-Out Scenario and assess potential impacts, the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.28 was used (Appendix 2B). Information for the CalEEMod Analysis, including residential unit count and daily trips, was derived from the "Residential Build-Out Scenario," described in the Project Description of this document (§11.1.4). The most fitting land use type, "Apartment – Mid Rise," was used in the model, and default parameters were used where appropriate (e.g., construction equipment list, days of construction, etc.). See the Air Quality §3.2.3 b), of this document for additional information on CalEEMod inputs. Mitigation measures available in the model, such as carpooling, Title 24 compliance, the offset of propane use, and use of renewable energy, were not included in



the analysis and therefore the CalEEMod analysis represents a maximum estimation of potential GHG emissions. The results are summarized in Table 5. As can be seen in Table 5, GHG emissions from construction and operation of the Residential Build-Out Scenario would be below the BAAQMD CEQA threshold.

Table 5: Construction and Operational GHG Emissions of Residential Build-Out Scenario (Source: Appendix 2B - CalEEMod Analysis, 2024)

Emission Source	CO ₂ e (MT/yr)	BAAQMD Threshold (MT/yr)	Exceeds Threshold?
Construction - Unmitigated	249	1,100	No
Operation - Unmitigated	507	1,100	No

For comparison purposes, a CalEEMod Analysis was also conducted for the Medical Build-Out Scenario (Appendix 2B) to compare emissions of what is currently permissible onsite (medical only) to what could be permissible onsite if the Proposed Project were to be approved (residential or medical). For the Medical Build-Out Scenario, inputs to the CalEEMod model were sourced from the scenario described in the Project Description of this document (§11.1.4). The “Hospital” Land Use Type was used to reflect the medical facility. The medical facility building was assumed to have a 38,000 sq. ft. footprint. During operation of a medical facility, the primary activities that would generate pollutant emissions would be daily vehicle traffic from patients, employees, and visitors. Assuming 100 patient beds and a 3:1 employee/patient ratio, approximately 1,400 daily trips were estimated (estimated at two (2) trips per patient per day and four (4) trips per employee per day). Default values were used in the model where appropriate. The analysis for the Medical Build-Out Scenario estimated that approximately 1,445 MT/yr of CO₂e emissions would be generated by this scenario, nearly three times greater than the residential scenario. While there is significant assumption feeding into both CalEEMod analysis scenarios, the results demonstrate that a residential development project, which is not currently allowed onsite, could generate less GHG Emissions than a medical development project, which is currently allowed onsite and would be permissible under the existing R-4-Q zoning.

Therefore, significant, or cumulative impacts to the environment due to GHG emissions from the Proposed Project are not likely. Thus, the Proposed Project would not generate GHGs, either directly or indirectly, that would have a significant impact on the environment and impacts would be less than significant.

- b) **Finding:** The project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gas. *Less than significant impact.*

Discussion: The Proposed Project would significantly impact GHG emissions if it were to conflict with an adopted plan, policy or regulation intended to reduce GHG emissions. As described above, the Proposed Project would not directly conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The Proposed Project could cause indirect impacts through future principally permitted site development facilitated by the Zone Reclassification. All future development would be required to meet the greenhouse gas emission reduction goals, policies, standards, and measures of the following applicable plans, policies, and regulations:

1) Humboldt County General Plan – Air Quality Element (2017) and Energy Element (2017)

The Air Quality Element of the Humboldt County General Plan describes the County’s policies to reduce GHG emissions and mitigate climate change. The Energy Element also provides some policies and goals



related to reducing energy usage, and subsequently reducing GHGs. Applicable goals, policies, and standards from the General Plan are as follows:

- *AQ-P1. Reduce Length and Frequency of Vehicle Trips:* Reduce the length and frequency of vehicle trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel.
- *AQ-P11. Review of Projects for Greenhouse Gas Emission Reductions:* The County shall evaluate the GHG emissions of new large scale residential, commercial and industrial projects for compliance with state regulations and require feasible mitigation measures to minimize GHG emissions.
- *E-G1. Increase Energy Efficiency and Conservation.* Decrease energy consumption through increased energy conservation and efficiency in building, transportation, business, industry, government, water, and waste management.
- *E-P3. Local Renewable Energy Supply.* The County shall support renewable energy development projects including biomass, wind, solar, “run of the river” hydroelectric, and ocean energy, consistent with this Plan that increases local energy supply.

The site is an existing, developed site located near existing residential and commercial areas. The site is located within Census Tract 8 within the unincorporated area of Humboldt County. Census Tract 8 has a population of 4,684, signifying that the Project is located in a well-developed area (Census Reporter, 2024).

The site is well-located within an already-developed area of Eureka within the County of Humboldt. Public transit is available within 0.2 miles of the parcel, and existing bicycle and pedestrian facilities connect the parcel to Harris Street, a well-traveled Urban Principal Arterial street. While exact VMT is unknown, any future site development facilitated by the Proposed Project would not be promoting potential future development of a project in a remote area that could significantly increase Vehicle Miles Traveled, consistent with AQ-P1. A Greenhouse Gas Analysis was conducted for potential build-out scenarios facilitated by the Proposed Project, and the both the County’s permitting process and the State’s CEQA process allow for agency review of potential GHG emissions and reduction strategies. Any future development would comply with all the building energy efficiency standards for all new commercial buildings set by Title 24, including the requirement to install solar panels on the rooftops of new residential structures, and to install energy efficient equipment within new structures (consistent with Goal E-G1 and Policy E-P3).

2) California Air Resources Board Climate Change Scoping Plan (2022)

The 2022 Scoping Plan developed by the California Air Resources Board (CARB) provides context and strategies to help achieve statewide greenhouse gas emission reduction goals. Appendix D of the Plan includes eight (8) key attributes for residential and mixed-use projects that reduce GHGs. The eight (8) attributes are as follows (some key attributes have been shortened for brevity):

1. *Provides EV charging infrastructure that, at minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel.*
2. *Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).*
3. *Does not result in the loss or conversion of natural and working lands.*
4. *Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre), or is in proximity to existing transit stops (within a half mile).*
5. *Reduces parking requirements... by providing residential parking supply at a ratio of less than one parking space per dwelling unit.*
6. *At least 20% of units included are affordable to lower-income residents.*



7. *Results in no net loss of existing affordable units.*
8. *Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking.*

If a residential or mixed-use project is consistent with all of the key project attributes in Appendix D of the 2022 CARB Scoping Plan, it is “clearly” consistent with the policies and goals of the Scoping Plan. However, lead agencies may determine, with adequate additional supporting evidence, that projects incorporating some, but not all, of the key project attributes are still consistent with the State’s climate goals in the 2022 Scoping Plan.

While there is no specific residential or non-residential development to compare these all of these attributes to, any site development facilitated by the Proposed Project would be required to meet all CBC and Title 24 Standards, consistent with components of Attribute 1. Additionally, removing the medical-only Q-zone would allow for mixed-use development to occur onsite, consistent with Attribute 1. The site is located on an existing developed site, surrounded by existing urban uses, and is already served by existing water and sewer connections, consistent with Attribute 2. No trees would be allowed to be removed, consistent with Attribute 3. There are two (2) bus stops located 0.2 miles from the site, consistent with Attribute 4. With regard to the remaining attributes, no parking requirements or income-level housing have yet been decided, as there is currently no specific project.

Furthermore, the 2022 CARB Scoping Plan references SB 100, the requirement that electricity utility companies must source 60% of electricity from eligible renewable sources by 2030. The project site is served by PG&E. The utility company obtained 38% of its power from renewable energy sources, which is on track to meet the 60% renewable energy mix by 2030. (PG&E, 2022).

3) NCUAQMD Particulate Matter Attainment Plan (1995)

The NCUAQMD prepared a Particulate Matter Attainment Plan, Draft Report, in May 1995 with the goal of achieving and maintaining state ambient air quality standards for PM₁₀. This report includes a description of the planning area (North Coast Unified Air District), and emissions inventory, general attainment goals, and a listing of cost-effective control strategies. The NCUAQMD’s attainment plan established goals to reduce PM₁₀ emissions and eliminate the number of days in which standards are exceeded. The plan includes three areas of recommended control strategies to meet these goals – transportation, land use and burning. Control measures for these areas are included in the Particulate Matter Attainment Plan. Compliance with the control measures in the Particulate Matter Attainment Plan would not only result in a reduction of PM₁₀ emissions but would also result in a reduction of GHG emissions. Control strategies focused on reducing transportation emissions, more efficient land use patterns, and reducing emissions from burning activities would also reduce the amount of GHG emissions. Any development facilitated by the Proposed Project would be required to meet all CBC and Title 24 Standards; construction of any proposed facilities would not be able to occur until sign-off from the Humboldt County Building Department occurred.

Therefore, the Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs and the impact would be less than significant.

Mitigation Measures

None.



3.2.9. HAZARDS AND HAZARDOUS MATERIALS

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐



Setting

The site is an existing, partially developed site within the established area of Eureka, outside of City limits in the unincorporated area of Humboldt County. The site is currently developed with medical facilities, associated parking, and landscaping. The remainder of the property is forested.

The site has not historically been used for industrial purposes, hazardous waste storage, or other significant hazardous materials or hazardous waste generating activities. The State Water Resources Control Board (SWRCB) Geotracker website (accessed October 2024) did not identify any cleanup sites on the subject parcel. The nearest Cleanup Program site is the Chevron Leaking Underground Storage Tank (LUST) Cleanup site, a closed case located at 2600 Harris Street, approximately 430 feet north/northwest of the Proposed Project site.

The site has a CalEnviroScreen score of between 5 to 10% (CalEnviroScreen 3.0, accessed October 2024). The CalEnviroScreen mapping tool helps identify California communities that are most affected by sources of pollution, and where people are often especially vulnerable to pollution effects. The scores are mapped so that different communities can be compared. Scores range between 1-100%. An area with a high score is one that experiences a much higher pollution burden than areas with low scores. The low score of 5 to 10% indicates that the subject parcel is not likely to be recognized as a highly disadvantaged area from environmental pollution.

The closest schools to the Proposed Project Site are Washington Elementary School (located 0.23 miles west of the site), Pacific View Charter School (0.45 miles north/northwest), Von Humboldt High School (0.68 miles north/northwest), Zane Middle School (0.74 miles northwest), and Glen Paul School and Winship Middle School (0.78 miles south). The Humboldt Sheriff's office is located 0.9 driving miles from the Site, a roughly 10-minute drive. Eureka Police Department is located 1.7 driving miles from the site, or a 10-15-minute drive. The closest airport is Murray Field Airport (KEKA), located approximately 2.1 air miles northeast of the property.

The site is not located within a FEMA Flood Zone or a dam failure inundation zone. According to the Humboldt County Web GIS, the site is located in a State Responsibility Area (SRA) and within the Humboldt No. 1 Fire Protection District. The Proposed Project is not located in the Coastal Zone and would not be directly inundated by a tsunami or sea level rise.

Analysis

- a) and b) Finding: The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. *Less than significant impact.*

Discussion: The Proposed Project involves the removal of a qualifying zone currently restricting onsite uses to medical uses only. No change to the principal zone (R-4) or land use designation (RM) would occur. No direct significant hazard to the public or environment is anticipated as a result of this Zone Reclassification.

Future development of the site, facilitated by the Zone Reclassification, could involve the use of hazardous materials either through construction or operation of potential onsite development activities. Allowable uses in the R-4 zone that are principally permitted could involve the routine use, transport generation, and/or disposal of hazardous materials. The California Code of Regulations (CCR) defines a hazardous material as a substance that, because of physical or chemical properties, quantity, concentration, or other characteristics, may either: (1) cause an increase in mortality or an increase in serious, irreversible, or incapacitating illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored,



transported or disposed of, or otherwise managed (CCR, Title 22, Division 4.5, Chapter 10, Article 2, Section 66260.10). Pesticides, herbicides, fungicides, fertilizers, fuels, and solvents associated with the Proposed Project are considered hazardous materials. Hazardous wastes refer to hazardous materials that are no longer used and have been disposed of or are awaiting disposal.

The Department of Toxic Substances Control (DTSC) requires that local jurisdictions have a Certified Unified Program Agency (CUPA), which is in charge of conducting compliance inspection of sites that handle hazardous materials, generate or treat hazardous waste, and/or operate underground storage tanks. Locally, the Hazardous Materials Program of the Humboldt County Division of Environmental Health (DEH) is the acting CUPA in charge of hazardous material sites in Humboldt County. Under CUPA, a Hazardous Materials Business Plan (HMBP) would be required for projects that store greater than 55 gallons, 500 pounds, or 200 cubic feet of hazardous materials for 30 days or more at any time throughout the course of the year, or projects that produce any amount of hazardous waste (DEH, 2024). Therefore, any future site development utilizing these quantities of hazardous materials, or generating any amount of hazardous waste, would be required to develop a Hazardous Materials Business Plan. This Hazardous Materials Business Plan would be reviewed and accepted by the DEH and would be submitted electronically to the California Environmental Reporting System (CERS). The HMBP would discuss all hazardous materials and waste potentially generated by a business. Approval of this plan would require a business to track and maintain hazardous material and waste volumes and would require regular reporting to CERS (DEH, 2024). This is a local requirement and is thus not included as a Mitigation Measure. Therefore, future site uses potentially facilitated by the Proposed Project would be subject to review and approval of hazardous material routine use, transport, and/or disposal.

Worker exposure to hazardous materials is regulated by the California Department of Industrial Relations, 42 Division of Occupational Safety and Health (Cal/OSHA) and requires worker safety protections. Cal/OSHA enforces hazard communication regulations that require worker training and hazard information (signage/postings) compliance. In addition, hazard communication compliance includes procedures for identifying and labeling hazardous substances, communicating information related to hazardous substances storage, handling, and transportation and preparation of health and safety plans to protect employees.

Therefore, as the Proposed Project would be required to comply with the above regulations, hazardous materials programs, and worker safety agencies, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and would not create a hazard to the public or the environment through reasonably foreseeable accidental conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

- c) **Finding:** The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. *Less than significant impact.*

Discussion: See discussion in Section 3.2.9 a) and b), above. Washington Elementary School is located approximately 0.22 miles west of the Project site. However, the Proposed Project does not propose to generate hazardous emissions or to handle hazardous or acutely hazardous materials, substances or waste. Any potential future site uses proposing to generate hazardous emissions or handle hazardous materials would require additional review and would be required to develop a HMBP, in accordance with CUPA and subject to the approval of the County's DEH. Therefore, impacts would be less than significant.

- d) **Finding:** The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. *No impact.*



Discussion: The Proposed Project site was not included on a list of hazardous materials sites pursuant to Government Code Section 65962.5, per the SWRCB's GeoTracker website (SWRCB Geotracker, 2024). Because the Proposed Project is not listed as a hazardous materials site, implementation of the Proposed Project would not create a significant hazard to the public or the environment. No impact would occur.

- e) Finding: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area. *No impact.*

Discussion: The Proposed Project Area is not located within an airport land use plan or within two miles of a public airport or public use airport. The closest airport is Murray Field Airport (KEKA), located approximately 2.05 air miles northeast of the property. Therefore, the Proposed Project would not result in a safety hazard for people residing or working in the Proposed Project Area. No impact would occur.

