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None.

3.10 Effects Found Not to be Significant

Section 15128 of the CEQA Guidelines requires that an EIR briefly describe any possible effects that were determined not to be significant. This section discusses the environmental topics that were determined to not result in potentially significant environmental effects. The discussion of each topic relies on the checklist questions listed in Appendix G of the 2024 CEQA Guidelines and shown in italic text at the beginning of each topical impact analysis in this section.

3.10.1 Geology and Soils

1. *Would the plan expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - a. *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?*
 - b. *Strong seismic ground shaking?*
 - c. *Seismic-related ground failure, including liquefaction?*
 - d. *Landslides?*

Humboldt County is located within a seismically active region. Specifically, the Mendocino Triple Junction is located in the Pacific Ocean near Cape Mendocino, the westernmost point of California's coast, located within Humboldt County. The Mendocino Triple Junction is the point where three tectonic plates (Gorda, North American, and Pacific) and three major faults (the Cascadia Subduction Zone, the San Andreas Fault, and the Mendocino Fracture Zone) meet. As a result, large earthquakes would be expected to occur during the economic lifespan (50 years) of any improvements or subsequent infrastructure that occurs as a result of the RCAP. There are State regulations, as well as local requirements established by the County and city general plans and municipal codes, that address seismic hazards. The Alquist-Priolo Act prohibits the development of structures for human occupancy across active fault traces. Under the Alquist-Priolo Act, the California Geological Survey has established "Zones of Required Investigation" on either side of an active fault that delimits areas susceptible to surface fault rupture. The zones are referred to as *Earthquake Fault Zones* and are shown on official maps published by California Geological Survey. The Alquist-Priolo Act requires geologic studies be conducted to locate and assess any active fault traces in and around known active fault areas prior to development of structures for human occupancy to prevent the construction of such structures in such locations. In addition, the California Building Code (CBC) incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake. The CBC includes provisions for demolition and construction, as well as regulations regarding building foundations and soil types to protect people and property from hazards associated with falling debris or construction processes. Seismic standards within the CBC are among the strictest in the world because of California's susceptibility to earthquakes and other seismic events.

The RCAP is a policy document intended to reduce GHG emissions within Humboldt County. RCAP projects and infrastructure would not include habitable development but would still be subject to the CBC and local jurisdiction's general plan policies, zoning regulations, and design and

infrastructure construction, geotechnical, foundation, and slope standards. This would minimize potential geological risks associated with rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, and landslides. Therefore, RCAP impacts related to risk associated with earthquakes and ground failure would be less than significant.

2. *Would the plan result in substantial soil erosion or the loss of topsoil?*

The RCAP is a policy document intended to reduce GHG emissions within Humboldt County. Future RCAP-related improvements and infrastructure, such as renewable energy and transportation facilities per RCAP Measures BE-1, BE-2, T-1 Urban and Rural, T-2 Urban and Rural, T-4, and T-10, may require excavation and groundbreaking activities to prepare a project site. However, project contractor(s) would be required to implement standard Best Management Practices (BMPs), pursuant to the Clean Water Act and the Porter-Cologne Water Quality Control Act, to control runoff and ensure that associated grading and construction would not negatively impact water quality. Such BMPs may include installing straw bales, fiber rolls, and/or silt fencing structures to assure the minimization of erosion resulting from construction and to avoid runoff into sensitive habitat areas, limiting ground disturbance to the minimum necessary, and stabilizing disturbed soil areas as soon as feasible after construction is completed.

In addition, the Cities of Eureka, Arcata, Fortuna, and Trinidad and portions of unincorporated Humboldt County (McKinleyville; the greater Eureka area, including Myrtle town, Cutten, Ridgewood Heights, Pine Hill, and Humboldt Hill; and Shelter Cove) are subject to the State Water Quality Control Board (SWRCB) General Permit for Municipal Separate Storm Sewer Systems (MS4 Permit). Notably, Condition E.12 of the MS4 Permit required local agencies, by June 30, 2015, to require that projects comply with post-construction stormwater requirements based on “low impact development” (LID) standards.¹ LID standards are intended to maintain a site’s pre-development runoff characteristics by using design techniques that capture, treat, and infiltrate stormwater on site. The jurisdictions noted above have collaborated to develop a common manual, the *Humboldt Low Impact Development Stormwater Manual* (Humboldt LID Stormwater Manual), to present technical information, procedures, and guidance for complying with the State’s LID design standards.² Per the Humboldt LID Stormwater Manual, RCAP improvements or subsequent infrastructure, if not determined to be an Exempt Project,³ would require preparation of a Stormwater Control Plan (SCP) to describe how a project will manage the site’s stormwater and control run-off.

Additionally, RCAP projects such as utility-scale renewable energy per RCAP Measure BE-2, renewable fuel production per RCAP Measure T-10, organic waste processing per RCAP Measure SW-1, recycled water per RCAP Measure WW-2, and transportation facilities per RCAP Measures T-1 Urban and Rural, T-2 Urban and Rural and T-4 that could disturb one or more acres of soil or would disturb less than one acre individually but are part of a larger common plan of development that in total disturbs one or more acres would be subject to the requirements of the National Pollutant

¹ LID standards are guidelines that help manage stormwater and runoff to reduce adverse water quality impacts and replenish groundwater.

² Humboldt County. 2021. Humboldt Low Impact Development Stormwater Manual (Version 3.0) – Design Guidance for Stormwater Treatment and Control Projects in Phase II MS4 Permit Areas. https://northcoaststormwatercoalition.org/wp-content/uploads/2021/10/Humboldt-LID-Stormwater-Manual_V3.0.pdf (accessed November 2024).

³ In accordance with the *Humboldt Low Impact Development Stormwater Manual*, Exempt Projects include the following, which are not subject to LID requirements: projects that create or replace less than 2,500 square feet (SF) of impervious surface; interior remodels and routine maintenance or repair such as exterior wall surface replacement; reroofing of an existing building; asphalt or paving overlays and resurfacing of existing surfaces; and Linear Underground Projects (LUPs) unless the LUP has a discreet location that has greater than or equal to 5,000 SF of newly constructed impervious surface.

Discharge Elimination System (NPDES) General Construction Activity Stormwater Permit (Construction General Permit Order 2009-0009-DWQ, also known as the CGP) of the SWRCB. Construction activity subject to the CGP includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.⁴ Where such activities would occur, operators of such construction sites are required to implement stormwater controls and develop a Stormwater Pollution Prevention Plan (SWPPP) identifying specific BMPs to be implemented during construction to reduce the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. Within California, the NPDES permit program is administered by the SWRCB and the Regional Water Quality Control Boards. Within Humboldt, the respective Regional Water Board is the North Coast Regional Water Quality Control Board (NCRWQCB).

