



COUNTY OF HUMBOLDT  
PLANNING AND BUILDING DEPARTMENT

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3015 H Street Eureka CA 95501  
Phone: (707) 445-7541 Fax: (707) 268-3792  
<http://www.co.humboldt.ca.us/planning/>

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT**

Date: June 3, 2021

To: Interested Parties  
All Recipients on the Distribution List

Lead Agency: County of Humboldt Planning & Building Department

Contact: Alyssa Suárez, Planner  
Humboldt County Planning & Building Department  
3015 H Street  
Eureka, CA 95501

Project Title: Nordic Aquafarms California, LLC Land-based Aquaculture Project

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**NOTICE IS HEREBY GIVEN THAT** the County of Humboldt (County) as lead agency under the California Environmental Quality Act (CEQA), circulated an Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project from April 23, 2021 to May 24, 2021 (SCH #2021040532). In response to the comments received from the public on the IS/MND, the County has prepared this Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) for the Nordic Aquafarms California, LLC Land-based Aquaculture Project and associated Humboldt Bay Harbor, Recreation and Conservation District (Harbor District) Humboldt Bay Master Water Intakes Project. The NOP includes a description of the project, project location maps and site layout, and an overview of the potential impacts that will be addressed in the EIR. This NOP was prepared in accordance with Section 15082 of the CEQA Guidelines.

**THE PURPOSE OF THIS NOTICE IS:** (1) to solicit input, by July 6, 2021, from interested individuals, groups, and responsible and trustee agencies about the desired content and scope of the draft EIR to be prepared by the County of Humboldt for the proposed Project; and (2) to announce public scoping meetings for the proposed Project, to be held at the following times:

- A) Regulatory agency meeting: June 10, 2021 at 11:00 a.m. to 12:00 p.m.
- B) Public meeting: June 10, 2021 at 6:00 p.m. to 7:00 p.m.

Please use the link below to join the meeting via Zoom or phone:

1. <https://zoom.us/j/91600859767?pwd=bmtOQ0k5SGNrdFE5YVRjN0VvUi9mQT09>  
Passcode: 673021
2. Call in via telephone at 346-248-7799, enter meeting ID 916 0085 9767, enter password: 673021

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**A 30-DAY NOP REVIEW PERIOD:** The NOP will be circulated for a 30-day review period from June 3, 2021, to July 6, 2021. The County of Humboldt Planning and Building Department welcomes responsible and trustee agency input during this review.

Written comments should be submitted or postmarked no later than **5:00 p.m. on July 6, 2021**. Please indicate a contact person in your response and send your comments to:

Alyssa Suárez, Planner II  
Humboldt County Planning & Building Department  
3015 H Street  
Eureka, CA 95501  
[asuarez@co.humboldt.ca.us](mailto:asuarez@co.humboldt.ca.us)

**DOCUMENTS AVAILABLE FOR PUBLIC REVIEW:** The NOP and related project documents are available for public review online at: <http://www.humboldt.gov/2347/Major-Projects>

### PROJECT LOCATION AND SETTING:

The Project is located in the Samoa area, east of Vance Avenue, approximately 2,000 feet north from the intersection of Vance Avenue and Bay Street, on the property known as 364 Vance Avenue (Assessor Parcel Number 401-112-021). The parcel is accessed from Vance Avenue via New Navy Base Road and LP Drive and is served by a 50-foot-wide non-exclusive easement for ingress and egress on Vance Avenue.

The NAFC Project Site is situated in a developed industrial area of the Samoa Peninsula where timber processing and pulp mill and timber-related industrial operations have historically occurred for more than 50 years. The Project Site generally consists of remnant pulp mill infrastructure and concrete foundations associated with previously demolished pulp mill structures. Surrounding land uses are primarily industrial. The NAFC facility is proposed within a 36-acre lease area on the 76 -acre parcel. Water intakes are located approximately one-half mile apart along the Samoa Channel in Humboldt Bay at the Redwood Marine Terminal II (RMT II) Dock and Red Tank Dock.