- f) Finding: The project would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. *Less than significant impact.*

Discussion: The Humboldt County Office of Emergency Services (OES) is the primary local coordination agency for emergencies and disasters impacting the site, and the County at large. The County of Humboldt has developed an Emergency Operations Plan, a guidance document which addresses the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and human-caused disasters in or affecting Humboldt County. Humboldt County OES provides a zone map for specific evacuation zones within the County. The site is located within zone EUR-E017, which encompasses the areas east of Harrison Avenue, south/southwest of Myrtle Avenue, and north of Manzanita Avenue (Zonehaven, 2024).

OES has authored numerous emergency response plans, including a Dam Failure Contingency Plan, Flood Contingency Plan, Local Assistance Center Plan, and a Tsunami Evacuation Plan. The site is not located within a Tsunami Zone, FEMA Flood Zone, or Dam Failure Inundation Zone, per Humboldt County Web GIS, and would not impact implementation of any authored emergency response plans from Humboldt OES. No other emergency response plans or emergency evacuation plans are known.

Any potential development facilitated by the Proposed Project would be required to comply with the "State Minimum Fire Safe Regulations," also known as Subchapter 2, which establish the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection (CAL FIRE) (14 C.C.R. §1270-1276.05) (2023). The State Minimum Fire Safe Regulations provides specific standards for roads providing ingress and egress, signing of streets and buildings, minimum water supply requirements, and setback distances for maintaining defensible space. The improvement plans for any potential development would be reviewed by the County to verify compliance with the State's Minimum Fire Safe Regulations which would ensure that adequate access for emergency response and evacuation is provided. This would occur during either future discretionary review from the Humboldt County Planning Department, or during review of building, grading, or demolition permits by the Humboldt County Building Department. In both cases, the Humboldt County Department of Public Works (DPW) would be a referral agency and would be required to find the proposed plans in compliance with the Fire Safe Regulations.

Furthermore, the site is located on Walford Avenue, off Harris Street in Eureka. Walford Avenue is a paved, county-maintained road with a centerline stripe. Harris Street is a designated Urban Principal Arterial Street, which provides the highest level of conventional street service to virtually all area traffic generators and is capable of handling large traffic volumes, per the Humboldt County General Plan (2017). It is anticipated that any residents, employees, or visitors onsite as part of a future development project facilitated by the Proposed Project, would have access to Harris Street and would thus be able to quickly evacuate in an emergency. As



such, this Proposed Project would not interfere with any emergency response or evacuation plan. Therefore, the Proposed Project would not impair the implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan, and a less than significant impact would occur.

- g) **Finding:** The project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to an urbanized area or where residences are intermixed with wildlands. *Less than significant impact.*

Discussion: Fire protection in Humboldt County is provided by local districts, cities, and CAL FIRE. CAL FIRE identifies fire hazard severity zones in State Responsibility Areas (SRA) throughout California. The project site is located within an SRA and within the Humboldt No. 1 Fire Protection District. According to Humboldt County Web GIS mapping (2024), the Proposed Project Area is located in an area of Moderate Fire Hazard Severity Zone within the SRA.

At this time, no specific development is proposed. The Proposed Project involves a Zone Reclassification, with no inherent risk of fire increase. For potential future site development facilitated by the Proposed Project, the risk of causing a wildfire would not be significant during construction and operation because the Proposed Project activities would comply with state and local requirements. Equipment would be “fire-safe,” i.e., operating under a fire safety plan and equipped with spark arrestors. The access road would be maintained in a state such that it is free of vegetation during times of activity. As required by fire code and the CBC, all proposed buildings onsite would be developed with fire suppression systems in accordance with local and state laws.

In addition, as described above, any potential onsite development facilitated by the Proposed Project would be required to comply with the State Minimum Fire Safe Regulations (14 C.C.R. §1270-1276.05) (2023), and, subsequently, the County’s Fire Safe Regulations. These regulations provide specific standards for roads allowing ingress and egress, signing of streets and buildings, minimum water supply requirements, and setback distances for maintaining defensible space. The building permit approval process for potential future site development would be subject to approval by the Humboldt County Building Department and the Humboldt County DPW to verify compliance with the State Minimum Fire Safe Regulations which would ensure that adequate access for emergency response and evacuation is provided.

Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. Potential impacts would be less than significant, and no mitigation would be necessary.

Mitigation Measures

None.



3.2.10. HYDROLOGY AND WATER QUALITY

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



Setting

The Proposed Project is on an approximately 10.32-acre parcel just outside of the City of Eureka boundary and within unincorporated Humboldt County. The parcel is currently developed with medical facilities and an associated parking lot. The area of existing impervious surface (buildings and parking lot) onsite is 1.08 acres. An area of 2.42 acres onsite was cleared from approved tree removal operation under a Less Than Three Acre Conservation (1-23EX-00096-HUM).

The Proposed Project is located in the Ryan Slough hydrological planning watershed of the Freshwater Creek Super Planning Watershed within the greater Eureka Plain Hydrologic Sub Area (Humboldt County Web GIS, 2024). The 141,160.81-acre Eureka Plain Planning Watershed (Humboldt County Web GIS, 2024) encompasses Jacoby, Freshwater, Salmon Creek, and Elk River watersheds that drain into Humboldt Bay. Within the Eureka Plain Unit is the Freshwater Creek HUC-12 Watershed, which is the second largest freshwater tributary to Humboldt Bay at just under 20,000 acres (NCRWQCB, 2018). Average annual precipitation for the project area is approximately 42 inches per year (PRISM, 2024). No Wild or Scenic Rivers exist close to the property.

The Eureka Plain Watershed is part of the North Coastal Water Basin, which is subject to the NCRWQCB North Coast Basin Plan (2018). The North Coast Basin Plan designates the Eureka Plain Hydrologic Units as having adequate water supply to meet currently projected requirements. The Plan describes Ruth Lake Reservoir, which provides municipal water to the Eureka area, as having enough storage to continue providing adequate storage capacity for current projected uses.

The Freshwater Creek Watershed is designated as “Impaired” per section 303(d) of the Clean Water Act, for excessive sediment and aluminum impairment according to the Waterbody Report by the Environmental Protection Agency (EPA) (2024). A waterbody that is impaired for a particular constituent or stressor requires the development of a Total Maximum Daily Load (TMDL), which is a pollution control plan for the waterbody and the associated constituent or stressor. The TMDL identifies the quantity of the constituent that can be safely assimilated by a waterbody without violating water quality standards. A TMDL for sediment in Freshwater Creek is under development by the NCRWQCB as of February 2024. The goal is to restore and maintain the sediment impaired beneficial uses of water of Freshwater Creek and its tributaries (NCRWQCB, 2024).

A gulch and associated intermittent Class II and ephemeral Class III flow southwest through the property, exiting the parcel and draining 2,300 feet downstream to Ryan Creek, a tributary of Humboldt Bay. The Humboldt County Streamside Management Area and Wetlands Ordinance (SMAWO) contains requirements for construction and land disturbance to be a certain distance away from watercourses (50 feet away from intermittent drainages, 100 feet away from perennial drainages) and wetlands (50 feet away from seasonal wetlands and 150 feet away from perennial wetlands).

No permanent stream crossings exist onsite. A Streambed Alteration Agreement (SAA) was issued under notification number EPIMS 40254 for the installation and removal of one Class III temporary crossing associated with the completed Less Than Three Acre Conversion Exemption by CAL FIRE, however, the temporary stream crossing was not installed. There are no stream crossing at the site.

The site is located within the Eureka Plain Groundwater Basin (Basin No. 1-009), per the Groundwater Basin Boundary Assessment Tool (California Department of Water Resources [DWR], 2019). The Eureka Plain Groundwater Basin covers approximately 58 square miles in and around the Humboldt Bay Area. As part of the Sustainable Groundwater Management Act (SGMA), the DWR prioritized 515 groundwater basins and subbasins in California as either high, medium, low, or very low based on eight components to determine which



basins are in overdraft and/or require groundwater management (DWR, 2024). The Eureka Plain Groundwater Basin is designated as a “Very Low” priority groundwater basin (DWR, 2019).

The site is within the MS4 General Permit Boundary of the Myrtle town Area. The LID standards are enumerated in the Humboldt Low Impact Development Stormwater Manual Version 3.0 (“Humboldt LID Manual”) (2021). The site is not within a mapped FEMA flood zone, a tsunami hazard zone, a seiche zone, an area at risk of mudflow, or an area at risk of inundation.

The site is connected to the Humboldt Community Services District for onsite wastewater treatment and drinking water. Humboldt CSD sources water from the Humboldt Bay Municipal Water District (HBMWD), which sources water primarily from Ruth Lake. Humboldt CSD sources approximately ¼ of their supply from CSD-owned wells located in the Eureka Plain Groundwater Basin.

Applicable Goals, Policies, and Standards in the Humboldt County General Plan Water Resource Element include the following:

- | | |
|-----------------------|---|
| Goal WR-G2 | Water Resource Habitat. River and stream habitat supporting the recovery and continued viability of wild, native salmonoid and other abundant coldwater fish populations supporting a thriving, commercial, sport and tribal fishery. |
| Policy WR-P10 | Erosion and Sediment Discharge. Ministerial and discretionary projects requiring a grading permit shall comply with performance standards adopted by ordinance and/or conditioned to minimize erosion and discharge of sediments into surface runoff, drainage systems, and water bodies consistent with the best management practices, adopted TMDLs, and non-point source regulatory standards. |
| Policy WR-P12 | Project Design. Development should be designed to complement and not detract from the function of rivers, streams, ponds, wetlands, and their setback areas. |
| Policy WR-P36 | Natural Stormwater Drainage Courses. Natural drainage courses, including ephemeral streams, shall be retained, and protected from development impacts which would alter the natural drainage courses, increase erosion or sedimentation, or have a significant adverse effect on flow rates or water quality. Natural vegetation within riparian and wetland protection zones shall be maintained to preserve natural drainage characteristics consistent with the Biological Resource policies. Stormwater discharges from outfalls, culverts, gutters, and other drainage control facilities that discharge into natural drainage courses shall be dissipated so that they make no significant contribution to additional erosion and, where feasible, are filtered are cleaned of pollutants. |
| Policy WR-P42 | Erosion and Sediment Control Measures. Incorporate appropriate erosion and sediment control measures into development design and improvements. |
| Standard WR-S6 | TMDLs Implementation. Discretionary development within watersheds containing impaired water bodies as defined under Section 303(d) of the federal Clean Water Act and governed by the TMDL implementation consistent with applicable TMDLs. |
| Standard WR-S7 | Erosion and Sediment Discharge. Ministerial and discretionary projects shall conform to grading ordinance standards for erosion and sediment control. |



Standard WR-S9 Projects in Proximity to Wild and Scenic Rivers. Projects located within state designated wild, scenic, or recreational river basins shall be consistent with the guidelines in the State Wild and Scenic Rivers Act as amended.

Analysis

- a) **Finding:** The project would not violate any water quality standards or waste discharge requirements. *Less than significant impact.*

Discussion: The Proposed Project is to remove the medical-only Q-zone overlay on the property, which would not directly violate any water quality standards or waste discharge requirements. Removal of the Q-zone would allow principally permitted uses in the R-4 zone to move forward onsite, potentially facilitating future onsite construction of a principally permitted use (e.g., residential). Future onsite construction facilitated by the Zone Reclassification could involve grading and excavation of the site, demolition of existing buildings, and construction of new building development (e.g., foundations, utility trenching, stormwater features, etc.).

This type of construction and operation of heavy equipment has the potential to disturb soil and pavement, which could be entrapped in stormwater and result in sediment discharged from the site. Stormwater may include debris, particulates, and petroleum hydrocarbons due to improper storage of materials. As part of the building permit process with the Humboldt County Building Department, the applicant would be required to obtain a Grading and Building Permit and develop an associated Erosion and Sediment Control Plan to address potential impacts to water quality from construction. This plan would detail Best Management Practices (BMPs) onsite, including erosion control and sediment prevention BMPs. BMPs are activities or measures determined to be practicable, acceptable to the public, and cost effective in preventing water pollution or reducing the amount of pollution generated by non-point sources.

New construction could only occur within the Potential Developable Area, which is located outside of all SMA buffers and away from watercourses, in compliance with the Humboldt County SMAWO (Appendix A1 – Site Plans, Sheet C2). No wetlands are located onsite (Appendix 2D).

If greater than one (1) acre of land disturbance were to occur, the site would be required to enroll in the SWRCB CGP (Order No. 2022-0057-DWQ). If required to obtain a Construction General Permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed. The SWPPP would document the stormwater dynamics at the site, the BMPs water quality protection measures that will be used during construction and post construction, and the frequency of inspections.

Additionally, the site is located within the MS4 General Permit Area and is thus subject to the SWRCB's General Permit requirements for post-construction, implemented through the Humboldt LID Manual Version 3. The requirements of the Humboldt LID Manual are mandatory components of the permitting process and are thus not included as a Mitigation Measure.

The Humboldt LID Manual requires different submittals for different types of projects, based on the type and scale of the project. The following requirements would apply to any potential future site development facilitated by the Proposed Project (refer to the Humboldt LID Manual for specifics):

- If a project creates or replaces less than 2,500 sq. ft. of impervious surface, the project is exempt from the program.
- If a project creates or replaces greater than 2,500 sq. ft. of impervious surface, but less than 5,000 sq. ft. of impervious surface, the project is designated as a "Small Project" and is required to submit a Stormwater Information Sheet, follow the instructions of Part B of the Manual, and develop a Small Project Stormwater



Control Plan (SCP). Humboldt County Department of Public Works (DPW) would need to review and sign off on the SCP.

- If a project creates or replaces greater than 5,000 sq. ft. of impervious surface, the project is designated as a “Regulated Project” and is required to submit a Stormwater Information Sheet, follow instructions of Part C of the Humboldt LID Manual, develop a Preliminary SCP, and develop a Final SCP. Humboldt County DPW would need to review and sign off on the SCP.
- If a project creates or replaces greater than one acre of impervious surface and creates a net increase in impervious surface, the project is designated as a “Hydromodification Project” and is required to submit a Stormwater Information Sheet, follow instructions of Part C, develop a Preliminary SCP, develop a Final SCP, and design stormwater features such that post-project runoff does not exceed estimated pre-project flow rate for the two-year, 24-hour precipitation event. Humboldt County DPW would need to review and sign off on the SCP.

The exact type of project (e.g., “Regulated Project” vs. “Hydromodification Project”) would be determined during the building permit phase. However, it is likely that a future residential project would replace greater than 5,000 sq. ft. of impervious surface and would therefore fall into the designation of “Hydromodification Project”, which would require development of an SCP. Humboldt County DPW would need to review and approve the SCP prior to the commencement of onsite development.

As the Proposed Project, and site development facilitated by the Proposed Project, would be required to comply with existing stormwater and waste discharge orders, the General Plan, and the Humboldt County Code, and would require development and approval of a SCP prior to project construction, the project would not violate water quality standards or waste discharge requirements. Therefore, impacts would be less than significant.