With implementation of appropriate BMPs and compliance with Humboldt LID Stormwater Manual requirements and the CGP, as applicable, the RCAP would not result in substantial soil erosion or the loss of topsoil. Therefore, RCAP impacts related to erosion and topsoil would be less than significant.

3. *Would the plan 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?*

Areas of unstable soils are present throughout Humboldt. For example, soils subject to liquefaction are predominantly found near Humboldt Bay where muds and sands are present, while soils subject to landslide are concentrated in the Cape Mendocino watershed area as well as in the North Coast Ranges.⁵ The RCAP is a policy document intended to reduce GHG emissions within Humboldt. The RCAP does not include specific projects or project locations, but there is the potential for future RCAP-related improvements and infrastructure to occur in areas with unstable soils. Future RCAP-related improvements and infrastructure would be required to comply with the CBC and the local jurisdiction's general plan policies, zoning regulations, and design and construction standards to ensure that structural design and construction account for local conditions related to geologic and soil stability. With compliance with existing regulations, future projects and infrastructure that stem from the RCAP would not directly or indirectly cause substantial adverse effects related to unstable soils. Therefore, RCAP impacts related to risk associated with unstable geologic unit or soil would be less than significant.

4. *Would the plan be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Expansive soils generally comprise cohesive, fine-grained clay soils and represent a significant structural hazard to buildings founded on them, especially where seasonal fluctuations in soil moisture occur at the foundation-bearing depth. The RCAP is a policy document intended to reduce GHG emissions within Humboldt. The RCAP does not include specific projects or project locations, but there is the potential for future RCAP-related improvements and infrastructure to occur in areas with expansive soils. Humboldt County and the individual city general plan policies, zoning

⁴ State Water Resources Control Board (SWRCB). 2024. *Welcome to the Construction Stormwater Program*. https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html (accessed November 2024).

⁵ Humboldt County. 2017. Humboldt General Plan Update Revised Draft Environmental Impact Report. <https://humboldt.gov/DocumentCenter/View/58851/Revised-Draft-Environmental-Impact-Report---Complete-Document-PDF> (accessed November 2024).

regulations, and design and construction standards require completion of preliminary soils report and geologic investigations to determine adverse geologic and soil conditions. If expansive soils are identified, then special design considerations per the CBC and local zoning and building regulations would be required. With compliance with existing regulations, future projects and infrastructure that stem from the RCAP would not directly or indirectly cause substantial adverse effects related to expansive soils. Therefore, RCAP impacts related to risk associated with expansive soils would be less than significant.

5. *Would the plan area 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?*

The RCAP is a policy document intended to reduce GHG emissions within Humboldt and would not result in new habitable development, though some RCAP-related projects such as utility-scale renewable energy facilities per RCAP Measures BE-1 and BE-2, organic waste processing facilities per RCAP Measure SW-1, and renewable fuel production facilities per RCAP Measure T-10 could require restroom facilities that may utilize septic tanks or alternative wastewater disposal systems. In addition, RCAP Measure WW-1 includes actions that promote improvements and upgrades to existing septic and alternative wastewater disposal systems, such as the use of anaerobic digesters to generate renewable fuel. In the event septic tanks and other alternative wastewater disposal systems are necessary for infrastructure that occurs as a result of the RCAP, such systems would be required to comply with all applicable federal, state, and local regulations related to their design and use, including Humboldt County Department of Environmental Health (DEH) and local jurisdictions' policies and standards. Upgrades and improvements to existing septic and alternative wastewater disposal systems promoted by RCAP Measure WW-1 would also be required to comply with the applicable regulations. Such policies are designed to ensure systems are properly sited and designed for each specific location. Therefore, RCAP impacts related to septic tanks and alternative wastewater disposal systems would be less than significant.

6. *Would the plan directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Implementation of the RCAP, including associated improvements and subsequent development to occur as a result of the proposed plan, may require excavation and groundbreaking activities to prepare a project site. The University of California, Berkeley Museum of Paleontology's repository⁶ has on record over 700 specimens on file within Humboldt, including invertebrates, vertebrates, microfossils, and fossils, indicating groundbreaking activities within the County has the potential to result in inadvertent discovery of paleontological resources. Furthermore, a paleontological resources report, prepared for a separate project involving broadband infrastructure proposed within Humboldt, Trinity, and Shasta Counties, indicates that within the Eureka-Arcata-Trinidad area, "paleontologically sensitive geologic units are widespread" and include unnamed Pleistocene-age nonmarine terrace deposits, unnamed Pleistocene-age marine and nonmarine overlap deposits,

⁶ The University of California Museum of Paleontology at U.C. Berkeley (2024) has several online databases that can be searched, including archives, photographs, localities, and specimens, available at the following link: <https://ucmp.berkeley.edu/collections/databases/>.

and the Falor Formation.⁷ The report further notes that fossil remains of a mammoth have also been located within northern Humboldt County.⁸

Although there are no specific projects and locations identified in the RCAP, implementation of the RCAP would facilitate projects and infrastructure that may include site preparation, demolition, and other construction activities. Such projects would include renewable energy infrastructure (wind, solar, and hydrogen) per RCAP Measures BE-1, BE-2, BE-3, BE-7, and T-10, EV charging and parking infrastructure per RCAP Measures T-6 and T-7 and transportation infrastructure (transit, bicycle, and pedestrian) per RCAP Measures T-1 Urban and Rural, T-2 Urban and Rural, T-4, and T-7. In addition, RCAP Measures SW-1 and WW-2 may result in new organic waste processing and recycled water facilities and infrastructure. Construction of such projects would include site preparation and other ground-disturbing construction activities that could affect previously unknown paleontological resources.

Although there is potential for inadvertent discovery of paleontological resources during groundbreaking activities associated with the RCAP, the State protects paleontological resources located on public lands pursuant to Section 5097.5 of the California Public Resource Code (PRC) and local jurisdictions include policies in local planning documents, including respective general plans, that provide protocol in the event of inadvertent discovery of such resources. Such policies include halting work (including grading and other ground disturbing activities) at the find location until the resources are evaluated and appropriate treatment is determined and implemented. Such policies include Humboldt County General Plan Standard CU-S4, Eureka General Plan Policy HS-1.7, Arcata General Plan Policy H-7, Fortuna General Plan Policy NCR-7.1, and Rio Dell General Plan Policy P1.3.4-2. By complying with State and local regulations and inadvertent discovery protocols, it is anticipated that implementation of the RCAP would not destroy unique paleontological resources or geological features. Therefore, RCAP impacts related to paleontological resources would be less than significant.