The NAFC Project Site maintains a generally consistent elevation across the site, ranging from roughly 15 to 20 feet above mean sea level (MSL), then slightly increasing in elevation along the western portion of the site, ranging from approximately 20 to 25 feet above MSL. The topography of the western Project Site boundary, located west of Vance Avenue, gradually transitions into dune swales and the former Samoa Landfill (now capped) west of Vance Avenue. The Project Site is located on a former pulp mill site that remains an active Brownfield site (Regional Water Quality Control Board case no. 1NHU892), which includes Geotracker Field Points as shown in the EnviroStar and Geotracker online databases. The Project is located 1,000 feet east of the Samoa Solid Waste Disposal Site (SWDS).

### PROJECT SITE LAND USE AND ZONING:

The subject parcel is designated Industrial/Coastal-Dependent (MC) under the Local Coastal Program – Humboldt Bay Area Plan.

The subject parcel is zoned Coastal Dependent-Industrial (MC) and Industrial General (MG), with an Archaeological Resource Area Outside Shelter Cove (A) combining zone. The proposed work will be

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located on the portion of lands zoned MC/A. Aquaculture and aquaculture support facilities are principally permitted in both the MC and MG land use designations and is principally permitted in the MC zone.

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### **PROJECT DESCRIPTION:**

The applicant (Nordic Aquafarms California, LLC. (NAFC)) is requesting a Coastal Development Permit and Special Permit for the construction of a land-based finfish recirculating aquaculture system (RAS) facility, which includes the development of five buildings totaling approximately 766,530 square feet and the installation of 3-5 megawatt (MW) solar panel array mounted on building rooftops, covering approximately 690,000 square feet. The height of the tallest proposed building is 60 feet. The facility would have an annual production capacity of approximately 25,000-27,000 metric tons of Head On Gutted (HOG) fish once complete. The aquaculture facility would produce fresh head on gutted fish and fillets for delivery to regional markets. The species to be produced at the facility is intended to be Atlantic Salmon, although the applicant has not yet received approval from CDFW.

The project will include ancillary support features such as paved parking, fire access roads, security fencing, and stormwater management features. The project would require approximately 2.5 million gallons per day (MGD) of freshwater and industrial water sourced from the Mad River. Existing on-site water service supplied by the Humboldt Bay Municipal Water District would be connected to the new buildings for potable use, fire sprinklers, and irrigation. The project would require approximately 10 MGD of salt water, which will be provided via existing sea chest infrastructure located adjacent to the NAFC Project Site, which will be upgraded as described below. Treated wastewater would be discharged utilizing the existing Redwood Marine Terminal II ocean outfall pipe, which extends one and a half miles offshore. A total volume of 12.5 MGD is anticipated to be released daily. Wastewater discharge is permitted by the North Coast Regional Water Quality Control Board.

In order to supply saltwater to the project site, the Humboldt Bay Harbor, Recreation and Conservation District (District) proposes to upgrade/improve and operate two formerly used bay-water intake systems (sea chests) in Humboldt Bay. The impacts associated with the proposed improvements will be evaluated as part of this EIR. The water intakes are located approximately one-half mile apart along the Samoa Channel at the Redwood Marine Terminal II (RMT II) Dock and Red Tank Dock. The intake systems were operated by a pulp mill from around 1966 until the mill was closed in 2008. Salt water from the intakes would be used by District tenants and other entities for aquaculture and other allowable uses. The proposed project includes bay water withdrawal and pumping to specific upland points that will be connected to by future users. This proposed project also includes installation of a fire suppression water line and fire hydrant replacement. The line would have a critical role in future fire suppression on the Samoa Peninsula. The fire suppression line would share a trench with the bay water line. A bay water line would provide water from the RMT II Dock and Red Tank Dock water intakes to manifolds at RMT I, RMT II and NAFC. Aquaculturists and other users would connect to the manifolds to receive bay water.