- b) Finding: The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. *Less than significant impact.*

Discussion: The site is located within the Eureka Plain Groundwater Basin, which is designated as a Low Priority Basin per the Sustainable Groundwater Management Act. The site is connected to an existing municipal water system through the Humboldt CSD. According to the CSD 2024 Annual Water Supply and Demand Assessment Report (AWSDAR), approximately $\frac{1}{4}$ of their water supply is sourced from groundwater wells within the Eureka Plain Groundwater Basin. Maximum potential supply from these wells is 730 acre-feet per year (AFY). However, current demand from the wells is less than 500 AFY. Furthermore, recharge to the Eureka Plain Groundwater Basin is estimated at 26,180 AF per year, while documented withdrawals are approximately 6,100 AFY (Humboldt CSD, 2024b). Therefore, the Proposed Project would not substantially decrease groundwater supplies.

Approximately 1.08 acres of the Potential Developable Area onsite is already developed with impermeable surfaces. Potential site development facilitated by the Proposed Project could increase onsite impermeable surface area within the Potential Developable Area. However, no significant impact to groundwater recharge from infiltration would take place because the total area of impervious surfaces at the Site would either remain roughly the same or decrease as the result of implementation of LID features associated with a required post-construction SCP. As a result, the Proposed Project would not decrease water supplies, interfere with groundwater recharge, or impede sustainable groundwater management of the basin. A less than significant impact would occur.

- c. i) Finding: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off- site. *Less than significant impact.*



Discussion: Any onsite development would occur outside of SMAs within the Potential Developable Area, which is located greater than 100 feet from perennial watercourses and 50 feet from intermittent watercourses (Appendix 1A – Site Plans, Sheet C2). No wetlands are located onsite (Appendix 2D).

Approximately 1.08 acres of the Potential Developable Area onsite is already developed with impermeable surfaces. Potential site development facilitated by the Proposed Project could increase onsite impermeable surface area within the Potential Developable Area. The Potential Developable Area is 3.5 acres. Additional impermeable surface could be added to the site, however, site impervious surfaces would either remain roughly the same or decrease as the result of implementation of LID features associated with a required post-construction SCP. Humboldt County DPW would be required to sign off on stormwater treatment and LID features onsite, prior to commencement of construction.

In addition, a Grading Plan and associated Erosion and Sediment Control Plan would be required to be obtained through the Humboldt County Building Department, which would detail onsite BMPs to prohibit impacts to onsite watercourses.

With creation, approval, and implementation of a post-construction SCP through DPW and a Grading Plan / Erosion and Sediment Control Plan with the Building Department, adherence to the Humboldt County General Plan standards and SMAWO, compliance with SWRCB CGP, and implementation of a SWPPP, the Proposed Project, and future onsite development facilitated by the Proposed Project, would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant, and no mitigation would be necessary.

- c. ii) Finding: The project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. *Less than significant impact.*

Discussion: The site is not located within a mapped FEMA Flood Hazard Zone. Development of the site would likely trigger the need for a post-construction SCP and implementation of onsite stormwater treatment through LID standards, described above, per MS4 General Permit requirements. Any increased runoff from the addition of impervious surface would be required to be reviewed and signed off on by the County during the MS4 permitting process. With adherence to the MS4 General Permit Requirements, implementation of operating restrictions, and compliance with SWRCB CGP and development of an onsite SWPPP, the Proposed Project and future site development facilitated by the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant.

- c. iii) Finding: The project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. *Less than significant impact.*

Discussion: See discussion in subsections a), c.i), and c.ii), above. The site is not connected to a municipal storm drainage system. Site disturbance and development would be required to obtain Building Permits, complete with an Erosion and Sediment Control Plan, from the County of Humboldt and would be required to comply with the Humboldt LID Manual. A post-construction SCP, as described in the Humboldt County LID Stormwater Manual, would be required. Humboldt County DPW would need to approve and sign off on the proposed SCP prior to construction or site disturbance. With adherence to the MS4 General Permit Requirements, implementation of operating restrictions, and compliance with SWRCB Construction General Permit and development of an onsite SWPPP, the Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor would it provide substantial additional sources of polluted runoff. A less than significant impact would occur.



- c. iv) **Finding:** The project would not impede or redirect flood flows. *No impact.*

Discussion: The site is not located within a mapped FEMA Flood Hazard Zone or in an area prone to inundation. Therefore, the Proposed Project would not impede or redirect flood flows. No impact would occur.

- d) **Finding:** The project would not in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation. *No impact.*

Discussion: The site is not located in a flood hazard, tsunami, seiche zone, or an area at risk of inundation. Therefore, the Proposed Project would not increase the risk of pollutants due to project inundation within those areas. No impact would occur.

- e) **Finding:** The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. *Less than significant impact.*

Discussion: The Proposed Project is located within the Eureka Plain Groundwater Basin, a “Low Priority Basin” as designated by state law. This Basin is not subject to a Sustainable Groundwater Management Plan. See also discussions under subsections a) – d), above. In addition, the site is located in the Eureka Plain Watershed, which is part of the North Coastal Water Basin. The North Coast Water Basin is subject to the NCRWQCB’s North Coast Basin Plan (2018). The Proposed Project does not conflict with this Basin Plan. If greater than one (1) acre of land disturbance were to occur, the site would be required to enroll in the SWRCB CGP (Order No. 2022-0057-DWQ). If required to obtain a Construction General Permit, a Stormwater Pollution Prevention Plan (SWPPP) would be developed. The SWPPP documents stormwater dynamics at the site and BMP water quality protection measures that would be used during construction and post-construction. Additionally, the site is located within an MS4 General Permit Area, and any designated project would be required to implement a post-construction SCP to address water quality and avoid impacts to groundwater and stormwater. Therefore, the Proposed Project, and potential future site redevelopment, would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management Plan. Impacts would be less than significant.

Mitigation Measures

None.



3.2.11. LAND USE AND PLANNING

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with the jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Setting

The Proposed Project is a Zone Reclassification and text amendment to the General Plan to remove the Qualifying Zone from the Proposed Project site that restricts onsite use to medical uses only.

Within Humboldt County, applicable land use plans and policies to the Proposed Project include the Humboldt County General Plan, the Humboldt County Code, the Humboldt County Housing Element, and any applicable Community Plans, described in further detail below. Other applicable plans and policies include the Humboldt County Draft Regional Climate Action Plan (2024), the HCAOG 20-Year Regional Transportation Plan (RTP) (2021 Update), the HCAOG Regional Bicycle Plan Update (2018), and the NCUQMD Particulate Matter (PM₁₀) Draft Attainment Plan (1995).

Humboldt County General Plan: All jurisdictions located within the State of California are required to adopt and maintain a “General Plan”, which acts as a long-term planning blueprint for land use development within the County’s jurisdiction. General Plans typically include city-wide goals and specific policies and programs to implement those goals. A jurisdiction’s General Plan often analyzes distinct categories, divided into “elements” (e.g., Land Use, Housing, Health, and Safety, etc.), which can be updated independently of one another, as needed, to provide flexibility and adaptivity to changing social, economic, or climate conditions facing a jurisdiction. Land use changes and development projects, including subdivisions, Zone Reclassifications, property improvements, are subject to conformance with the General Plan. Humboldt County adopted their most recent General Plan on October 23, 2017. The previous General Plan was the Humboldt County Framework Plan, which was last amended in 1998.

Humboldt County Code: From the General Plan, a jurisdiction develops a code to implement development standards, parking requirements, zoning classifications, etc. In Humboldt County, the zoning code to implement the General Plan is called the Humboldt County Code (HCC). The County is currently in the process of revising zoning classifications to reflect the 2019 General Plan updates.

Humboldt County Housing Element & RHNA Allocation: A jurisdiction’s Housing Element is one of the required elements within the General Plan. Although the Housing Element is a component of the General Plan,



it gets updated on a different and more frequent timeline. The Housing Element is designed to achieve State-mandated housing objectives, including identifying adequate sites for a range of housing opportunities, assisting in the development of adequate and affordable housing, addressing constraints to meeting the County’s housing needs, conserving and improving the condition of housing, and promoting housing opportunities for all persons. The County’s Housing Element, which includes housing-related goals, policies, and standards in the County from 2019 through 2027, was most recently updated in 2019. The County’s Housing Element was adopted by the Board of Supervisors on August 20, 2019. On October 23, 2019, the California Department of Housing and Community Development (HCD) certified the Housing Element.

Within the State of California, a city or county’s share of regional housing needs is determined by the Regional Housing Needs Assessment (RHNA) process. Per the most recent RHNA process for the Humboldt region, the County of Humboldt has been allocated a share of 1,413 additional new housing units prior to 2027 (2019 Humboldt County Regional Housing Needs Assessment Plan, 2019). The Technical Appendix of the Housing Element describes, in detail, potential development sites to support the County of Humboldt in meeting its RHNA allocation in its Residential Land Inventory. Although the Proposed Project site is located within an HOZ, the project APN was not considered as a site for residential growth in the Residential Land Inventory to support the County’s RHNA allocation, likely due to its existing prohibitive medical-restriction Qualifying Zone.

Relevant goals policies to the Proposed Project, from the Humboldt County General Plan, specific to the Land Use Element, the 2019 Housing Element, and the Eureka Community Plan include the following:

- Goal GP-G1** **Land Inventory and Service Availability.** An adequate supply of vacant land with readily available urban services to accommodate a wide variety of industrial, commercial, and residential development opportunities necessary for growth.
- Goal GP-G2** **Community Planning Areas.** Sufficient development emphasis and public investment in Urban Development Areas to create expanding commerce and housing opportunities, economically viable urban services and conservation of open space and resource lands.
- Goal UL-G1** **Urban Development Areas.** Urban Development Areas serving as centers of business expansion, residential growth and public investments in infrastructure and services.
- Goal H-G1** **Housing Production.** Regulatory policies, practices and financial incentives that promote the creation of affordable housing, protect the public health, safety, and welfare, promote clear development requirements, advance equity, minimize the environmental impacts of housing development and reflect the goals and priorities of this Plan.
- Policy H-P4** **Maintenance of an Adequate Supply of Residential Land.** The County shall maintain an adequate supply of residentially zoned land to accommodate projected housing needs for all income categories and special needs populations throughout the Housing Element planning period.
- Policy H-P5** **Maintaining an Adequate Land Inventory.** Unless written findings are made pursuant to Government Code Section 65863 et seq. supported by substantial evidence, the County shall not allow a reduction in residential units in the residential land inventory below that specified in the current Regional Housing Need Allocation (RHNA).



Policy H-P17 **Promote Infill, Reuse and Redevelopment.** The County shall promote infill, re-use, and redevelopment of vacant and under-developed land within Urban Development Areas and Housing Opportunity Zones as a strategy to create affordable housing, provide an economic stimulus and re-vitalize community investment.

Policy H-P18 **Housing Opportunity Zones.** The County shall continue to stimulate residential and infrastructure development within Housing Opportunity Zones. The County shall review and consider the expansion of or the addition of new Housing Opportunity Zones, as needed and where appropriate.

Eureka Community Plan: Community Planning Areas (CPAs) have been designated in various areas of the County to allow for more precise mapping and application of Plan policies. The Proposed Project Site is located within the Eureka CPA. The Eureka Community Plan was developed on April 25, 1995, and incorporated by reference into the Humboldt County General Plan. Applicable goals and policies of the Eureka Community Plan (1995) Land Use Element equivalent (titled Urban Land Use in the CPA) include the following: to concentrate new development around existing public services and improvements, to protect the area's numerous drainage gulches (greenway/open space areas) while providing for development along hillside terrain, to ensure that new development will be provided with adequate infrastructure and services. Applicable Policies include the following

Goal 4220 (A) **Roadway Network.** To provide a circulation system that accommodates existing and planned land uses and provides for an efficient movement of people, goods, and services within the Planning Area.

Policy 4220 (1) **Maintain a Level of Service of C or better on arterials in the Planning Area.** The County shall strive to maintain an acceptable level of service goal to be consistent with the financial resources available and the limits of technical feasibility.

The Proposed Project is located off Walford Avenue in Eureka, CA, within the Humboldt County jurisdiction. The Project site is developed with existing medical facilities, and associated parking and landscaping. The remainder of the property is forested. The property is zoned Apartment Professional (R-4*-Q) and has a General Plan land use designation of Residential Medium Density (RM). Surrounding properties are zoned Neighborhood Commercial (C-1) and Residential One-Family (R-1). Surrounding land use designations adjacent to the property are Commercial (CG) and Residential Low Density (RL 1-7). The Proposed Project site is located within a Housing Opportunity Zone (HOZ), or within an area found by the County to be suitable for future development due to its existing or potential connection to public water and sewer systems. The Project site is located within the Eureka Community Planning Area (CPA). **Analysis**

- a) **Finding:** The project would not physically divide an established community. *No Impact.*

Discussion: The Proposed Project involves removal of a Qualifying Zone currently restricting property uses to medical uses only. The Project does not propose any change to the principal zone (R-4) or the General Plan land use designation (RM). No component of the Proposed Project would physically divide an established community, and no impact would occur.

- b) **Finding:** The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. *Less than significant impact.*



Discussion: The Proposed Project includes a text amendment to the Eureka Community Plan, which is embedded into the Humboldt County General Plan. The text amendment would remove language about the medical-only Q-zone that currently overlays the site. The Proposed Project would change the principal zoning of Apartment Professional (R-4*) to add a B-1 combining zone consistent with the draft General Plan Update zoning recommendation to reflect the Eureka Community Plan language, resulting in a R-4 B-1 zone. The proposed project would not change the General Plan land use designation of Residential Medium Density (RM).

The Residential Medium Density (RM) designation is used in areas with full urban services and where common-walled units and apartments are appropriate, including duplexes, townhouses, and apartments and manufactured home park developments. See Figure 18 for a list of allowable land use types under the RM designation. Additionally, the Apartment Professional (R-4) zone allows multi-family residential projects (see Figure 7 in the Project Description for a full list of principally permitted uses within the R-4 zone). Therefore, a multi-family residential development project would be a compatible land use for the site's existing zoning and General plan if the Q-zone were removed.

Table 4-B Residential Land Use Designations				
Allowable Use Types	RM	RL	RE	RA
Residential				
Single Family Residential	X	X	X	X
Accessory Dwelling Unit	X	X	X	X
Multi-Family Residential	X	X		
Manufactured Home Parks	X	X		
Guest House		X	X	X
Group Residential	X			
Planned Developments	X	X	X	X
Emergency Shelter	X			
Transitional Housing	X			
Residential Accessory Uses ¹	X	X	X	X
Other				
Cottage Industry	X	X	X	X
Bed & Breakfast Inns	X	X	X	X
Community Assembly	X	X	X	X
Neighborhood Commercial	X	X	X	X
Non-Commercial Recreation	X	X	X	X
Office and Professional	X			
Private Institution	X	X	X	
General Agriculture			X	X
Intensive Agriculture			X	X
Stables & Kennels			X	X
Timber Production			X	X
Fish & Wildlife Management	X	X	X	X
Essential Services	X	X	X	X
Similar Compatible Uses	X	X	X	X
Development Standards				
Density Range	7 to 30 units per acre, as specified on map	1-8 units per acre, as specified on map	1 to 5 acres per unit, as specified on map	5 to 160 acres per unit, as specified on map
Max. Floor Area Ratio	1.00	0.40	0.20	0.10
Additional Provisions	per zoning	per zoning	per zoning	per zoning
¹ Residential Accessory Uses include Community Care Facilities, Family Day Care Center, and Family Day Care Home. ² Coastal: - The coastal RE & RL designations allow neighborhood commercial, private institution, private recreation - The coastal RM designation allows duplexes, guest houses, hotels & motels, private institution				

Figure 18: Residential Land Use Designations (Source: Humboldt County General Plan, 2017)

Approval of the Proposed Project could allow for development of multi-family residential and other residential uses onsite. In the Residential Build-Out Scenario, a maximum of 105 units could be constructed onsite. This could account for additional units toward the County's RHNA numbers that were previously unconsidered



during the County's Housing Element Residential Land Inventory. These additional units would not be possible with the current Q-zone overlay, and would help to support the County's Housing Element and Land Use Element policies regarding fulfillment of the County's RHNA units.