3.10.2 Hazards and Hazardous Materials

1. *Would the plan create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
2. *Would the plan 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?*

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, State, or local agency, or has characteristics defined as hazardous by a federal, State, or local agency. Chemical and physical properties such as toxicity, ignitability, corrosiveness, and reactivity cause a substance to be considered hazardous. These properties are defined in the California Code of Regulations (CCR), Title 22, §66261.20-66261.24. A “hazardous waste” includes any hazardous material that is discarded, abandoned, or will be recycled. Therefore, the criteria that render a material hazardous also cause a waste to be classified as hazardous (California Health and Safety Code, Section 25117).

⁷ PaleoServices – San Diego Natural History Museum. 2021. *Paleontological Resource Technical Report – Digital 299 Broadband; Humboldt, Trinity, and Shasta Counties, California*. <https://ia.cpuc.ca.gov/environment/info/transcon/ismnd/Appendix%20L%20-%20Paleontological%20Report%20and%20Monitoring%20Plan/Digital%20299%20Paleo%20Resource%20Technical%20Report%202021%201109.pdf> (accessed November 2024).

⁸ Ibid.

Implementation of the RCAP, including associated improvements or subsequent infrastructure may require the routine transport, use, and disposal of hazardous materials, such as those commonly associated with large-scale renewable energy (e.g., RCAP Measures BE-1 and BE-2), battery energy storage (e.g., RCAP Measures BE-2, BE-4, and BE-7), renewable fuel production (e.g., RCAP Measures T-10 and WW-1), organic waste processing (e.g., RCAP Measure SW-1), and recycled water (e.g., RCAP Measure WW-2) facilities, including the overall construction process and associated operation and maintenance. Such hazardous materials may include but are not limited to gasoline, diesel fuel, hydraulic fluids, oils, lubricants, acids, bases, cleaning solvents, and paint, as well as lithium-ion batteries, renewable fuels (e.g., biofuels and renewable natural gas), and hydrogen fuel. The use and storage of these hazardous materials, in particular, large-scale storage of lithium-ion batteries, hydrogen fuel, and biofuels, could create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving their release.

Any use, storage, transport, or disposal of potentially hazardous materials during construction and operation of RCAP projects would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials, including but not limited to Title 49 of the Code of Federal Regulations (CFR), Title 22, Division 4.5 of the CCR, the NPDES permitting program for construction activities, 29 CFR Part 1910, National Fire Protection Association standards, and local fire district review and conditions. Additionally, future RCAP projects involving the use or storage of hazardous materials would be subject to existing regulations in the Humboldt County Code (HCC), Humboldt County General Plan, and each individual city's municipal code and general plan including policies and development standards that would limit the allowable locations of large-scale renewable energy and battery energy storage, renewable fuel production, organic waste processing, and recycled water facilities. Such large-scale projects would also require discretionary permit approvals and project-level CEQA review. Compliance with existing hazardous materials regulations and local development standards would minimize the potential for the RCAP to result in significant hazards to the public or environment due to the routine use, transport, or disposal of hazardous materials and due to upset or accidental releases. Therefore, RCAP impacts related to risk associated with transport, use, or disposal of hazardous materials and hazardous materials release would be less than significant.

3. *Would the plan emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

As described above under Impacts 3.10.2.1 and 3.10.2.2, future RCAP related projects such as renewable energy, battery energy storage, renewable fuel, organic waste processing, and recycled water facilities would involve the use and storage of hazardous materials. Such projects would be subject to federal, State, and local regulations pertaining to the use, storage, transport, and disposal of hazardous materials, which would minimize the potential for accidental releases of hazardous materials that could affect schools. Furthermore, local general plan and zoning code policies and regulations would limit the allowable locations of large-scale renewable energy and battery energy storage, renewable fuel production, organic waste processing, and recycled water facilities to appropriate locations and impose safety requirements that would reduce risks to surrounding land uses, including schools. These include policies such as Humboldt General Plan Policy S-P32 and Standard S-S16, Arcata General Plan Policies PS-6d, PS-6e and PS-6g, Eureka General Plan Policies AQ-1.5, Q-1.6, HS-3.1, HS-3.4, HS-3.7 and HS-3.8, Ferndale General Plan Implementation Program 2.b, Fortuna General Plan Policies HS-1.1, HS-6.1, HS-6.3, HS-6.4, HS-6.7, HS-6.8, Rio Dell General Plan Policy P1.2.4-3, and Trinidad General Plan Public Safety Element Recommendations 21 and 22. Compliance with existing hazardous materials regulations and local development standards would

minimize the potential for the RCAP to result in significant hazards to schools. Therefore, RCAP impacts related to risk associated with hazardous materials release near a school would be less than significant.

4. *Would the plan be located on a site included on a list of hazardous material 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?*

Government Code Section 65962.5 requires that the California Department of Toxic Substances Control (DTSC) compile and update a list of hazardous waste facilities; land designated as hazardous waste property; hazardous waste disposals on public land; sites that contain potential hazards to public health, safety or the environment, the risk of fire or explosion, and toxic hazards; and all sites included in the Abandoned Site Assessment Program. Contaminated sites are present throughout Humboldt, primarily The DTSC Hazardous Waste and Substances Site List includes two active sites, the State Water Resources Control Board Leaking Underground Storage Tanks List includes 12 sites with open cases, and the United States Environmental Protection Agency (USEPA) lists one site in Humboldt, the Copper Bluff Mine, as a Superfund site.^{9, 10, 11} While the RCAP is a policy document intended to reduce GHG emissions within Humboldt County, improvements and subsequent infrastructure associated with implementation of the RCAP may occur. Should such infrastructure be proposed on a site included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5, compliance with applicable federal, State, and local laws and regulations regarding cleanup and reuse of a listed hazardous materials site would ensure there would not be a significant hazard to the public or the environment. Therefore, RCAP impacts related to risk associated with location on a listed hazardous materials site would be less than significant.

5. *For a plan area located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

There are eight airports within Humboldt: California Redwood Coast – Humboldt County Airport, Dinsmore Airport, Garberville Airport, Kneeland Airport, Murray Field Airport, Rohnerville Airport, Samoa Field Airport, and Shelter Cove Airport. Under implementation of the RCAP, improvements and subsequent infrastructure may occur. Should any such development occur on a site located within an airport land use plan or within two miles of a public airport or public use airport, compliance with federal, State, and local regulations, including the Humboldt Airport Land Use Compatibility Plan¹², pertaining to projects and infrastructure in proximity to an airport would be required, including but not limited to land use types and compatibility, heights, and siting and design specifications. This would ensure potential projects and infrastructure would not result in a safety hazard for people residing or working in the area. Additionally, as addressed under Impact NOI-3 in Section 3.7, *Noise*, the RCAP would not expose people residing or working in the vicinity of

⁹ DTSC. 2024. Hazardous Waste and Substances Site List.

https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29 (accessed November 2024).

