ENVIRONMENTAL INITIAL STUDY

INITIAL STUDY CHECKLIST
PROPOSED MITIGATED NEGATIVE DECLARATION
Loleta Community Services District
Wastewater Treatment Facility and Effluent Disposal Improvement Project

Prepared by:
SHN
812 W. Wabash Ave.
Eureka, CA 95501

September 2026

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Abbreviations and Acronyms

AB	Assembly Bill
ACM	asbestos-containing materials
AE	Agriculture Exclusive
AEP	Association of Environmental Professionals
AHERA	Asbestos Hazard Emergency Response Act
APN	Assessor's Parcel Number
BMP	best management practice
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCE	Community Choice Energy
CCR	California Code of Regulations
CDFW	California Department of Fish & Wildlife
CDPR	California Department of Parks and Recreation
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbon
CGP	Construction General Permit
CGS	California Geological Survey
CH4	methane
CO	carbon monoxide
CO2	carbon dioxide
CRHR	California Register of Historical Resources
CUPAs	Certified Unified Program Agencies
dB	decibel
dBA	decibel "A-weighted" scale
District	Loleta Community Services District
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
EIR	environmental impact report
EOP	Emergency Operations Plan
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
H_2S	Hydrogen sulfide
HCDEH	Humboldt County Division of Environmental Health
HDPE	High-Density Polyethylene
HFC	hydrofluorocarbon
HMP	Hazard Mitigation Plan
HWMA	Humboldt Waste Management Authority
IS	Initial Study
ITE	Institute of Transportation Engineers
LBP	Lead-based paint
LCC	Land Capability Class
LCI	Governor's Office of Land Use and Climate Innovation
LCSC	Lead-containing surface coatings
LCSD	Loleta Community Services District
LE	Land Evaluation
LESA	California Agricultural Land Evaluation and Site Assessment
LOS	level of service
LRA	Local Responsibility Area
LUST	leaking underground storage tank
MMTCO2e	million metric tons of CO2 equivalent
MND	Mitigated Negative Declaration
mph	miles per hour
MTCO2e/yr	metric tons of CO2 equivalent per year
N2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAVD88	North American Vertical Datum of 1988
NCAB	North Coast Air Basin
NCUAQMD	North Coast Unified Air Quality Management District
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NO2	nitrogen dioxide
NOA	naturally occurring asbestos
NOx	nitrous oxides
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O3	Ozone
OHWM	Ordinary High-Water Mark
PF	Public Facility
PFC	perfluorocarbon
PG&E	Pacific Gas & Electric

Abbreviations and Acronyms (cont'd)

PM2.5	Particulate Matter smaller than 2.5 microns in diameter
PM10	Particulate Matter smaller than 10 microns in diameter
ppm	parts per million
PPV	Peak particle velocity
PRC	Public Resources Code
PVC	polyvinyl chloride
QSD	Qualified SWPPP Developer
RCAP	Regional Climate Action Plan
RCEA	Redwood Coast Energy Authority
ROG	reactive organic gases
ROW	right-of-way
RWQCB	North Coast Regional Water Quality Control Board
SA	Site Assessment
SB	Senate Bill
sf	square feet
SF6	hexafluoride
SO2	sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
THPO	Tribal Historic Preservation Officer
TP	Test Pit
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish & Wildlife Service
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compounds
WRA	William Rich & Associates

Loleta Community Services District
ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** LCSD Wastewater Treatment Facility and Effluent Disposal Improvement Project

2. **Lead Agency Name and Address**:

   Loleta Community Services District
   P.O. Box 236
   Loleta, CA 95551

3. **Contact Person and Phone Number**: Dennie Her – General Manager, 707-733-1717

4. **Project Location:** The project is located in and near the unincorporated community of Loleta in northern California, approximately 15 miles south of Eureka in Humboldt County (County; Figure 1; U.S. Geological Survey [USGS] Fields Landing 7.5-minute quadrangle, Township 3 North, Range 1 and 2 West, Sections 18 and 19, Humboldt Meridian). The approximate center point of the project is located at 40.637814, -124.231055. The project is located within Assessor's parcel numbers (APNs) 309-191-012, 309-211-002, 309-211-006, 309-211-007, and 309-251-002.

5. **Applicant's Name and Address:**

   Loleta Community Services District
   P.O. Box 236
   Loleta, CA 95551

6. **General Plan Designation:** See Table 1 in Section 2.1 (Project Location and Setting).

7. **Zoning:** Agriculture Exclusive with combining zones indicating potential coastal wetland areas, flood hazard areas, streams and riparian corridors protection, and transitional agricultural lands (AE-60/W,F,R,T). See Table 1 in Section 2.1 (Project Location and Setting).

8. **Existing Facilities and Use:** The existing wastewater treatment facility (WWTF) parcel is developed with WWTF infrastructure, and most of the parcel is graveled for parking and all-weather access. The WWTF consists of a single-series process train, including headworks, aeration tank, secondary clarifier, and chlorine contact basin. The existing wastewater discharge pipe easement, the proposed land application site, and the proposed new WWTF site are currently used and have been used for agriculture, primarily for grazing and occasionally hay or silage cultivation, for over 100 years.

9. **Description of Project:** Loleta Community Services District (LCSD) maintains and operates a wastewater treatment system that serves the community of Loleta. LCSD is planning to modify its WWTF and effluent discharge system to meet the terms of its current National Pollutant Discharge Elimination System (NPDES) permit, including waste discharge requirements for recycled water (beneficial reuse for irrigation of agricultural land becomes the discharge point instead of surface water). Current and future effluent limitations for pollutants cannot be met by the existing wastewater treatment and disposal process. The proposed project includes a land acquisition and new wastewater treatment facility component (including geotechnical borings), rehabilitation of the existing waste discharge pipe component, and land application of treated effluent component. LCSD proposes to expand the existing 0.48-acre WWTF parcel (APN 309-211-006) into an approximately 0.77-acre portion of an adjacent 55.47-acre parcel (APN 309-191-012) using a lot line adjustment, which requires an amendment to the local coastal plan (Eel River Area Plan) and a zone reclassification. A new WWTF will be constructed, and the old WWTF will be demolished. The new WWTF will include a new headworks with pre-screening in the form of a mechanical screen. The proposed secondary treatment system is an extended aeration system. Whereas the existing WWTF uses chlorine gas for disinfection, this project proposes installing an ultraviolet (UV) disinfection system. Currently, LCSD contracts to have waste sludge hauled to another facility for dewatering and disposal. Because of the high cost of paying a third party to haul and dewater sludge, LCSD plans to install a dewatering press at the new WWTF to reduce the cost of hauling and disposal. A

concrete retaining wall will be constructed along the western edge of the new WWTF, and all new WWTF structures will be elevated (or flood-proofed) to at least 1 foot above the 100-year base flood elevation. For further details of the proposed project, see Section 2.0 (Project Description).

10. **Surrounding Land Uses and Setting:** The WWTF is adjacent to agricultural land uses to the north, west, and south, and is adjacent to low and medium density residential land uses to the east, across Eel River Drive. The existing wastewater discharge pipe and proposed land application area both include and are surrounded by agricultural land uses, primarily grazing and occasionally hay or silage cultivation (see Table 1 in Section 2.1 [Project Location and Setting]). The discharge pipe outfalls at a wetland that discharges to the Eel River during wet weather conditions. The project is located approximately 2.4 miles from the main branch of the Eel River at the WWTF, 1 mile from the main branch of the Eel River at the discharge pipe outfall, and 8.8 miles from the Pacific Ocean at the WWTF. Most of the study area is within the 100-year flood plain of the Eel River. Slopes are mostly 0 to 2 percent, which may have been graded over the years for farming. The project is located approximately ¾ miles west of Highway 101.

11. **Other public agencies whose approval is required (for example, permits, financing approval, or participation agreement):** LCSD as Lead Agency for the proposed project has discretionary authority over the primary project proposal. To implement this project, the applicant may need to obtain, at a minimum, the following discretionary permits/approvals from other agencies:

    - State Water Resources Control Board (SWRCB) – Financing Approval
    - Humboldt County Planning Division – Rezone, Local Coastal Plan Amendment, Lot Line Adjustment, Conditional Use Permit
    - Humboldt County Building Division – Encroachment Permit
    - U.S. Army Corps of Engineers (USACE) – Section 404 Permit
    - North Coast Regional Water Quality Control Board – Section 401 Water Quality Certification
    - State Water Resources Control Board (SWRCB) – State General Construction Permit, Stormwater Pollution Prevention Plan (SWPPP)

12. **Tribal Consultation:** LCSD requested a list of regional Tribes from the Native American Heritage Commission (NAHC). Under Assembly Bill (AB) 52, LCSD sent notification letters to local Native American Tribes on June 16, 2026 (Bear River Band of the Rohnerville Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, and Wiyot Tribe). The only response received was on June 23, 2026, from Edwin Smith of Bear River Band of the Rohnerville Rancheria who had no comment and no concerns.

13. **Purpose of this Document:** This document only seeks to analyze the environmental impacts of the construction and operation of the proposed LCSD Wastewater Treatment Facility and Effluent Disposal Improvement Project.

SECTION 1.0
INTRODUCTION

1.1 Introduction and Regulatory Guidance

This document is an Initial Study (IS) that summarizes the technical studies prepared for the proposed Loleta Community Services District (LCSD; the District) Wastewater Treatment Facility and Effluent Disposal Improvement Project and provides justification for a Mitigated Negative Declaration (MND). This document has been prepared in accordance with the current California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. The purpose of this document is to evaluate the potential environmental impacts of the proposed LCSD Wastewater Treatment Facility and Effluent Disposal Improvement Project in the unincorporated community of Loleta. Mitigation measures have been proposed to avoid or minimize any significant impacts that were identified.

1.2 Lead Agency

The Lead Agency is the public agency with primary responsibility for implementing a proposed project. Accordingly, LCSD is the CEQA Lead Agency.

1.3 Purpose of the Initial Study

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

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

1.4 Review Process

This IS/MND is being circulated for public and agency review as required by CEQA. Because state agencies will act as responsible or trustee agencies, LCSD will circulate the IS/MND to the State Clearinghouse of the Governor's Office of Land Use and Climate Innovation (LCI) for distribution and a 30-day review period.

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

Dennie Her, General Manager
Loleta Community Services District
P.O. Box 236
Loleta, CA 95551
generalmanagerlcsd@gmail.com

SECTION 2.0
PROJECT DESCRIPTION

2.1 Project Location and Setting

Regional Setting

The Loleta Community Services District (LCSD; the District) is located in the unincorporated community of Loleta on the northern coast of California, approximately 15 miles south of Eureka in Humboldt County (Figure 1). LCSD was established in 1990 for the purpose of providing water and sewer services and is approximately 106 acres in size. Loleta is an unincorporated community located 1 mile from the Eel River and 5 miles from the Pacific Ocean and Humboldt Bay. The average annual precipitation for the region is 40.4 inches, with most of the precipitation occurring between November and April (NOAA, 2026) and temperatures range from an average low of 47.4 degrees Fahrenheit (°F) from November–April to an average high of 58.5°F from May–October (NOAA, 2026). Extremes in temperatures are relatively uncommon due to the maritime influence.

Project Location

The proposed project is located in the town of Loleta in Humboldt County, California (see Figure 1 for vicinity map and Figure 2 for project location map). The wastewater treatment facility (WWTF) is located on Assessor's parcel number (APN) 309-211-006. The wastewater discharge pipe is located on APNs 309-211-007, 309-211-002, and 309-251-002. The site proposed for land application of treated effluent and the 0.77 acres proposed for acquisition by LCSD for construction of the new WWTF are on APN 309-191-012 (Figures 2 through 4).

The project is located entirely within the Coastal Zone, with parts located in both "Appeal" and "State" coastal development permit (CDP) jurisdictions. The WWTF (existing and proposed) is within "Appeal" CDP jurisdiction. The wastewater discharge pipe and land application site are located partially within both "Appeal" and "State" CDP jurisdictions. Therefore, the CDP permit process is proposed to be consolidated to the state. The approximate center point of the project is located at 40.637362, -124.229860.

See Table 1 for the project location APNs, general plan, and zoning designations.

Table 1. Assessor's Parcel Numbers, General Plan, Zoning Designations

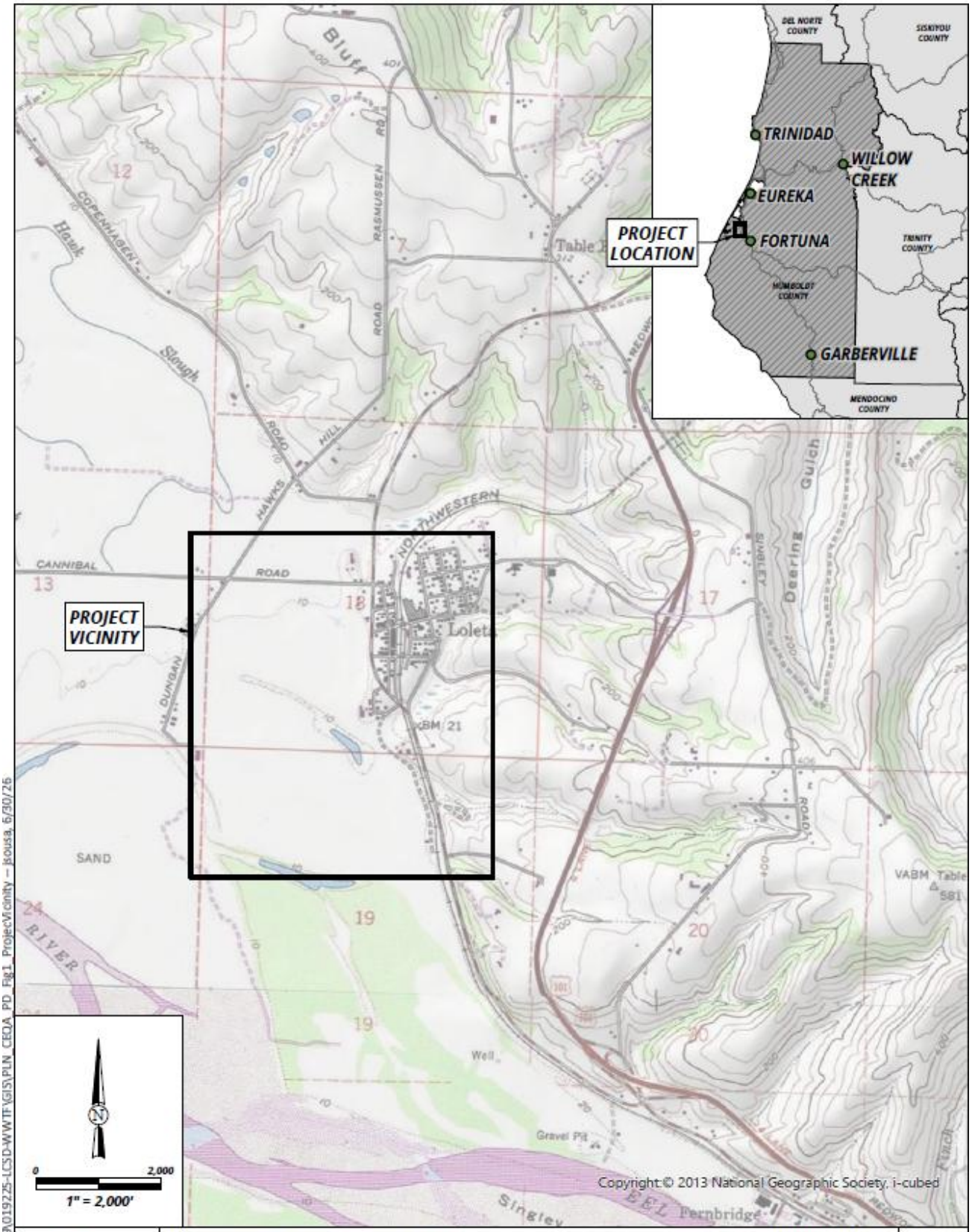
Proposed Project Component	APN	General Plan Designation[a]	Zoning Designation[b]
Land Application of Treated Effluent	309-191-012	AE	AE-60/W,F,R,T
Wastewater Discharge Pipe Rehabilitation	309-211-002	AE	AE-60/W,F,R,T
WWTF	309-211-006	PF	AE-60/W,F,R,T
Wastewater Discharge Pipe Rehabilitation	309-211-007	AE	AE-60/W,F,R,T
Wastewater Discharge Pipe Rehabilitation	309-251-002	AE	AE-60/W,F,R,T

a: General Plan Designations:
AE: Agricultural Exclusive
PF: Public Facilities

b: Zoning Designations:
AE-60: Agriculture Exclusive Zone-60 Acre Minimum Parcel Size
W: Coastal Wetland Areas combining zone
F: Flood Hazard Areas combining zone
R: Streams and Riparian Corridors Protection combining zone
T: Transitional Agricultural Lands combining zone

Surrounding Land Uses and Existing Setting

The existing WWTF parcel is adjacent to agricultural land uses to the north, west, and south, and is adjacent to low and medium density residential land uses to the east, across Eel River Drive. The existing wastewater discharge pipe and proposed land application area are both surrounded by agricultural land uses (Table 1). The discharge pipe outfalls at a wetland that discharges to the Eel River during wet weather conditions. The project is located approximately 2.4 miles from the main branch of the Eel River at the WWTF, 1 mile from the main branch of the Eel River at the discharge pipe outfall, and 8.8 miles from the Pacific Ocean at the WWTF. Most of the project area is within the 100-year flood plain of the Eel River (except for most of the existing and proposed WWTF sites). Slopes are mostly 0 to 2 percent, which may have been graded over the years for farming. The project is located approximately ¾ mile west of Highway 101.



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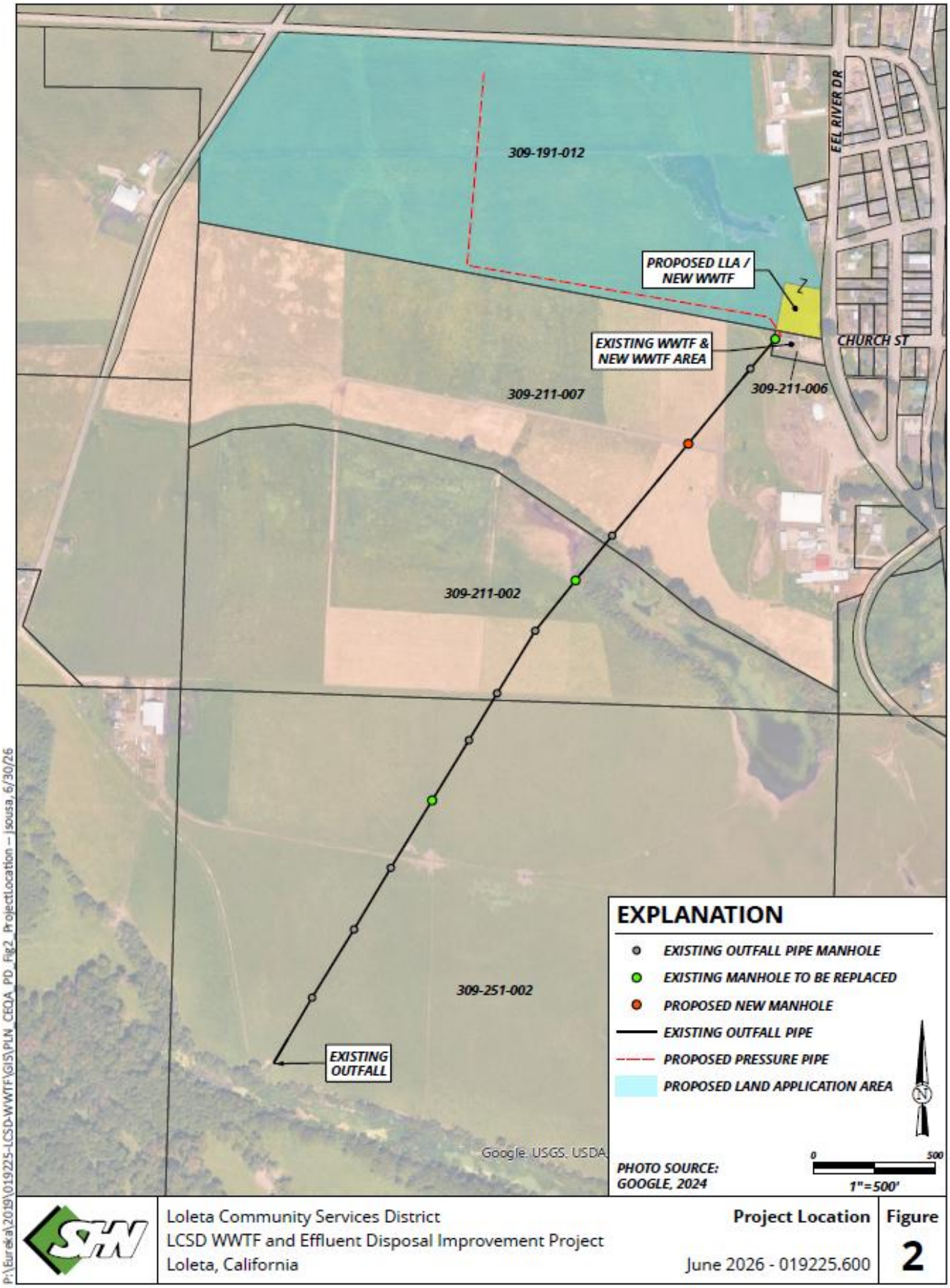
Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Project Vicinity Map