As listed above, the County's Land Use Element of the General Plan contains goals, policies, and standards that relate to land use and planning. The site is currently developed with medical offices, and is restricted to development of additional medical offices only by the Q-zone Combining Zone Overlay. No other development (e.g., housing, commercial, mixed-use, etc.) could be proposed onsite with the current zoning. Therefore, the Proposed Project would increase the potential types of projects that could be developed onsite, in support of Goal GP-G1. Specifically, the Proposed Project could increase residential opportunities onsite, in support of Goal H-G1, Policy H-P4, and Policy H-P5. The site is located within an Urban Development Area and within a Housing Opportunity Zone, both of which are areas specifically encouraged for residential growth (Goal UL-G1 and Policy H-P18) and is also infill development located in close proximity to transit stops, existing residences, and commercial development (Policy H-P17). Therefore, the Proposed Project would support the goals and policies of the County's General Plan.

Additionally, the Project is within the Eureka Community Plan Area. The Proposed Project would be consistent with the goals and policies of the Eureka Community Plan Land Use Element Equivalent (titled Urban Land Use in the 1995 document) by concentrating new development around existing development (e.g., promoting infill development) and by ensuring that all onsite development would be set back appropriately from nearby streams, therefore protecting the area's gulches and greenways while still promoting necessary development to keep the surrounding community vibrant and economically productive.

The ECP also references Level-of-Service (LOS) standards within the Public Services and Facilities chapter. As part of recent commercial redevelopment in the area (the Safeway project), a traffic signal was recently installed at the intersection of Walford Avenue and Harris Street to address potential traffic impacts. The signals at Walford and Harrison still serve to effectively mitigate localized LOS concerns linked to development in this area. Further, traffic volume estimates for maximum build-out under the medical offices scenario suggests a maximum of 1400 daily trips whereas build-out under the residential scenario would create over 50% less new traffic (632 trips). This shows that the proposed zoning change would create the potential for considerably lower traffic volumes than what would otherwise be possible with ministerial development, such as build-out with principally permitted medical offices. It is reasonable to conclude that the proposed zoning change would not add traffic volumes resulting in changes to LOS conditions in excess of those already anticipated under the Eureka Community Plan.

The analysis contained in this document addressed the potential conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Proposed Project adopted for the purpose of avoiding or mitigating an environmental effect including, but not limited to, the Eureka Community Plan, Humboldt County General Plan and County Code, the Humboldt County Draft Climate Action Plan (2024), the HCAOG 20-Year Regional Transportation Plan (2021 Update), the HCAOG Regional Bicycle Plan Update (2018), and the NCUQMD Particulate Matter (PM₁₀) Draft Attainment Plan (1995). As discussed throughout this document, the Proposed Project would not conflict with any goals, policies, or objectives in the Humboldt County General Plan intended to mitigate potential environmental impacts. In instances where potentially significant impacts have been identified, mitigation has been incorporated to reduce each impact to less than significant levels.



Therefore, based on the analysis conducted in this document, it was determined that the Proposed Project was not in conflict with any adopted land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. A less than significant impact would occur.

Mitigation Measures

None.



3.2.12. MINERAL RESOURCES

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan, or other land use plan?	☐	☐	☐	☒

Setting

The mineral resource production in Humboldt County is primarily limited to sand, gravel, and other base aggregate. The State Surface Mining and Reclamation Act (SMARA) of 1975 is a State policy for the reclamation of mineral lands. The County of Humboldt Web GIS Portal includes parcels containing mineral resources as reported by SMARA. The Proposed Project site is not designated as containing mineral resources. No historical mining is known to have occurred on the property.

No known mining parcels are located near the Project Site. Surrounding properties are zoned Neighborhood Commercial (C-1) and Residential One-Family (R-1), and surrounding land use designations adjacent to the property are Commercial (CG) and Residential Low Density (RL 1-7).

Analysis

- a) Finding: The project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. *No impact.*

Discussion: The Proposed Project site does not include any lands that are classified as MRZ-2 or any known locally important mineral resources. The Proposed Project site is not within any mining operations, and no mining operations are nearby. The Zone Reclassification would not impact the availability of a known mineral resource. No impact would occur.

- b) Finding: The Proposed Project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. *Less than Significant Impact.*

Discussion: The Proposed Project site does not include any lands that are classified as MRZ-2 or any known locally important mineral resources. The Proposed Project site is not delineated on a local general plan, specific



plan, or other land use plan displaying a locally available mineral resource recovery site. Therefore, the Proposed Project would not impact mineral resources, and no impact would occur.

Mitigation Measures

None.



3.2.13. NOISE

Would the Project result in:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or ground-borne noise levels?	☐	☒	☐	☐
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?	☐	☐	☐	☒

Setting

The property is built-out with existing medical offices and an associated parking lot is in the north portion of the Project parcel. The remainder of the property is undeveloped or forested land (Figure 3). The Project site is within the unincorporated Humboldt County just outside of the City of Eureka boundary. The site is located at the end of Walford Ave, which is accessed by Harris Street. The Project site is surrounded by residential, commercial, and medical uses, including single-family homes, senior care facilities, and medical buildings. The site is at the end of Walford Ave, which is accessed by Harris Street. If the Proposed Project is approved, noise at the site would increase from construction and operational activities for either the Residential Scenario or Medical Scenario build-out when compared to the existing use.

The noise standards in the Humboldt County General Plan are based on the Community Noise Equivalent Level (CNEL), which is a measure that describes average noise exposure over a period of time (Humboldt County General Plan, 2017). Because communities are more sensitive to impacts from nighttime noise, noise descriptors must specifically take this time period into account. Common measures include the CNEL and the Day-Night Average Level (Ldn). Both reflect noise exposure over an average day, with greater weight given to noise occurring during the evening and night. The two descriptors are roughly equivalent, but CNEL is used in the General Plan for regulating cumulative noise exposure over a 24-hour period.

Per Policy N-S1 (see below) the Land Use/Noise Compatibility Standards, Table 13-C, shall be used as a guide to ensure compatibility of land uses. Development may occur in areas identified as “normally unacceptable” if mitigation measures can reduce indoor noise levels to “Maximum Interior Noise Levels” and outdoor noise levels to the maximum “Normally Acceptable” value for the given Land Use Category. According to Table 13-



C (Land Use/Noise Compatibility Standards) in the Humboldt County General Plan, normally acceptable noise levels go up to 60 dB in a Residential land use category for R-4 zoned properties (Figure 19).

According to the General Plan, a standard construction wood frame house reduces noise transmission by 15 dB. Interior noise levels for residences are not to exceed 45 dB. Therefore, the maximum exterior noise level for residences is 60 dB without requiring additional insulation. In areas where CNEL noise levels exceed 60 dB, the need for additional noise insulation would vary depending on the land use designation; adjacent uses; distance-to-noise source; and intervening topography, vegetation, and other buffers (Humboldt County General Plan, 2017).

Table 13-C Land Use / Noise Compatibility Standards



CLEARLY ACCEPTABLE NORMALLY ACCEPTABLE NORMALLY UNACCEPTABLE CLEARLY UNACCEPTABLE

LAND USE INTERPRETATION FOR
CNEL (or Ldn) VALUE

LAND USE CATEGORY	Maximum Interior Noise Levels*	50 – 60	61 – 70	71 – 80	81 – 90	91+
Residential Single Family, Duplex, Mobile Homes	45					
Residential Multiple Family, Dormitories, etc.	45					
Transient Lodging	45					
School Classrooms, Libraries, Churches	45					
Hospitals, Nursing Homes	45					
Auditoriums, Concert Halls, Music Shells	35					
Sports Arenas, Outdoor Spectator Sports						
Playgrounds, Neighborhood Parks						
Golf Courses, Riding Stables, Water Rec., Cemeteries						

Figure 19: Noise Compatibility Standards (Source: Humboldt County General Plan, 2017)

Relevant policies and standards to the Proposed Project from the Humboldt County General Plan specific to the Noise Element include the following:

Policy N-P1

Minimize Noise from Stationary and Mobile Sources. Minimize stationary noise sources and noise emanating from temporary activities by applying appropriate standards for average and short-term noise levels during permit review and subsequent monitoring.

Policy N-P2

Guide to Land Use Planning. Evaluate current noise levels and mitigate projected noise levels when making community planning and zoning decisions to minimize the exposure of community planning and zoning decisions to minimize the exposure of community residents to nuisance noise levels. Minimize vehicular and aircraft noise exposure by planning land uses compatible with transportation corridors and airports, and applying noise attenuation designs and construction standards. Avoid zoning patterns that permit people to “move to the nuisance” unless mitigated through project conditions or recorded notice.



- Policy N-P4** **Protection from Excessive Noise.** Protect persons from existing or future excessive levels of noise which interfere with sleep, communication, relaxation, health, or legally permitted use of property.
- Standard N-S1** **Land Use/Noise Compatibility Matrix.** The Land Use/Noise Compatibility Standards (Table 13-C) shall be used as a guide to ensure compatibility of land uses. Development may occur in areas identified as “normally unacceptable” if mitigation measures can reduce indoor noise levels to “Maximum Interior Noise Levels” and outdoor noise levels to the maximum “Normally Acceptable” value for the given Land Use Category.
- Standard N-S5** **Noise Standards for Habitable Rooms.** Noise reduction shall be required as necessary in new development to achieve a maximum of 45 CNEL (Community Noise Equivalent Level) interior noise levels in all habitable rooms per California building standards.
- Standard N-S7** **Short-term Noise Performance Standards (Lmax).** The following noise standards, unless otherwise specifically indicated, shall apply to all property within their assigned noise zones and such standards shall constitute the maximum permissible noise level within the respective zones.

SHORT-TERM NOISE STANDARDS (Lmax)		
Zoning Classification	Day (maximum)	Night (maximum)
	6:00 a.m. to 10:00 p.m.	10:00 p.m. to 6:00 a.m.
	dBA	dBA
MG, MC, AE, TPZ, TC, AG, FP, FR, MH	80	70
CN, MB, ML, RRA, CG, CR	75	65
C-1, C-2, C-3,		
RM, R-3, R-4	65	60
RS, R-1, R-2, NR	65	60

Figure 20: Standard N-S7 - Short-Term Noise Standards for Zoning Classifications (Source: Humboldt County General Plan Noise Element, 2017)

Analysis

- a) **Finding:** The project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. *Less than significant impact with mitigation incorporated.*

Discussion: The Proposed Project is to remove the medical-only Qualifying Zone overlaying the property and a General Plan text amendment to remove the Q-zone provision in Section 2620.15 of the Eureka Community Plan, a supplement to the policies of the General Plan. The Project would not change the principal zoning of R-4 or General Plan land use designation of RM. Construction and operation of the any future site development facilitated by the Proposed Project (e.g., the Residential Build-Out Scenario) would have the potential to generate noise and noise impacts.

Table 13-A in the County General Plan lists an inventory of prominent noise sources for unincorporated areas of the county. For the community of Eureka, the prominent stationary sources of noise are from U.S. 101, Myrtle Ave., Harris, Henderson, & H. Street for roads and Redwood Acres. The Proposed Project is about 0.4



miles from Redwood Acres Fairgrounds and 0.08 miles from Harris Street, signifying that the project site is susceptible to existing stationary noise sources. Per the General Plan, and medical office developments are both typically considered to be noise-sensitive land uses, as opposed to land uses that generate significant noise levels.

Construction activities associated with potential future site development facilitated by the Proposed Project would result in a temporary increase in noise levels in the area. Noise impacts from construction would include the sound of machinery and equipment, potential drilling for foundations and/or utility trenching, noise from construction vehicular traffic, and various tools, generators, etc., as needed. Noise impacts from construction would be temporary. It is unknown at this time exactly what construction activities would occur onsite in the future, however, they would be required to follow the short-term noise standards listed in Standard N-S7 of the General Plan (Figure 20). For onsite construction, the maximum short-term day (6:00 AM to 10:00 PM) noise standard for RM land uses is 65 dBA. The maximum short-term night (10:00 PM to 6:00 AM) noise standard for RM land uses is 60 dBA (Figure 20).

To ensure impacts on nearby residents and senior care facilities are less than significant, **Mitigation Measure NOI-1** has been incorporated. Mitigation Measure NOI-1 further restricts construction activities with heavy equipment to between the hours of 8 a.m. and 5 p.m. on Mondays through Fridays, the hours of 9 a.m. to 5 p.m. on Saturdays, and no construction on Sundays and holidays. In addition, construction noise would be mitigated by the provisions within **Mitigation Measure AQ-1**, which reduces idling times for equipment to a maximum of 5 minutes.

Per Humboldt County General Plan Chapter 13, noise impacts for new development projects should be based on a comparison of the noise compatibility standards provided Table 13-C of the General Plan (Figure 19). Clearly acceptable CNEL levels, per Table 13-C of the General Plan, for residential land uses are CNEL of 50 dB to 60 dB. Clearly acceptable noise exposure is defined in the General Plan as “the noise exposure is such that the activities associated with the land use may be carried out with essentially no interference. (Residential areas: both indoor and outdoor noise environments are pleasant).” Any future site development – residential, medical, or otherwise – would be required to meet these noise standards. As this is already a requirement, no mitigation would be necessary.

Future site development would be in compliance with the policies and goals of the Noise Element of the General Plan. As described above, noise would be minimized onsite from stationary and mobile sources by reducing equipment idling and by adhering to the short-term noise levels during construction, consistent with Policy N-P1 and Standards N-S7. Any future development would be required to generate noise at levels under those listed in the noise compatibility levels of Table 13-C of the Noise Element, consistent with Policy N-P4 and Standards N-S1 and N-S5. In addition, the project site is located in an area near existing residences and mixed-use development, and the Proposed Project would not facilitate people moving to excessively noisy areas incompatible with existing planning and zoning decisions, consistent with Policy N-P2.

Therefore, potential future site development facilitated by the Proposed Project would not expose persons to or result in the generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standard of other agencies. Impacts would be less than significant with Mitigation Measure NOI-1 and Mitigation Measure AQ-1 incorporated.