The bay water line and fire suppression water line would be trenched except at one point where they would cross a stormwater feature and where the bay water line would run on the edges of Red Tank Dock and RMT II Dock. The fire suppression water line would terminate near the RMT I manifold, RMT II manifold and at Red Tank Dock. Figure 3 shows the general layout of the waterlines and manifolds. The fire suppression water line would have a maximum outside diameter of 12 inches. The bay water line would range from 18-36 inch maximum outside diameter. The maximum width of ground impacts would be 19 feet in sections where both pipes occur and 17 feet where only one pipe occurs. There is an existing walkway across the stormwater feature. The two pipes would be attached to this walkway or to a replacement structure of the same size or smaller.

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The proposed aquaculture facility will include a complete process, from egg to harvestable fish, contained indoors in separate buildings connected by swim pipes for fish transfer. The facility would include the following design elements:

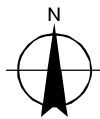
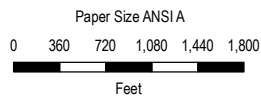
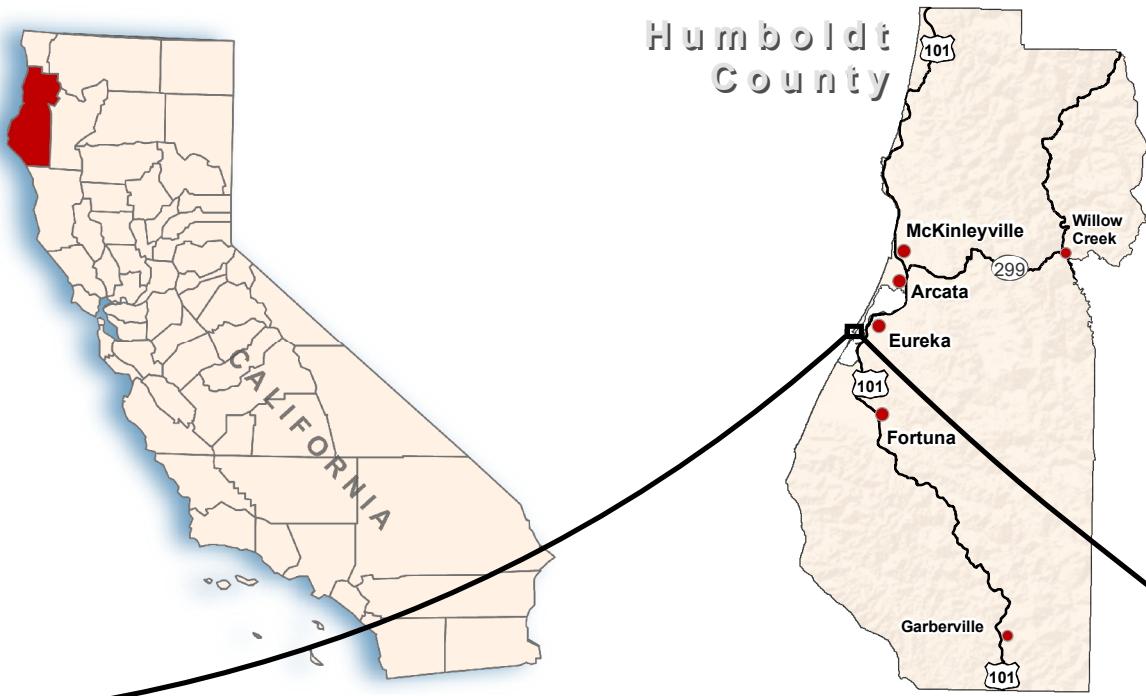
1. A hatchery operation where eggs are hatched, and fish fry grow to juvenile size (Building 3)
2. A grow-out operation with large tanks where fish are grown to market size (Buildings 1 & 2)
3. A fish processing facility from which fish is processed and fresh product is shipped out 4 days a week, coproducts are chilled and stored for sale (Building 4)
4. Backup systems that will enable critical functions to operate for many days in the event of a power outage
5. Oxygen generation plant and liquid oxygen storage
6. Water intake treatment that ensures consistently clean water for the fish (Buildings 1 & 2)
7. An advanced wastewater treatment plant to treat the discharge water, including a Moving Bed Biofilm Reactor, a membrane bioreactor, and Ultraviolet (UV-C) dosing (Building 5)
8. Administrative building and associated operations/maintenance facilities (Building 4)