June 2026 - 019225.600

Figure 1



Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Project Location
June 2026 - 019225.600

Figure 2

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Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Existing WWTF to be Demolished

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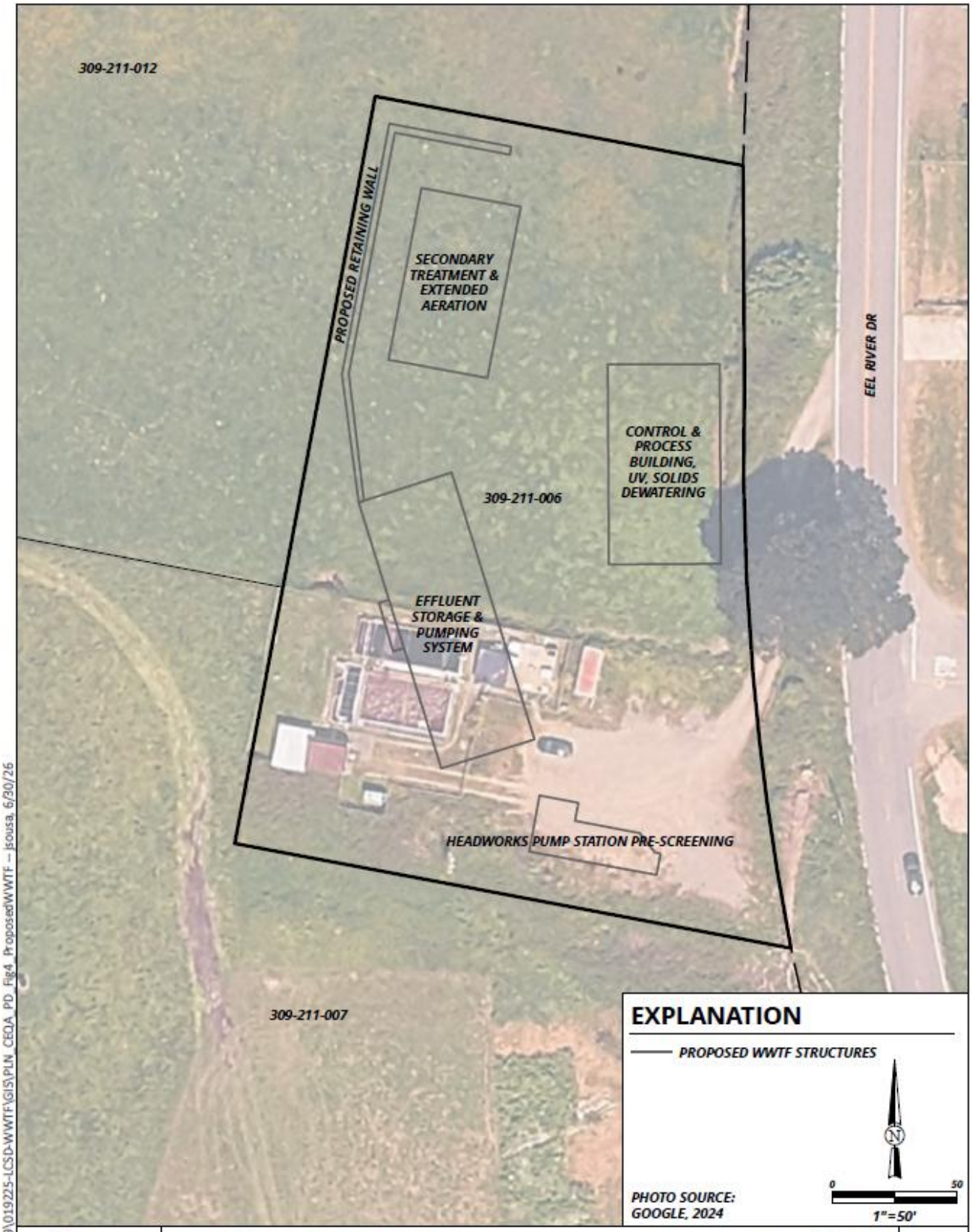
Figure 3



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Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Proposed WWTF

June 2026 - 019225.600

Figure 4

2.2 Existing Conditions

Wastewater Treatment Facility

LCSD maintains and operates a wastewater treatment system that serves the community of Loleta. The overall wastewater treatment system consists of a collection system, WWTF, and year-round effluent disposal to a wetland tributary to the Eel River. The existing WWTF was built in 1956 and is now over 60 years old. The facility consists of a single series process train, including aeration tank, secondary clarifier, and chlorine contact basin. LCSD's WWTF discharges to surface waters, and LCSD is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit that sets forth specific discharge requirements to ensure protection of public health, environmental health, and water quality. This permit is renewed every 5 years by the North Coast Regional Water Quality Control Board (RWQCB). At each renewal, the permit may incorporate new treatment objectives and discharge standards that require an upgrade or modification to the facility to meet new regulatory requirements.

Due to the existing WWTF's inability to meet permit requirements implemented with the most recent NPDES permit (Order No. R1-2020-0002 adopted April 16, 2020), the RWQCB adopted Time Schedule Order (TSO) R1-2020-0003, which instituted increased interim limits for constituents the current plant is unable to treat effectively. TSO R1-2020-0003 required the District to upgrade or replace the existing WWTF to achieve compliance with all limits in Order No. R1-2020-0002 by October 31, 2023. Subsequent extensions to the TSO have been requested through the RWQCB such that the final compliance date will be determined once a firm schedule can be established.

Wastewater Discharge Pipe

Currently, treated wastewater effluent is discharged from the WWTF by gravity flow and is conveyed through a subsurface pipe to a wetland. The wetland discharges directly to the Eel River during wet weather conditions. The discharge pipe runs southwest from the WWTF approximately 3,700 feet to the discharge point. The discharge to the wetland occurs at a point on the north bank of the Eel River approximately one-quarter mile south of Duncan Road. The location of the WWTF, discharge pipe, and outfall location are shown in Figure 2. The agricultural field the discharge pipe traverses is currently used for and has been used for agriculture, primarily for grazing and occasionally hay or silage cultivation, for over 100 years.

Under the District's current NPDES permit, discharges of treated effluent to the Eel River and its tributaries, including wetlands, are prohibited from May 15 through September 30 each year. From October 1 through May 14, discharges of wastewater are limited to 1 percent of the flow of the receiving water. Compliance with this limitation is evaluated based on flow measurements at the upstream receiving water monitoring location and effluent flow measurements at the WWTF that discharges to the wetland. Currently, effluent discharges to the wetland occur year-round and are in violation of the Basin Plan's seasonal discharge prohibition.

Effluent Disposal

Currently, treated wastewater effluent is discharged from the WWTF by gravity flow and is conveyed through the subsurface wastewater discharge pipe described above and discharges to a wetland that discharges directly to the Eel River during wet weather conditions. Currently, effluent discharges to the wetland occur year-round and are in violation of the Basin Plan's seasonal discharge prohibition.

2.3 Proposed Project

LCSD is planning to modify its WWTF and effluent discharge system to meet the terms of the current NPDES permit, including waste discharge requirements (WDR) for recycled water (beneficial reuse for irrigation of agricultural land becomes the discharge point instead of surface water [SHN, 2016; SHN, 2022, SHN, 2026a]). Current and future effluent limitations for pollutants cannot be met by the existing wastewater treatment and disposal process. The proposed project includes a land acquisition and new wastewater treatment facility component (including geotechnical borings), rehabilitation of the existing waste discharge pipe component, and land application of treated effluent component.

Project Funding

LCSD is applying for final design and construction funding through the SWRCB's Division of Financial Assistance (DFA) Clean Water State Revolving Fund.

Land Acquisition and New Wastewater Treatment Facility

LCSD proposes to expand the existing 0.48-acre WWTF parcel (APN 309-211-006) into an approximately 0.77-acre portion of an adjacent 55.47-acre parcel (APN 309-191-012) using a lot line adjustment (Figures 2 and 3). The County of Humboldt and California Coastal Commission have indicated that an amendment to the local coastal plan (LCP; Eel River Area Plan) and a zone reclassification are required, because the adjacent parcel has a general plan (Eel River Area Plan) land use designation of Agriculture Exclusive (AE) and is zoned Agriculture Exclusive with combining zones indicating potential coastal wetland areas, flood hazard areas, streams and riparian corridors protection, and transitional agricultural lands (AE-60/W,F,R,T). Also, the zoning of the existing WWTF parcel is AE-60/W,F,R,T which is inconsistent with the plan designation of Public Facilities (PF). That inconsistency is also proposed to be resolved concurrently. Following the land acquisition, the LCSD WWTF parcel will be approximately 1.25 acres in size.

A new WWTF facility entrance will be constructed within Humboldt County's right-of-way (ROW) along Eel River Drive, in accordance with Humboldt County Public Works requirements. Power lines (Pacific Gas and Electric [PG&E]) and municipal water service (LCSD) will be extended to the new WWTF.

Geotechnical borings will be necessary to determine the geotechnical characteristics of the new WWTF site. The borings will be drilled by a California-licensed C-57 drilling subcontractor to drill up to five rotary wash borings to a maximum depth of 70 feet within the proposed building footprints to provide a representational cross-section of subsurface conditions. The borings will be closed with Portland cement placed from the bottom of the borehole to the ground surface.

The proposed influent pump station at the new WWTF includes submersible sewage pumps with variable frequency drives placed in a wet well. Proposed preliminary treatment at the WWTF includes pre-screening in the form of a mechanical screen.

The proposed secondary treatment system is an extended aeration system. The extended aeration system provides a high-quality effluent that would be reliable in meeting current and future permit requirements for land application and discharge to the Eel River, with effluent ammonia concentration less than 1 milligram per liter (mg/L), and total nitrogen concentrations of less than 10 mg/L.

Whereas the existing WWTF uses chlorine gas for disinfection, due to safety concerns, the production of chlorine byproducts, and operator input, this project proposes installing an ultraviolet (UV) disinfection system (Figure 4).

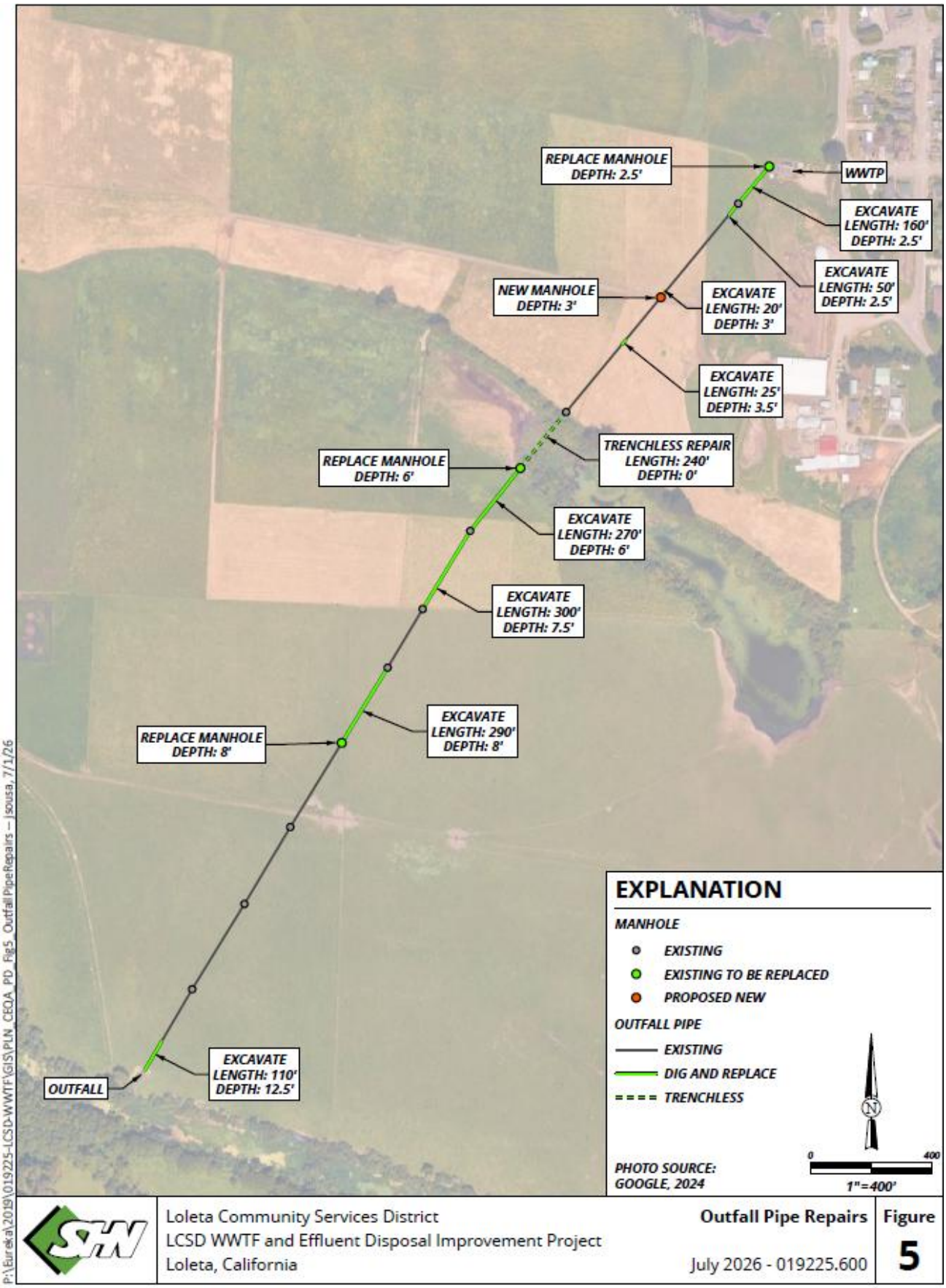
Currently, LCSD contracts to have waste sludge hauled to another facility for dewatering and disposal. Because of the high cost of paying a third party to haul and dewater sludge, LCSD plans to install a dewatering press at the new WWTF to reduce the cost of hauling and disposal.

A concrete retaining wall will be constructed along the western edge of the new WWTF, and all new WWTF structures will be elevated (or flood-proofed) to at least 1 foot above the 100-year base flood elevation. The ground surface at the WWTF will be a combination of asphalt pavement and graveled surfaces. Stormwater management facilities will be constructed in compliance with a post-development stormwater management plan (to be developed as part of the final design) that addresses runoff from all new and/or replaced impervious and semi-pervious surfaces, as required by the permitting agencies and in accordance with Humboldt County development standards, which include detaining and infiltrating all stormwater on site such that post-project stormwater runoff does not exceed pre-project runoff.

Following construction of the new WWTF, the existing WWTF will be demolished.

Wastewater Discharge Pipe Rehabilitation

Currently, treated effluent is discharged to the existing discharge location year-round although this discharge is prohibited during the period of May 15 through September 30. LCSD proposes to continue to use the existing discharge location during the winter discharge period, from October 1 through May 14, when it is allowed. Continued use of this pipeline will require improvements to maintain its integrity. The proposed improvements include replacing or repairing sections of the approximately 3,700 feet of discharge pipe (six sections totaling 1,465 linear feet), replacing three manholes, and installing one new manhole, all within the existing pipe footprint and easement (Figures 2 and 5). The new manhole is needed so that the pipe can be accessed at regular intervals for repairs and maintenance and will be located in an upland area. Construction will use trenchless and open trench dig and replace methods. No expansion or enlargement of the 12-inch-diameter discharge pipe is proposed.


REPLACE MANHOLE
DEPTH: 2.5'
WWTP
EXCAVATE
LENGTH: 160'
DEPTH: 2.5'
EXCAVATE
LENGTH: 50'
DEPTH: 2.5'
NEW MANHOLE
DEPTH: 3'
EXCAVATE
LENGTH: 20'
DEPTH: 3'
EXCAVATE
LENGTH: 25'
DEPTH: 3.5'
TRENCHLESS REPAIR
LENGTH: 240'
DEPTH: 0'
REPLACE MANHOLE
DEPTH: 6'
EXCAVATE
LENGTH: 270'
DEPTH: 6'
EXCAVATE
LENGTH: 300'
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EXCAVATE
LENGTH: 290'
DEPTH: 8'
REPLACE MANHOLE
DEPTH: 8'
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EXISTING TO BE REPLACED
PROPOSED NEW
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Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California
Outfall Pipe Repairs
July 2026 - 019225.600
Figure
5

A total of approximately 1,225 linear feet of discharge pipe will be replaced using dig and replace methods. The trench will be 2.5 feet deep and 2 feet wide near the WWTF and up to 13 feet deep and 4 feet wide near the outfall headwall. The existing pipe will be cut off flush with the outfall headwall, and new piping will be inserted into the existing hole extending to the outer edge of the headwall but not beyond. All construction activities and staging will occur within 25 feet of the pipeline centerline. Trenching will occur in grazed agricultural wetlands but outside of slough remnant and riparian areas. Excavated soil from the trench will be temporarily placed within a 25-foot-wide area along (and including) the trench before replacement into the trench.

Approximately 240 feet of pipe that crosses under a slough remnant and riparian area between manholes 8 and 10 will be repaired using trenchless methods (Figure 5). The proposed trenchless repair method will be slip-lining, which does not use any chemical additives. Slip-lining pulls a new high-density polyethylene (HDPE) pipe through the existing pipe, forming a new pipe inside the host pipe. Cured-in-place pipe (CIPP) will not be used on the outfall pipe. All construction activities and staging will occur within approximately 25 feet of the pipe centerline and outside of slough remnant and riparian areas.

Due to timing constraints, both the discharge pipeline and the new land application irrigation force main may need to be worked on concurrently. If the discharge pipe repairs are conducted following construction of the new land application system, no bypass pumping of effluent in the discharge pipe will be required. If repair of the discharge pipe occurs before the new land application site is constructed, flow in the discharge pipe will need to bypass the segments under repair. While work is being conducted on a section of the discharge pipe, the pipe will be plugged on the upstream end, and effluent will be pumped out of the manhole to a manhole on the downstream end of the section on which work is being conducted. The portable pump will be located next to the upstream manhole, and the hose will be laid parallel to the existing pipeline in the field and routed to the downstream manhole.

Land Application of Treated Effluent

To address effluent disposal during the summer discharge prohibition period, from May 15 through September 30, LCSD has leased approximately 50 acres of agricultural pastureland northwest of and adjacent to the WWTF and will construct a land application system for treated effluent. This will allow LCSD to achieve compliance with the effluent disposal requirements during the summer discharge prohibition period. The site proposed for land application of treated effluent is on APN 309-191-012 (Figure 2), which is currently used for and has been used for agriculture, primarily for grazing and occasionally hay or silage cultivation, for over 100 years.

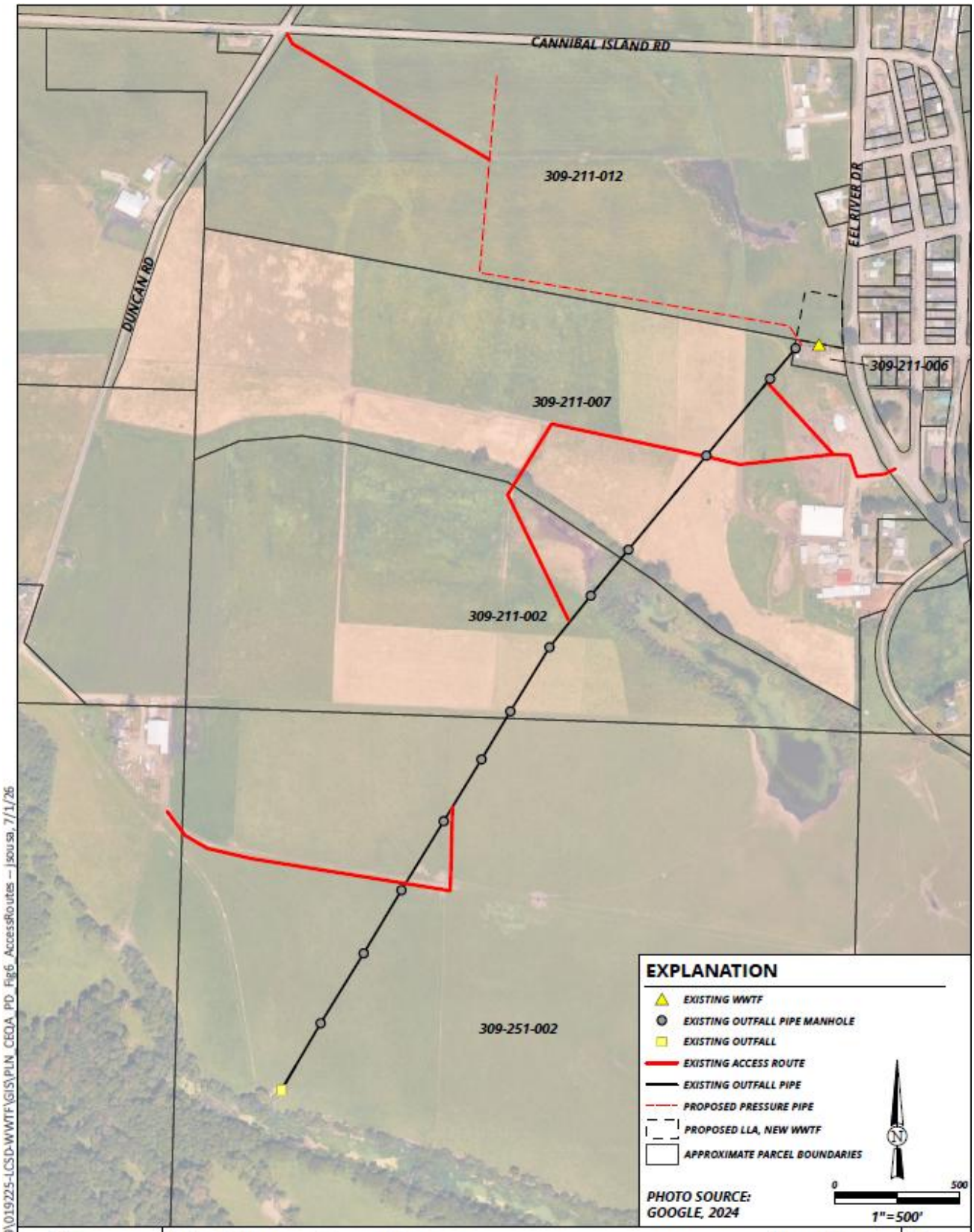
To convey treated effluent for land application, a new effluent pumping station will be constructed at the new WWTF (Figure 4), and a new subsurface 4-inch-diameter force main pipe will be constructed between the new pump station and the land application site (2,150 linear feet) using open cut trenching (Figure 2). Trenching will occur in grazed agricultural wetlands and will be 3 feet deep by 3 feet wide. All construction activities and staging will occur within 15 feet of the pipeline centerline. Excavated soil from the trench will be temporarily placed within a 15-foot-wide area along (and including) the trench before replacement into the trench.