- b) **Finding:** The Proposed Project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels. *Less than significant impact with mitigation incorporated.*

Discussion: The Project proposal to remove the medical-only Qualifying Zone overlay would not expose persons to or generate excessive groundborne vibration or groundborne noise levels. Groundborne vibration and noise levels may result from construction machinery and equipment facilitated by approval of the Proposed



Project. Groundborne vibrations or groundborne noise levels would be short in duration and would occur during daytime hours.

Per Caltrans' 2020 Transportation and Construction Vibration Guidance Manual, 0.7 inches per second Peak Particle Velocity (PPV) of vibration is considered "disturbing". It is not anticipated that vibrations would exceed this threshold. Per the Caltrans Vibration Guidance Manual, a study by the Federal Transportation Administration in 2018 quantified the PPV a person would experience at 25 feet from the source: Vibratory roller – 0.210 PPV, Large bulldozer – 0.089 PPV, Jackhammer – 0.035 PPV. The use of jackhammers, bulldozers, and vibratory rollers may be required during construction, but they would be temporary. Construction activities would be required to adhere to the short-term noise standards of the General Plan (Figure 20) and would further be mitigated by **Mitigation Measures NOI-1**. With the incorporation of Mitigation Measure NOI-1, the Proposed Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant with mitigation incorporated.

- c) **Finding:** The project would not, 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, expose people residing or working in the project area to excessive noise levels. *No impact.*

Discussion: The Proposed Project Area is not in the vicinity of a private airstrip, airport land use plan, or within two miles of a public airport or public use airport. The closest airport is the Murray Field Airport (KEKA), located approximately 2.1 air miles northeast of the property. However, the Proposed Project is within an area already developed with similar facilities including medical offices and residential. Therefore, the Proposed Project would not expose people residing or working in the Proposed Project Area to excessive noise levels. No impacts would occur, and no mitigation would be necessary.

Mitigation Measures

Implement Mitigation Measures AQ-1 and NOI-1

NOI-1. The operation of tools and equipment used in association with any future construction, repair, alteration, or demolition at the site shall be limited to between the hours of 8 a.m. and 5 p.m., Monday through Friday, and between the hours of 9 a.m. and 5 p.m. on Saturdays, unless further restricted by any required permit. In addition, no heavy equipment-related construction activities shall be allowed on Sundays or on holidays.



3.2.14. POPULATION AND HOUSING

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

Setting

The Proposed Project site is located within the unincorporated area of Humboldt County, within the developed area of Eureka, just outside of City limits. The 10.32-acre site is located near existing single-family residential homes, commercial businesses, senior care facilities, and medical facilities. The site is accessed from Walford Avenue, off Harris Street. The site is currently developed with medical facilities and associated parking, and is connected to existing power, water, and wastewater facilities.

The Proposed Project involves a Zone Reclassification to remove a medical-only Q-Zone overlay from the site. The Proposed Project would change the zone from Qualified Apartment Professional (R-4-Q) to Apartment Professional (R-4). The Proposed Project also involves a General Plan text amendment to remove language surrounding the Qualifying Zone from the Eureka Community Plan, a subset of the Humboldt County General Plan. The Proposed Project would not alter the principal zone of Apartment Professional (R-4) or the General Plan land use designation of Residential Medium Density (RM).

Humboldt County is a rural county with a large land area and low population density. The 2020 Census reported the county’s population to be 136,463, which represents an increase of 1,840 over the population reported in the 2010 census (US Census Bureau, 2024). Approximately 53% of the population of Humboldt County lives within the unincorporated area of the County (Housing Element Appendix, 2019). Humboldt County has a demonstrated need for additional housing (Housing Element Appendix, 2019).

Between 1985 and 1990, the County grew by about 8,000 people (7.3 percent), representing an average annual increase of 1.4 percent. The current annual growth rate is about 0.6 percent. California Department of Finance projections indicate an anticipated average annual growth of 0.41 percent over the next 20 years which is lower than the 0.80 percent annual growth experienced in the past 30 years (Humboldt County GP Land Use Element, 2017).

Analysis

- a) Finding: The Proposed Project would not induce substantial 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). *Less than significant impact.*

Discussion: Growth inducing impacts are generally caused by projects that have a direct or indirect effect on economic growth, population growth, or when the project taxes community service facilities which require upgrades beyond the existing remaining capacity. The site is already connected to service facilities, including water, sewer, and wastewater. No new infrastructure or road extensions are proposed or needed at this time; future potential new infrastructure or road extensions would require additional discretionary review.

Approval of the Proposed Project could allow housing to be built onsite, as described in the “Residential Build-Out Scenario” in the Project Description. In this hypothetical scenario, which reflects a concept of the “maximum” build-out the site could be developed with, accounting for the principal zoning, design constraints, density, FAR, and other factors, approximately 105 units of housing could be constructed onsite under a potential future development project if the Proposed Project were to be approved. Of those 105 units, 52 would be estimated to be one-bedroom (1-BR) units, and 53 would be estimated to be two-bedroom (2-BR) units.

Between 1985 and 1990, the County grew by about 8,000 people (7.3%), representing an average annual increase of 1.4%. The California Department of Finance projections indicate an anticipated average annual growth of 0.41 percent over the next 20 years, lower than the 0.80 percent annual growth experienced in the past 30 years (Humboldt County Land Use Element, 2017). Based on Humboldt County’s household size in 2018 of 2.29 persons per household per the 2019 Housing Element Technical Appendix, 105 units would equate to 240 residents. Approximately 240 residents, which is likely a high estimate, represents less than 0.2% of the County’s population and would not represent significant population growth in the County. This is assuming that all new residents would come from outside of the County, which is highly unlikely considering the demonstrated need for housing in Humboldt County.

The site is connected to existing public services, and potential future residential development of the site facilitated by the Proposed Project would not significantly increase population growth. Therefore, the Proposed Project would not induce substantial population growth in the area either directly or indirectly, and impacts would be less than significant.

- b) Finding: The project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. *No Impact.*

Discussion: The Proposed Project would not displace people or existing housing. The Proposed Project is a Zone Reclassification to remove a medical-only Qualifying Zone restriction from the site, potentially allowing for the addition of future housing. Therefore, the Proposed Project would not displace a substantial number of existing housing, necessitating the construction of replacement housing elsewhere. No impacts would occur in this regard.

Mitigation Measures

None.



3.2.15. PUBLIC SERVICES

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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:				
a) Fire protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Setting

The project site is located within Humboldt County jurisdiction. In 2017, the County began to update its Housing Element for 2019 – 2027. The update process included an impacts analysis on implementing the Housing Element that accounted for the County's Regional Housing Needs Allocation (RHNA) numbers of the development of 1,413 new housing units prior to 2027. A CEQA Addendum to the General Plan Update Program EIR was conducted for the 2019 Housing Element (Humboldt County, 2017).

Fire Protection:

Fire protection within Humboldt County is provided by local districts and cities (often considered special districts). Areas outside of these special districts and cities are typically served by volunteer fire companies. In addition, much of the County is serviced by the California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE protection for the site is provided by the Humboldt-Del Norte Fire Unit, located in Fortuna, and services 3.1 million acres between the Oregon border and Mendocino County (CAL FIRE, 2024). CAL FIRE has responsibility for enforcement of Fire Safe Standards as required by Public Resources Code (PRC) 4290 and 4291.

The subject parcel is in a State Responsibility Area (SRA) and has a Moderate Fire Hazard Severity rating (Humboldt Web GIS, 2024). Fire protection services would be provided by the Humboldt No.1 Fire Protection District, which maintains a fire station roughly 0.6 miles east of the project site;

Police Protection:

The Humboldt County Sheriff's Office is responsible for law enforcement in the unincorporated areas of the County including for the Proposed Project site. The Humboldt County Sheriff's Office provides a variety of public safety services countywide (court and corrections services) and law enforcement services for the unincorporated areas of the County. The California Highway Patrol is responsible for enforcing traffic laws on roadways within the unincorporated areas and on state highways throughout the County. The Sheriff's Office Operations Bureau is made up of seven units under the command of the Undersheriff. The most visible of these units is the Patrol Unit. Sheriff's Deputies assigned to the Patrol Unit are responsible for responding to emergency calls for service, criminal investigations, and crime prevention through neighborhood and beat patrols. According to the Humboldt County General Plan Update, in the more rural areas of the County, like the Proposed Project Area, maximum response times may reach 50 minutes because of longer travel distances,



varied topography, available resources, and the location of the Sheriff Deputy on patrol in relation to the incident (Humboldt County, 2017).

Police and law enforcement services for the Proposed Project Area are provided by the Humboldt County Sheriff's Department. The Humboldt Sheriff's office is located 0.9 driving miles from the Site, less than a 5-minute drive (Google Maps, 2024).

Schools, Parks, and other Facilities:

Nearby schools include Washington Elementary School (0.23 miles west), Pacific View Charter School (0.45 miles north/northwest), Von Humboldt High School (0.68 miles north/northwest), Zane Middle School (0.74 miles northwest), and Glen Paul School and Winship Middle School (0.78 miles south). There are no known community centers within 1 mile of the Project.

The nearest park to the project site is Sequoia Park, located approximately 0.38 miles west of the parcel within the City of Eureka limits. The McKay Community Forest is located 0.29 air miles east of the Project site, within the unincorporated area of Humboldt County.

Analysis

- a) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services for fire protection. *Less than significant impact.*

Discussion: The project site is located within the jurisdiction of Humboldt No. 1 Fire Protection District. Humboldt Bay Fire Department has five stations in the Eureka area. Fire Station 5 (3455 Harris Street, Eureka) is closest to the Project site, located 0.6 driving miles west of the site and a 2-minute drive, according to Google Maps.

The CEQA document conducted for the 2019 Housing Element update, which included analysis of the construction of 1,413 additional homes, accounted for increased impact on fire services and no impacts were found. Furthermore, any potential future site development would be required to obtain a building permit, which would be reviewed for fire safety and compliance with the County-adopted "State Minimum Fire Safe Regulations", also known as Subchapter 2, which establish the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection (CAL FIRE) (14 C.C.R. §1270-1276.05) (2023). Through the building permit process, any development would be referred to Humboldt Bay Fire, CAL FIRE, and the Department of Public Works to ensure all fire-related codes and standards were being met within the proposed buildings. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of fire protection. Impacts would be less than significant.

- b) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services for police protection. *Less than significant impact.*

Discussion: The site is located in Humboldt County, within the jurisdiction of the Humboldt Sheriff's Department. The Humboldt Sheriff's office is located 0.9 driving miles from the Project site, a 10-minute drive. Eureka Police Department is located 1.7 driving miles from the site, or a roughly 10-15-minute drive. The



CEQA document conducted for the 2019 Housing Element update, which included analysis of the construction of 1,413 additional homes, accounted for increased impact on police protection services and no impacts were found. The Project site is within a 5-minute driving range of emergency services, including fire and police protection. Therefore, impacts would be less than significant.

- c)- e) **Finding:** The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services schools, parks, or other public facilities including public health services and library services. *Less than significant impact.*

Discussion: The closest schools to the Proposed Project Site are Washington Elementary School (located 0.23 miles west of the site), Pacific View Charter School (0.45 miles north/northwest), Von Humboldt High School (0.68 miles north/northwest), Zane Middle School (0.74-mile northwest), and Glen Paul School and Winship Middle School (0.78 miles south). The nearest park to the project site is Sequoia Park, located approximately 0.38 miles west of the parcel within the City of Eureka limits. The McKay Community Forest is located 0.29 air miles east of the Project site, within the unincorporated area of Humboldt County.

Removal of the medical-only Q-zone overlay would not prohibit the construction of new medical facilities onsite, or the expansion of existing onsite medical facilities. The Proposed Project could allow for future site development, including residential development, that could lightly increase use of nearby parks and schools. However, it is not anticipated that the number of potential residents would significantly impact surrounding schools, parks, or other public facilities including public health and library services. Therefore, impacts would be less than significant.

Mitigation Measures

None.



3.2.16. RECREATION

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

Setting

Humboldt County has a population of approximately 136,463 (US Census Bureau, 2024). Humboldt County also has a wealth of parks and recreation space. According to the General Plan, over 20% of the County’s 2.3 million acres are protected open space, forests, and recreation areas. The Project site is located at 3200 Walford Avenue, in Eureka, within the unincorporated area of Humboldt County. The nearest park to the project site is Sequoia Park, located approximately 0.38 miles west of the parcel within the City of Eureka Limits. The McKay Community Forest is located 0.29 air miles east of the Project site, within the unincorporated area of Humboldt County.

The Humboldt County General Plan includes policies and standards relevant to recreation in the Land Use Element, Conservation and Open Space Element, and Community Infrastructure and Services Element. Applicable policies from these elements include the following:

- Policy IS-P18

Parks and Recreation Service in Urban Development Areas. Encourage and support special districts to provide neighborhood parks and recreation services within Urban Development Areas.
- Policy UL-P15

High Density Uses Near Parks. The County shall consider planning higher density mixed-uses and/or commercial uses adjacent to parks to promote park use and safety.
- Standard IS-S10

Interim Parks and Recreation Standards. Parks and recreation standards contained in the Government Code Section 66477 shall be used as the standard for parkland dedication in the review of divisions of land for which a tentative map is required pursuant to Section 66426, until such time that the County has established parks and recreation standards for new development that differentiate between urban and rural settings; specify acreage of park land of 3 acres per 1,000 residents;



and specify land dedication, in-lieu fee, or other mechanisms to fund park and recreation improvements and funding for operation and maintenance.

Policy IS-P27

Parks Master Plan. In cooperation with other park service providers, the County shall establish and maintain a Parks Master Plan that would assess current facilities within each inland and coastal planning area, determine appropriate locations for new facilities, and identify funding options.

Analysis

- a) **Finding:** The project would not 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. *Less than significant impact.*

Discussion: See analysis under subpart (d) of Section 3.2.15 Public Services above. The Proposed Project Zone Reclassification would not directly have any impacts on parks and recreation, however, a future residential project facilitated by the Proposed Project could increase residents in the area, which in turn could increase the use of existing neighborhood or regional parks, or other recreational facilities.

The nearest parks and recreation space to the project site are Sequoia Park (City of Eureka jurisdiction) and the McKay Community Forest (Humboldt County jurisdiction). As such, it is appropriate to analyze the Proposed Project's potential impact on both City of Eureka and Humboldt County Park lands.

In the conceptual Residential Build-Out Scenario described in the Project Description of this document, a maximum of 105 units could be developed onsite, reflective of existing principal zoning, local general plan, and design constraints. Based on the average household size in Humboldt County of 2.29 persons (Housing Element Technical Appendix, 2019), 105 units would equate to approximately 240 residents, representing less than 0.2% of the County's population. It is unlikely that these additional residents, which is a significant overestimate, would negatively impact local parks through use.

In addition, according to the City of Eureka 2040 General Plan EIR, the current ratio of community and neighborhoods park space to residents in Eureka is 4.9 acres per 1,000 residents, well above the recommended one (1) acre per 1,000 persons for neighborhood parks and three (3) acres per 1,000 residents for community parks. Additionally, based on Humboldt County's population of 136,463 and the estimated 460,000 acres of recreation, park, and open space, the County is significantly over the recommended ratio of three acres of park land per 1,000 residents described in Standard IS-S10 of the General Plan. With the addition of 240 residents utilizing parks (which is a very conservative estimate and unlikely, given the site constraints), both jurisdictions would still meet their park land acreage per 1,000 residents criteria.