### Project phasing:

The aquaculture facility is anticipated to be built out in two primary phases, with preliminary site preparation (Phase 0):

1. Phase 0 - Brownfield Redevelopment (2022): asbestos abatement; structure demolition; soil remediation; waste stream characterization, transportation, and disposal.
2. Phase 1 – Brownfield Redevelopment and Aquaculture Facility Stage 1 (2022 - 2023): Intake and outfall connections; ground densification to prepare construction of building foundations; construction of Phase 1 grow-out module (Building 1), Central Utility Plant (Building 3), Fish Processing Plant/Administrative (Building 4), Wastewater Treatment and Backup Power (Building 5); Oxygen generation storage; stormwater systems; onsite and offsite biological mitigation.
3. Phase 2 – Aquaculture Facility Stage 2 (2026 or 2027): Ground densification; Phase 2 grow-out module (Building 2); soil remediation; expansion of utilities; existing leach field decommissioning.

The proposed fire suppression systems and sea chests improvements are anticipated to begin prior to construction of Phase 1 of the aquaculture facility. Timing is dependent on obtaining all agency approvals and permits.



Map Projection: Lambert Conformal Conic  
 Horizontal Datum: North American 1983  
 Grid: NAD 1983 StatePlane California 1 FIPS 0401 Feet

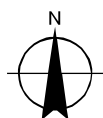
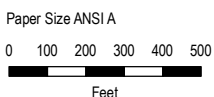
Nordic Aquafarms California, LLC  
 Samoa Peninsula Sustainable  
 Aquaculture Development Project  
 Samoa, Humboldt County, California

Project No. 11205607  
 Revision No. -  
 Date Apr 2021

Vicinity Map

FIGURE 1

- Legend**
- Parcel Boundary (M. O'Hearn 2011 Survey)
  - Parcel Boundary provided by CRC
  - Proposed Structures
  - Area of Potential Effect
  - (E) Existing Infrastructure**
  - ↔ HBMWD Water Main Line
  - HBMWD Water Trunk Line
  - Ocean Outfall Connection Path