During the land application irrigation process, aboveground piping and irrigation equipment will be used and periodically rotated to irrigate various areas of the land application site. The irrigation system will include a 4-inch-diameter underground header pipe that will connect to vertical risers where the sprinkler connects to the pipe. The sprinkler system is a mobile reel of flexible HDPE pipe with a sprinkler head on the end of the pipe. The sprinkler head is pulled out from the reel the length of the field by a small tractor and then the sprinkler is drawn back into the reel as it irrigates. Then the entire reel unit is moved to another header location and drawn back out for irrigation of a new part of the field.

2.4 Equipment, Access, and Staging

Wastewater Treatment Facility

Equipment to be used during demolition and construction at the WWTF will include pickup trucks, commercial delivery trucks, concrete trucks, backhoes, excavators, and cranes, as well as a drill rig during geotechnical borings. Deep piles may be necessary for geotechnical stability of the large treatment system concrete basins, which will also require drill rigs during construction. Access to the WWTF is from Eel River Drive (Figure 6). Construction equipment and materials will be staged on upland portions of the WWTF site or on upland portions of adjacent areas that may be leased from adjacent landowners.



P:\Eureka\2019\019225-LCSD-WWTF\GIS\PLN_CEQA_PD_Fig6_AccessRoutes – jsousa, 7/1/26

Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Access Routes

July 2026 - 019225.600

Figure 6

Wastewater Discharge Pipe

Construction equipment for replacing sections of the subsurface discharge pipe will include two or three double-axle flatbed trucks for delivering materials and equipment to the site, a backhoe or excavator for trenching, dump trucks for transport of excavated and backfill material, and small pickup trucks for transport of personnel. Approximately 1,225 feet of the discharge pipe will be rehabilitated using open trench dig and replace methods. Installation of one new manhole and replacement of three existing manholes will require working areas around each manhole not greater than an area 25 feet wide by 40 feet long.

Land Application of Treated Effluent

Equipment to be used during construction of the land application system will include backhoes, excavators, commercial delivery trucks, and pickup trucks. Trucks and equipment will need to drive across and park on the pasture lands to construct the force main and associated infrastructure for land application. Construction access for work done on APN 309-191-012 will be from Duncan Road (Figure 6). Construction equipment and materials will be staged on upland portions of the WWTF site on Eel River Drive or on upland portions of adjacent areas that may be leased from adjacent landowners.

2.5 Construction Schedule

LCSD plans to construct the WWTF improvements in 2030 and 2031, working year-round. Construction of the WWTF improvements is proposed to take approximately 18 months. Geotechnical borings are anticipated to be drilled in June or July 2027 and will occur over a period of approximately 5 workdays.

Construction of the land application system is proposed to occur over approximately 80 workdays between May 15 and September 30, 2030, when ground conditions are sufficiently dry.

Rehabilitation of the wastewater discharge pipe is proposed to occur over approximately 100 workdays between May 15 and September 30, 2031, to coincide with the period when summer flow is eliminated through the system, rainfall is minimal, and when ground conditions are sufficiently dry.

2.6 Best Management Practices and Avoidance and Minimization Measures

The following construction best management practices (BMPs) and avoidance and minimization measures (AMMs) will be implemented during construction:

- Repairs of the wastewater discharge pipeline and construction of the new land application irrigation pipeline including all work in wetlands shall occur during the dry season only (from May 15 through September 30).
- All ground-disturbing activities and asphaltic-concrete paving operations shall occur during dry weather only.
- If rainfall is forecasted during the time construction activities are being performed, all onsite stockpiles of soil, gravel, and construction debris shall be covered and secured before the onset of precipitation. After a rainstorm, all silt and debris shall be removed from the construction area and stormwater controls.
- No excavated soil or construction debris shall be temporarily placed or stored where it may be subject to entering the slough remnant, riparian areas, the Eel River or other jurisdictional waters of the U.S. or state. All onsite stockpiles of soil and construction debris shall be contained at all times to minimize discharge of sediment and other pollutants.
- No debris, soil, silt, sand, trash, concrete or washings thereof, oil or other petroleum products or washings thereof, or other foreign materials shall be allowed to enter or be placed where it may be washed by rainfall or runoff into jurisdictional waters of the U.S. or state.
- During construction, all trash shall be removed from the work site and disposed of on a regular basis to avoid contamination of habitat. Any and all debris resulting from construction activities shall be removed from the project site and disposed of at an authorized disposal location within 10 days of project completion and/or prior to the onset of the rainy season, whichever is earlier. All spoils and construction debris will be hauled off site and disposed of at an appropriately permitted upland disposal facility (landfill or recycling plant).
- Only wildlife-friendly 100 percent biodegradable erosion and sediment control products that will not entrap or harm wildlife shall be used. Erosion and sediment control products shall not contain synthetic (that is, plastic or nylon) netting. Photodegradable synthetic products are not considered biodegradable.

- Fuels, lubricants, and solvents shall not be allowed to enter storm drain systems or jurisdictional waters of the U.S. or state. All equipment used during construction shall be checked for leaks at the beginning of each work day.
- BMPs for concrete paving and grinding operations, and storm drain inlet protection shall be employed to prevent concrete grindings, concrete slurry, and paving rinseate from entering drop inlets or sheet-flowing into coastal waters.
- Hazardous materials management equipment, including oil containment booms and absorbent pads, shall be available and immediately on hand at the project site. A registered first-response, professional, hazardous materials clean-up/remediation service shall be locally available on call. Any accidental spill shall be contained rapidly and cleaned up. In the event of a spill, LCSD shall notify the appropriate regulatory agencies immediately.
- Prior to the commencement of construction in agricultural fields, the limits of the approved work areas shall be physically delineated, limiting the potential area affected by construction, and workers shall be educated about the limitations on construction.
- All vehicles and equipment shall be restricted to pre-established work areas and access routes, as shown in Figure 6.
- No riparian vegetation shall be removed.
- During trenching and excavation in agricultural areas (including all wetland areas), the top 6 inches of excavated material shall be separately stockpiled by the contractor. The contractor shall ensure that this stockpiled soil material is kept moist and that the material is restored to the construction trench as soon as is feasible. This topsoil material shall be reintroduced as the top fill material in the restored trench section.
- Upon completion of component construction activities and prior to October 15, all temporarily disturbed agricultural lands (including but not limited to areas disturbed by trenching and construction materials and equipment staging and access) shall be decompacted, recontoured, and reseeded, as needed, to restore pre-project conditions. Revegetation shall occur with a mix of regionally appropriate native grasses and/or noninvasive agricultural species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be identified from time to time by the State of California, shall be employed on the site. No plant species listed as a "noxious weed" by the governments of the State of California or the U.S. shall be utilized within the property.
- To avoid potential impacts to nesting birds, one of the following shall be implemented:
    - conduct vegetation removal and other ground disturbance activities associated with any construction activities between mid-August and mid-February, when birds are not typically nesting; or
    - if vegetation removal or ground-disturbing activity will occur during the nesting season (February 15 to August 15 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits within 5 days of the commencement of construction. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) and implemented to prevent abandonment of the active nest.
- To avoid potential impacts to northern red-legged frog during project related activities, on the day the project-related work is initiated, a qualified biologist shall conduct a pre-construction survey for northern red-legged frog prior to vegetation trimming and mobilization of heavy equipment in all work areas.
    - If northern red-legged frog is observed in an active construction zone, the contractor shall immediately halt construction activities until a) the frog has left the area or b) a qualified biologist, in consultation with CDFW, has moved the frog to a safe location in similar habitat outside of the construction zone.
- To avoid potential impacts to northwestern pond turtle, on the same day of and prior to ground-disturbing work initiated within 500 meters of the aquatic habitat below the outfall pipe discharge point, a qualified biologist will conduct a survey for northwestern pond turtle.

- If northwestern pond turtle is confirmed to be present, the qualified biologist will halt work in the area of potential impact until the animal has left the area of potential impact on its own.
- If no northwestern pond turtles are observed during the survey, no further surveys or monitoring are required.

- Fully implement all conditions of approval required by permit terms.

SECTION 3.0
ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

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

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project COULD have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT (EIR) is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project COULD have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Signature Date

_____ Loleta Community Services District

Printed name For

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (for example, the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (for example, the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant with mitigation, or less-than-significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-than-significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section 21, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addresses. Identify which effects from the above checklist were within the scope of and adequately analyze in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated,": describe the mitigation measures which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (for example, general plan, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats, however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue identifies:

   a) The significant criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less-than-significant.

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Setting: The existing 0.48-acre WWTF parcel is developed with WWTF infrastructure, and the majority of the parcel is graveled for parking and all-weather access (Figure 7). The WWTF was built in 1956 and is now over 60 years old. The WWTF consists of a single series process train, including aeration tank, secondary clarifier, and chlorine contact basin (Figure 8). The WWTF is adjacent to agricultural land uses to the north, west, and south, and is adjacent to low and medium density residential land uses to the east across Eel River Drive. The 0.77-acre proposed WWTF expansion area is adjacent to the existing WWTF to the south, low density residential land uses to the east across Eel River Drive, and agricultural land uses to the north and west (Figure 9). The existing wastewater discharge pipe (Figure 10) and proposed land application area (Figure 11) both include and are surrounded by agricultural land uses, primarily grazing and occasionally hay or silage cultivation. The discharge pipe is located belowground with periodic manhole access, and outfalls at a wetland that discharges to the Eel River during wet weather conditions. The project site is visible from Eel River Drive, Cannibal Island Road, and other local roadways.

Figure 7 – Existing WWTF Facing West from Eel River Drive

Figure 8 – Existing WWTF Clarifier Basin, Aerator Basin, and Blower House

Figure 9 – Proposed WWTF Area Facing Southwest from Eel River Drive

Figure 10 – Existing Wastewater Discharge Pipe Manhole Cover

Figure 11 – Proposed Land Application Area Looking East from Duncan Road

The project is not located in a designated Coastal Scenic or Coastal View area identified in the certified Humboldt County Local Coastal Program (Eel River Area Plan; Humboldt County, 2014). There are no designated state scenic highways in the project vicinity (Caltrans, 2026a).

No lighting is proposed at the discharge pipe or land application site. The proposed WWTF would include operational and security lighting within the WWTF site. Consistent with Humboldt County regulations for the coastal zone, all exterior lighting would be designed to minimize light pollution and glare through the use of full cutoff fixtures, downward-directed shielding, appropriate color temperature lighting, and controls such as motion sensors and/or timers to limit lighting to periods of necessary use. Lighting would be confined to the facility footprint and would not be directed toward adjacent properties or the night sky.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Have a substantial adverse effect on a scenic vista?*** Less-Than-Significant Impact

Section 30251 of the Coastal Act and Section 3.42 of the certified Humboldt County Local Coastal Program (Eel River Area Plan; Humboldt County, 2014) state, in applicable part, as follows:

> *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas…*

The area is comprised of scenic open agricultural lands with seasonal wetlands, sloughs, and riparian forest, although the project area is not located in a designated Coastal Scenic or Coastal View area identified in the Eel River Area Plan (Humboldt County, 2014).

The proposed repairs to the existing subsurface wastewater discharge pipeline and the proposed installation of a new land application irrigation force main will not result in a permanent visual change to the project area. Although work on these pipelines involves trenching, impacts will be temporary and the ground surface will be restored to existing conditions following construction.

The proposed new WWTF, like the existing WWTF, will be constructed on a bench below the adjacent Eel River Drive. Following construction of the new WWTF, the existing WWTF structures will be demolished and removed. The tallest existing WWTF structure (the blower/disinfection building) is approximately 15 feet tall. The tallest proposed building ("Control & Process Building, UV, Solids, Dewatering" in Figure 4, also called operations building) would be approximately 18 to 20 feet tall at its peak. The proposed Aeromod basin ("Secondary Treatment & Extended Aeration" in Figure 4) would be approximately 14 feet tall. The tops of all of the other proposed

improvements would be at grade or would only protrude several feet above grade. The tallest of the proposed new buildings, the proposed operations building ("Control & Process Building, UV, Solids, Dewatering" in Figure 4) would have a floor elevation near 28 feet (North American Vertical Datum of 1988 [NAVD88]) and a top elevation near 46 to 48 feet (NAVD88). As the top elevation of the tallest existing WWTF building is approximately 28 to 30 feet elevation (NAVD88), the tallest new WWTF building (operations building) would have a top elevation approximately 18 feet higher than the tallest existing WWTF building. It would be approximately 80 feet long as seen from Eel River Drive. This would alter and partially obstruct views westward from a section of Eel River Drive adjacent to the new WWTF. However, the project will require a Local Coastal Plan Amendment and a Coastal Development Permit from the California Coastal Commission and a Rezone, Lot Line Adjustment, and Conditional Use Permit from Humboldt County, which will include any conditions of approval required to protect scenic and visual resources and ensure consistency with the Coastal Act, certified Local Coastal Plan, general plan, zoning, and other applicable regulations. The Rezone and Local Coastal Plan Amendment will change the new WWTF land acquisition area from an agricultural use type to a public facilities use type, with which the project will be deemed consistent in order to obtain approval.

Based on the information provided above, the proposed project would not have a substantial adverse effect on a scenic vista. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?*** No Impact

California's Scenic Highway Program was created by the State Legislature in 1963. The project site is located approximately 0.75 miles west of Highway 101 and is not visible from the highway. Highway 101 is listed as an eligible State scenic highway but is not officially designated (Caltrans, 2026a).

Based on the information provided above, the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. Therefore, the proposed project would result in no impact on this resource category.

c) ***In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*** Less-Than-Significant Impact

The project is located on the western edge of the urbanized area of Loleta, with low and medium density residential land uses to the east and larger agricultural parcels to the north, west, and south. The proposed actions would not conflict with zoning and other regulations governing scenic quality within Humboldt County and the coastal zone. As described above, the visual setting of the proposed project area consists of an existing WWTF with structures and gravel surfaces and agricultural fields used for grazing and periodic cultivation. The project is adjacent to or visually near local roadways including Eel River Drive, Duncan Road, and Cannibal Island Road.

Following construction of the new WWTF, the existing WWTF structures will be demolished and removed. The tallest existing WWTF structure (the blower/disinfection building) is approximately 15 feet tall. The tallest proposed building ("Control & Process Building, UV, Solids, Dewatering" in Figure 4, also called operations building) would be approximately 18 to 20 feet tall at its peak. The proposed Aeromod basin ("Secondary Treatment & Extended Aeration" in Figure 4) would be approximately 14 feet tall. The tops of all of the other proposed improvements would be at grade or would only protrude several feet above grade. The tallest of the proposed new buildings, the proposed operations building ("Control & Process Building, UV, Solids, Dewatering" in Figure 4) would have a floor elevation near 28 feet (NAVD88) and a top elevation near 46 to 48 feet (NAVD88). As the top elevation of the tallest existing WWTF building is approximately 28 to 30 feet elevation (NAVD88), the tallest new WWTF building (operations building) would have a top elevation approximately 18 feet higher than the tallest existing WWTF building. It would be approximately 80 feet long as seen from Eel River Drive. This would alter and partially obstruct views westward from a section of Eel River Drive adjacent to the new WWTF. However, the project will require a Local Coastal Plan Amendment and a Coastal Development Permit from the California Coastal Commission and a Rezone, Lot Line Adjustment, and Conditional Use Permit from Humboldt County, which will include any conditions of approval required to protect scenic and visual resources and ensure consistency with the Coastal Act, certified

Local Coastal Plan, general plan, zoning, and other applicable regulations. The Rezone and Local Coastal Plan Amendment will change the new WWTF land acquisition area from an agricultural use type to a public facilities use type, with which the project will be deemed consistent in order to obtain approval.

Based on the information provided above, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with applicable zoning and other regulations governing scenic quality. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

d) ***Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***
Less-Than-Significant Impact

Light pollution results from nighttime illumination that increases skyglow, glare, or light spill beyond the area intended to be illuminated. Such effects can reduce nighttime visibility of the night sky and may adversely affect nearby sensitive receptors if not properly controlled. Existing nighttime lighting in the project vicinity is limited and includes operational and security lighting at the existing WWTF, residential lighting along Eel River Road and the community of Loleta east of the project site, residential lighting from scattered rural residences west of Eel River Drive, and streetlights east of the project along Loleta Drive and Main Street. The surrounding area therefore currently experiences a low level of ambient nighttime illumination.

The proposed project would include operational and security lighting within the WWTF site. However, consistent with Humboldt County regulations for the coastal zone, all exterior lighting would be designed to minimize light and glare through the use of full cutoff fixtures, downward-directed shielding, and controls such as motion sensors and/or timers to limit lighting to periods of necessary use. Lighting would be confined to the facility footprint and would not be directed toward adjacent properties or the night sky. As the proposed project would not introduce unshielded or excessive nighttime lighting and would incorporate design features to minimize light spill and glare, it would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Aesthetics*.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural, Land Evaluation and Site Assessment Mode (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:	**Potentially Significant Impact**	**Less-Than-Significant with Mitigation Incorporated**	**Less-Than-Significant Impact**	**No Impact**
a) Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			**X**	
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?			**X**	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				**X**
d) Result in the loss of forest land or conversion of forest land to non-forest use?				**X**
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				**X**

Setting: As defined in the Humboldt County General Plan (Humboldt County, 2007) and the Eel River Area Plan (Humboldt County, 2014), the project area spans the following land use designations: Agricultural Exclusive (AE) and Public Facilities (PF). All project parcels are zoned Agriculture Exclusive-60 Acre Minimum Parcel Size, with combining zones indicating potential Coastal Wetland Areas, Flood Hazard Areas, Streams and Riparian Corridors Protection, and Transitional Agricultural Lands (AE-60/W,F,R,T), including the WWTF parcel (Table 1). The existing WWTF parcel is developed with WWTF infrastructure, and the majority of the parcel is graveled for parking and all-weather access. The existing wastewater discharge pipe easement and the proposed land application site are currently used and have been used for agriculture, primarily for grazing and occasionally hay or silage cultivation, for over 100 years.

The proposed project would involve temporary ground disturbance during construction to repair the existing wastewater discharge pipe and to install the land application force main.

LCSD proposes to expand the existing 0.48-acre WWTF parcel (APN 309-211-006) into an approximately 0.77-acre portion of an adjacent 55.47-acre agricultural parcel (APN 309-191-012) using a lot line adjustment, resulting in a 1.25-acre WWTF parcel (Figures 2 and 3). The project requires a Local Coastal Plan (Eel River Area Plan) amendment and zone reclassification to resolve inconsistencies and accommodate public facility use. SHN prepared a California Agricultural Land Evaluation and Site Assessment (LESA; SHN, 2026b) for the 0.77-acre WWTF expansion area to review compliance with the regulations of CEQA, the California Farmland Mapping and Monitoring Program (FMMP), the California Land Conservation Act (Williamson Act), and Eel River Area Plan.

Soil Classifications: The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) soil map shows the soil composition in the project area is made up of three soil map units: 110- Weott, 0 to 2 percent slopes; 220- Ferndale, 0 to 2 percent slopes; and 230- Hookton-TableBluff complex, 2 to 9 percent slopes (Figure 12).

The majority of the study area is on Weott soils, within farmed pasturelands used for livestock grazing or occasionally planted for hay and silage for winter feed. This includes most of the proposed land application area, parts of the existing

and proposed WWTF, and part of the discharge pipe alignment. NRCS designated 110- Weott soils as “Prime farmland if irrigated and drained.”