Both the City of Eureka 2040 General Plan EIR and the Humboldt County General Plan CEQA Addendum to the General Plan Program EIR comprehensively evaluated environmental impacts resulting from General Plan implementation, including the creation 1,886 units of additional housing by the City of Eureka and 1,413 additional new housing units by the County of Humboldt, respectively. Therefore, the project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration would occur or be accelerated. Impacts would be less than significant.

- b) **Finding:** The project would not include recreational facilities or require the expansion of recreational facilities which might have an adverse effect on the environment. *No impact.*



Discussion: The Proposed Project would not include construction of recreational facilities, either directly through the Zone Reclassification, or indirectly through future site redevelopment facilitated by the Zone Reclassification. None of the principally permitted uses in the R-4 zone are recreational facilities. Any future proposed recreational facilities would require additional discretionary planning review and/or building permit review. Therefore, it is not anticipated that the project would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No impact would occur.

Mitigation Measures

None.



3.2.17. TRANSPORTATION

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

Setting

The Proposed Project parcel is approximately 10.32 acres in size, located off Walford Avenue in the developed area of Eureka, outside of City limits. The site is developed with existing medical facilities and associated parking and landscaping. The remainder of the parcel is undeveloped.

Walford Avenue provides direct access to the site. Walford Avenue is a county-maintained two-lane, paved roadway with a centerline stripe and is designated as a “local” road per the Humboldt County General Plan Circulation Element (2017). Walford Avenue dead ends at the Project site and is located off Harris Street, which is designated as an “Urban Principal Arterial” roadway in the Circulation Element. Both access roads exceed Category 4 standards. Per the Road Standards in the Circulation Element, “Urban Principal Arterial” roads provide the highest level of conventional street service to virtually all area traffic generators.

The site is well-connected to public transit, pedestrian, and bicycle transportation routes. There are two (2) Eureka Transit System bus stops located near the Project site: one located at the intersection of Harris Street and Granada Street, and one located at Harrison Avenue and Harris Street. In the Eureka Transit System, these two stops are served by the Green Route and the Rainbow Route. Both are located 0.2 miles walking distance from the project parcel and have direct pedestrian paths of travel to the project site via designated crosswalks and sidewalks. Harrison Avenue, Harris Street, and Walford Avenue all have sidewalks. The segment of Harris Street used to access Walford Avenue is developed with an existing Class II bicycle lane (HCAOG Bike Map, 2024).

The closest airport is Murray Field Airport (KEKA), located approximately 2.1 air miles northeast of the property.



Relevant policies and standards to the Proposed Project from the Humboldt County General Plan specific to the transportation in the Air Quality Element and the Circulation Element include the following:

- | | |
|---------------------|--|
| Policy AQ-P1 | Reduce Length and Frequency of Vehicle Trips. Reduce the length and frequency of vehicle trips through land use and transportation policies by encouraging mixed-use development, compact development patterns in areas served by public transit, and active modes of travel. |
| Goal C-G1 | Circulation System Safety and Functionality. A safe, efficient, accessible, and convenient circulation system in and between cities, communities, neighborhoods, hamlets, and adjoining regions taking into consideration the context-specific needs of all users, consistent with urban, suburban, rural, or remote community character. |
| Policy C-P3 | Consideration of Transportation Impacts in Land Use Decision Making. Decisions to change or expand the land use of a particular area shall include an analysis of the impacts to existing and proposed transportation facilities and services so as to minimize or avoid significant operational, environmental, economic, and health-related consequences. |
| Policy C-P8 | Coordination Between County Agencies. County Public Works shall coordinate with Planning and Building and consider suggestions from other County departments to encourage uniform implementation of the Circulation Element and County-Wide Transportation Plan. |
| Policy C-P9 | Circulation Planning for Bicycles, Pedestrians and Transit. Circulation planning and project review shall include an assessment for bicycle, pedestrian, and public transit access. |

In addition, the Humboldt County Association of Governments (HCAOG)’s Regional Transportation Plan (RTP), also known as VROOM 2022-2042, developed land use and transportation policies to promote proactive planning and encourage efficient land use from a multimodal transportation perspective in rural Humboldt County. Applicable Policies include the following:

- | | |
|----------------------|---|
| Policy Land-1 | Reduce Driving. HCAOG encourages and supports land use planning and projects that accommodate reducing driving, such as through infill development, pedestrian friendly streets, bicycle infrastructure, and transit-oriented development. |
| Policy Land-2 | Expand Transit Ridership. HCAOG advocates for and supports land use policies and programs that will enable enriched intra- and inter-regional transit service and multi-modal connections in urbanized areas throughout the county. |
| Policy Land-4 | Nearby Access to Essential Services. HCAOG supports mixed-use land uses for fostering successful commercial and work opportunities near where people live, and advocates for mixed-use development patterns to include affordable housing and essential services for people with low and very low incomes. |

HCAOG’s 2018 Humboldt Regional Bicycle Plan includes projects, objectives, and policies to develop and maintain a comprehensive a regional bicycle network, and to encourage land use planning that supports and encourages bicycle-friendly transit.



Analysis

- a) **Finding:** The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. *Less than significant impact.*

Discussion: The Proposed Project is a Zone Reclassification project which would not directly conflict with a program, plan, ordinance, or policy addressing the circulation system. Indirect impacts could come from potential future principally permitted development projects facilitated by the Zone Reclassification. Any future onsite development would be required to follow the goals, policies, and standards of the Humboldt County General Plan, the Land Use & Transportation Policies in HCAOG's VROOM 2022-2042 Regional Transportation Plan (RTP), and the HCAOG's 2018 Humboldt Regional Bicycle Plan,.

Potential future residential development onsite facilitated by the Proposed Project would support the goals, standards, and policies of these plans listed above. Any future residential development onsite would be infill development on an already-developed site located in an urban area of the County (in support of Policy Land-1 of the RTP). The site is located near existing commercial, residential, and medical development, and is well-connected to pedestrian, bicycle, and public transit modalities of transportation, with two bus stops within walking distance (in support of Goal C-G1, Policy C-P3, and Policy C-P9 of the General Plan, and in support of Policy Land-4 of the RTP). Increasing housing near existing public transit facilities could increase transit ridership, in support of Policy Land-2 of the RTP. The addition of multiple dwelling units in this already-developed location would likely reduce VMT by increasing housing closer to where people work and thus reducing driving miles from workers living further outside of the developed area of Eureka (in support of Policy AQ-P1 of the General Plan and Policy Land-1 of the RTP). And as discussed in the Land Use section above, the LOS thresholds are consistent with the standards outlined in the Eureka Community Plan. Lastly, the Humboldt County permitting process allows for inter-agency coordination through referrals to applicable agencies, in support of Policy C-P8 of the General Plan.

The addition of new residents within a residential / commercial area could increase ridership of public transit. Regarding a potential public transit ridership increase, the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) states that lead agencies generally should not treat an increase in transit from infill development as an adverse impact on multimodal transportation networks, because although it increases ridership, it also adds destinations for riders, thus improving proximity and accessibility to services for local residents (pg. 19). Therefore, the increase in ridership from a potential future residential development facilitated by the Proposed Project would not have an adverse impact on existing transit facilities.

As described above, the site is highly walkable, bikeable, and well-connected to public transit. It is within 0.2 miles of two bus stops located on Harris Street, which is connected to the Project site via pedestrian walkways. A designated Class II bicycle facility is located on Harris Street in the vicinity of the Project, allowing cyclists to easily access Walford Avenue and thus the Project site. The Proposed Project would not remove or change the location of any existing or proposed sidewalks, bicycle lanes, or public transportation facilities. Therefore, the Project would not impact bicycle or pedestrian facilities or associated plans.

The Proposed Project is not in conflict with the Humboldt County General Plan and the Circulation Element, the Eureka Community Plan, the HCAOG RTP, also known as VROOM 2022-2042, or the Humboldt Regional Bicycle Plan. Therefore, the Proposed Project would not directly or indirectly conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities, either through direct implementation of the Zone Reclassification, or indirectly through potential future development facilitated by the Zone Reclassification. A less than significant impact would occur.



- b) Finding: The project would not conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b). *Less than significant impact.*

Discussion: CEQA Guidelines section 15064.3, subdivision (b), involves Vehicle Miles Traveled (VMT), which represents the total number of daily miles driven by persons traveling to and from a defined geographic area. VMT can vary broadly, depending on the type of project and the number of people commuting to the site from a variety of differences. CEQA Guidelines Section 15064.3, subdivision (b) (“CEQA Guidelines,” for the purposes of this section) indicates that land use projects would have a significant impact if the project resulted in VMT exceeding an applicable threshold of significance.

Humboldt County has not yet adopted VMT thresholds of significance, nor are any draft thresholds available at the time of this writing.

The Governor’s Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) provides some guidance for qualitatively analyzing transportation impacts. Under “Screening Thresholds for Land Use Projects,” it is recommended that a proposed project that would generate 15% or more below the existing residential VMT per capita, measured against the region or the city, may indicate a less-than-significant transportation impact. No other recommendations from the OPR’s Technical Advisory are appropriate for the Proposed Project, as the site is not within a ¼-mile of a major transit stop, is not a “small project,” and is not located within an area designated as “low VMT” (CEQA Site Check, 2024).

Table 6 below shows the Traffic Analysis Zone (TAZ) for the subject property, derived from a custom application of StreetLight Data and using Year 2022 VMT estimates. The subject property falls well below the 15% threshold, indicating a less than significant impact.

Table 6: Average VMT per Resident and Employee (Source: StreetLight Data, compiled by Fehr and Peers)

	City of Eureka	Eureka and Unincorporated Humboldt County	Humboldt County	85%	Stokes Property (Block Group 0602300070001)
Average VMT per Resident (HBX)	13.68	21.78	22.1	18.79	13.78
Average VMT per Employee (HBW)	9.54	9.6	14.7	12.5	9.38

Additionally, a comparative qualitative approach to VMT under the existing and proposed zoning designations is appropriate to include as supplementary analysis. The Proposed Project would remove the medical-only Q Zone from the subject property, allowing a wider variety of uses (including residential) to be permitted on the property under the existing principal zone. The Proposed Project would not alter the principal zone of Apartment Professional (R-4). As described in the Project Description, a large medical facility could be permitted on the property under the existing principal and qualified combining zone (Medical Build-Out Scenario), and a multi-family housing development could be permitted on the property under the existing principal zoning with the qualified combining zone removed (Residential Build-Out Scenario). The following analysis compares the estimated VMT of the Medical Build-Out Scenario to that of the Residential Build-Out Scenario.

Humboldt County has a population of 136,463 (US Census Bureau, 2024). The four (4) most populated areas of Humboldt County are Eureka, Arcata, McKinleyville, and Fortuna. The greater Eureka Area, including the city limits, Myrtle town, Cutten, Pine Hills, and Humboldt Hill), has a population of 48,119 people and comprises approximately 35% of the population in Humboldt County (US Census Bureau, 2024). The Arcata,



McKinleyville, and Fortuna greater areas comprise approximately 43%, with a combined population of over 58,924 people. The remaining unincorporated areas of Humboldt County, including more remote areas of Petrolia, Willow Creek, Garberville, Orick, etc., comprise approximately 22% of the remaining population. Walford Avenue is located in Eureka, outside of the city limits, which is centrally located between population centers in Humboldt County. From the subject property in Eureka, it is approximately 10 miles to Arcata, 15 miles to McKinleyville, and 18 miles to Fortuna (an average distance of 14 miles).

Medical Facility Build-Out Scenario Estimated VMT: The estimated number of daily trips associated with this medical facility is 1,400, based on an assumption of two (2) trips per 100 patients per day (200 trips), and four (4) trips per 300 employees per day (1,200 trips). (See Table 1 in Project Description). For VMT estimation purposes, patients are anticipated to come from all areas of the County, proportional to population areas, and employees are anticipated to come from the more populated areas of the County, proportional to population areas.

- Patients: Per the Project Description, two (2) trips per patient are anticipated per day. It is assumed that, proportional to the population areas, 35% of patients (35 patients, 70 total daily trips) would come from the Eureka area, 43% (43 patients, 86 total daily trips) would come from the Arcata/McKinleyville/Fortuna areas, and 22% (22 patients, 44 total daily trips) would come from other unincorporated areas of the County. It is assumed that the average patient from Eureka would travel approximately 6 miles to and from the site. From Arcata/McKinleyville/Fortuna areas, it is assumed that a patient would travel an average distance of 14 miles (the average distance from the site to these populated areas) to and from the site. From unincorporated areas of Humboldt County, it is estimated that a patient would drive an average of 50 miles to and from the site, to account for access from more remote areas of the County. The estimated 35 patients from Eureka would travel a combined total of approximately 420 miles (70 trips at 6 miles each way), the 43 patients from the Arcata/McKinleyville/Fortuna areas would travel a combined total of approximately 1,204 miles (86 trips at 14 miles each way), and the 22 patients from the remainder of Humboldt County would travel a combined total of 2,200 miles (44 trips at 50 miles each way). In total, patients would travel a combined total of approximately 3,824 miles per day.
- Employees: Per the Project Description, four (4) trips per employee are anticipated per day, including two (2) trips to and from the site as a commute from home, and two (2) trips to and from the site during lunch / break. It is assumed that half of the 300 employees of the medical facility would reside in the greater Eureka area (with an estimated commute of 6 miles to and from the site), and that half would reside in the Arcata/McKinleyville/Fortuna Area (with an estimated commute of 14 miles to and from the site). Therefore, associated commuting miles from employees would be 6,000 (1,800 miles from 150 employees commuting 12 miles round-trip per day, in addition to 4,200 miles from 150 employees commuting 28 miles round-trip per day). It is anticipated that employees would also break for lunch and drive an estimated total of 4 miles to and from the site for lunch, for a total of 2,400 miles (300 employees driving an estimated 8 miles round-trip for lunch daily). In total, employee trips per day would equate to an average of approximately 8,400 miles.

Combining the miles generated by patients and employees visiting the site, the Medical Facility Build-Out Scenario would have an estimated daily VMT of 12,224 miles.

Residential Build-Out Scenario Estimated VMT: Per the Project Description, the residential build-out scenario could develop a maximum of 105 units, with an associated 158 parking spaces. Assuming four (4) trips per day, the scenario would result in approximately 632 trips per day. For the purposes of this estimation, it can be assumed that two (2) of the trips per day would be associated with commuting to work, and that two (2) of the trips per day would be associated with errands (e.g., picking up groceries, dropping kids off at school, etc.). For commuting to work, it is assumed that driving residents would work in the



populated areas of Humboldt County. It is assumed that half of the driving residents (79 persons) would work within Eureka (estimated 6 miles to and from the site), and the other half (79 persons) would work within Arcata/McKinleyville/Fortuna areas (estimated 14 miles to and from the site). In total, 3,160 miles would come from residents commuting to work daily (948 miles within the Eureka area and 2,212 miles within the Arcata/McKinleyville/Fortuna areas). For trips associated with errands, an estimated 6 miles twice per day is assumed per 158 driving residents, for a total of 1,896 miles daily. Therefore, the Residential Build-Out Scenario would generate an estimated daily VMT of 5,056 miles.