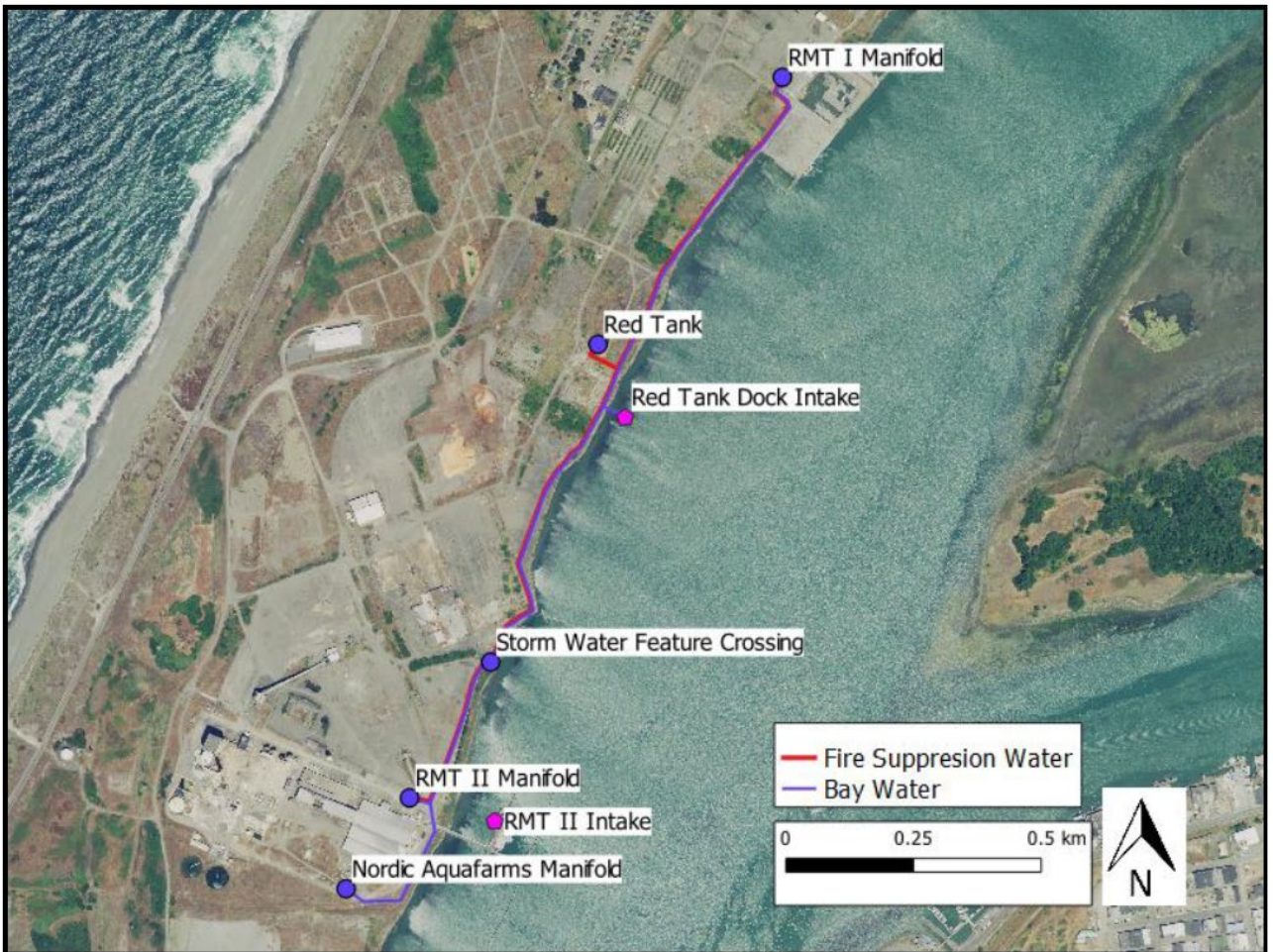
Nordiq Aquafarms California, LLC  
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**Proposed Site Layout**

**FIGURE 2**



**Figure 3: Proposed bay water intakes, bay water line, fire suppression line and manifolds that bay water will be delivered to.**



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### SUMMARY OF KEY ENVIRONMENTAL ISSUES TO BE ADDRESSED IN THE EIR

Pursuant to Section 15064 of the State CEQA Guidelines, the discussion of potential Project effects on the environment in the EIR will concentrate on those impacts that the County has determined may be potentially significant. The detailed analysis will evaluate the Project; however, the EIR will also describe a range of reasonable alternatives to the proposed Project that are capable of meeting most of the Project's objectives, and that would avoid or substantially lessen any of the significant effects of the Project, consistent with State CEQA Guidelines Section 15126.6. The EIR will also evaluate the cumulative impacts of the Project when considered in conjunction with other related past, present, and reasonably foreseeable future projects.

The EIR will evaluate all CEQA Guidelines Appendix G topics; however, the County has determined that the proposed project could potentially result in environmental impacts to certain environmental resources. These topic areas will be evaluated in the EIR, and feasible and practicable mitigation measures will be recommended to reduce any potentially significant impacts. Therefore, the EIR will focus on the following topic areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Energy
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazardous and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Brief descriptions of proposed analyses follow.

**Aesthetics:** The project site is situated between the Pacific Ocean to the west, and Humboldt Bay to the east. The Aesthetics analysis will characterize the visual setting and evaluate potential direct and indirect impacts to the surrounding aesthetic of the existing land uses and development, and natural setting. Visual simulations will be compared to analyze the existing site development to the proposed NAFC facility. Avoidance and mitigation measures would be imposed if significant impacts are identified.