Figure 12 – NRCS Custom Soil Resource Map

The higher elevation soils on the eastern edge of the pasturelands are the Hookton-TableBluff complex soils, with 2 to 9 percent slopes. This includes the edge of the land application area and parts of the existing and proposed WWTF. NRCS designated 230- Hookton-TableBluff complex soils as “Farmland of statewide importance.”

The southern part of the discharge pipe alignment is in the Ferndale soils, with 0 to 2 percent slopes. NRCS designated 220- Ferndale soils as “Prime farmland if irrigated.”

Eel River Area Plan: A primary directive of the Eel River Area Plan is the permanent preservation of the regional agricultural economy by keeping prime agricultural soils in active production. To achieve this, the plan enforces strict

non-conversion policies that prohibit the subdivision or fragmentation of viable farmlands into parcels that cannot support commercial operations. Furthermore, the Eel River Area Plan specifically accounts for the critical "upland-lowland" dynamic unique to the Eel River delta, recognizing that higher-elevation, flood-free pastures are ecologically and economically essential to support low-lying grazing lands during seasonal winter inundation. Consequently, any proposed non-agricultural development or public facility expansion within areas designated as Agriculture Exclusive (AE) is subjected to rigorous regulatory scrutiny to prevent the loss or degradation of these coastal agricultural resources.

California Agricultural Land Evaluation and Site Assessment (LESA): Under CEQA, a project may be determined to have a significant environmental impact if it results in the unnecessary or irreversible conversion of productive agricultural lands to non-agricultural uses. To provide a quantifiable, objective standard for evaluating impacts to agricultural resources under CEQA, Appendix G of the CEQA Guidelines (14 California Code of Regulations [CCR] § 15000 et seq.) explicitly identifies the LESA model as an authorized, standardized tool for assessing development-related impacts on agriculture and farmland. Originally developed by the USDA NRCS in 1981, the model was adapted in 1990 by the California Department of Conservation (DOC) to evaluate land-use decisions affecting agricultural conversions (DOC, 1997). The model provides CEQA lead agencies and permitting agencies with a quantitative, consistent methodology to ensure agricultural land conversions are objectively considered during environmental reviews. By calculating a finalized, combined numerical score, the LESA model provides empirical, substantial evidence to establish whether an environmental impact is less than significant, potentially significant, or significant and unavoidable, thereby determining the appropriate level of environmental documentation (for example, a Mitigated Negative Declaration or an Environmental Impact Report) required for the project.

The FMMP was established by the DOC, under the Division of Land Resource Protection, to monitor the conversion of the State's agricultural lands. Pursuant to California Government Code Section 65570, the FMMP compiles biennial "Important Farmland" maps using aerial photography, computer-based geographic information systems (GIS), public review, and field reconnaissance. Although the FMMP serves as an essential informational resource for environmental review, it functions strictly as an advisory service and does not directly regulate local land-use decisions. To classify agricultural land, the FMMP integrates USDA NRCS soil surveys and national land inventory criteria with state-specific land use, topography, microclimate, and irrigation infrastructure data. Land is categorized into eight distinct classifications based on its physical and chemical soil properties alongside current management constraints:

1. Prime Farmland: Land with the best combination of physical and chemical characteristics for producing sustained high crop yields. To qualify, the land must have been used for active, irrigated crop production at some point during the two biennial mapping update cycles prior to the map date, and it must possess a dependable irrigation supply. It excludes publicly owned lands with adopted policies prohibiting agricultural use.
2. Farmland of Statewide Importance: Land similar to "Prime Farmland" that possesses a good combination of features for crop production but carries minor agricultural limitations such as greater slopes, lower water-holding capacity, or a shallower rooting depth.
3. Unique Farmland: Lesser-quality soils used for the production of the state's leading agricultural cash crops. It is typically non-irrigated but possesses the specific microclimate and soil conditions necessary to support high-value specialty crops.
4. Farmland of Local Importance: Land identified by local county agricultural advisory groups and boards of supervisors as vital to the local agricultural economy, despite not meeting the strict criteria for "Prime," "Statewide," or "Unique" designations.
5. Grazing Land: Lands on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for "Grazing Land" is 40 acres.
6. Urban and Built-Up Land: Land occupied by structures or infrastructure with a building density of at least one dwelling unit per 1.5 acres.
7. Land Committed to Nonagricultural Use: Vacant or low-density lands that possess a permanent legal or planning commitment to future urban development, despite currently supporting agricultural or grazing activities.
8. Other Land: Lands not encompassed by any other mapping category. Common examples include low-density rural residential developments, brushlands, timberlands, wetlands, and vacant parcels surrounded by urban development.

Although the FMMP provides the standard baseline data for agricultural impact analyses throughout California, the DOC has not yet published digital "Important Farmland" mapping spatial data for the Humboldt County region (DOC, 2026a). Consequently, the LESA uses USDA NRCS Web Soil Survey Important Farmland classifications as the reference for this assessment. Additionally, the California Agricultural LESA Model is designed to function independently of predefined map designations. The LESA methodology evaluates the explicit physical and economic factors of a site—including the specific Land Capability Class (LCC) and Storie Index rating of individual soil map units alongside project-specific geographic parameters—rather than relying on automated FMMP map outputs. The absence of regional FMMP mapping does not preclude or invalidate the LESA model evaluation, as the calculation independently derives its Land Evaluation (LE) score directly from primary NRCS soil profile data.

The USDA NRCS soil map indicates that the 0.77-acre LESA Assessment Area is composed of two soil map units: 110–Weott, 0 to 2 percent slopes, and 230–Hookton-TableBluff complex, 2 to 9 percent slopes (Figure 12). The USDA NRCS classifies soil map unit 110 as "Prime Farmland if Irrigated and Drained" and the soil map unit 230 as "Farmland of Statewide Importance." The California LESA Model uses a scoring matrix that separately weighs physical soil quality factors (the Land Evaluation component) and geographic/economic variables (the Site Assessment component), such as parcel size, water availability, and proximity to conflicting urban uses. To determine CEQA significance thresholds, the California LESA Model scores two primary categories on a 100-point scale:

1. Land Evaluation (LE) Factors: Evaluates soil quality using the Land Capability Classification (LCC) Rating and the Storie Index Rating.
2. Site Assessment (SA) Factors: Evaluates project context using the Project Size Rating, Water Resource Availability Rating, Surrounding Agricultural Land Rating, and Surrounding Protected Land Rating.

The final consolidated score determines whether the conversion of agricultural land is considered is less than significant, potentially significant, or significant and unavoidable.

The project-specific California Agricultural LESA analysis of the 0.77-acre Assessment Area resulted in a final total LESA score of 48.46 with an LE score of 31.21 and an SA score of 17.25. Under the standardized California LESA model scoring thresholds, a final score between 40 and 59 points is considered environmentally significant only if both the LE and SA sub-scores each equal or exceed 20 points (DOC, 1997). As the project's SA sub-score of 17.25 points falls below the mandatory 20-point significance threshold, the proposed conversion of 0.77 acres of agricultural land does not constitute a significant agricultural resource impact under CEQA.

Williamson Act: The California Land Conservation Act of 1965, also known as the Williamson Act, is codified in California Government Code Sections 51200–51297.4. The statute authorizes local governments to execute contracts with landowners to restrict specific parcels within designated agricultural preserves to agricultural or compatible open space uses. In exchange for this restriction, enrolled lands are assessed based on their actual agricultural income capability rather than their unrestricted market value, yielding substantial property tax reductions. Humboldt County has adopted the Williamson Act. According to the Humboldt County Planning and Building Department GIS portal, the only project parcel that is currently under a Williamson Act contract is APN 309-251-002, which is one of the parcels containing the existing wastewater discharge pipe to be repaired. The parcel containing the 0.77 acres to be acquired by LCSD for the purposes of WWTF expansion (APN 309-191-012) is not currently under a Williamson Act contract, nor are APNs 309-211-002, -007 (the other parcels containing the existing wastewater discharge pipe to be repaired), or -006 (the existing WWTF parcel) (Humboldt County, 2026a).

Forest Land and Timberland: None of the project parcels contain forest land or timberland or are zoned for timberland production (Humboldt County, 2026a).

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*** Less-Than-Significant Impact

As described above under Setting, the majority of the study area is on Weott soils, within farmed pasturelands used for livestock grazing or occasionally planted for hay and silage for winter feed. This includes most of the proposed land application area, parts of the existing and proposed WWTF, and part of the discharge pipe alignment. NRCS designated 110- Weott soils as "Prime farmland if irrigated and drained." The higher elevation soils on the eastern edge of the pasturelands are the Hookton-TableBluff complex soils, with 2 to 9 percent slopes. This includes the edge of the land application area and parts of the existing and proposed WWTF. NRCS designated 230-Hookton-TableBluff complex soils as "Farmland of statewide importance." The southern part of the discharge pipe alignment is in the Ferndale soils, with 0 to 2 percent slopes. NRCS designated 220- Ferndale soils as "Prime farmland if irrigated" (Figure 12).

The proposed repairs to the existing discharge pipe and installation of the land application irrigation force main would involve temporary ground disturbance within prime agricultural lands designated as Agriculture Exclusive that are actively used for cattle grazing, including one parcel enrolled in a Williamson Act contract (APN 309-251-002; the parcel where the discharge pipeline outfalls). Because the existing discharge pipeline to be repaired and the new land application pipeline to be installed are located underground and do not interfere with grazing activities above ground, these pipelines will not result in a conversion of agricultural lands to non-agricultural uses. In addition, the use of a retractable sprinkler system to irrigate approximately 50 acres of grazing land with treated wastewater will be supportive of continued agricultural use of the affected parcel. The lease agreement for LCSD's use of the subject property specifically provides that LCSD and the property owner will meet each year to agree on and coordinate irrigation and cattle grazing rotation schedules so that the property owner can continue to graze livestock on the parcel year-round.

Furthermore, the land application system will irrigate agricultural land during the dry season, improving the quality of the grazing area. LCSD's 2016 Wastewater Facilities Plan (SHN, 2016) included water balance calculations to determine the area required for irrigation of crop cover at agronomic rates that do not exceed the hydraulic and nutrient agronomic needs of the vegetation being irrigated. The facility has a design and permitted average dry weather flow (ADFW) of 0.081 million gallons per day (MGD), while current actual ADFW is approximately 0.05 MGD and projected ADFW for year 2040 is 0.062 MGD. According to the water balance calculations, for the projected ADWF of 0.062 MGD, approximately 34 acres of land is needed for treated wastewater application at agronomic rates. The proposed land application system will irrigate approximately 50 acres during the dry season, well within the agronomic threshold for current and projected ADFW.

Although the proposed repairs to the existing discharge pipe and installation of the land application irrigation force main will not result in a conversion of agricultural land to a non-agricultural use, the proposed repair and installation of buried pipeline will involve temporary construction impacts to agricultural lands. LCSD proposes a number of best management practices and avoidance and mitigation measures to minimize these impacts. Construction work, including access and staging, will be limited to only a small portion of the agricultural parcels within the vehicle access routes and pipeline corridors (Figure 6), and construction will affect only a portion of the work area at a given time as the pipe sections are worked on sequentially. Existing fences and gates will remain functional and grazing activities will be ongoing during repairs of the existing pipeline and construction of the land application system. Temporary fencing around construction activities will be installed as needed to prevent conflicts with livestock.

To ensure the continued productivity of prime agricultural lands and protect the long-term productivity of soils, LCSD has proposed to separately stockpile the top 6 inches of excavated material during trenching in agricultural areas, keep the material moist, and return the material to the construction trench as soon as feasible after repairs or replacement of pipeline segments are completed. The topsoil material will be reintroduced as the top fill material in the restored trench section. LCSD also proposes to de-compact, recontour, and reseed construction areas as needed to restore pre-project conditions in the agricultural fields. Revegetation shall occur with a mix of regionally appropriate native grasses and/or noninvasive agricultural species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be identified from time to time by the State of California, shall be employed on the site. No plant species listed as a "noxious weed" by the governments of the State of California or the U.S. shall be utilized within the property (see Project Description – Section 2.0). Therefore, the proposed discharge pipe repairs and land application irrigation force main installation would not convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

To review the project's potential impacts regarding agricultural land conversion associated with the 0.77-acre land acquisition and new WWTF facility component, SHN prepared a California Agricultural Land Evaluation and Site Assessment (LESA; SHN, 2026b). The LESA analysis of the 0.77-acre Assessment Area resulted in a final total LESA score of 48.46 with an LE score of 31.21 and an SA score of 17.25. Under the standardized California LESA model scoring thresholds, a final score between 40 and 59 points is considered environmentally significant only if both the LE and SA sub-scores each equal or exceed 20 points (DOC, 1997). Because the project's SA sub-score of 17.25 points falls below the mandatory 20-point significance threshold, the proposed conversion of 0.77 acres of agricultural land does not constitute a significant agricultural resource impact under CEQA.

Furthermore, the project would operate consistently with regional agricultural goals, as the expanded public facility infrastructure is designed to provide high-quality, treated recycled water back to local agricultural producers for operational irrigation benefits. Therefore, the proposed 0.77-acre land acquisition and new WWTF facility component would not have a significant impact regarding conversion of Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

Based on the information provided above, the proposed project would not have a significant impact regarding conversion of Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Conflict with existing zoning for agricultural use, or a Williamson Act Contract?*** Less-Than-Significant Impact

As defined in the Humboldt County General Plan (Humboldt County, 2007) and the Eel River Area Plan (Humboldt County, 2014), the project area spans the following land use designations: Agricultural Exclusive (AE) and Public Facilities (PF). All project parcels are zoned Agriculture Exclusive-60 Acre Minimum Parcel Size, with combining zones indicating potential Coastal Wetland Areas, Flood Hazard Areas, Streams and Riparian Corridors Protection, and Transitional Agricultural Lands (AE-60/W,F,R,T), including the WWTF parcel (Table 1). The existing WWTF parcel is developed with WWTF infrastructure, and the majority of the parcel is graveled for parking and all-weather access. The existing wastewater discharge pipe easement and the proposed land application site are currently used and have been used for agriculture, primarily for grazing and occasionally hay or silage cultivation, for over 100 years.

As described under subsection a), the proposed repairs to the existing discharge pipe and installation of the land application irrigation force main would involve temporary ground disturbance within prime agricultural lands designated as Agriculture Exclusive that are actively used for cattle grazing, including one parcel enrolled in a Williamson Act contract (APN 309-251-002; the parcel where the discharge pipeline outfalls). Discharge pipe repairs will occur within an approximately 175-feet-long by 50-feet-wide corridor within APN 309-251-002. Because the existing pipeline to be repaired and the new pipeline to be installed are located underground and do not interfere with grazing activities above ground, these pipelines will not result in a conversion of agricultural lands to non-agricultural uses. In addition, the proposed land application irrigation will be supportive of continued agricultural use of the affected parcel. The project description includes best management practices and avoidance and minimization measures to minimize impacts to agriculture, including setting aside and replacing topsoil, and de-compacting, recontouring, and reseeding construction areas as needed to restore pre-project conditions in the agricultural fields. Construction work, including access and staging, will be limited to only a small portion of the agricultural parcels within the vehicle access routes and pipeline corridors (Figure 6), and construction will affect only a portion of the work area at a given time as the pipe sections are worked on sequentially. Therefore, the proposed discharge pipe repairs and land application irrigation force main installation would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

As described under subsection a), to review potential impacts regarding agricultural land conversion associated with the 0.77-acre land acquisition and new WWTF facility component, SHN prepared a California Agricultural Land Evaluation and Site Assessment (LESA; SHN, 2026b). The LESA analysis of the 0.77-acre Assessment Area resulted in a final total LESA score of 48.46 with an LE score of 31.21 and an SA score of 17.25. Under the standardized California LESA model scoring thresholds, a final score between 40 and 59 points is considered environmentally

significant only if both the LE and SA sub-scores each equal or exceed 20 points (DOC, 1997). Because the project's SA sub-score of 17.25 points falls below the mandatory 20-point significance threshold, the proposed conversion of 0.77 acres of agricultural land does not constitute a significant agricultural resource impact under CEQA.

For the reasons explained above, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) ***Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*** No Impact

The existing WWTF parcel is developed with WWTF infrastructure and the majority of the parcel is graveled for parking and all-weather access. The existing wastewater discharge pipe easement and the proposed land application site are currently used and have been used for agriculture, primarily for grazing and occasionally hay or silage cultivation, for over 100 years. None of the project parcels contain forest land or timberland or are zoned for timberland production (Humboldt County, 2026a).

The proposed project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code (PRC) section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, the proposed project would result in no impact on this resource category.

d) ***Result in the loss of forest land or conversion of forest land to non-forest use?*** No Impact

None of the project parcels contain forest land or timberland or are zoned for timberland production (Humboldt County, 2026a). As such, the development of the project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the proposed project would result in no impact on this resource category.

e) ***Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*** No Impact

The proposed project will not produce significant growth inducing or cumulative impacts that will result in the conversion of farmland or forestland. Growth inducing impacts are generally caused by projects that have a direct or indirect effect on economic growth, population growth, or land development. The project proposes improvements to LCSD's community wastewater treatment and disposal system including land acquisition and a new wastewater treatment facility, rehabilitation of the existing waste discharge pipe, and land application of treated effluent. The new WWTF is sized to meet LCSD's existing needs plus future demands estimated using a 0.95 percent growth rate (which was based on a comparison of the number of LCSD water service connections between 2005 and 2013 [SHN, 2016]).

As discussed in subsection a), the project area contains "Prime farmland if irrigated and drained," "Farmland of statewide importance," and "Prime farmland if irrigated," but the project would not have a significant impact regarding conversion of Prime Farmland, Unique Farmland, or Statewide Importance (Farmland) to non-agricultural use.

As discussed in subsection c), none of the project parcels contain forest land or timberland or are zoned for timberland production (Humboldt County, 2026a).

There are no other changes in the existing environment caused by the project that would negatively impact farmland or forest land in or adjacent to the project area, and, therefore, no impact would result.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Agriculture and Forestry Resources*.

III. AIR QUALITY

Where available, the significant criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less-Than-Significant with Mitigation Incorporated**	**Less-Than-Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?		**X**		
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			**X**	
c) Expose sensitive receptors to substantial pollutant concentrations?		**X**		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			**X**	

Setting: The parcels containing the project site are located in the North Coast Air Basin (NCAB), which extends for 250 miles from Sonoma County in the south to the Oregon border. The climate of the NCAB is influenced by two major topographic units: the Klamath Mountains and the Coast Range provinces. The climate is moderate with the predominant weather factor being moist air masses from the ocean. Predominant wind direction is typically from the northwest during summer months and from the southwest during winter storm events.

Sensitive receptors (for example, children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest known sensitive receptors are the residences east of Eel River Drive within the developed town of Loleta (Figure 2). The nearest are approximately 80 feet away from the existing and proposed WWTF, across the street. The nearest school is the Loleta Grammar School, located approximately ½ mile northeast of the project.

Criteria Air Pollutants: Regulated air pollutants are known as criteria air pollutants. Criteria air pollutants are regulated by the North Coast Unified Air Quality Management District (NCUAQMD), California Air Resources Board (CARB), and the U.S. Environmental Protection Agency (USEPA). Exposure to criteria air pollutants can cause myriad adverse health effects in humans. Human health effects of criteria air pollutants are summarized below in Table 2.

Table 2. Summary of Criteria Air Pollutants

Criteria Air Pollutant	Major Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust (USEPA, 2025b).	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death (USEPA, 2025b).
Nitrogen Dioxide (NO_2)	A group of highly reactive gases known as oxides of nitrogen or nitrogen oxides (NO_x). Other nitrogen oxides include nitrous acid and nitric acid. NO_2 is used as the indicator for the larger group of nitrogen oxides. Sources include motor vehicles, electric utilities, and other sources that burn fuel (USEPA, 2025c).	Can aggravate respiratory diseases, particularly asthma, leading to respiratory symptoms. Can react with other chemicals in the air to form both particulate matter and ozone. Makes the air hazy and difficult to see though (USEPA, 2025c).
Ozone (O_3)	Ozone is created by chemical reactions between oxides of nitrogen (NOx) and volatile organic compounds (VOC). It is emitted by cars, power plants, industrial boilers, refineries, chemical plants, and other sources chemically react in the presence of sunlight (USEPA, 2026).	Cause coughing and sore or scratchy throat; makes it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath. Inflames and damages the airways; makes the lungs more susceptible to infection. Aggravates lung diseases such as asthma, emphysema, and chronic bronchitis; increases the frequency of asthma attacks (USEPA, 2026).
Particulate Matter (PM10 and PM2.5)	Emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks or fires (USEPA, 2025d).	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; non-fatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (USEPA, 2025d).
Sulfur Dioxide (SO_2)	A colorless gas produced primarily from fossil fuel combustion at power plants and industrial facilities. Major sources include fuel combustion, industrial processes, and shipping (CARB, 2026a).	Human health effects include respiratory effects and increased asthma symptoms. (CARB, 2026a).
Hydrogen Sulfide (H_2S)	A colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. It is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills. Industrial sources include petrochemical plants, coke oven plants, and kraft paper mills (CARB, 2026c).	Can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting. A few studies suggest that asthmatics may be at increased risk of exacerbation of their asthma symptoms (CARB, 2026c).
Lead	Lead is a soft, chemically resistant metal that forms both organic and inorganic compounds. As an air pollutant, it occurs in fine particles. While vehicle emissions declined with the phase-out of leaded gasoline, lead remains in soils and can be resuspended. Current major sources include metal processing (especially smelters) and piston-engine aircraft using leaded aviation fuel, along with incinerators, utilities, and battery manufacturing (CARB, 2026d).	Can cause high blood pressure, kidney disease, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain, and birth defects (CARB, 2026d).