Both of these VMT analyses reflect estimations based off of a high intensity of site buildout, leading to conservative and likely high estimates of VMT based on the assumptions provided above and not accounting for proximity to transit. The Residential Build-Out Scenario that could be permitted if the Proposed Project were approved, would have significantly less associated VMT of 5,056 miles, compared to the Medical Build-Out Scenario VMT of 12,224 miles, which could be permitted currently under the existing zoning.

The analysis above does not account for proximity to transit stops. The site is located in close proximity to two (2) regularly served transit stops within walking distance (approximately 0.2 miles) from the site. Proximity to developed transit would likely reduce vehicular miles driven by any residents, patients, or employees of the site.

Future discretionary projects that could be permitted under the R-4 zone if the Proposed Project were approved could also generate high VMT (e.g., lodge, hotel, motel, social halls, recreation facilities, etc.), however, these uses would require discretionary review and would be analyzed in the future under CEQA, if applicable.

As such, impacts to VMT from the Proposed Project would be less than significant, and the Project would be consistent with CEQA guidelines section 15064.3, subdivision (b). A less than significant impact would occur.

- c) Finding: The project would not substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). *Less than significant impact.*

Discussion: The Project site is accessed off Walford Avenue, which is accessed off Harris Street in the southeast area of the City of Eureka, outside City limits. Walford Avenue is a straight avenue that leads directly from Harris Street to the site, where it dead ends. There are no sharp or geometric design features (including sharp curves) on the way to the site from Harris Street. The site has full vision clearance at the ingress/egress point where Walford Avenue meets Timber Fall Court.

The Proposed Project does not involve any incompatible uses (e.g., farm equipment) that could impact transportation.

Future site development would trigger a building permit process with the Humboldt County Building Department. During the Building Permit process, the project would be referred to the Humboldt County Department of Public Works (DPW). Site access, circulation, and traffic signs would be reviewed for consistency with code standards involving vision clearance areas at ingress/egress access points, limits on driveways, and internal pedestrian access. Unless otherwise required by the DPW, any improvements to site circulation would occur onsite. No changes to Walford Avenue or Harris Street are currently proposed, although potential future site development could trigger an evaluation of surrounding sidewalks and potential repairs to bring pedestrian facilities up to California Building Code (CBC) standards.

Therefore, the Proposed Project would not result in hazards due to incompatible uses and would not substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersection) or incompatible uses (e.g. farm equipment). A less than significant impact would occur.



- d) **Finding:** The project would not result in inadequate emergency access. *Less than significant impact.*

Discussion: The project site is accessed off Walford Avenue, which is designated as a “local” road, per the Humboldt County General Plan. Walford Avenue leads directly to the site from Harris Street. Harris Street is a designated Urban Principal Arterial street, which is capable of handling higher traffic volumes compared to other County road designations. It is anticipated that any residents, employees, or visitors onsite as part of a future development project facilitated by the Proposed Project would have access to Harris Street through Walford Avenue and would thus be able to evacuate the site quickly in an emergency. In addition, Harris Street is a major evacuation / emergency route for all first responder activities heading east bound within the developed area of Eureka. The Proposed Project would not involve street construction on Harris Street or Harrison Avenue and would not directly block any emergency access.

The Proposed Project would be required to comply with the “State Minimum Fire Safe Regulations,” also known as Subchapter 2, which establish the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection (CAL FIRE) (14 C.C.R. §1270-1276.05) (2023). The State Minimum Fire Safe Regulations (FSR) provides specific standards for roads providing ingress and egress, signing of streets and buildings, minimum water supply requirements, and set- back distances for maintaining defensible space. The improvement plans for the Proposed Project would be reviewed by the County to verify compliance with the State’s Minimum Fire Safe Regulations, which would ensure that adequate access for emergency vehicles is provided.

Any future building permits for site development facilitated by the Proposed Project would be reviewed through the Building Department process, where plans would be reviewed for adequate internal circulation, ingress/egress, emergency access, and for consistency with FSR. Therefore, the Proposed Project would not result in inadequate emergency access. Impacts would be less than significant.

Mitigation Measures

None.



3.2.18. TRIBAL CULTURAL RESOURCES

Would the Project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☒	☐	☐
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

Setting

Refer to Cultural Resources Section for applicable policies.

Applicable policies regarding cultural and historical resources from the Humboldt County General Plan Land Use Element and Conservation and Open Space Element are summarized in Section 3.2.5, Cultural Resources, additional policies regarding tribal cultural resources include the following:

Policy CU-P2

Native American Tribal Consultation. Native American Tribes (as defined below in shall be consulted during discretionary project review for the identification, protect mitigation of adverse impacts to significant cultural resources. Consultation on ministerial shall be initiated if it has been determined the project may create a substantial adverse change to a significant cultural resource. At their request, Tribes shall be afforded the opportunity to and provide comments to the County early in project review and planning (screening) about or potential Tribal cultural resources located in project areas within their respective geographical area of concern.



Analysis

- a i-ii) **Finding:** The project will not cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in the local register of historical resources as defined in Public Resources Code §5020.1(k). *Less than significant impact with mitigation incorporated.*

Discussion: See analysis in Section 3.2.5, Cultural Resources. The County sent out requests for official inter-governmental consultation, per AB 52 and SB 18, in December of 2024. Requests were sent to the Wiyot Tribe, the Bear River Band of the Rohnerville Rancheria, the Blue Lake Rancheria, and the Cher-Ae Heights Indian Community of the Trinidad Rancheria. No responses were received. Consultation letters were sent to all previously referred Tribal governments. **Mitigation Measure CUL-1** has been incorporated to ensure impacts to Tribal Cultural Resources remain less than significant.

Mitigation Measures

Implement Mitigation Measures CUL-1.



3.2.19. UTILITIES AND SERVICE SYSTEMS

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

Setting

The 10.32-acre parcel is located within the developed area of the City of Eureka, within Humboldt County jurisdiction. Surrounding land uses include residential, commercial, medical offices, care facilities, and undeveloped forest land. The parcel is developed with medical facilities, associated parking, and landscaping. The remainder of the property is undeveloped forest land. The site is connected to water and wastewater services through the Humboldt Community Services District (CSD), and PG&E provides electricity and natural gas to the site. Stormwater is treated onsite.



Analysis

- a) **Finding:** The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. *Less than significant impact.*

Discussion: Stormwater is treated onsite. The site is currently connected to water, wastewater treatment, electric power, natural gas, and telecommunication facilities. No expansion of these facilities is currently proposed. Potential future development facilitated by the Proposed Project could intensify onsite uses (e.g., by adding residential uses to the site) that could require onsite improvements for connections to existing utility services. This could involve trenching and grading to connect new structures to existing municipal water supply and wastewater treatment systems, or natural gas /electrical lines. However, it is anticipated that improvements associated with expanded infrastructure would be located onsite, within the Potential Developable Area, which is located outside of all watercourse setbacks.

Based on Humboldt County's household size in 2018 of 2.29 persons per household per the 2019 Housing Element Technical Appendix, 105 units would equate to a maximum of 240 residents. This is likely an extremely high estimate used for analysis purposes to reflect the most conservative impact scenario. According to Appendix C – Expected Daily Wastewater Flows of the Humboldt County Onsite Wastewater Treatment System (OWTS) Regulations and Technical Manual (2017), using the estimate of 60 gallons per person per day for multi-family residential units, approximately 240 residents would create a maximum demand of 14,400 gallons per day (5,256,000 gallons or approximately 16.1 acre-feet per year). The Humboldt CSD is currently approximating 1,978 acre-feet of projected demand (from July 1, 2024 – June 30, 2025) and has a potential water supply of 5,9747 acre-feet (Humboldt CSD, 2024b). Therefore, Humboldt CSD is currently utilizing approximately 1/3 of its water supply, and the addition of up to 16.1 acre-feet would not have a significant impact on the capacity of the Humboldt CSD system such that additional off-site utility lines or similar would be warranted.

Additionally, these expanded utilities would be analyzed during development of a Building Permit, which would be submitted to the Humboldt County Building Department and would be routed to the utility service providers for comment. Approval of a Building Permit would be required prior to the commencement of any construction onsite. Thus, the Proposed Project would not result in significant environmental effects related to the relocation or construction of new or expanded utilities. Therefore, impacts would be less than significant.

- b) **Finding:** The project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. *Less than significant impact.*

Discussion: The site is currently connected to the Humboldt CSD, which provides water to the unincorporated areas of the County to approximately 19,778 residents (Humboldt CSD, 2024a). Humboldt CSD currently serves water to the existing onsite medical facilities. According to the Humboldt CSD 2024 Annual Water Supply and Demand Assessment Report (AWSDAR), the Humboldt CSD purchases water from three (3) sources. Water purchased directly from the Humboldt Bay Municipal Water District (HBMWD) comprises approximately half of the CSD's water supply. Approximately one quarter of CSD water is purchased from the City of Eureka, which purchases the water from HBMWD through the Hubbard and Harris booster pump station located in the city limits. The final quarter is pumped from wells owned by the HBMWD located in the Humboldt Hill Area that draws from groundwater within the Eureka Plain Basin.

The Humboldt CSD is not currently experiencing a water shortage, even accounting for projected demand (Humboldt CSD, 2024b). The projected demand for CSD water from July 1, 2024, through June 30, 2025, is



1,978 acre-feet (AF), based on the average demand of the past four years. This average includes normal and dry precipitation years, as 2020 was a dry year (PRISM, 2024). Humboldt CSD has a potential water supply of 5,974 AFY, accounting for all three water sources, meaning that the CSD is only tapping into one third of its potential water supply (Humboldt CSD, 2024b). Therefore, the Proposed Project would have sufficient water supplies available during normal, dry, and multiple dry years. Impacts would be less than significant.

- c) Finding: The project would not result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. *Less than significant impact.*

Discussion: See discussion in 3.2.19 (a), above. The site is served by Humboldt CSD wastewater services. Wastewater collected by Humboldt CSD is treated at the City of Eureka Elk River Wastewater Treatment Plant (Humboldt Community Services District, 2024a). According to the Elk River Wastewater Treatment Plant 2017 Annual Report, the plant has a permitted capacity of 8.6 million gallons per day (MGD). Per the 2017 Annual Report, the plant has an average flow rate of 4.75 MGD and was designed to treat peak dry weather flows of 9.5 MGD. Peak wet weather flow design and permitted capacity is 32.2 MGD. Wastewater generated by future site development could result in up to 14,400 gallons of wastewater per day, based on 240 residents (Humboldt County OWTS Regulations and Technical Manual, 2017). The addition of 14,400 gallons per day is less than 0.01% of the system's treatment capacity of 8.6 million gallons per day and would not represent a significant increase or strain on the system such that inadequate capacity were to occur. Therefore, the Proposed Project would not result in a determination that there is not enough capacity to process the wastewater generated in addition to existing commitments. A less than significant impact would occur.

- d-e) Finding: The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and the project would comply with federal, state, and local management and reduction statuses and regulations related to solid waste. *Less than significant impact.*

Discussion: The Proposed Project, and potential future development facilitated by the Proposed Project, would be required to comply with all federal, state, and local statutes related to solid waste, including AB 939, which requires each jurisdiction in California to divert at least 50% of its waste stream away from landfills either through waste reduction, recycling or other means. The Humboldt County General Plan Waste Management Section of the Conservation and Open Space Element (2017) includes waste diversion goals. According to the General Plan, in 2012 the County as a whole disposed of 84,145 tons of solid waste in landfills, with approximately 43% or 36,182 tons emanating from the unincorporated areas of Humboldt County. The General Plan encourages implementation of waste reduction programs, including recycling.

Waste disposal services to the site would be served by Recology Humboldt County. Humboldt County is a member of the Joint Power Association Humboldt Waste Management Authority (HWMA). HWMA operates the Hawthorne Street Waste Transfer Station, which is located approximately 2 miles west of the Project site.

Development facilitated by the Proposed Project would generate solid waste during construction and operation. Solid waste would be collected by Recology and taken to the HWMA transfer station. Waste from the HWMA transfer station is generally transferred to the Anderson Landfill in Anderson, California, and/or the Dry Creek Landfill in Medford Oregon (City of Eureka Municipal Service Review, 2014). Per the Municipal Service Review, the Anderson Landfill has a daily permitted disposal of approximately 1,018 tons per day, and a remaining capacity of about eight million tons. Under current conditions, the Anderson Landfill is not expected to close until 2036. The Dry Creek Landfill has a remaining capacity of approximately 50 million tons. The Dry Creek Landfill has been estimated to have the remaining disposal capacity to provide for its current service area for another 75 to 100 years. Therefore, it is reasonable to assume that the two landfills could handle solid waste from future development facilitated by the Proposed Project.



Solid waste generated by the Proposed Project would be consistent with historic and surrounding uses at the site and other adjacent commercial uses. Based on the remaining capacities at the Anderson and Dry Creek Landfills, these landfills would have sufficient capacity to serve the project's solid waste disposal needs. Therefore, a less than significant impact would occur.

Therefore, the Proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs, would not produce waste in excess of state or local standards or impair attainment of solid waste goals, and would not violate any federal, state, or local statuses and regulations related to solid waste. Impacts would be less than significant.

Mitigation Measures

None



3.2.20. WILDFIRE

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

Setting:

The Proposed Project Area is in unincorporated Humboldt County, outside of the City of Eureka boundary, and within the City of Eureka Sphere of Influence. Fire protection in Humboldt County is provided by local districts, cities, and CAL FIRE. The Project site is within the CAL FIRE State Responsibility Area (SRA) and locally is within the Humboldt No. 1 Fire Protection District. The Proposed Project Area is located within an SRA area classified as a Moderate Fire Hazard Severity Zone (CAL FIRE, 2024).

In the event of a fire, the Humboldt No. 1 Fire Protection District would service the Proposed Project (Humboldt County Web GIS, 2024). According to the Humboldt County General Plan (2017), in general, local agencies (e.g., the Humboldt No. 1 Fire Protection District) would be responsible for structural fire protection onsite, and state and/or federal agencies (e.g., CAL FIRE) would be responsible for wildland fire protection onsite. Local agencies frequently assist the federal and State agencies with vegetation fires.

Humboldt No. 1 Fire Protection District services the outlying unincorporated areas of the greater Eureka area. Each of the five fire stations located throughout the City of Eureka and Humboldt No. 1 Fire Protection District are full-time fire stations that house an engine company and staffed with 17 on-duty personnel working a 48-



hour shift schedule (Humboldt Bay Fire, n.d.). Fire Station 5 (3455 Harris Street, Eureka) is closest to the Project site, located 0.6 driving miles east of the site and a 2-minute drive, according to Google Maps.

There are no historical records of fires on the subject parcel, or within the Proposed Project Area. The nearest mapped historical fire is the Bay Fire in 2008, which burned approximately 56.65 acres and is located approximately 3.5 miles west of the Proposed Project Area (Humboldt County Web GIS, 2024).

