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Thompson, Brendan@Waterboards <Brendan.Thompson@waterboards.ca.gov> Monday, August 21, 2023 4:10 PM

District Planner (districtplanner@humboldtbay.org)

Bey, Ryan A.@Waterboards; Strong, Shannon@Waterboards; Moore,

Heaven@Waterboards; Dragaloski, Walt F.@Waterboards; OPR State Clearinghouse RB1 Comments: NOP Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal (SCH No. 2023060752)

Dear Mr. Homlund.

Thank you for providing North Coast Regional Water Quality Control Board (Regional Water Board) staff the opportunity to comment on the Notice of Preparation of an Environmental Impact Report (EIR) for the Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal Project (Project). The Project would involve approximately 180 acres of redevelopment on the Samoa Peninsula and involve construction of paved and compacted roads throughout the site and approximately 13.5 acres of new buildings.

The Regional Water Board is concerned about potential impacts to Humboldt Bay that may occur from stormwater runoff during the permanent Project configuration (i.e., post-construction). We are pleased that the NOP depicts several post-construction stormwater control features around the Project perimeter. Although the Project area is not subject to the County of Humboldt's Municipal Separate Storm Sewer System stormwater NPDES permit (MS4 permit) coverage and associated post-construction stormwater requirements, the Regional Water Board will utilize the Clean Water Act section 401 water quality certification process to require a level of Low Impact Development (LID) post-construction stormwater control commensurate to the MS4 permit requirements. Please ensure that the Harbor District 1) include all post-construction stormwater control Best Management Practice (BMP) designs and details with your 401 certification application, and that 2) the treatment meets the minimum MS4 permit standards. Additionally, please include as many specific post-construction LID BMP details as possible in the EIR to help Regional Water Board staff evaluate the appropriateness and adequacy of the proposed treatment.

Additionally, because this very large project would present a risk of pollution discharge to Humboldt Bay during construction, the 401 certification application and EIR should also include details that demonstrate how stormwater pollutants will be prevented from entering the Bay during construction, for both the dry and wet seasons.

Thank you. Please contact me if you have any questions.

Brendan Thompson (he/him/his) *Why?* Environmental Scientist North Coast Regional Water Quality Control Board 930 6th Street, Eureka, CA 95501 (707) 576-6795

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