Table 2. Summary of Criteria Air Pollutants

Criteria Air Pollutant	Major Sources	Human Health Effects
Sulfate	A sub-fraction of ambient particulate matter. Emissions of sulfur-containing compounds occur primarily from the combustion of petroleum-derived fuels (for example, gasoline and diesel fuel) that contain sulfur. A small amount of sulfate is directly emitted from combustion of sulfur-containing fuels, but most ambient sulfate is formed in the atmosphere (CARB, 2026e).	Much like health effects of PM2.5, sulfate can cause reduced lung function, aggravated asthmatic symptoms, and increased risk of emergency department visits, hospitalizations, and death in people who have chronic heart or lung diseases (CARB, 2026e).
Vinyl Chloride	A colorless gas with a mild, sweet odor. Most vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products, thus may be emitted from industrial processes. Vinyl chloride has been detected near landfills, sewage treatment plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents (CARB, 2026f).	Short-term exposure to high levels (10 parts per million [ppm] or above) of vinyl chloride in air causes central nervous system effects, such as dizziness, drowsiness, and headaches. The primary non-cancer health effect of long-term exposure to vinyl chloride through inhalation or oral exposure is liver damage. Inhalation exposure to vinyl chloride has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans (CARB, 2026f).
Visibility Reducing Particles	These particles vary greatly in shape, size, and chemical composition, and come from a variety of natural and manmade sources. Some haze-causing particles are directly emitted to the air such as windblown dust and soot. Others are formed in the air from the chemical transformation of gaseous pollutants (for example, sulfates, nitrates, and organic carbon particles) which are the major constituents of fine PM. These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment (CARB, 2026g).	Haze not only impacts visibility, but some haze-causing pollutants have been linked to serious health problems and environmental damage as well. Exposure to particles up to 2.5 (PM2.5) and 10 microns (PM10) in diameter in the ambient air can contribute to a broad range of adverse health effects, including premature death, hospitalizations, and emergency department visits for worsened heart and lung diseases (CARB, 2026g).

Toxic Air Contaminants: In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. According to Section 39655 of the California Health and Safety Code, a TAC is "an air pollutant which may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health." To date, the CARB has designated nearly 200 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs vary, but typically include industrial processes, such as petroleum refining; commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects associated with TACs are quite diverse and generally are assessed locally rather than regionally.

Asbestos: Asbestos particles and fibers are naturally occurring in some rock and soil formations, but because of its strength and heat resistance, asbestos has been used in a variety of building materials. If asbestos-containing materials (ACM) are disturbed, for example during demolition of a structure, asbestos particles and fibers may be released into the air. Three of the major health effects associated with asbestos exposure are:

- Lung cancer
- Mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest and the abdomen and heart
- Asbestosis, a serious progressive, long-term, non-cancer disease of the lungs (USEPA, 2025a)

The disturbance, abatement, and demolition of any structures containing ACM would require compliance with USEPA Asbestos Hazard Emergency Response Act (AHERA), USEPA National Emission Standards for Hazardous Air Pollutants (NESHAP), and California Division of Occupational Safety and Health (Cal/OSHA) regulations regarding asbestos in construction.

Lead: As described in Table 2, exposure to lead can lead to harmful health effects in humans. If lead-based paint (LBP) and lead-containing surface coatings (LCSC) are chipped or deteriorating, lead particles may become airborne as dust, chips, and suspended particles. The disturbance of any materials containing any amount of lead would require compliance with Cal/OSHA Lead Construction Standards (Title 8 CCR 1532.1) for worker protection, and compliance with the California Code of Regulations Title 17, CCR 35000-36100.

Diesel Particulate Matter: CARB has identified diesel particulate matter (DPM) as a toxic air contaminant. Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as DPM. More than 90 percent of DPM is less than 1 micrometer in diameter and thus is a subset of particulate matter less than 2.5 microns in diameter (PM2.5). DPM is typically composed of carbon particles and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds (VOCs) and oxides of nitrogen (NOx). The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation. Diesel exhaust can also cause coughing, headaches, light-headedness, and nausea. Due to their extremely small size, these particles can be inhaled and eventually become trapped in the lungs' bronchial and alveolar regions. Because it is part of PM2.5, DPM also contributes to the same non-cancer health effects as PM2.5 exposure (CARB, 2026b).

Regulatory Framework: Activities affecting air quality in Humboldt County are subject to the authority of the North Coast Unified Air Quality Management District (NCUAQMD) and the California Air Resources Board (CARB). The NCUAQMD is a regional environmental regulatory agency which has jurisdiction over Humboldt, Del Norte, and Trinity counties in Northern California. The NCUAQMD is listed as being in "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM10) standard in Humboldt County only (NCUAQMD, 2026). In 1995, the NCUAQMD prepared a Draft Particulate Matter (PM10) Attainment Plan to identify the primary sources of PM10 in the District and recommend control measures (NCUAQMD, 1995). In the Draft Plan, the largest source of particulate matter is fugitive dust emissions from vehicular traffic on unpaved roads.

Significance Threshold: The NCUAQMD has not formally adopted significance thresholds for use in environmental review of infrastructure projects. For the purposes of assessing air quality impacts in CEQA documents, NCUAQMD Rule 110 – New Source Review (NSR) And Prevention of Significant Deterioration (PSD), which contains thresholds for operational emissions from new stationary sources, is commonly used as a significance threshold for project-level review for infrastructure improvement projects. Although these stationary source emissions thresholds do not directly apply to projects, they provide a reference point for levels of emissions that would trigger NCUAQMD requirements for best available control technology and/or mitigation off sets. Per Rule 110, criteria air pollutants from the operation of stationary sources are considered significant if they exceed the following thresholds listed in Table 3 (NCUAQMD, 2015).

Table 3: NCUAQMD Significance Thresholds[a]

Pollutant	Significance Thresholds	
	Daily (pounds per day)	Annual (tons per year)
Reactive Organic Compounds	50	40
Nitrogen Oxides	50	40
Carbon Monoxide	500	100
Sulfur Oxides	80	40

Pollutant	Significance Thresholds	
	Daily (pounds per day)	Annual (tons per year)
Particulate Matter (PM10)	80	15
Particulate Matter (PM2.5)	50	10

a. NCUAQMD, 2015

In using NCUAQMD Rule 110 as a threshold in this document, the Lead Agency is exercising its discretion to formulate localized CEQA significance criteria based in part on the NCUAQMD rules, as they reflect the best available expert judgment regarding what constitutes significant levels of air pollution within the regional air basin that includes Humboldt County.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) Conflict with or obstruct implementation of the applicable air quality plan? Less-Than-Significant with Mitigation Incorporated

The project is located in Humboldt County, which is located in the NCAB and is subject to the jurisdiction of the NCUAQMD. The NCUAQMD is listed as being in "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM10) standard in Humboldt County only (NCUAQMD, 2026). Construction of the proposed project would include site preparation, grading, trenching, discharge pipe rehabilitation, recycled water force main installation, building construction, demolition, paving, and revegetation. These include activities and equipment which may result in the emission of PM10, for which Humboldt County is in non-attainment under state ambient air quality standards. As stated previously, the NCUAQMD prepared a Draft Particulate Matter (PM10) Attainment Plan in May 1995. The Draft Plan includes a description of the planning area, an emissions inventory, general attainment goals, and a listing of cost-effective control strategies. NCUAQMD's Attainment Plan established goals to reduce PM10 emissions and eliminate the number of days in which state standards are exceeded.

Construction

Construction of the proposed project has the potential to temporarily contribute to PM10 concentrations from dust generation. NCUAQMD's Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity (NCUAQMD, 2015). The following standard conditions for controlling dust emissions during construction will be required as **Mitigation Measure AQ-1** in order to provide consistency with the Draft Particulate Matter (PM10) Attainment Plan.

- all active construction areas (for example, parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered a minimum of two times per day during the dry season;
- hydroseed or apply non-toxic soil stabilizers to inactive construction areas;
- dust-generating activities shall be limited during periods of high winds (over 15 miles per hour [mph]);
- suspend excavation and grading activity when winds exceed 25 mph;
- all haul trucks transporting soil, sand, or other loose material, likely to give rise to airborne dust, shall be covered;
- all vehicle speeds shall be limited to 15 mph within the construction area;
- promptly remove earth or other tracked out material from paved streets onto which earth, or other material has been transported by trucking or earth-moving equipment; and
- conduct digging, backfilling, and paving of utility trenches in such a manner as to minimize the creation of airborne dust.

With the implementation of **Mitigation Measure AQ-1**, the proposed project's construction activity would not conflict with or obstruct implementation of the Draft Plan.

Operation

The Draft Particulate Matter (PM10) Attainment Plan includes three areas of recommended control strategies to achieve attainment status: transportation, land use, and burning. The project aligns with control measures identified in the PM10 Attainment Plan appropriate to this type of project, such as stop-and-go traffic, which accounts for a large portion of vehicular related PM10 emissions. This is especially true with heavy duty, diesel-fueled vehicles (NCUAQMD, 1995). The project site is located nearby to highway access. The close proximity to the highway minimizes stop-and-go traffic for haul trucks and reduces potential vehicular PM10 emissions. Additionally, because the discharge pipe and land application force main will be located underground, and the new WWTF parcel will be largely covered by structures and gravel surfaces, operations would have limited potential to generate fugitive dust. The current and ongoing agricultural land uses on the project parcels and other nearby and adjacent parcels pose a greater source of fugitive dust than the maintenance and operation of the WWTF facilities. Therefore, the proposed project would not conflict with the PM10 Attainment Plan.

With the implementation of **Mitigation Measure AQ-1** and based on the information provided above, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? Less-Than-Significant Impact

As discussed in the Setting, the project is located in Humboldt County, which is located in the NCAB and is subject to the jurisdiction of the NCUAQMD. The NCUAQMD's primary responsibility is to achieve and maintain federal and state air quality standards, subject to the powers and duties of the CARB. Humboldt County is listed as being in "attainment" or "unclassified" for all the federal and state ambient air quality standards except for the state 24-hour particulate matter (PM10) standard (NCUAQMD, 2026).

The proposed project has the potential to generate PM10 emissions during both construction and operation. During construction activities, PM10 emissions would primarily be generated from fugitive dust from ground-disturbing activities and vehicle/equipment exhaust. During operation of the proposed project, minimal PM10 emissions would be generated, primarily from maintenance activities with the potential to generate fugitive dust (for example, site maintenance involving ground-disturbing activity) and vehicle/equipment exhaust.

Both construction and operational emissions for the proposed project were estimated using the California Emissions Estimator Model (CalEEMod; CAPCOA, 2022), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operation of a variety of land use projects. The model applies inherent default values for various land uses, including trip generation rates based on the Institute of Transportation Engineers (ITE) Manual, vehicle mix, trip length, average speed, etc. However, where project-specific data is available, such data should be input into the model. Project-specific information input into the model was derived from the project description at the beginning of this document, from the Wastewater Facilities Plan – Addendum 1 (SHN, 2026a) and Basis of Design Report (SHN, 2022), and from supplemental information provided by the project engineer related to the size of proposed structures and equipment, area of grading and site preparation, equipment that would be used for construction, number of days for each construction activity, the quantity of materials that would be imported and exported, and information on the proposed standby generator. Otherwise, where project-specific information was not available, the model default values were used for estimating emissions from the project. Due to the PM10 attainment status for Humboldt County, PM10 is the primary focus of the emissions estimates and analysis in this section. For information purposes only, emissions estimates are also provided for other common air pollutants including ROG, CO, NOx, SOx, and PM2.5.

Tables 4 and 5 below provide the maximum daily construction and operations emissions estimates (unmitigated) from CalEEMod as compared to the significance threshold for PM10 in NCUAQMD Rule 110. As discussed in the Air Quality Setting, although not directly applicable to land use projects, the Rule 110 significance thresholds provide a reference point for levels of emissions that would trigger requirements for best available control technology and/or mitigation off-sets. As such, these thresholds reflect the best available expert judgment regarding what constitutes significant levels of air pollution within the NCAB and Humboldt County. For the purposes of this analysis, PM10 emissions from construction and operation of the proposed project would be cumulatively considerable if they exceed the Rule 110 significance threshold (NCUAQMD, 2015).

Table 4. Maximum Daily Construction Emissions (Unmitigated)

Criteria Pollutants	Emissions (pounds per day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions[a]	27.9	25.9	29.9	0.05	8.9	5.0
Significance Threshold[b]	50	50	500	80	80	50
Exceeds Significance Threshold?	No	No	No	No	No	No

a. CAPCOA, 2022
b. NCUAQMD, 2015

Table 5. Maximum Daily Operational Emissions (Unmitigated)

Criteria Pollutants	Emissions (pounds per day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Emissions[a]	2.14	2.40	12.2	<0.1	2.36	0.65
Significance Threshold[b]	50	50	500	80	80	50
Exceeds Significance Threshold?	No	No	No	No	No	No

a. CAPCOA, 2022
b. NCUAQMD, 2015

As indicated in Tables 4 and 5, the maximum daily construction and operational emissions from the proposed project would be below the NCUAQMD Rule 110 significance threshold for PM10. Additionally, the construction and operation of the proposed project would not exceed the significance thresholds for ROG, CO, NOx, SOx, and PM2.5. As such, the proposed project is not anticipated to result in a cumulatively considerable net increase of PM10.

The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the NCUAQMD is in non-attainment under an applicable federal or state ambient air quality standard. Therefore, the proposed project would result in a less-than-significant impact.

c) ***Expose sensitive receptors to substantial pollutant concentrations?*** Less-Than-Significant with Mitigation Incorporated

This discussion addresses whether the proposed project would expose sensitive receptors to substantial concentrations of criteria air pollutants or toxic air contaminants during construction activity including naturally occurring asbestos, fugitive dust (PM2.5 and PM10), and DPM.

As noted in the Air Quality Setting, high concentrations of criteria air pollutants and toxic air contaminants can result in adverse health effects to humans. Some population groups are considered more sensitive to air pollution than others; in particular, children, elderly, and acutely or chronically ill persons, especially those with cardio-respiratory diseases such as asthma and bronchitis. Land uses that generally house more sensitive people include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest known potential sensitive receptors to the project site are the residences east of Eel River Drive within the developed town of Loleta (Figure 2). The nearest are approximately 80 feet away from the existing and proposed WWTF, across the street. The nearest school is the Loleta Grammar School, located approximately ½ mile northeast of the project.

The NCUAQMD has not adopted guidance for health risk assessments or health risk significance thresholds. However, the NCUAQMD recommends on their website the use of the California Air Pollution Control Officers Association (CAPCOA) guidance document entitled “Health Risk Assessment for Proposed Land Use Projects” to assist lead agencies with the requirements of CEQA when projects may involve exposure to toxic air contaminants (NCUAQMD, 2026). The document primarily focuses on addressing long-term public health risk impacts from and

to proposed land use projects. The document does not provide guidance on how risk assessments for construction projects should be addressed in CEQA (CAPCOA, 2009).

Air quality issues occur when sources of air pollutants and sensitive receptors are located near one another. As discussed in the CAPCOA guidance document (CAPCOA, 2009), there are basically two types of land use projects that have the potential to cause long-term public health risk impacts:

- Land use projects with toxic emissions that impact receptors. Examples of these types of projects include combustion-related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, and quarry operations.
- Land use projects that would place receptors in the vicinity of existing toxic sources. This would occur when residential, commercial, or institutional developments are proposed to be located in the vicinity of existing toxic emission sources such as stationary sources, high traffic roads, freeways, rail yards, and ports.

The following analysis evaluates whether the project would result in construction- or operational-related impacts to sensitive receptors.

Construction

Criteria Air Pollutants: The construction activities proposed by the project would result in the emission of criteria air pollutants. As indicated in Table 4, the construction emissions from the proposed project are well below the NCUAQMD stationary source thresholds. These thresholds were developed by the NCUAQMD, and approved by the CARB and USEPA, to ensure that stationary sources would not contribute to an exceedance of federal and state ambient air quality standards in the region. As discussed in the Air Quality Setting, the USEPA has concluded that the current National Ambient Air Quality Standards (NAAQS) protect the public health, including the at-risk populations, with an adequate margin of safety. Because the construction emissions from the proposed project would not exceed the NCUAQMD thresholds, the project would not expose sensitive receptors to substantial concentrations of criteria air pollutants.

Naturally Occurring Asbestos: The U.S. Geological Survey (USGS, 2011) has published mapping identifying areas that are known to contain naturally occurring asbestos (NOA). The California Department of Conservation (DOC, 2000) has also published mapping of areas more likely to contain NOA. These mapping sources indicate that there are several locations within Humboldt County that are known to contain NOA. The project site is located in an area that is not identified as an area known to contain or likely to contain NOA. The closest areas containing NOA are located over 30 miles east and southeast of the project (USGS, 2011; DOC, 2000). As such, the project site does not contain NOA that could be released during construction activities such as site preparation, grading, and trenching.

***Fugitive Dust*:** Fugitive dust has the potential to be generated during construction from activities including site preparation, grading, and trenching. Construction-related dust emissions typically vary from day to day, depending on the level and type of activity, silt content of construction site soil, and weather conditions. Fugitive dust generated from construction activity can result in nuisances and localized health impacts. Considering the type of project and the area that would be disturbed by construction activity, there is a potential for the generation of significant quantities of fugitive dust. To reduce potential impacts from fugitive dust generation during construction activity, **Mitigation Measure AQ-1** has been included for the project, which requires the implementation of fugitive dust control measures.

Diesel PM: The use of diesel-powered equipment during construction activity would generate DPM, which is a known carcinogen. The majority of heavy diesel equipment used during construction activity would occur during grading of the project site. However, construction activities would be transitory, occurring intermittently over the entire construction site and over a short timeframe of approximately 18 months. Residents and other sensitive receptors located within the vicinity of the project site would be exposed to construction contaminants only for the duration of construction activity. These brief exposure periods would substantially limit exposure to hazardous emissions.

Due to the limited scale and duration of construction activities, and the rapid dissipation of DPM with distance, it is not anticipated that sensitive receptors would be exposed to substantial DPM concentrations. According to CARB, concentrations of mobile-source diesel particulate matter emissions are typically reduced by 70 percent at a distance of approximately 500 feet (CARB, 2005). Based on the emissions modeling conducted for the project,

maximum daily emissions of diesel PM (modeled by PM2.5, which is conservatively considered a surrogate for diesel PM), would not exceed 2 pounds per day for all construction activities combined (see Table 4; CAPCOA, 2022). This is well below the NCUAQMD significance threshold of 50 pounds per day. This maximum daily emission level represents all construction activities; however, individual site improvements would result individually in less emissions. Thus, due to the dispersive properties of DPM, concentrations from individual site improvements would be lower, resulting in less exposure to any one receptor.

Construction activities would occur for brief periods of time for each proposed site improvement. Residents located within the vicinity of the project site would be exposed to construction contaminants only for the duration of construction activity. These brief exposure periods would substantially limit exposure to hazardous emissions.

Operation

Project operations will involve the operation of the new WWTF, continued winter discharge of treated wastewater to the Eel River, and summertime land application of treated effluent. This infrastructure is not generally considered to be a land use that emits substantial quantities of toxic emissions. Any emissions currently being emitted by operation of the existing WWTF would be considered part of the existing baseline conditions. Because the proposed project would not increase LCSD's service area or amount of wastewater treated, it would not result in any significant increases in operational emissions.

Conclusion

Based on the project location, design, and implementation of **Mitigation Measure AQ-1**, construction and operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, impacts from the proposed project would be less than significant with mitigation incorporated.

d) ***Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***
Less-Than-Significant Impact

Construction

Minor odors from the use of equipment during construction activities would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. Project emissions or odors caused by construction would not adversely affect a substantial amount of people and the construction impact would be less than significant.

Operation

During ongoing, long-term operation of the facility, the proposed WWTF, like the existing WWTF, will generate odors associated with wastewater and its processing. Due to the modern design and improved operations, the odors produced by the new WWTF are anticipated to be less than for the existing WWTF, within levels typically associated with such a facility, and to which the public has become accustomed. For example, the new WWTF will have a headworks mechanical screen and washing/compacting equipment that will clean the influent trash and debris before automatically placing it into a disposal bin with a bagger that would help contain odors from the removed material. This will reduce odors associated with the primary screening that is not done at the existing WWTF. The existing WWTF only has a manual bar screen, and screenings are removed by hand and placed in a disposal bin outside exposed to the atmosphere without being washed. The land application of treated wastewater is not anticipated to generate a noticeable odor, as the wastewater will have been sufficiently treated by that point. Therefore, a less-than-significant impact would result.

Conclusion

Based on the information provided above, the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Therefore, the proposed project would result in a less-than-significant impact.