The County of Humboldt Office of Emergency Services (OES) coordinates emergency response in Humboldt County through the Humboldt Operational Area. The Proposed Project Area lies within Evacuation Zone EUR-E017, per the OES website (Zonehaven, 2024). The Humboldt Operational Area is composed of the County of Humboldt, serving as the lead agency, and all political subdivisions (cities and Special Districts) within the county.

Policies, ordinances, and regulations that oversee wildfire-related preparedness and response include the California Governor's Office of Emergency Services State of California Emergency Response Plan (2024), California Public Resources Code, California Board of Forestry and Fire Protection State Minimum Fire Safe Regulations (2023), Humboldt County General Plan, Humboldt County Community Wildfire Protection Plan, and the Humboldt County Emergency Operations Plan.

Analysis

- a-d) **Finding:** The project would not substantially impair an adopted emergency response plan or emergency evacuation plan; would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. *Less than significant impact.*

Discussion: The Proposed Project Area is located within an SRA and is classified as a Moderate Fire Hazard Severity Zone (CAL FIRE, 2024). Fire Hazard Severity Zone maps evaluate "hazard" where lands are described in terms of the probability level of the physical conditions of a particular area to create a likelihood of expected fire behavior over a 30 to 50-year period without considering mitigation measures such as home hardening, recent wildlife, or fuel reduction efforts (CAL FIRE, 2024). Fire protection onsite would be handled by the Humboldt No. 1 Fire Protection District. The Proposed Project was referred to CAL FIRE during the County permitting process. CAL FIRE provided no adverse comments on the Project.

According to Humboldt County Web GIS (2024), the Proposed Project site is accessed by either Harris Street (Urban Principal Arterial class), or Harrison Avenue (Major Collector class). Harris Street is a designated Urban Principal Arterial street, which provides the highest level of conventional street service to virtually all area traffic generators and is capable of handling large traffic volumes, per the Humboldt County General Plan (2017). It is anticipated that any residents, employees, or visitors onsite as part of a future development project facilitated by the Proposed Project, would have access to Harris Street and would thus be able to quickly evacuate in an emergency. Furthermore, the Proposed Project would not involve street construction on Harris Street or Harrison Avenue and would not directly block any emergency access. Any site development would be confined to the bounds of the Potential Developable Area. The building permit and/or encroachment permit process would ensure the site's internal circulation and existing driveways would allow adequate access for emergency vehicles along Harris Street and to the site per all applicable state and local laws. As such, this Proposed Project would not interfere with any emergency response or evacuation plan.



Any onsite development facilitated from the approval of the Proposed Project would be within the Potential Developable Area and designed to meet current building code standards for fire safety. The Proposed Project would be required to comply with the State’s “Minimum Fire Safe Regulations,” also known as Subchapter 2, which establish the minimum Wildfire protection standards of the California Board of Forestry and Fire Protection (CAL FIRE) (14 C.C.R. §1270-1276.05) (2023). The State Minimum Fire Safe Regulations provides specific standards for roads providing ingress and egress, signing of streets and buildings, minimum water supply requirements, and setback distances for maintaining defensible space. The County has adopted these specific standards in the County’s Fire Safe Regulations (FSR).

Potential onsite future construction facilitated by the Proposed Project would involve the use of equipment. Per CAL FIRE requirements, equipment would be “fire-safe,” i.e., operating under a fire safety plan and equipped with spark arrestors. The access road is a County-maintained road, and the onsite driveway would be maintained in a state such that it is free of vegetation during times of activity. PG&E power is already in existence onsite, and no offsite improvements are proposed. No installation or maintenance of infrastructure would exacerbate the risk of fire onsite.

Slopes in the Potential Developable Area are relatively flat, ranging from 0% to 8%. No development would be located on steep slopes (greater than 30%) or within a 100-year flood zone, and no recent historic fires are located nearby. No slopes are nearby that could cause mudslides on the property. Therefore, it is not anticipated that the Proposed Project would expose people or structures to post-wildfire risks such as slope instability or runoff.

Any new proposed onsite structures, or changes to existing structures, would be required to follow CBC standards for fire safety. Improvement plans for the Proposed Project would be subject to approval by the Humboldt County Building Department to verify compliance with the State and County’s Fire Safe Regulations, which would ensure that adequate access for emergency response and evacuation is provided. This analysis would occur with submittal of approval plans to the County’s Building Department. Due to this, in addition to the above discussion, a less than significant impact would occur.

Mitigation Measures

None.



3.2.21. MANDATORY FINDINGS OF SIGNIFICANCE

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

Setting:

The project information provided for each of the topics above has been reviewed for all actions associated with both temporary construction and long-term operation. Based on the project description and its location, the Proposed Project would not result in any significant impacts with the incorporated operating restrictions, mitigation measures, as well as those standards and requirements of other regulating resource agencies.

Analysis

- a) Finding: The Proposed Project will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. *Less than significant impact with mitigation incorporated.*

Discussion: The site is located within the Eureka area, in the County limits. The site is already partially developed with medical facilities. A Less than 3 Acre Conversion, which was prepared by a Registered Professional Forester and approved by CAL FIRE, has already been carried out onsite, leaving a 3.5-acre Potential Developable Area for future site development (including the existing developed area). No work within the SMAO watercourse buffers is proposed, or would be allowed. A Biological Scoping Report (Appendix 2C) did not find that a potential future residential project would have impacts on any known sensitive plant or animal species. Additionally, no wetlands are present onsite that could be impacted by potential future construction facilitated by the Proposed Project (Appendix 2D). The applicant would be required to follow water quality protection requirements of the Construction General Order and the MS4 Permit, as regulated by the SWRCB



and Humboldt County, and would be required to treat stormwater onsite during construction and operation. Potential impacts to cultural and tribal cultural resources resulting from a future redevelopment project are addressed in Section 3.2.5 and Section 3.2.18, respectively. This document incorporates mitigation measures to reduce impacts from Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Noise, and Tribal Cultural Resources to less-than-significant levels. The measures included in this document reduce the Proposed Project's individual impacts to a less-than-significant level.

- b) Finding: The Proposed Project will not have impacts that are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a Proposed Project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects) (CEQA Guidelines §§ 15064(h)(1), 15355). *Less than significant impact with mitigation incorporated.*

Discussion: This mitigated negative declaration documents the project's design features and clear, specific mitigation measures that eliminate the project's potential, project-specific impacts on the environment or mitigates its potential impacts to a less-than-significant level. A "lead agency may determine in an initial study that a project's contribution to a significant cumulative impact would be rendered less than cumulatively considerable and thus is not significant." (CEQA Guidelines, § 15064(h)(2)).

When making this determination, the lead agency may conclude that the effects of a project under review would not be cumulatively considerable where "there is no evidence of any individual potentially significant effect." (*Sierra Club v. West Side Irrigation District* (2005) 128 Cal.App.4th 690, 701-702 (*Sierra Club*), citing *Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1358 (*Leonoff*)). Importantly, the "mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project's incremental effects are cumulatively considerable." (CEQA Guidelines § 15064(h)(4)).

A lead agency's analysis of cumulative impacts in a mitigated negative declaration is not the same as the analysis required in an EIR. In the mitigated negative declaration context, the lead agency's obligation is to determine whether the incremental effects of the project under review are "considerable." (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1996) 42 Cal.App.4th 608, 624-635 (*San Joaquin Raptor*)). A lead agency's investigation of this question, further, does not require "some sort of grand statistical analysis" or other detailed inquiry of the type that could be appropriate in an EIR. (*San Joaquin Raptor*, p. 625). A lead agency, as noted, can correctly conclude that the impacts of a project under review are not cumulatively considerable when there is no substantial evidence that any incremental impacts of the project are potentially significant. (*San Joaquin Raptor*, p. 624, citing *Leonoff*, at p. 1358).

As discussed throughout this document, implementation of the Proposed Project has the potential to result in impacts to the environment that are individually limited, however, mitigation has been incorporated to reduce any potentially significant impacts that are individually limited to a less than significant level. This document incorporates mitigation measures to reduce impacts from Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Noise, and Tribal Cultural Resources to less-than-significant levels. The measures included in this document reduce the Proposed Project's individual impacts to a less-than-significant level.

With regard to other resource categories, the Proposed Project would not have any impacts that are considered cumulatively impactful. Aesthetically, the Proposed Project site is not visible from any designated scenic highway. Any future site development would be consistent with the existing surrounding residential, commercial, care facilities, and medical uses, and would be required to follow outdoor lighting requirements. The Proposed Project aligns with the County's General Plan and Zoning Code. The property does not contain viable agricultural, forestry, or mineral resources that could be either changed or impacted by implementation



of the Proposed Project. The property does not contain agricultural, forestry, or mineral resources. The Project is located within the NCAB, which is currently in non-attainment for PM₁₀, and would follow all requirements surrounding fugitive dust prevention. The Proposed Project would source power from PG&E and would not significantly contribute to increased levels of PM₁₀ or other pollutants, including Greenhouse Gas Emissions. The Proposed Project would require grading and building permits which will not be approved unless the project is consistent with applicable County standards. The site is not within an area of liquefaction, an Alquist-Priolo fault zone, or an area of high geologic instability. Any future land disturbance greater than one acre would require development of a SWPPP, in compliance with the SWRCB's Construction General Order. Any potential future project facilitated by the Proposed Project that creates or replaces greater than 5,000 sq. ft. of impervious surface would be required to adhere to the LID standards. All potential future buildings facilitated by the Proposed Project would be required to conform with the most recent California Building Code. The Project would follow all regulations surrounding hazardous materials and would be required to enroll in CUPA if hazardous materials storage were required. For additional analysis on impacts to additional resource categories, see discussions in Sections 3.2.1 through 3.2.20, above.

As such, with incorporation of Mitigation Measures AQ-1, BIO-1, CUL-1, GEO-1, and NOI-1 throughout this document, the Proposed Project would not contribute to environmental effects that are individually limited, but cumulatively considerable, and impacts would be less than significant with mitigation.

c) Finding: The Proposed Project will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly. *Less than significant impact with mitigation incorporated.*

Discussion: The Proposed Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this document. In instances where the Proposed Project has the potential to result in direct or indirect adverse effects to human beings, including impacts to Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Noise, and Tribal Cultural Resources, mitigation measures have been applied to reduce the impact to below a level of significance. With required implementation of mitigation measures identified in this document, construction and operation of the Proposed Project would not involve any activities that would result in environmental effects which would cause substantial adverse effects on human beings.

Mitigation Measures

Implement Mitigation Measures AQ-1, BIO-1, CUL-1, GEO-1, and NOI-1.



3.2.22. MITIGATION MEASURES, MONITORING, AND REPORTING PROGRAM

The Department found that the project could result in potentially significant adverse impacts unless mitigation measures are required. A list of mitigation that addresses and mitigates potentially significant adverse impacts to a level of non-significance follows.

Mitigation measures were incorporated into the conditions of project approval. The following is a list of these measures and a verification form to ensure measures shall be met.

Mitigation Measures

AQ-1. During construction and operation, the following dust control measures shall be implemented:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day in areas of active construction.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.
- All construction and operation equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations (ongoing)	Applicant	Humboldt County Planning and Building Department in consultation with North Coast Air Resources Control Board	Inspection Report		

BIO-1. Avoidance and Minimization Measures to Protect Special Status and Nesting Birds.

No noise- or vibration-generating construction activities within 100 feet of the edge of riparian and tree area shall occur between March 15th to August 15th, when birds may be nesting on the adjacent property. If construction during this time is unavoidable, a qualified biologist shall conduct a pre-construction survey for nesting bird pairs, nests, and eggs within 100 feet of the construction limits. If an active nest is encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS or CDFW, as applicable, and implemented to prevent abandonment of the active nest



Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
No more than two weeks prior to ground disturbing activities, if occurring between February 1 st and August 31 st	Qualified Biologist	Humboldt County Planning and Building Department in consultation with the California Department of Fish and Wildlife	Qualified Biologist will prepare report		

CUL-1. If cultural materials, for example: chipped or ground stone, historic debris, building foundations, or bone are discovered during ground-disturbance activities, work shall be stopped within 50-foot buffer of the discovery location, per the Cultural Resources Investigation Report. Work near the archaeological find(s) shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials and offered recommendation for further action.

If human remains are discovered during project construction, work would be stopped at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie adjacent to human remains (Public Resources Code, Section 7050.5). The Humboldt County coroner would be contacted to determine if the cause of death must be investigated. If the coroner determines that the remains are of Native American origin, it is necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (Public Resources Code, Section 5097). The coroner would contact the NAHC. The descendants or most likely descendants of the deceased would be contacted, and work would not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations	Applicant and, if necessary, a qualified professional archaeologist	Humboldt County Planning and Building Department in consultation Tribal governments, if necessary	If needed, the qualified professional archaeologist will prepare a Compliance Report.		



GEO-1. If paleontological resources are encountered during implementation of the Project, ground disturbing activities will be temporarily redirected from the vicinity of the find. A qualified paleontologist shall be retained by the developer to make an evaluation of the find. If a significant paleontological resource(s) is discovered on the property, the qualified paleontologist shall develop a plan of mitigation which shall include salvage excavation and removal of the find, removal of sediment from around the specimen (in the laboratory), research to identify and categorize the find, curation in the find a local qualified repository, and preparation of a report summarizing the find.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction activity and project operations	Applicant and, if necessary, a qualified paleontologist	Humboldt County Planning and Building Department in consultation Tribal governments, if necessary	If needed, the qualified paleontologist will prepare a Compliance Report		

NOI-1. The operation of tools and equipment used in association with any future construction, repair, alteration, or demolition at the site shall be limited to between the hours of 8 a.m. and 5 p.m., Monday through Friday, and between the hours of 9 a.m. and 5 p.m. on Saturdays, unless further restricted by any required permit. In addition, no heavy equipment-related construction activities shall be allowed on Sundays or on holidays.

Implementation Time Frame	Party Responsible for Implementation	Party Responsible for Verification	Form of Verification	Date of Verification	Verified/ Comments
During construction, repair, alteration, or demolition at the site	Applicant	Humboldt County Planning and Building Department	Inspection by Humboldt County Staff		



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Site Plans (July 2024)

CalEEMod Analysis of Residential and Medical Build-Out Scenarios – Air Quality Analysis (October 2024)

Hohman & Associates Forestry Consultants

Biological Scoping Report (December 2023)

Biological Opinion to the Presence / Absence of Wetlands (October 2024)



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Appendix 1

Site Plans (NorthPoint Consulting Group, Inc, August 2024)

Zone Reclassification and General Plan Text Amendment
Memorandum, Petition Approval, and Supporting Materials
(NorthPoint Consulting Group, January 12, 2024)



Appendix 2

Humboldt County Ordinance 2078, June 1995

CalEEMod Analysis of Residential and Medical Build-Out
Scenarios Summary Reports (NorthPoint Consulting Group,
October 2024)

Biological Scoping Report (Hohman & Associates Forestry
Consultants, December 2023)

Biological Opinion to the Presence / Absence of Wetlands (Hohman
& Associates Forestry Consultants, October 2024)