**Air Quality:** The EIR will consider direct and indirect impacts to regional and local air quality associated with project construction (including demolition activities) and operation. Emissions of criteria air pollutants will be estimated using computer models and methodology approved by the North Coast Unified Air Quality Management District (NCUAQMD). Project consistency with adopted plans or policies intended to address air quality will be evaluated and avoidance measures identified. Avoidance measures or permits may be identified in the Project EIR.

**Biological Resources:** The Project Site is a developed industrial area, characterized by hardscape and areas of historic grading and filling. The proposed project footprint lies on the east side of Vance Avenue, which is primarily characterized by existing concrete foundations and remnant pulp mill structures. The southern portion of the project site is characterized by an existing leach field, historic fill, concrete debris, and a cyclone fence approximately 20-feet from the southern property line. The Biological Resources analysis for the EIR will evaluate potential direct and indirect biological impacts on sensitive and rare species, habitat, migration corridors, and wetlands. The EIR will analyze the impacts on marine resources as a

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result of the proposed wastewater discharge from the ocean outfall pipe; impacts on biological resources in the Humboldt Bay associated with the proposed saltwater intake and required upgrades to the sea chest infrastructure (i.e., fish entrainment); and consider impacts to terrestrial and marine species as a result of project construction and operations, and in-water work associated with improving the sea chests.

**Cultural Resources:** The Cultural Resources analysis will evaluate potential direct and indirect impacts to archaeological and historic resources .

**Energy:** The estimated normal daily electricity usage for the project is 21.4 megawatts (MW), a portion of which will be offset by the 3-5 MW rooftop solar installation which will cover approximately 690,000 square feet of facility rooftops. The EIR will assess the proposed energy usage with regards to the State’s adopted energy goals and plans for renewable energy or energy efficiency. The EIR will also evaluate the impacts to Humboldt County’s electrical grid and capacity of the Pacific Gas & Electric (PG&E) King Salmon Power Plant to support the increase in energy use, while also considering the potential impacts of power use in the event of Public Safety Power Shutoffs (PSPS).

**Geology and Soils:** The project site is located on a generally flat site with elevations and slope stabilities rated as Low to Moderate Instability. The Project is situated within a seismically active area close to several seismic sources capable of generating moderate to strong ground motions. The EIR will evaluate impacts from landslides and unstable soils that could result from grading, roads, and new development.

**Greenhouse Gas Emissions:** In the North Bay Air Basin, North Coast Unified Air Quality Management District (NCUAQMD) regulates greenhouse gas emissions through its Rule 111 (Federal Permitting Requirements for Sources of Greenhouse Gases). The EIR will evaluate the Project for consistency with Rule 111, California’s Greenhouse Gas (GHG) reduction goals, recommendations contained in the AB 32 Scoping Plan, and other recent guidance documents regarding Project-generated GHG emissions, including those from operational truck traffic.

**Hazards and Hazardous Materials:** The project will occur within an industrial area host to hazardous materials associated with the former pulp mill site. The site is a designated Brownfields site with known contaminants occurring within existing structures proposed for demolition. The EIR will evaluate potential impacts associated with the risks to hazards, including but not limited to risks associated with Project demolition, construction, and operation. Avoidance and mitigation measures would be imposed if significant impacts are identified.

**Hydrology and Water Quality:** The project site is along the North Spit of the Humboldt Bay, and situated directly east of the Pacific Ocean. Flowing waters (streams, rivers, or natural drainages) are not located on site. The EIR will evaluate potential project impacts to Humboldt Bay associated with saltwater intake improvements and use, the Pacific Ocean associated with treated wastewater discharge, increased runoff and flooding, and water quality from project grading and construction. The project will analyze the impacts of treated wastewater on the surrounding ocean resources near the multi-port diffuser. Avoidance and mitigation measures would be imposed if significant impacts are identified.

**Land Use and Planning:** The Project site is located within lands designated for coastal dependent industrial uses by Humboldt County. The EIR will evaluate the proposed Project for consistency with existing local land use policies and regulations, including applicable habitat conservation plans, local coastal plans, and airport land use plans. No avoidance measures have been identified at this time, but such measures may be included in the Project EIR.