Mitigation Measures: In order for the proposed project to result in a less-than-significant impact on *Air Quality*, the following mitigation measures will be implemented:

Mitigation Measure AQ-1. Requirements to Reduce Air Pollution: The contractor shall implement the following air quality protection measures during construction:

- All exposed surfaces (such as parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day in areas of active construction to control dust or as necessary.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes. Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The NCUAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

IV. BIOLOGICAL RESOURCES

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

Setting: The setting and analysis in this section are based on the Biological Resources Assessment (BRA; SHN, 2026c) and the Aquatic Resources Delineation Report (ARD; SHN, 2026d) that were prepared for this project.

The project site is primarily located on a broad, flat to gently sloping topography. The WWTF is constructed on the toe of a slope associated with Table Bluff and contains slopes ranging from 3 to 7 percent and a steep embankment constructed for Eel River Drive on the eastern portion of the WWTF parcel. The surrounding fields including the location of the discharge pipe and proposed land application site are used for agriculture, primarily grazing and cultivation, and mostly have 0 to 2 percent slopes. These and the other adjacent fields have been used in the same manner for over 100 years. As such, vegetation is generally grazed and the overwhelming majority of species are non-native.

The BRA included a literature review, seasonally appropriate field surveys, and habitat assessments to determine biological resources present or with potential to occur within the project area. The BRA documented the presence or absence of special-status and sensitive biological resources within the study area, and if observed, the extent and condition of these resources. Additionally, it included lists of special-status species reported from the project region, applicable existing regulations for the protection of sensitive biological resources, and documentation of all plant and animal species observed within the study area. SHN's biologists conducted field surveys on June 3 and July 6, 2026, for special-status species present and habitat assessment.

Special-Status Plant Species

Based on a review of special status plant species, 56 special status plant species have been reported from the region consisting of the Fields Landing quadrangle and the surrounding quadrangles. Of the special status plant species reported for the region, 48 plant species are considered to have low or no potential to occur in the study area and 8 species have a moderate or high potential of occurring in the study area. Species with a moderate or high potential for occurrence within the study area are listed below.

- Short-leaved evax (*Hesperevax sparsiflora var. brevifolia*)
- Harlequin lotus (*Hosackia gracilis*)
- Marsh pea (*Lathyrus palustris*)
- Howell's montia (*Montia howellii*)
- Wolf's evening-primrose (*Oenothera wolfii*)
- Maple-leaved checkerbloom (*Sidalcea malachroides*)
- Siskiyou checkerbloom (*Sidalcea malviflora ssp. patula*)
- Coast checkerbloom (*Sidalcea oregana ssp. eximia*)

No special status plant species were observed within the project area.

Special-Status Animal Species

Based on a review of special status animal species, 80 special status animal species have been reported with the potential to occur in the project region consisting of the Fields Landing quadrangle and the surrounding quadrangles. Of the special status animal species potentially occurring in the region, 58 animal species are considered to have a low potential to occur in the study area and 22 species have a moderate to high potential. Species with a moderate or high potential for occurrence within the study area are listed below and discussed under subsection a).

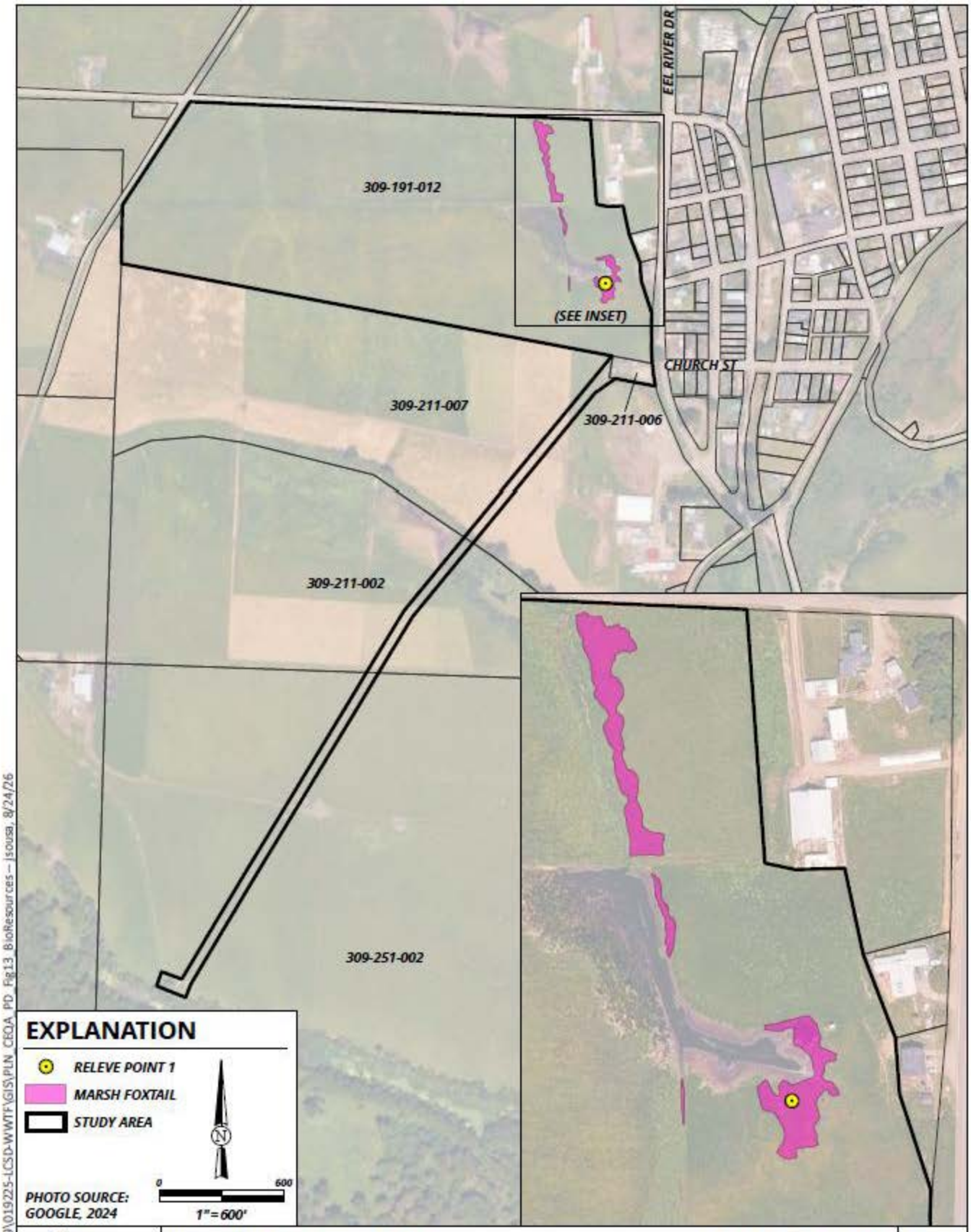
- Northern red-legged frog (*Rana aurora*)
- Sharp-shinned hawk (*Accipiter striatus*)
- Grasshopper sparrow (*Ammodramus savannarum*)
- Great egret (*Ardea alba*)
- Great blue heron (*Ardea herodias*)
- Short-eared owl (*Asio flammeus*)
- Cooper’s Hawk (*Astur cooperii*)
- Northern harrier (*Circus cyaneus*)
- Snowy egret (*Egretta thula*)
- White-tailed kite (*Elanus leucurus*)
- Willow flycatcher (*Empidonax traillii*)
- Merlin (*Falco columbarius*)
- American peregrine falcon (*Falco peregrinus anatum*)
- Yellow-breasted chat (*Icteria virens*)
- Black-crowned night heron (*Nycticorax nycticorax*)
- Bryant’s savannah sparrow (*Passerculus sandwichensis alaudinus*)
- Black-capped chickadee (*Poecile atricapillus*)
- Purple martin (*Progne subis*)

- Yellow warbler (*Setophaga petechia*)
- Silver-haired bat (*Lasionycteris noctivagans*)
- Hoary bat (*Lasiurus cinereus*)
- Northwestern pond turtle (*Actinemys marmorata*)

Three special status animal species were observed within the project area – great egret (*Ardea alba*), Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*), and yellow warbler (*Setophaga petechia*).

Sensitive Natural Communities

One sensitive natural community as defined by the Manual of California Vegetation or California Department of Fish and Wildlife (CDFW) Natural Communities list occurs within the study area (Figure 13). *Alopecurus geniculatus* (water foxtail) Provisional Alliance, hereinafter referred to as water foxtail meadow, is a provisional sensitive natural community vulnerable to extirpation in California and worldwide. The only riparian habitat observed within the study area was located within a three-parameter wetland (the northern portion of Wetland 2 within a slough remnant), so it was not separately mapped as riparian habitat. Riparian habitat and water foxtail meadow are discussed below under subsection b).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Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California
Botanical Resources
August 2026 - 019225.600
Figure
13

Wetlands and Jurisdictional Drainages

The Aquatic Resources Delineation (ARD) investigated the project location for wetlands, streams and other waterbodies, and riparian habitat that could be affected by the project. Fieldwork was performed on June 8, 10, and 12, 2026. Wetland and stream delineations adhere to state and federal jurisdiction requirements using U.S. Army Corps of Engineers (USACE) three-parameter wetland determination and USACE Ordinary High Water Mark (OHWM) methodologies. Additionally, the study area is located within the California Coastal Zone; thus, California Coastal Commission (CCC) wetland determination parameters were also applied to satisfy its distinct criteria.

The study area contains seven three-parameter wetlands (Figures 14 through 18). There were no additional state or CCC wetlands or other waters differentiated from the three-parameter wetlands, or CDFW riparian habitat associations. The total wetland area documented within the study area is approximately 2,130,986 square feet (sf; 48.92 ac), as detailed in Table 6 and Figures 14 through 18.

Wetlands 1, 3, 4, 5, and 6, and portions of Wetlands 2 and 7 are historically farmed wetlands that have been graded and drained and are used for livestock pasture grazing or for the occasional hay or silage crop. Portions of Wetlands 2 and 7 are part of higher functioning wetlands.

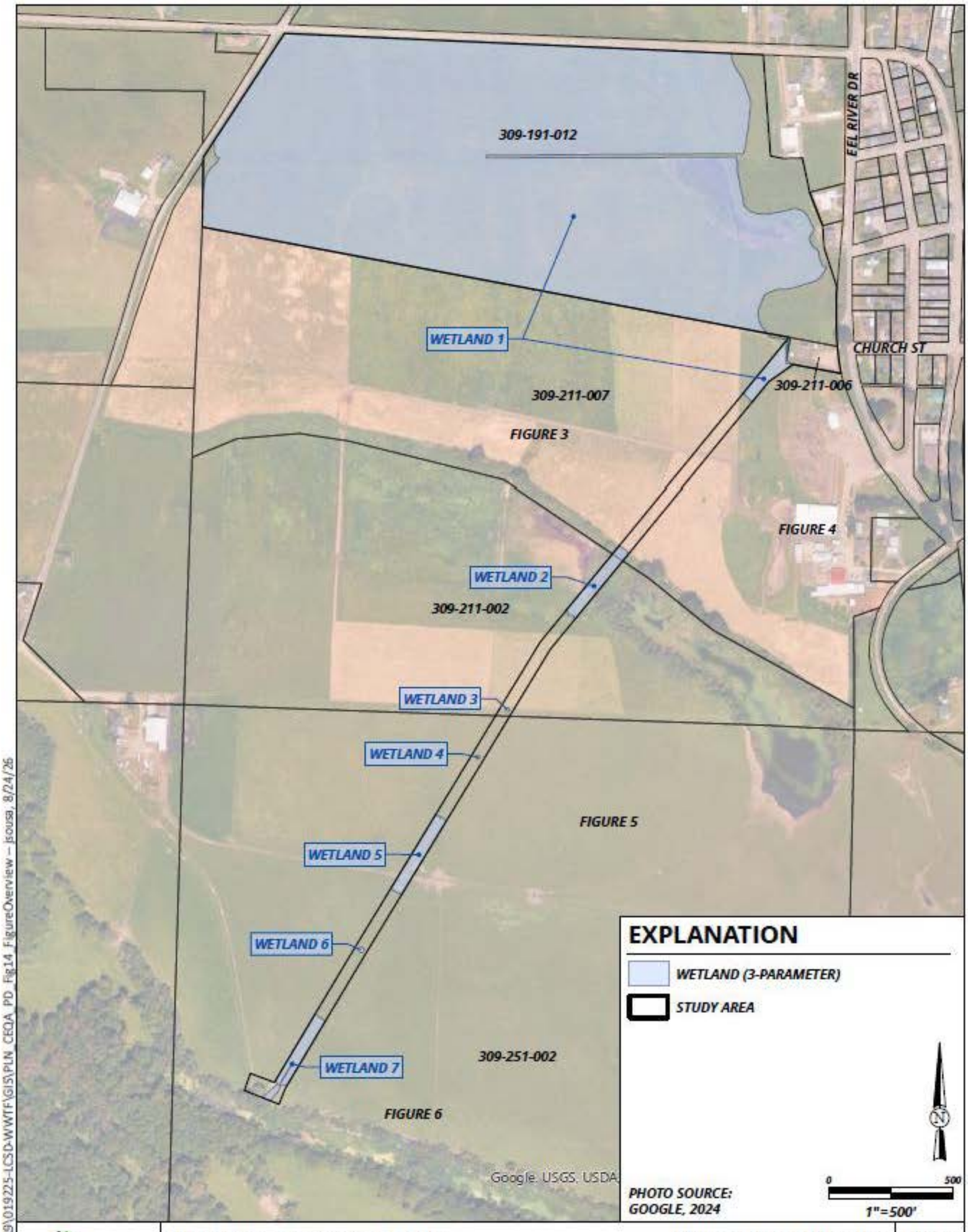
No ordinary highwater marks were observed within the study area. The only riparian habitat observed within the study area was located within a three-parameter wetland (the northern portion of Wetland 2 within a slough remnant), so it was not separately mapped as riparian habitat.

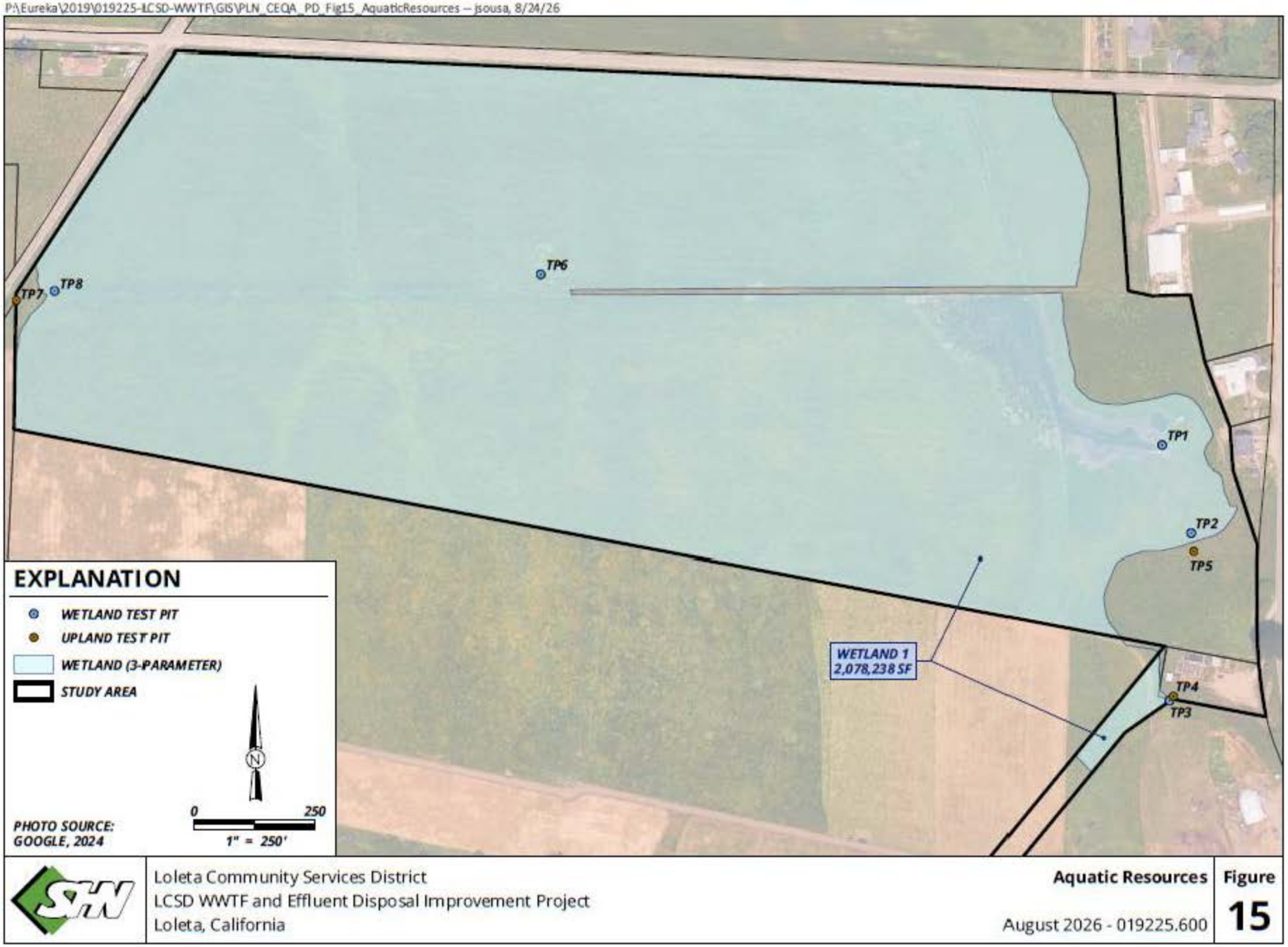
Table 6 identifies which permitting agencies have jurisdiction over the documented aquatic resources. Wetland 7 is the only federally jurisdictional wetland as it is the only wetland feature with connectivity to the Eel River (a traditional navigable water). All of the wetlands delineated within the study area are state jurisdictional under the RWQCB and the CCC. Project permitting falls under the jurisdiction of the USACE, RWQCB, the County of Humboldt, and the CCC.