¹⁰ State Water Resources Control Board. 2024. Leaking Underground Storage Tanks List

¹¹ USEPA. 2024. National Priorities List and Superfund Alternative Approach Sites. <https://www.epa.gov/superfund/search-superfund-sites-where-you-live> (accessed November 2024).

¹² Humboldt County Airport Land Use Commission. 2021. Humboldt County Airport Land Use Compatibility Plan.

<https://humboldt.gov/DocumentCenter/View/95080/2021-Airport-Land-Use-Compatibility-Plan-adopted-04132021-33-MB> (accessed October 2024).

airports to excessive noise levels. Therefore, RCAP impacts related to risk associated with airports would be less than significant.

6. Would the plan impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Humboldt County Emergency Operations Plan is a multi-jurisdictional plan that addresses the planned response to emergency situations associated with natural disasters, technological incidents, and national security emergencies in, or affecting, Humboldt.¹³ Emergency evacuation routes present throughout Humboldt provide critical transportation facilities in the event of an emergency. Critical transportation facilities for emergency evacuation throughout Humboldt include U.S. 101, SR 299, SR 255, SR 36, and SR 96. These routes provide regional connectivity throughout Humboldt and allow emergency vehicles to travel countywide, including connections to incorporated cities within Humboldt. The RCAP does not involve site-specific development, nor would it facilitate new development that would interfere with adopted emergency plans. Implementation of some RCAP measures, such as those related to active transportation and public transit infrastructure (e.g., Measures T-1 Urban and Rural, T-2 Urban and Rural and T-4) may involve construction within the local or State right-of-way. Construction activities have the potential to require lane closures and may impact traffic and vehicle speeds on the affected roadways.

However, existing State, County, and City regulations minimize the potential for RCAP projects to interfere with emergency response and evacuation. For example, temporary construction barricades or other obstructions that could impede emergency access on State highway systems/routes would be subject to the standards set forth in the California Manual of Uniform Traffic Control Devices (Manual).¹⁴ The Manual requires the creation and approval of temporary traffic control plans to be used for minimizing impacts to roadways. Pursuant to County Code Title IV, Division 1, Chapter 1, construction activities occurring on County roads would be required to minimize interference with traffic. Projects occurring in the incorporated Cities would be required to comply with similar City-specific regulations regarding encroachment and construction safety, such as Chapter 56-10 of the Eureka Municipal Code, Chapter 12.08 of the Blue Lake Municipal Code, Chapter 12.08 of the Fortuna Municipal Code, and Chapter 12.04 of the Trinidad Municipal Code. The RCAP would not include future projects and land uses that would interfere with emergency response and evacuation plans during operation. Therefore, RCAP impacts related to risk associated with interference with emergency response and evacuation plans would be less than significant.

7. Would the plan expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

As discussed in further detail under Section 3.10.7, *Wildfire*, 45 percent of lands within Humboldt County are classified as Very High, 48 percent as High, and 4 percent as Moderate fire hazard severity.¹⁵ The RCAP is a policy document that does not propose specific projects or development. However, there is the potential for future RCAP-related projects to result in new structures, such as renewable energy (e.g., RCAP Measures BE-1 and BE-2), battery energy storage (e.g., RCAP Measures BE-2, BE-4, and BE-7), renewable fuel production (e.g., RCAP Measures T-10 and WW-1),

¹³ Humboldt County. 2015. Emergency Operations Plan. <https://humboldt.gov/DocumentCenter/View/51861/Humboldt-County-Emergency-Operations-Plan-2015> (accessed November 2024).

¹⁴ California Department of Transportation. 2024. CA Manual on Uniform Traffic Control Devices. <https://dot.ca.gov/programs/safety-programs/camutcd> (accessed October 2024).

¹⁵ Humboldt County. 2019. Humboldt County Community Wildfire Protection Plan. <https://humboldt.gov/2431/Community-Wildfire-Protection-Plan> (accessed November 2024).

organic waste processing (e.g., RCAP Measure SW-1), and recycled water (e.g., RCAP Measure WW-2) facilities, that could be located in areas subject to wildfire hazard. Future projects occurring within fire hazard severity zones would be subject to compliance with local, State, and federal standards for building materials, site design, defensible space, and emergency access per the California Building Code, California Fire Code, and Uniform Fire Code, as well as local regulations such as HCC Title III, Division 11 and local fire district review and conditions. Compliance with existing regulations would minimize the risk of loss, injury, or death involving wildfires. In addition, the RCAP contains Measures T-10 and CS-3, which include actions to sustainably manage forest biomass through actions such as understory clearing, that would reduce the risk of wildfire within Humboldt's forested areas. Therefore, RCAP impacts related to risk associated with wildland fires would be less than significant.

3.10.3 Hydrology and Water Quality

1. *Would the plan violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

The RCAP is a policy document to reduce GHG emissions in Humboldt and does not include specific projects that would have a direct adverse impact on water quality. Nonetheless, some projects facilitated by the RCAP would involve activities that could degrade surface water or groundwater quality or violate any water quality standards or waste discharge requirements as a result of construction activities, stormwater runoff, or the accidental release of stored fuels. For example, new renewable energy, renewable fuel, organic waste processing, and recycled water infrastructure promoted by RCAP Measures BE-1, BE-2, T-10, WW-1, SW-1, and WW-2 could require new roads or other impervious surfaces, with resulting stormwater runoff impacts. Additionally, as described in Section 3.10.2, *Hazards and Hazardous Materials*, new renewable fuel production and fueling facilities could potentially result in accidental spills of biofuels, which could affect surface or groundwater quality. Construction activities associated with future infrastructure improvements under the RCAP, including those mentioned above as well as transportation infrastructure (e.g., Measures T-1 Urban and Rural, T-2 Urban and Rural and T-4), could result in temporary water quality impacts due to soil erosion and ground disturbance.