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**Noise:** Impact analysis for this section will include evaluation of noise and vibration resulting from three potential construction methods, including rammed aggregate piles, vibro displacement columns, and vibro soil densification. Impact analysis will also evaluate noise and vibrations that would result from the installation of sheet piling using a vibratory pile driver and installed to a depth of approximately 30 feet. Impact analysis will also evaluate the noise and vibration from the sea chest pumps during operation. Construction of the Project would temporarily increase noise in the immediate vicinity of the Project Site. Noise impacts resulting from construction would depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise sensitive areas. Operational noise would primarily consist of vehicles entering and leaving the Project Site. Noise and vibration resulting from operation of the Project would be analyzed for consistency with Industrial Performance Standards as established in Humboldt County Code Section 313-103-1.

**Public Services:** The project would result in development that could require additional police and fire protection. The Project is estimated to employ approximately 150 employees. It is anticipated that a majority of these employees would be hired locally. Because the majority of future employees already live in the area, they would not create a significant demand for additional housing. The Project would result in an increase in employees on the Samoa Peninsula, which could increase incidental demand for general retail and services such as lunch-time restaurants. The EIR will evaluate impacts on the provision of these services.

**Recreation:** The project would result in development that is unlikely to impact recreation. The EIR will evaluate impacts on recreation and recreational facilities, including public recreational access to the coast.

### **Transportation:**

**Roadways:** The Samoa Peninsula has limited vehicular access. New Navy Base Road is the primary route that links development along the peninsula. Immediately north of the town of Samoa, New Navy Base Road intersects with SR 255 and splits – resulting in one route southeast over the Samoa Bridge to Eureka and US 101 and one route north through the remainder of the Samoa Peninsula where it connects to US 101 in Arcata. These are the only two routes available for employees, visitors, and freight traffic to access the Project Site. Immediate access to the Project Site is provided by Vance Avenue, which runs parallel to a portion of New Navy Base Road. Vance Avenue is connected to New Navy Base Road primarily by Bay Street and LP Drive. All of these roads are two-way roads with one travel lane in each direction.

**Pedestrian and Bicycle Facilities:** As specified in the Humboldt County Regional Transportation Plan, all streets, roadways, and highways in Humboldt County are open to bicycle use (HCAOG 2018). The Humboldt County Regional Bicycle Plan identifies New Navy Base Road through the Project Site as a proposed future Class I bike path, which is defined as a separated, surfaced right-of-way designated exclusively for non-motorized use (can be solely for bicyclists, or can be shared with pedestrians and/or equestrians). The proposed Class I bike path would continue north along SR 255 to the City of Arcata (HCAOG 2018). Roadways in the Project Area do not include sidewalks, so pedestrians are limited to the roadway shoulder or in the road right-of-way.

**Public Transit:** There are currently no commuter transit services or fixed-route public transit routes in the Samoa Peninsula.

**Airports:** The nearest airport to the Project Site is Samoa Field Airport, which is owned and managed by the City of Eureka.

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**Vehicle Miles Traveled:** SB 743 creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative measure of effectiveness (MOE) for evaluating transportation impacts, which was done in early 2019. Humboldt County has not yet adopted VMT thresholds.

CEQA Guidelines section 15064.3 states "[V]ehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except projects for regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact." This section goes on to state in b(3), "If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc."

The EIR will assess transportation impacts associated with the project construction and operations, including vehicles coming and going to the site associated with employee traffic.

**Tribal Cultural Resources:** The Project is located within the traditional territory of Wiyot Tribe. The Project Site is not listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic resources as defined in Public Resources Code section 5020.1(k). Consistent with the requirements of CEQA and the requirements of Public Resources Code section 21080.3.1, Humboldt County will initiate consultation regarding tribal cultural resources pursuant to AB 52.