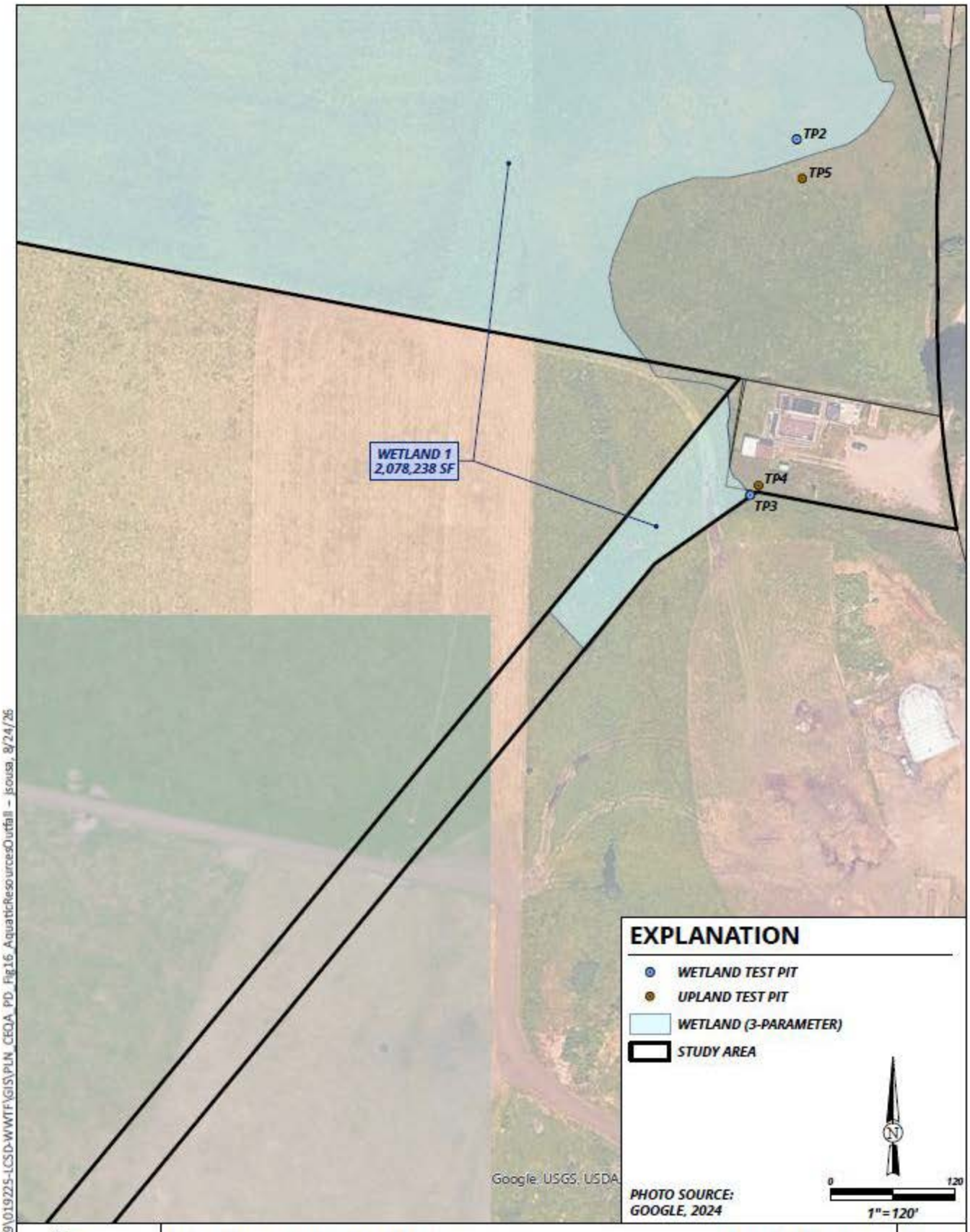
Table 6. Aquatic Resources within the Study Area

Aquatic Resource Name	TP Associated with Wetland	Cowardin Type	Location[a] (Latitude/ Longitude) In Decimal Degrees	USACE[b] Jurisdictional Area (sf)[c]	RWQCB[d] Jurisdictional Area (sf)	CDFW[e] Jurisdictional Area (sf)	CCC[f] Jurisdictional Area (sf)
Potential Wetland Waters in the Study Area							
Wetland 1	TP1 through TP8	PEM1E0ng	40.64153282°/ -124.23128596°	N/A	2,078,238	N/A	2,078,238
Wetland 2	TP9, TP10	PFO1E0n/ PEM1E0n[h]	40.63703426°/ -124.2299212°	N/A	16,972	N/A	16,972
Wetland 3	Exploratory pits	PEM1E0ng	40.6356011°/ -124.23118165°	N/A	206	N/A	206
Wetland 4	Exploratory pits	PEM1E0ng	40.63506705°/ -124.2315888°	N/A	172	N/A	172
Wetland 5	TP11, TP12	PEM1E0ng	40.63397364°/ -124.2324124°	N/A	17,456	N/A	17,456
Wetland 6	Exploratory pits	PEM1E0ng	40.63290555°/- 124.2332093°	N/A	365	N/A	365
Wetland 7	TP13, TP14	PEM1E0n/ PEM1H0n[i]	40.63171804°/ -124.23409978°	17,577	17,577	N/A	17,577
Wetland Waters Total				**17,577[j] (0.40 acres)**	**2,130,986 (48.92 acres)**	**0 (0.00 acres)**	**2,130,986 (48.92 acres)**

a. Datum WGS 84: World Geodetic System 1984
b. USACE: U.S. Army Corps of Engineers
c. sf: square feet
d. RWQCB: Regional Water Quality Control Board
e. CDFW: California Department of Fish and Wildlife
f. CCC: California Coastal Commission
g. PEM1E0n: Palustrine Emergent Persistent Seasonally Flooded/Saturated Freshwater Mineral Soils
h. PFO1E0n/PEM1E0n: Palustrine Forested Broad-Leaved Deciduous Seasonally Flooded/Saturated, Freshwater with Mineral and Palustrine Emergent Persistent Seasonally Flooded/Saturated Freshwater Mineral Soils
i. PEM1E0n/PEM1H0n: Palustrine Emergent Persistent Seasonally Flooded/Saturated Freshwater Mineral Soils and Palustrine Emergent Persistent Permanently Flooded Freshwater Mineral Soils with Mineral Soils; Source: (Cowardin, 1979)
j. The most current shift in regulatory definitions for USACE jurisdictional wetlands in the Sackett vs. EPA Supreme Court decision, which has decided that unless a 3-parameter wetland has a continuous surface connection to a traditional navigable waterbody, it is not claimed as jurisdictional waters of the U.S. (Supreme Court of the U.S., 2023)


309-191-012
EEL RIVER DR
WETLAND 1
CHURCH ST
309-211-006
309-211-007
FIGURE 3
FIGURE 4
WETLAND 2
309-211-002
WETLAND 3
WETLAND 4
FIGURE 5
WETLAND 5
WETLAND 6
WETLAND 7
309-251-002
FIGURE 6
Google, USGS, USDA
EXPLANATION
WETLAND (3-PARAMETER)
STUDY AREA
N
PHOTO SOURCE:
GOOGLE, 2024
0
500
1"=500'
P:\Eureka\2019\019225-LCSD-WWTF\GIS\PLN_CEQA_PD_Fig14_FigureOverview – jsousa, 8/24/26
Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California
Wetland Figure Overview
August 2026 - 019225.600
Figure
14


P:\Eureka\2019\019225-LCSD-WWTF\GIS\PLN_CEQA_PD_Fig15_AquaticResources – jsousa, 8/24/26
TP6
TP7
TP8
TP1
TP2
TP5
TP4
TP3
WETLAND 1
2,078,238 SF
EXPLANATION
WETLAND TEST PIT
UPLAND TEST PIT
WETLAND (3-PARAMETER)
STUDY AREA
N
0
250
1" = 250'
PHOTO SOURCE:
GOOGLE, 2024
Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California
Aquatic Resources
August 2026 - 019225.600
Figure
15

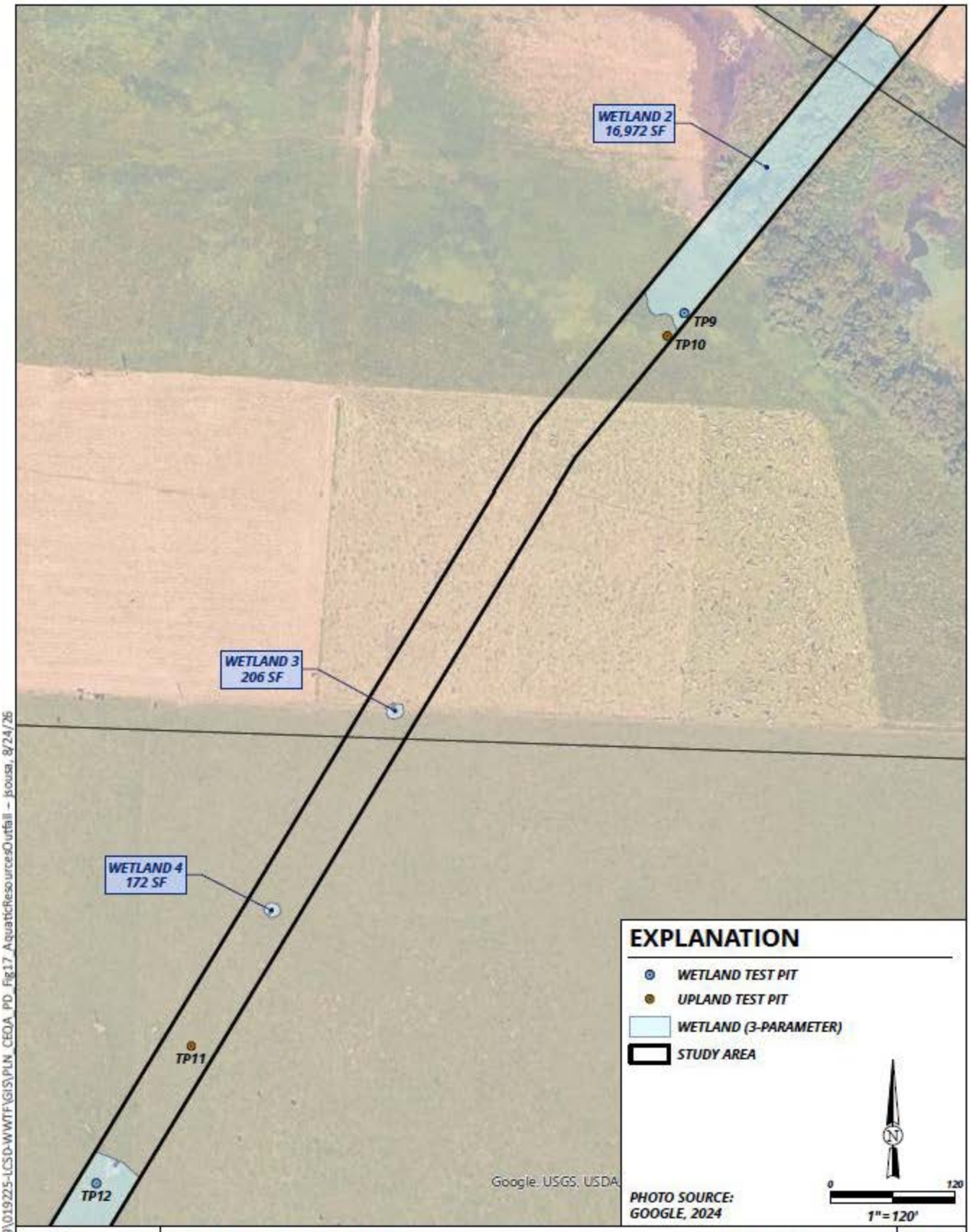


Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Aquatic Resources

August 2026 - 019225.600

Figure 16

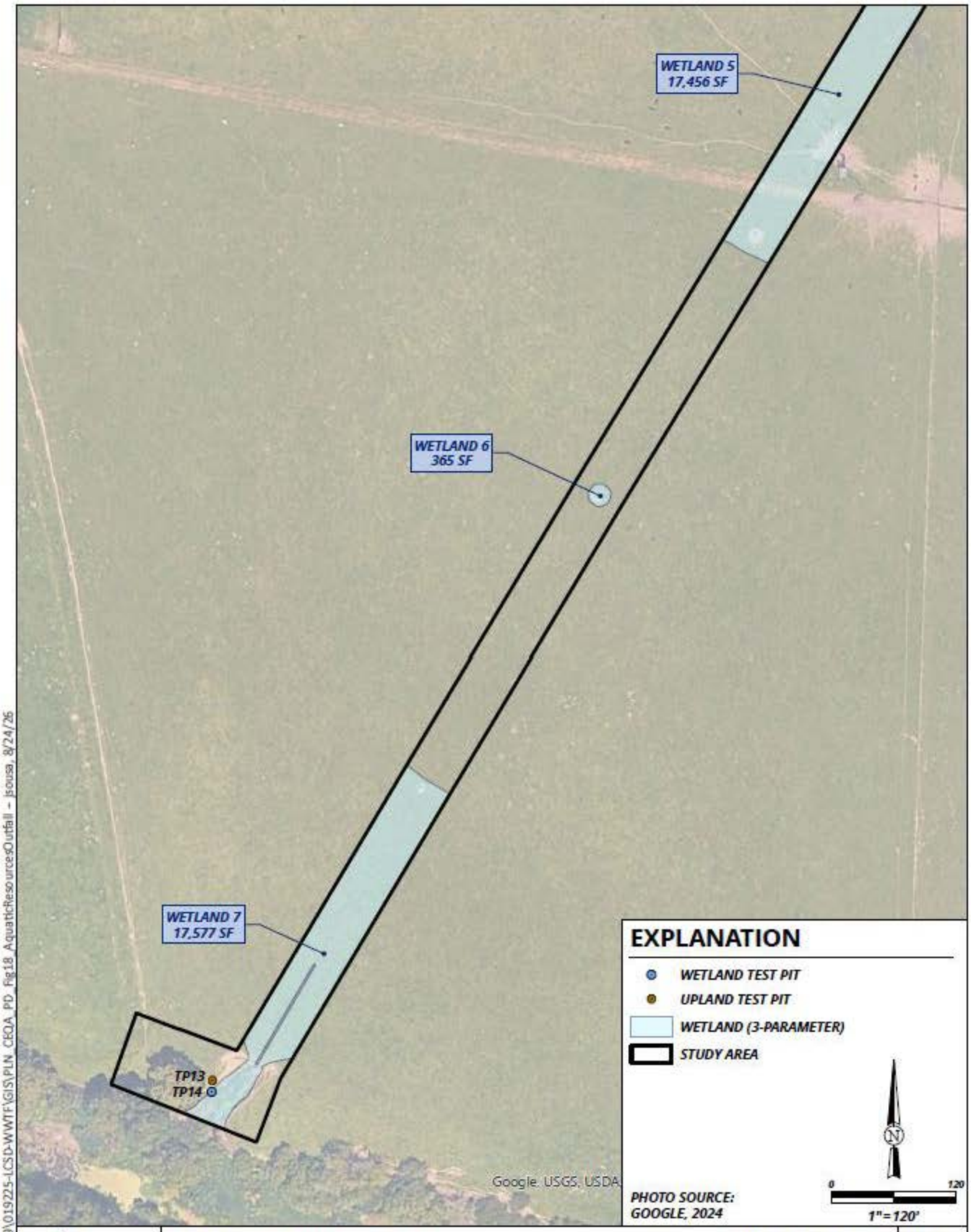


Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Aquatic Resources

August 2026 - 019225.600

Figure 17



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Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

Aquatic Resources

August 2026 - 019225.600

Figure 18

The results of the wetland investigation are further discussed below under subsection c).

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*** Less Than Significant with Mitigation Incorporated

Surveys of the site were conducted in preparation of the BRA (SHN, 2026c), which addresses special-status biological resources present or potentially occurring within the site, evaluates project-related impacts, and recommends appropriate avoidance and minimization measures.

Special-Status Plant Species

Based on a review for special status plant species, 56 special status plant species have been reported from the region consisting of the Fields Landing quadrangle and the surrounding quadrangles. Of the special status plant species reported for the region, 48 plant species are considered to have low or no potential to occur in the study area and 8 species have a moderate or high potential of occurring in the study area. Species with a moderate or high potential for occurrence within the study area are listed above in Setting. No special status plant species were observed within the project area. Therefore, there would be a less-than-significant impact on special-status plant species.

Special-Status Animal Species

Based on a review of special status animal species, 80 special status animal species have been reported with the potential to occur in the project region consisting of the Fields Landing quadrangle and the surrounding quadrangles. Of the special status animal species potentially occurring in the region, 58 animal species are considered to have a low potential to occur in the study area and 22 species have a moderate to high potential. Species with a moderate or high potential for occurrence within the study area are discussed below.

The northern red-legged frog (*Rana aurora*) occurs in lowlands or foothills in humid forests, woodlands, grasslands, and within and adjacent to streamsides with plant cover and breeds in permanent water sources. Breeding occurs between December and April, with metamorphosis completed by late July. Northern red-legged frogs are known to occur hundreds of meters from water, especially in thick vegetation. However, they are most frequently found within 5 meters of water in densely vegetated areas. Habitat exists within the study area for this species, particularly in and near the remnant slough wetland (within the north portion of Wetland 2) and below the discharge pipe outfall (south of Wetland 7). Implementation of **Mitigation Measure BIO-1** (Protect Northern Red-legged Frog) will avoid or minimize potential impacts to northern red-legged frog to less than significant by having a qualified biologist conduct a pre-construction survey and stopping work if a northern red-legged frog is found within the construction area.

The sharp-shinned hawk (*Accipiter striatus*) breeds in riparian deciduous and mixed conifer habitats. It perches on north-facing slopes and forages in woodland openings and nests are usually within 275 feet of water. Suitable foraging habitat is available within the study area for this species, but it is not likely to nest on site. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The grasshopper sparrow (*Ammodramus savannarum*) occupies short grass prairies including grazed areas on flat ground. Suitable foraging and nesting habitat is available for this species within the study area. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The great egret (*Ardea alba*) forages in brackish marsh, estuaries, freshwater marsh, swamps, riparian areas, and wetlands. It will sometimes forage in open, wet fields. Rookery (nest) sites are located near foraging sites within

large trees. Suitable habitat is available for this species within the study area, and it was detected during the surveys. No rookery sites were observed; however, future active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The great blue heron (*Ardea herodias*) occurs in shallow estuaries and emergent wetlands. The great blue heron searches for prey in shallow water and open fields. It nests in colonies in tops of secluded large snags/live trees. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The short-eared owl (*Asio flammeus*) breeds in coastal grassland meadows, nesting on the ground in tall grasses. This species tends to be active during the day more than some other owl species. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The Cooper's hawk (*Astur cooperii*) occupies woodlands, including open, interrupted and marginal habitats. Nests are primarily in riparian areas with deciduous trees, in canyons bottoms, and also among live oaks. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The northern harrier (*Circus cyaneus*) occurs in coastal scrub, Great Basin grassland, marshes, swamps, and riparian scrub. The northern harrier nests and forages in grasslands, usually near wet areas, with nesting usually occurring at a marsh edge on the ground. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The snowy egret (*Egretta thula*) occurs in riparian forests and wetlands with rookery (nest) sites near marshes, streams, and lake margins. Suitable habitat exists within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The white-tailed kite (*Elanus leucurus*) occurs in rolling foothills and valley margins with scattered trees as well as riparian areas, river bottoms, or marshes next to deciduous woodlands. They forage within open areas, frequently grasslands, pastures close to isolated, dense-topped trees for nesting and perching. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The willow flycatcher (*Empidonax traillii*) forages for small flying insects along brushy areas. It breeds in moist meadows with perennial streams and lowland riparian woodlands dominated by willows and cottonwoods. The willow flycatcher nests near the edges of vegetation near streams. Suitable foraging habitat is available within the study area for this species, though nesting habitat is outside the study area along the main Eel River channel to the south. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The merlin (*Falco columbarius*) occurs along the coast, in tidal estuaries, savannahs, edges of grasslands and deserts, farms and ranches, and within open woodlands. This species occurs in the project region outside the breeding season but nests in more northern regions. Foraging habitat is available for this species within the study area. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The American peregrine falcon (*Falco peregrinus anatum*) is found within many open habitats; however, it is more likely along coastlines, lake edges, and mountain edges. It is most common near wetlands, lakes, rivers, or other water. It often nests on cliffs, banks, dunes, mounds, and also human-made structures, with the nest consisting of a scrape, depression, or ledge in an open area. Suitable foraging habitat is available for this species within the study area; however, nesting habitat is not available. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The yellow-breasted chat (*Icteria virens*) is a summer resident and inhabits riparian thickets of willow and other brushy tangles near watercourses. This species is known to nest in low, dense riparian vegetation consisting of willow, blackberry, and other shrubby, thicket-forming vegetation. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The black-crowned night heron (*Nycticorax nycticorax*) occurs in marshes, swamps, and other wetlands as well as riparian woodland. The black-crowned night heron is a colonial nester in rookery sites usually in trees, and occasionally in tule patches. Suitable habitat is available within the study area for this species. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*) occurs in agricultural fields, meadows, marshes, grasslands and tidally influenced areas with low vegetation. They nest in tall grasses on the ground. This species is common in the project region, and several individuals were observed singing from fence posts in the northern half of the study area. Suitable foraging and nesting habitat is available for this species throughout the study area. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The black-capped chickadee (*Poecile atricapillus*) occurs in riparian habitat with alder, willow, birch, and other deciduous riparian trees. It occasionally ventures into conifer stands near riparian areas. The chickadee excavates nest cavity in rotten wood, or nests in old woodpecker holes. Suitable habitat is available for this species within the study area, particularly in and near the remnant slough wetland (within the north portion of Wetland 2) and below the discharge pipe outfall (south of Wetland 7). Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The purple martin (*Progne subis*) occupies woodlands, primarily low elevation coniferous forests and nest in cavities built by woodpeckers or within human made structures such as power poles. Suitable habitat is available for this species within portions of the study area, particularly near the wastewater treatment facility. Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The yellow warbler (*Setophaga petechia*) occupies riparian vegetation in close proximity to water, along streams and in wet meadows. Suitable habitat is available for this species within portions of the study area, particularly in and near the remnant slough wetland (within the north portion of Wetland 2) and below the discharge pipe outfall (south of Wetland 7). Active nests of this species have potential to be destroyed or disturbed during construction. With the implementation of **Mitigation Measure BIO-2** (Pre-construction Nesting Bird Surveys), project-related activities are not anticipated to have a significant impact on this species or its habitat.

The silver-haired bat (*Lasionycteris noctivagans)* is most closely associated with coniferous, mixed coniferous, and deciduous forests, especially in old growth forests. It roosts in hollow trees, beneath exfoliating bark, in abandoned woodpecker holes, and rarely under rocks. Suitable habitat is available for this species within the study area,

including roosting habitat in the remnant wetland and near the outfall. Tree removal will not be conducted as part of the project, and significant disturbance to maternity roosts are not expected to occur to this species during construction of the project. Project-related activities are not anticipated to have a significant impact on this species or its habitat.

The hoary bat (*Lasiurus cinereus*) tends to prefer open or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. It generally roosts in dense foliage of medium to large trees. Suitable habitat is available for this species within the study area, including roosting habitat in the remnant wetland and near the outfall. Tree removal will not be conducted as part of the project, and significant disturbance to maternity roosts are not expected to occur to this species during construction of the project. Project-related activities are not anticipated to have a significant impact on this species or its habitat.

The northwestern pond turtle (*Actinemys marmorata*) is associated with permanent or nearly permanent water in a wide variety of habitat types. The northwestern pond turtle requires basking sites, such as partially submerged logs, rocks, mats of floating vegetation, or open mud banks. This species uses upland grassland for digging a nest burrow and leaving the eggs buried underground unattended until they hatch and emerge. Potential habitat for this species is available near the remnant wetland (Wetland 2) and near the discharge pipe outfall (Wetland 7). Implementation of **Mitigation Measure BIO-3** (Protect Northwestern Pond Turtle) will avoid or minimize potential impacts to northwestern pond turtle to less than significant by having a qualified biologist conduct a pre-construction survey and stopping work if a northwestern pond turtle is found within the construction area.