All projects facilitated by the RCAP would be required to comply with independently enforceable requirements of the NPDES CGP and the MS4 Permit as well as other federal, State, and local requirements such as the Clean Water Act, Porter-Cologne Water Quality Control Act, the Humboldt LID Stormwater Manual, and individual city and County grading ordinances, as applicable. This includes compliance with the California Green Building Standards Code, which requires the incorporation of BMPs for materials and waste storage, handling, equipment and vehicle maintenance, and fueling to reduce potential discharge of polluted runoff from construction sites. It also would include adherence to the CGP, which requires future projects facilitated by the RCAP to prepare and implement a SWPPP for construction activities. The SWPPP is required to identify BMPs to control construction-related erosion and sedimentation in dry weather and stormwater runoff, thereby avoiding substantial degradation of water quality. Typical BMPs that could be incorporated into the SWPPP to protect water quality include: diverting off-site runoff away from the construction site; vegetating or revegetating areas as soon as feasible following grading activities; placing perimeter straw wattles to prevent off-site transport of sediment; conducting dust control activities during demolition and construction; using contained equipment wash-out and vehicle maintenance areas; maintaining erosion and sedimentation control measures throughout the construction period; and training all on-site workers on general site housekeeping. Compliance with

applicable federal, State, and local regulations would ensure that potential impacts of construction facilitated by the RCAP related to polluted runoff would be less than significant.

Compliance with applicable federal, State, and local regulations also would be required during the operation of projects facilitated by the RCAP. Applicable requirements would include NPDES and MS4 Permit requirements as well as site-specific LID features to reduce the potential for pollution from incidental spills of chemicals that can be conveyed by storm and landscape irrigation flows. The NPDES permit would establish limits on pollutants discharged into waterways and require all new development and significant redevelopment to incorporate LID features to reduce the discharge of pollutants into receiving waters. Requisite implementation of BMPs would address water quality concerns, such as inadvertent release of pollutants (e.g., hydraulic fluids, petroleum, biofuels); improper management of hazardous materials; trash and debris; and improper management of portable restroom facilities (e.g., regular service). Additionally, compliance with the California Green Building Standards Code would require source controls for outdoor material storage areas, outdoor trash storage/waste handling areas, outdoor loading/unloading dock areas, and building materials areas to minimize potential water quality impacts. Source controls also would include storm drain messages and signage and beneficial landscape irrigation practices. Compliance with these requirements, as well as with project-specific, site-specific conditions imposed pursuant to individual CEQA and permitting processes, would ensure that degradation of water quality (surface and ground) would remain minimal and that projects facilitated by the RCAP would meet all waste discharge requirements. Therefore, RCAP impacts related to surface and groundwater quality would be less than significant.

2. *Would the plan substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Humboldt is in the North Coast Hydrologic Area and has four principal groundwater basins: Hoopa Valley, Mad River Valley, Eureka Plain, and Eel River Valley. Only the Eel River Valley Groundwater Basin is subject to a Groundwater Sustainability Plan.¹⁶ Implementation of the RCAP would not be expected to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. This is because the RCAP is a policy document intended to reduce GHG emissions within Humboldt, and would not result in new land uses, such as increased residential or commercial development, which would contribute to an increase in demand for groundwater. Additionally, the RCAP includes Measure WW-2 that seeks to decrease community water use by promoting water efficiency retrofits, sustainable landscaping, efficient landscaping irrigation, and increased recycled water production and use. RCAP Measure WW-2, specifically seeks to reduce per capita water consumption by 15 percent by 2030 and includes a related action to expand the recycled water system within the region. As such, the RCAP is anticipated to reduce the use of water, including groundwater supplies. Therefore, RCAP impacts related to groundwater supplies and recharge would be less than significant.

¹⁶ Humboldt County. 2017. Humboldt County General Plan Revised Draft EIR. <https://humboldt.gov/DocumentCenter/View/58851/Revised-Draft-Environmental-Impact-Report---Complete-Document-PDF> (accessed November 2024).

3. *Would the plan 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:*
 - a. *Result in substantial erosion or siltation on- or off-site?*
 - b. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*
 - c. *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?*
 - d. *Impede or redirect flood flows?*

Implementation of RCAP measures related to renewable energy (e.g., Measures BE-1 and BE-2), renewable fuel production (e.g., RCAP Measures T-10 and WW-1), organic waste processing (e.g., RCAP Measure SW-1), recycled water (e.g., RCAP Measure WW-2), infill development (e.g., Measure T-3), and active transportation and public transit (e.g., Measures T-1 Urban and Rural, T-2 Urban and Rural and T-4), may promote infrastructure development and construction activities within Humboldt. Implementation of RCAP measures related to infill development, active transportation, and public transit infrastructure would primarily occur within previously developed areas and would not result in substantial alterations to Humboldt's existing drainage patterns and amount of impervious surface. However, larger-scale facilities such as renewable energy (e.g., Measures BE-1 and BE-2), renewable fuel production (e.g., RCAP Measures T-10 and WW-1), organic waste processing (e.g., RCAP Measure SW-1), and recycled water (e.g., RCAP Measure WW-2) facilities may occur within previously undeveloped areas and could result in alteration of existing drainage patterns. Additionally, construction of projects facilitated by the RCAP could temporarily disturb underlying soils and could result in exposure of soil to runoff.

Without precautions, construction activities could produce pollutants and sediment in stormwater runoff. However, impacts to drainage patterns, erosion, runoff, and water quality during construction of RCAP-related projects would be minimized through the implementation of BMPs as required by the NPDES CGP and other applicable State and local regulations discussed above under Impact 3.10.3.1. Compliance with applicable federal, State, and local regulations would ensure that potential impacts of construction facilitated by the RCAP related to drainage patterns would be less than significant.

Compliance with applicable federal, State, and local regulations also would be required during the operation of projects facilitated by the RCAP. Applicable requirements would include NPDES and MS4 Permit requirements for the inclusion of site-specific LID features to reduce the potential for new development to substantially alter drainage conditions in a manner that would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, 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 impede or redirect flood flows. Under the MS4 Permit, certain categories of development and redevelopment projects must mimic predevelopment hydrology through infiltration, evapotranspiration, and rainfall harvest and use. Projects for which a LID plan is required must limit post-development peak stormwater runoff discharge rates to no greater than the estimated pre-development rate for developments where the increased peak, stormwater discharge rate would result in increased potential for downstream erosion.

Operation of any future projects also would be subject to CBC and local standards and policies that limit development within flood hazard areas and require flood protection measures. These policies address development and redevelopment, compatibility of uses, required pre-development drainage studies, compliance with discharge permits, and proposed BMPs to protect development within flood risk areas. These include HCC Chapter 5, Arcata Municipal Code Chapter 4, Blue Lake Chapter 13.20, Eureka Municipal Code Chapter 153, Ferndale Ordinance 08-02, Fortuna Municipal Code Chapter 15.58, Rio Dell Municipal Code Chapter 15.15, and Trinidad Municipal Code Chapter 17.20. Compliance with these requirements would confirm that operation of future RCAP-related projects and infrastructure would result in less than significant impacts related to drainage patterns and associated erosion, surface runoff, stormwater drainage systems, and flood flows.