**Utilities and Service Systems:** The industrial areas of the Samoa Peninsula, and specifically the Project Site, are well served by utilities because of the long history of high intensity industrial uses. Utilities and service systems for the project consist of the following:

**Water:** The Humboldt Bay Municipal Water District (HBMWD) provides wholesale and retail water services to the Samoa Peninsula. HBMWD maintains two separate pipeline systems delivering treated drinking water and untreated raw water to its customers in the area. HBMWD maintains a Capital Improvement Plan (CIP) to ensure that facilities and infrastructure are maintained and improved over time. These efforts have included projects on the Samoa Peninsula. The untreated raw water is currently supplied to industrial users on the peninsula. The source of the water is the Mad River. A one million-gallon (1 MG) raw water storage tank, owned and operated by HBMWD, is located southwest of the Project Site, approximately 600 feet west of the Project Site between Vance Avenue and New Navy Base Road. Lateral from the main water transmission lines already exist on the Project Site. Historically, this line served pulp mills on the peninsula; however, the majority of the industrial demand has since subsided. A will-serve letter was provided by the HBMWD on March 12, 2021. The letter confirmed the District has sufficient water to provide the needs of the Project, which include domestic water in the amount of 300,000 gallons per day and industrial non-potable water of 3 million gallons per day to the Project.

**Wastewater (Sanitary Sewer):** The only central sewer treatment system on the Samoa Peninsula is within the town of Samoa. Active industrial properties are served by on-site leachfields, which

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is the case for the Project Site. Phase 1 will continue to use the existing septic system. Phase 2 of the project would connect the project to the proposed Samoa Peninsula Wastewater Treatment System.

**Stormwater:** The peninsula is made up of typically well-drained soils (coarse sands) and topographic features that do not require addressing runoff issues. No formal stormwater systems, other than a few drainage ditches on some of the industrial properties, are located between the railroad tracks and Humboldt Bay. Some of these industrial areas have storm drain catch basins and underground piping, most of which is not formally mapped, and are owned and operated by private property owners. The stormwater system on the Project Site would be significantly upgraded to meet applicable stormwater requirements and contain on-site all stormwater resulting from an event up to the 100-year event.

**Solid Waste:** Solid waste and recyclables pickup within the Samoa Peninsula is collected by Recology, which also has a recycling plant on the Samoa Peninsula. The County, through Humboldt Waste Management Authority (HWMA), has been trucking its solid waste approximately 175 miles to two out-of-county landfills. The project would require transport of solid waste to an off-site facility.

**Energy:** Electricity is provided to the Samoa Peninsula by the Pacific Gas and Electric Company (PG&E). Power is transmitted to the Project Site through 115 kilovolt (kV) lines from the source to the PG&E substation located in Fairhaven. The power is then converted to be suitable for distribution via 12 kV overhead lines. Electricity is distributed via private lines and each structure has its own meter.

The EIR will evaluate the impacts to public utilities associated with the proposed new facilities, improvements to sea chests and fire suppression system.

**Wildfire:** The study area will include the Project Site and adjoining properties that could feasibly be impacted should a wildfire occur within the Project Site. The Project Site is located in a local responsibility area (LRA) meaning that it is in an area where local governments have financial responsibility for wildland fire protection. A portion of the Project Site is classified as having a "Moderate" fire hazard severity; the balance of the Project Site has no fire hazard ranking categorization. The EIR will assess potential impacts associated with wildfire.

**Cumulative Impacts:** Potential cumulative impacts of the project will be addressed in the EIR consistent with CEQA Guidelines Section 15130, including impacts associated with the modification and upgrade of the sea chests, as described in the project description and other projects proposed on the Samoa Peninsula.

**Other CEQA Issues:** The EIR will briefly discuss less than significant and/or insignificant issues, which at this time are expected to include agriculture and forest resources, mineral resources, and population and housing. CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant (PRC Section 21100, 14 CCR Sections 15126.2[a] and 15128).

**Alternatives:** In accordance with the state CEQA Guidelines (14 CCR Section 15126.6), the EIR will describe a range of reasonable alternatives to the proposed project that are capable of meeting most of the project's objectives, and which would avoid or substantially lessen any potential significant effects

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that may be identified. The EIR will analyze the No Project Alternative, an off site alternative, and will also identify the environmentally superior alternative. The EIR will identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why.