4. *In flood hazard, tsunami, or seiche zones, would the plan risk release of pollutants due to project inundation?*

Flood hazards in Humboldt are attributable to rivers and streams, dam failure, and coastal high-water hazards (tsunamis and flood tides), with river flooding being the most prevalent. Flooding is a concern for many waterways in Humboldt County, including the Eel River (including the Van Duzen and South Fork), the Mad River, Eureka Plain (especially Freshwater and Jacoby Creeks), and the Trinity River.¹⁷ Projects and infrastructure facilitated by and/or subsequent to implementation of the RCAP that would be located within flood and/or tsunami hazard zones would be subject to requirements of the respective local jurisdiction (i.e., County of Humboldt or an incorporated city) in addition to the CBC that specify design requirements for development located in flood or tsunami hazard zones. These include HCC Chapter 5, Arcata Municipal Code Chapter 4, Blue Lake Chapter 13.20, Eureka Municipal Code Chapter 153, Ferndale Ordinance 08-02, Fortuna Municipal Code Chapter 15.58, Rio Dell Municipal Code Chapter 15.15, and Trinidad Municipal Code Chapter 17.20. For any projects that would occur in proximity to a body of water such as Humboldt Bay that is at risk of a seiche, specific development standards as applicable by land use type would also apply. In addition, compliance with design standards as well as proper storage and handling of hazardous materials, described under Subsection 3.10.2, *Hazards and Hazardous Materials*, above, would reduce the risk of release of hazardous materials due to inundation. Therefore, RCAP impacts related to pollutant release due to inundation would be less than significant.

5. *Would the plan conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

The Water Quality Control Plan for the North Coast Region (Basin Plan) contains the regulations adopted by the NCRWQCB to control the discharge of waste and other factors affecting the quality of surface water and groundwater in Humboldt.¹⁸ In addition, the Eel River Valley Groundwater Basin is subject to a Groundwater Sustainability Plan.¹⁹ Implementation of the RCAP, including construction and operation of improvements and subsequent infrastructure, would not substantially affect surface water or groundwater resources within the RCAP plan area. As discussed above under Impacts 3.10.3.1 through 3.10.3.3, future RCAP projects would be subject to the construction and

¹⁷ Humboldt County. 2017. Humboldt County General Plan Revised Draft EIR.

<https://humboldt.gov/DocumentCenter/View/58851/Revised-Draft-Environmental-Impact-Report---Complete-Document-PDF> (accessed November 2024).

¹⁸ NCRWQCB. 2024. An Introduction to the Basin Plan. https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/ (accessed November 2024).

¹⁹ Humboldt County. 2017. Humboldt County General Plan Revised Draft EIR.

<https://humboldt.gov/DocumentCenter/View/58851/Revised-Draft-Environmental-Impact-Report---Complete-Document-PDF> (accessed November 2024).

post-construction requirements of the CGP and other applicable regional, State, and local regulations related to water quality and stormwater management. Specifically, projects facilitated by the RCAP would be subject to water quality standards imposed by NPDES permits, including stormwater discharge permits that would require BMPs to ensure protection of beneficial uses of surface waters governed by the Basin Plan. Though not anticipated, any future RCAP projects that would require direct extraction of groundwater from the Eel River Basin would be subject to approval from the Humboldt County Groundwater Sustainability Agency to ensure consistency with the groundwater sustainability plans. Additionally, the RCAP includes Measure WW-2 that seeks to decrease community water use by promoting water efficiency retrofits, sustainable landscaping, efficient landscaping irrigation, and increased recycled water production and use. As such, the RCAP is anticipated to reduce the use of water, including groundwater supplies. Therefore, RCAP impacts related to conflicts with water quality control or sustainable groundwater management plans would be less than significant.

3.10.4 Mineral Resources

1. *Would the plan 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?*
2. *Would the plan 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?*

Humboldt is known to contain mineral resources. The Humboldt County General Plan Conservation and Open Space Element indicates that there are over 90 extraction sites across Humboldt (both incorporated and unincorporated areas) that produce sand and gravel, metals, stone, and clay.²⁰ The mined materials are utilized for a variety of uses, including but not limited to concrete foundations; road construction, maintenance, and repair; fill materials; snow and ice control; railroad grade ballast; and as a filtration system for on-site sewage disposal systems. The RCAP is a policy document intended to reduce GHG emissions within Humboldt County and would not result in extraction or use of mineral resources. In addition, goals, policies, and implementation measures included in the County and individual city general plans of the various local agencies facilitate continued operation of local mining sites and protection of mineral resource areas from incompatible land uses and, thus, prevent loss of availability of known and locally important mineral resources. Therefore, RCAP impacts related to mineral resources would be less than significant.

²⁰ Humboldt County. 2017. General Plan Open Space and Conservation Element. <https://humboldt.gov/DocumentCenter/View/61986/Chapter-10-Conservation-and-Open-Space-Elements-PDF> (accessed November 2024).

3.10.5 Public Services

1. *Would the plan result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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:*
 - a. Fire protection?
 - b. Police protection?
 - c. Schools?
 - d. Parks?
 - e. Other public facilities?

The RCAP would not result in new habitable development requiring the provision or expansion of public services; rather, the RCAP would promote improvements and infrastructure such as renewable energy (e.g., Measures BE-1 and BE-2), renewable fuel production (e.g., Measures T-10 and WW-1), organic waste processing (e.g., Measure SW-1), recycled water (e.g., Measure WW-2), and active transportation and public transit infrastructure (e.g., Measures T-1 Urban and Rural, T-2 Urban and Rural and T-4). There are also no aspects of the RCAP, a policy document intended to reduce GHG emissions within Humboldt County, that would significantly impact the ability of the County, cities, or other local services providers to continue to provide public services in Humboldt. While improvements and subsequent infrastructure would occur, the RCAP would not be anticipated to result in substantial population growth, as described in Section 3.6, *Land Use Planning, Population, and Housing*. Furthermore, RCAP Measure T-3 would promote infill development and reduced urban sprawl within the region, thereby reducing demands upon public services. Therefore, implementation of the RCAP is not anticipated to result in the need for new or physically altered fire protection, police protection, schools, parks, or other public facilities (such as libraries) in order to maintain acceptable service ratios, response times, or other performance objectives. Therefore, RCAP impacts related to public services would be less than significant.

3.10.6 Recreation

1. *Would the plan 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?*
2. *Would the plan include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The RCAP would not result in new habitable or recreational development requiring the provision or expansion of parks or other recreational facilities; rather, sustainable infrastructure such as renewable energy and active transportation and public transit facilities would be constructed or expanded per RCAP Measures BE-1, BE-2, Measures T-1 Urban and Rural, T-2 Urban and Rural, and T-4. While improvements and subsequent infrastructure would occur, the RCAP would not be anticipated to result in substantial population growth, as described in Section 3.6, *Land Use Planning, Population, and Housing*. Implementation of the RCAP, including associated improvements or subsequent infrastructure to occur as a result of the plan, would not be expected to significantly increase the use of neighborhood and regional parks or other recreational facilities,

create new recreational facilities, nor require the construction or expansion of existing recreational facilities. This is because the RCAP is a policy document intended to reduce GHG emissions within Humboldt and includes strategies, measures, and actions intended to reduce the region's GHG emissions in order to achieve specified targets but does not include specific development plans for new recreational facilities or plans that would be expected to result in substantial deterioration of existing facilities. Therefore, RCAP impacts related to recreation would be less than significant impact.

3.10.7 Wildfire

1. *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the plan substantially impair an adopted emergency response plan or emergency evacuation plan?*

In general, areas that fall within the service boundaries of local fire districts are served by such districts; however, there are other areas outside of local district boundaries where volunteer fire companies have assumed responsibility for community fire service. In total, there are 41 local and volunteer fire protection departments that serve Humboldt. In addition, the California Department of Forestry and Fire Protection (CAL FIRE) provides fire protection services for the locations classified as the State Responsibility Area (SRA), which includes a large portion of the privately owned lands within Humboldt as well as State parks. The Federal Responsibility Area (FRA) within Humboldt County generally comprises public lands, national parks, or other lands owned by the federal government, and are managed by the U.S. Forest Service (USFS), U.S. Fish and Wildlife Service (USFWS), and the U.S. Department of Interior Bureau of Land Management (BLM).²¹

As indicated in the Humboldt County Community Wildfire Protection Plan, 45 percent of lands within Humboldt are classified as Very High, 48 percent as High, and 4 percent as Moderate fire hazard severity, as shown in Table 3.10-1.²² Humboldt is divided into two distinct areas of wildfire risk. The northeast and extreme southwest parts of the county have a high risk of wildfire occurrence, while the coastal areas and river valleys have moderate risk and generally better fire protection access.²³

²¹ Humboldt County. 2023. General Plan Safety Element. <https://humboldt.gov/205/General-Plan> (accessed November 2024).

²² Humboldt County. 2019. Humboldt County Community Wildfire Protection Plan. <https://humboldt.gov/2431/Community-Wildfire-Protection-Plan> (accessed November 2024).

²³ Ibid

Table 3.10-1 Humboldt Fire Hazard Severity by Planning Unit²⁴

FIGURE 5.2.3 FIRE HAZARD SEVERITY BY PLANNING UNIT (ACRES AND PERCENTAGE)								
PLANNING UNIT	Very High	%	High	%	Moderate	%	Other	%
Orick–Redwood Park (PU 1)	15,228	15	72,174	72	12,132	12	876	1
Upper Yurok Reservation (PU 2)	132,016	88	16,237	11	1,857	1	1,063	1
Mid Klamath (PU 3)	134,324	99	78	0	37	0	1,897	1
Hoopa (PU 4)	107,620	94	4,768	4	544	0	2,303	2
Trinidad (PU 5)	6	0	45,980	68	21,336	32	59	0
Redwood Creek (PU 6)	117,895	62	71,983	38	103	0	0	0
Willow Creek Area (PU 7)	163,937	97	3,921	2	114	0	376	0
Humboldt Bay Region (PU 8)	1,017	1	97,029	61	25,118	16	41,089	36
Kneeland–Maple Creek (PU 9)	79,578	65	43,553	35		0	0	0
Eel (PU 10)	2	0	133,267	70	24,138	13	65,653	35
Mad–Van Duzen (PU 11)	189,558	62	113,881	37	1,596	1	0	0
Mattole–Lost Coast (PU 12)	13,821	7	180,174	90	6,077	3	716	0
Southern Humboldt (PU 13)	58,028	23	194,740	76	1,964	1	402	0
Avenue of the Giants (PU 14)	19,508	13	120,897	82	6,780	5	0	0
Total	1,032,538	45%	1,098,682	48%	101,793	4%	114,434	0
<i>*Other = Non-Wildland/Non-Urban or Urban Unzoned</i>								

The Humboldt County Emergency Operations Plan is a multi-jurisdictional plan that addresses the planned response to emergency situations associated with natural disasters such as wildfires, technological incidents, and national security emergencies in, or affecting, Humboldt.²⁵ Emergency evacuation routes present throughout Humboldt provide critical transportation facilities in the event of an emergency event. Critical transportation facilities for emergency evacuation throughout Humboldt include U.S. 101, SR 299, SR 255, SR 36, and SR 96. These routes provide regional connectivity throughout Humboldt and allow emergency vehicles to travel countywide, including connections to incorporated cities within Humboldt.

Implementation of the RCAP, including associated improvements or subsequent sustainable infrastructure such as renewable energy (e.g., Measures BE-1 and BE-2), renewable fuel production (e.g., Measures T-10 and WW-1), organic waste processing (e.g., Measure SW-1), recycled water (e.g., Measure WW-2), and active transportation and public transit infrastructure (e.g., Measures T-1 Urban and Rural, T-2 Urban and Rural and T-4) would not be expected to substantially impair implementation of the Humboldt County Emergency Operations Plan. Specifically, the RCAP is a

²⁴ Ibid

²⁵ Humboldt County. 2015. Emergency Operations Plan. <https://humboldt.gov/DocumentCenter/View/51861/Humboldt-County-Emergency-Operations-Plan-2015> (accessed November 2024).

policy document intended to reduce GHG emissions within Humboldt and includes strategies, measures, and actions intended to reduce the region's GHG emissions in order to achieve specified targets but does not include specific infrastructure plans that would jeopardize emergency response and/or evacuation. Any improvements or subsequent infrastructure that may occur as a result of the proposed plan within the SRA would be subject to the Fire Safe Regulations adopted by the State Board of Forestry in Title 14 of the California Administrative Code. The Fire Safe Regulations establish minimum standards for wildfire protection within the SRA, including but not limited to standards for emergency access, emergency vehicle turning radius and vertical clearance, building numbering and signage, defensible space, and emergency water supply that would minimize potential wildfire impacts associated with potential projects and infrastructure within the SRA. Adequate emergency vehicle access would be provided to new infrastructure facilitated by the RCAP and no long-term disruptions to emergency evacuation routes would occur, as discussed under Section 3.10.2, *Hazards and Hazardous Materials*. In addition, the RCAP contains Measures T-10 and CS-3, which include actions to sustainably manage forest biomass such as through understory clearing, that would reduce the risk of wildfire within Humboldt's forested areas. Therefore, RCAP impacts related to risk associated with impairment of emergency response or evacuation plans would be less than significant.

2. *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the plan due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose plan occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
3. *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the plan 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?*

Implementation of RCAP Measures BE-1, BE-2, BE-3 Urban and Rural, and BE-8 may result in the installation and maintenance of additional electrical infrastructure such as electricity transmission lines, substations, and microgrids to support additional renewable and carbon-free energy facilities and increase the electrical system capacity in Humboldt. These measures could exacerbate wildfire risk during construction and operation of infrastructure that occurs within fire hazard areas. For example, heavy duty equipment used during project construction may produce sparks with the potential to ignite vegetation. However, future RCAP projects and electrical infrastructure occurring within wildfire hazard areas would be required to comply with fire safety regulations contained in the California Public Resources Code (PRC). PRC Section 4442 mandates the use of spark arrestors, which prevent the emission of flammable debris from exhaust, on earth-moving and portable construction equipment with internal combustion engines operating on any forest-covered, brush-covered, or grass-covered land. Furthermore, PRC Sections 4427 and 4431 specify standards for conducting construction activities on days when a burning permit is required, and PRC Section 4428 requires construction contractors to maintain fire suppression equipment during the highest fire danger period (April 1 to December 1) when operating on or near any forest-covered, brush-covered, or grass-covered land. With compliance with applicable PRC provisions, future infrastructure construction activities under the RCAP would not exacerbate wildfire risk in a manner that would expose plan occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire or result in temporary or ongoing impacts to the environment.

Operation of electrical transmission and distribution infrastructure within fire hazard areas may also exacerbate wildfire risks. Much of the electrical transmission and distribution infrastructure

facilitated by the RCAP would be owned and operated by the electrical utilities serving Humboldt (e.g., Pacific Gas and Electric [PG&E] and Redwood Coast Energy Authority [RCEA], which uses PG&E infrastructure) and would fall under the regulatory authority of the California Public Utilities Commission. The existing CPUC regulations that would govern electrical infrastructure during construction and/or operation include: General Order 95, under which fire safety requirements for overhead electrical lines include an auditable maintenance program, frequent inspections, vegetation management to maintain minimum clearances, and increased wind load requirements in high-fire-threat districts; General Order 165, which establishes requirements for the inspection of electric distribution and transmission facilities that are not contained within a substation; and General Order 166, which requires that investor-owned utilities develop a fire protection plan with measures that the electric utility will implement to mitigate the threat of power-line fires. Additionally, California Public Utilities Code Section 8386 requires electrical utility providers to annually prepare and submit a wildfire mitigation plan to the CPUC for approval. In compliance with this code section and with Standard 1.E of General Order 166, PG&E maintains a Wildfire Mitigation Plan and Wildfire Safety Program, which includes activities such as undergrounding powerlines, system hardening, and automatic power shutoffs.²⁶ Compliance with these requirements would minimize the potential for RCAP-related electrical infrastructure to exacerbate wildfire risk.

Future RCAP facilities, such as renewable energy projects and renewable fuel production facilities, would have the potential to exacerbate fire risk, for example in the event of an accidental fire at hydrogen or biofuel production or battery energy storage facilities. Future RCAP-related facilities occurring in wildfire hazard areas would be required to implement BMPs, such as defensible space and vegetation clearance zones, in compliance with the respective local jurisdiction's general plan policies, zoning regulations, fire code regulations, design and construction standards, and the CBC Wildland-Urban Interface Building Standards, as well as the adopted Fire Safe Regulations for any development specifically to occur within the SRA. These regulations require adequate access for emergency vehicles/personnel and adequate water and pressure to meet flow standards in the event that a fire needs to be extinguished is provided, as well as defensible space, fire hardening, fire suppression and safety systems, and other site design standards to reduce the risk of fire impacts. Compliance with these regulatory requirements would minimize the potential for operation of future infrastructure associated with the RCAP to exacerbate wildfire risks. In addition, the RCAP contains Measures T-10 and CS-3, which include actions to sustainably manage forest biomass through actions such as understory clearing, that would reduce the risk of wildfire within Humboldt's forested areas. Therefore, operation of future RCAP related infrastructure would not exacerbate wildfire risk in a manner that would expose plan occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire or result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

4. *If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the plan expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

According to the Humboldt County Operational Area Hazard Mitigation Plan, there were 634 recorded wildfires in Humboldt between 1910 and 2017, with 22 large fires exceeding 5,000 acres occurring since 1908.²⁷ In the wake of wildfire events, secondary hazards such as flooding and

²⁶ PG&E. 2024. 2023-2025 Wildfire Mitigation Plan R 5. <https://www.pge.com/assets/pge/docs/outages-and-safety/outage-preparedness-and-support/pge-wmp-r5-040224.pdf> (accessed November 2024).

²⁷ Humboldt County. 2020.

landslides can occur, especially in areas with steep slopes. Many portions of Humboldt that are designated as fire hazard severity zones are characterized by steep slopes that could 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. Some projects promoted by the RCAP, such as new electricity infrastructure (e.g., Measures BE-1, BE-2, BE-3 Urban and Rural, and BE-8), renewable energy projects (e.g., RCAP Measures BE-1 and BE-2), and renewable fuel production (e.g., Measures T-10 and WW-1), organic waste processing (e.g., Measure SW-1), and recycled water (e.g., Measure WW-2) facilities, depending on their locations and site-specific conditions, could increase the risk of wildfire or could expose people or structures to wildfire risks including downslope or downstream flooding, post-fire flooding, or landslides.

As described under Impacts 3.10.7.1 through 3.10.7.3, above, all new development is required to comply with the respective local jurisdiction's general plan policies, zoning regulations, fire code regulations, design and construction standards, and the CBC Wildland-Urban Interface Building Standards, as well as the adopted Fire Safe Regulations for any development specifically to occur within the SRA, reducing the extent to which future projects would expose people or structures to post-fire slope instability risk. As discussed in Section 3.10.1, *Geology and Soils*, if projects facilitated by the RCAP were proposed in landslide susceptible areas, required geotechnical design criteria would be incorporated into geotechnical reviews to verify the stability of nearby slopes and soils, and to provide recommendations intended to protect infrastructure from causing or being affected by landslides, as required by existing regulations. Likewise, as described in Section 3.10.1, *Geology and Soils*, and Section 3.10.3, *Hydrology and Water Quality*, future RCAP projects would be required to implement construction and operational stormwater BMPs pursuant to the Clean Water Act, Porter-Cologne Water Quality Control Act, SWRCB, NCRWQCB, and Humboldt LID Stormwater Manual, limiting the potential for post-fire flooding impacts. Therefore, RCAP impacts related to post-wildfire flooding or landsliding risks would be less than significant.

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