The dense vegetation within the remnant slough (north portion of Wetland 2) and the vegetated areas around the discharge pipe's outfall location (south of Wetland 7) are likely to support nesting birds, including raptors, February 1–August 31. In addition, human-made structures such as the WWTF buildings and the smaller shed structures along the discharge pipe alignment may be used by nesting birds. A barn swallow nest was observed under the eaves of a small shed along the proposed pipeline during the June 12, 2026 surveys. Agricultural fields that are undisturbed for a season may support grassland ground-nesting birds such as savannah sparrow, which were observed during the June 12, 2026 survey. Without mitigation, there is the potential for significant impacts to nesting birds during construction. With the incorporation of **Mitigation Measure BIO-2** which requires avoidance of potential impacts to nesting birds either through a seasonal restriction on vegetation removal/ground disturbance or through pre-construction nesting bird surveys, impacts to special-status bird species or nesting birds would be reduced to less than significant.

With the implementation of **Mitigation Measures BIO-1, BIO-2,** and **BIO-3**, and based on the information provided above, it has been determined that the proposed project would not have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) ***Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local of regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*** Less-Than-Significant Impact

A sensitive natural community (also defined as a vegetation alliance) is considered rare by the state when given the rank S1 through S3 or G1 through G3. Any rare or especially valuable habitats, such as sensitive vegetation communities, wetlands, sand dunes, or rare plant populations, are considered protected environmentally sensitive habitat areas (ESHA) under the California Coastal Act.

One sensitive natural community (also defined as a vegetation alliance) was identified and mapped within the study area (see Figure 13). The *Alopecurus geniculatus* (water foxtail) Provisional Alliance (G3? S3?), hereinafter referred to as water foxtail meadow, is a provisional sensitive natural community vulnerable to extirpation in California and worldwide. The designations "G3?" and "S3?" are conservation status ranks indicating that this ecological community is potentially vulnerable or rare, though data remain uncertain ("?"). Water foxtail meadow is distinguished by the continuous, dominant cover (greater than 50-percent relative cover) of water foxtail over a given area. Though often a bunchgrass, this hydrophytic species is stoloniferous, fast growing, and forms turfgrass swards under sufficiently saturated conditions, particularly wherever disturbance prevents the growth of woody

shrubs. Most stands of water foxtail in California are associated with valley bottoms, wet meadows, and stream terraces. Identified as non-wetland ESHA, four polygons of water foxtail meadow were mapped along the eastern edge of the agricultural field proposed for land application of treated effluent (0.640 acres; Figure 13). The polygons of water foxtail meadow are located outside of the areas subject to ground disturbance during project construction, as they are north and east of the proposed land application force main pipe (Figure 2) and outside of the proposed access routes (Figure 6). The polygons of water foxtail meadow are within the area proposed for land application of treated effluent (Figure 2). The proposed land application of treated wastewater to the area containing the water foxtail meadow polygons is consistent with the existing and historical land use of this area (baseline conditions), which has been used for agriculture, primarily grazing and cultivation, for over 100 years, and which is periodically subject to irrigation, fertilizing, grazing, tilling, and planting. As such, neither construction nor operation of the proposed project would have a substantial adverse effect on water foxtail meadow.

Regarding potential riparian habitat within the study area, a slough remnant dominated by a mix of coastal willow (*Salix hookeriana*), pacific willow (*Salix lasiandra* var*. lasiandra*), canary reedgrass (*Phalaris arundinacea*), and parrots feather (*Myriophyllum aquaticum*) was observed along a portion of the discharge pipe alignment (within the north portion of Wetland 2). Due to the overwhelming amount of cover (94 percent relative cover in the herb stratum) by species rated as either non-native or highly invasive by the California Invasive Plant Council (CalIPC), it was determined the slough remnant does not meet the criteria of a sensitive natural community. The area was delineated as a three-parameter wetland (Figure 17) and, therefore, was not mapped as riparian habitat. No other characteristically distinct riparian habitat occurrences were observed or mapped within the study area. The slough remnant area along a portion of the discharge pipe alignment (within the north portion of Wetland 2) containing potential riparian habitat will not be impacted during construction because that section is to be repaired using a trenchless repair method called slip-lining, with no ground disturbance in this area. Continued operation of the discharge pipe would not impact the potential riparian habitat. As such, neither construction nor operation of the proposed project would have a substantial adverse effect on potential riparian habitat.

Based on the information provided above, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local of regional plans, policies, regulations, or by CDFW or USFWS. Therefore, the proposed project would have a less-than-significant impact on this resource category.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means*?* Less-Than-Significant Impact with Mitigation Incorporated

The Aquatic Resources Delineation (ARD; SHN, 2026d) investigated the project location for wetlands, streams and other waterbodies, and riparian habitat that could be affected by the project. Wetland and stream delineations adhered to state and federal jurisdiction requirements using U.S. Army Corps of Engineers (USACE) three-parameter wetland determination and USACE Ordinary High Water Mark (OHWM) methodologies. Additionally, the study area is located within the California Coastal Zone; thus, California Coastal Commission (CCC) wetland determination parameters were also applied to satisfy its distinct criteria.

The study area contains seven three-parameter wetlands (Figures 14 through 18). There were no additional state or CCC wetlands or other waters differentiated from the three-parameter wetlands, or CDFW riparian habitat associations. The total wetland area documented within the study area is approximately 2,130,986 sf (48.92 ac), as detailed in Table 6 and Figures 14 through 18.

Wetlands 1, 3, 4, 5, and 6, and portions of Wetlands 2 and 7 are historically farmed wetlands that have been graded and drained and are used for livestock pasture grazing or for the occasional hay or silage crop. Portions of Wetlands 2 and 7 are part of higher functioning wetlands.

No ordinary highwater marks were observed within the study area. The only riparian habitat observed within the study area was located within a three-parameter wetland (the northern portion of Wetland 2 within a slough remnant), so it was not separately mapped as riparian habitat.

Table 6 identifies which permitting agencies have jurisdiction over the documented aquatic resources. Wetland 7 is the only federally jurisdictional wetland, as it is the only wetland feature with connectivity to the Eel River (a traditional navigable water). All of the wetlands delineated within the study area are state jurisdictional under the RWQCB and the CCC. Project permitting falls under the jurisdiction of the USACE, RWQCB, the County of Humboldt, and the CCC. Construction of the proposed project will involve temporary impacts to grazed agricultural wetlands (but outside of slough remnant and riparian areas), including portions of Wetlands 1, 2, 3, 4, 5, and 7 (Figure 19).

Construction of the proposed land application pipe will involve excavating a trench within approximately 1,948 linear feet of grazed agricultural wetlands that will be 3 feet deep by 3 feet wide. All construction activities and staging will occur within 15 feet of the land application pipeline centerline. Excavated soil from the land application pipeline trench will be temporarily placed within a 15-foot-wide area along (and including) the trench before replacement into the trench. A total of 29,215 sf (0.671 acres) of temporary wetland impact is associated with construction of the land application pipe.

Rehabilitation of the discharge pipe will involve excavating a trench within approximately 495 linear feet of grazed agricultural wetlands. The discharge pipe trench will be 2.5 feet deep and 2 feet wide near the WWTF and up to 13 feet deep and 4 feet wide near the outfall headwall. All construction activities and staging will occur within 25 feet of the discharge pipe centerline. Excavated soil from the trench will be temporarily placed within a 25-foot-wide area along (and including) the trench before replacement into the trench. A total of 11,632 sf (0.267 acres) of temporary wetland impact is associated with rehabilitation of the discharge pipe. Including both the land application pipe and the discharge pipe, the project includes a total of 40,847 sf (0.938 acres) of temporary wetland impact to grazed agricultural wetlands.

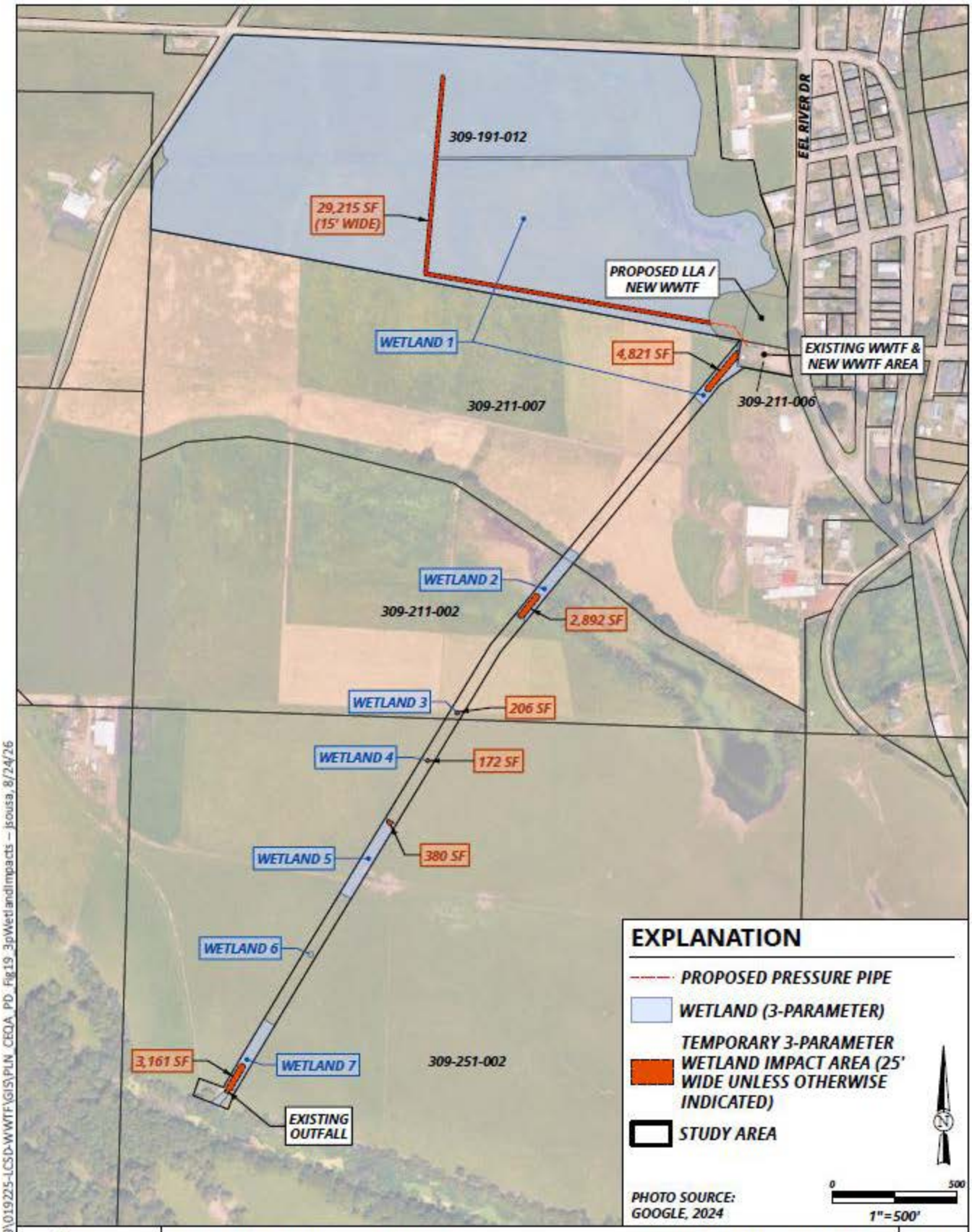
To ensure a temporary and less-than-significant impact to agricultural wetlands from project construction, during trenching and excavation in agricultural areas (including all wetland areas), the top 6 inches of excavated material shall be separately stockpiled by the contractor. The contractor shall ensure that this stockpiled soil material is kept moist and that the material is restored to the construction trench as soon as is feasible. This topsoil material shall be reintroduced as the top fill material in the restored trench section. This requirement has been incorporated as **Mitigation Measure BIO-4** (Stockpile and Replace Topsoil in Agricultural and Wetland Areas).

Upon completion of component construction activities and prior to October 15, all temporarily disturbed agricultural lands (including but not limited to areas disturbed by trenching and construction materials and equipment staging and access) shall be decompacted, recontoured, and reseeded, as needed, to restore pre-project conditions. Revegetation shall occur with a mix of regionally appropriate native grasses and/or noninvasive agricultural species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be identified from time to time by the State of California, shall be employed on the site. No plant species listed as a "noxious weed" by the governments of the State of California or the U.S. shall be utilized within the property. This requirement has been incorporated as **Mitigation Measure BIO-5** (Revegetate Temporarily Disturbed Agricultural Lands).

With the incorporation of **Mitigation Measures BIO-4** and **BIO-5**, and based on the information provided above, the proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, the proposed project would have a less-than-significant impact with mitigation incorporated on this resource category.

d) ***Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*** Less-Than-Significant Impact with Mitigation Incorporated

Project construction and operations do not include in-water work or any other activity that might impede fish migration. Terrestrial project construction and operations do not include construction of barriers to wildlife migration (such as extensive fencing, highly developed roadway, or large structures). Disturbance of migratory and nesting birds associated with noise is addressed in subsection a) above with **Mitigation Measure BIO-2** to ensure the potential impact to migratory and nesting birds would be less than significant.



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Loleta Community Services District
LCSD WWTF and Effluent Disposal Improvement Project
Loleta, California

3-P (USACE) Wetland Impacts

August 2026 - 019225.600

Figure 19

Based on the information provided above, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, the proposed project would have a less-than-significant impact with mitigation incorporated on this resource category.

e) ***Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*** Less-Than-Significant Impact with Mitigation Incorporated

Section 3.40 "Resource Protection Policies and Standards" and Section 3.41 "Environmentally Sensitive Habitats" of the Eel River Area Plan (Humboldt County, 2014) summarize policies germane to the protection of biological resources. Section 3.41.B states, in applicable part, that "*(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following: … (5) Incidental public service purposes, including, but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake outfall lines…. (c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary…."* In total, the proposed discharge pipeline repair and new irrigation force main installation would entail temporary impacts to approximately 40,847 sf (0.938 acres) of grazed agricultural wetlands (Figure 19). The proposed new manhole to be installed within the existing discharge pipe alignment is proposed in uplands so that no permanent wetland impact would result from its installation or from the project as a whole.

The project as designed represents the least environmentally damaging feasible project alternative, as discussed in LCSD's Petition Findings for Local Coastal Plan Amendment (SHN, 2024). Alternatives considered included constructing an ocean outfall, consolidating with another nearby community WWTF, expanding the WWTF into a different adjacent parcel, relocating the WWTF to elsewhere in Loleta, constructing a temporary WWTF within the proposed expansion area, phased partial construction, and various alternative types of treatment systems. The temporary impacts to grazed agricultural wetland proposed by the project are for incidental public service purposes. First, the proposed fill is being undertaken by a public agency to serve the public and, therefore, has a public service purpose. The proposed fill is also incidental to the primary service provided overall by the existing wastewater treatment system. The proposed fill in wetlands only modifies the location and method of treated wastewater discharge of the existing wastewater treatment system and does not increase service capacity or expand service to areas not already served by the existing system. Furthermore, the project constitutes burying pipe, which is an activity specifically listed in Section 3.41.B(5) as an incidental public service purpose for which filling and dredging in wetlands is allowed. **Mitigation Measures BIO-1** through **BIO-5** have been incorporated into the project to reduce potential impacts to biological resources to less than significant.

Additionally, the project would not conflict with the Humboldt County General Plan or the Eel River Area Plan because the project includes a Local Coastal Plan (Eel River Area Plan) amendment and a zone reclassification to facilitate the proposed project and to resolve the existing WWTF zoning designation of AE-60/W,F,R,T which is inconsistent with the existing general plan designation of Public Facilities (PF). Permits would be obtained as needed from applicable agencies such as Humboldt County, CCC, USACE, and RWQCB, and the project would be subject to a range of permit conditions of approval determined by the permitting agencies to ensure compliance with applicable regulations. No conflicts with policies or ordinances protecting biological resources have been identified.

For the reasons explained above, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the proposed project would have a less-than-significant impact with mitigation incorporated on this resource category.

f) ***Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community, Conservation Plan, or other approved local, regional, or State habitat conservation plan?*** No Impact

The proposed project is not located within the boundaries of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat conservation plan. As such, the project would not conflict with the provisions of an adopted habitat conservation plan. Therefore, the proposed project would have no impact on this resource category.

Mitigation Measures: In order for the proposed project to result in a less-than-significant impact on *Biological Resources*, the following mitigation measures will be implemented:

Mitigation Measure BIO-1. Protect Northern Red-legged Frog: To avoid potential impacts to northern red-legged frog during project related activities, on the day the project-related work is initiated, a qualified biologist shall conduct a pre-construction survey for northern red-legged frog prior to vegetation trimming and mobilization of heavy equipment in all work areas. If northern red-legged frog is observed in an active construction zone, the contractor shall immediately halt construction activities until a) the frog has left the area or b) a qualified biologist, in consultation with CDFW, has moved the frog to a safe location in similar habitat outside of the construction zone.

Mitigation Measure BIO-2. Pre-construction Nesting Bird Surveys: To avoid potential impacts to nesting birds, in accordance with the Migratory Bird Treaty Act, one of the following shall be implemented:

- conduct vegetation removal and other ground disturbance activities associated with any construction activities between mid-August and mid-February, when birds are not typically nesting; or
- if vegetation removal, structure modification or removal, or ground-disturbing activity is to take place during the nesting season (February 15 to August 15 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits within 5 days of the commencement of construction. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the U.S. Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) and implemented to prevent abandonment of the active nest.

Mitigation Measure BIO-3. Protect Northwestern Pond Turtle: To avoid potential impacts to northwestern pond turtle, on the same day of and prior to ground-disturbing work initiated within 500 meters of the aquatic habitat below the outfall pipe discharge point, a qualified biologist will conduct a survey for northwestern pond turtle.

- If northwestern pond turtle is confirmed to be present, the qualified biologist will halt work in the area of potential impact until the animal has left the area of potential impact on its own.
- If no northwestern pond turtles are observed during the survey, no further surveys or monitoring are required.

Mitigation Measure BIO-4. Stockpile and Replace Topsoil in Agricultural and Wetland Areas: During trenching and excavation in agricultural areas (including all wetland areas), the top 6 inches of excavated material shall be separately stockpiled by the contractor. The contractor shall ensure that this stockpiled soil material is kept moist and that the material is restored to the construction trench as soon as is feasible. This topsoil material shall be reintroduced as the top fill material in the restored trench section.

Mitigation Measure BIO-5. Revegetate Temporarily Disturbed Agricultural Lands: Upon completion of component construction activities and prior to October 15, all temporarily disturbed agricultural lands (including, but not limited to, areas disturbed by trenching and construction materials and equipment staging and access) shall be decompacted, recontoured, and reseeded, as needed, to restore pre-project conditions. Revegetation shall occur with a mix of regionally appropriate native grasses and/or noninvasive agricultural species. No plant species listed as problematic and/or invasive by the California Native Plant Society, the California Invasive Plant Council, or as may be identified from time to time by the State of California, shall be employed on the site. No plant species listed as a "noxious weed" by the governments of the State of California or the U.S. shall be utilized within the property.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?		**X**		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		**X**		
c) Disturb any human remains, including those interred outside of formal cemeteries?		**X**		

Archaeological and other resources can be damaged through uncontrolled public disclosure. Archeological site locations and culturally sensitive information are considered confidential, and public access to such information is restricted by state and federal law. Therefore, this information has been redacted for use in the Mitigated Negative Declaration (MND). Professionally qualified individuals, as determined by the California Office of Historic Preservation, may contact the lead agency in order to inquire about its availability.

Information regarding the location, character, or ownership of a historic resource is exempt from the Freedom of Information Act pursuant to 16 U.S.C. 470w-3 (National Historic Preservation Act) and 16 U.S.C. § 470hh (Archaeological Resources Protection Act) and California State Government Code, Section 6254.10.

Setting: A Cultural Resources Investigation was completed for the proposed project by William Rich and Associates (WRA). The purpose of this cultural resources investigation was to document the presence of significant cultural resources within the proposed Area of Potential Effect (APE), pursuant to Section 106 of the NHPA and Section 15064.5 of CEQA, and Public Resources Code (PRC) 21074. The environmental review process requires that state and federal agencies implement procedures to inventory and evaluate cultural resources and to assess potential effects on those cultural resources which may be listed in, or be eligible for listing, to the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR). The investigation methods utilized included a review of the files at the Northwest Information Center (NWIC), a review of archaeological and historical literature pertinent to the APE and general region, correspondence with Native Americans and other knowledgeable individuals regarding the history of the area, and an intensive field survey (WRA, 2026).

The field survey resulted in the recordation of the Loleta Wastewater Treatment Facility and associated sewer pipes and manholes, on California Department of Parks and Recreation (CDPR) 523-series archaeological site record forms, under the temporary field name “WRA 01 (Loleta Wastewater Treatment Facility)” as they meet the age threshold for identification. The Loleta Wastewater Treatment Facility recorded within the report was recommended not eligible for the NRHP or the CRHR due to its small size and lack of important associations of events, significant persons, or outstanding architectural or engineering design. No other historic period or Native American artifacts, features, sites or other cultural resources were identified during the investigation.

The investigation concluded that no significant archaeological or historic period cultural resources, that for the purposes of NHPA (Code of Federal Regulations, Title 36 Part 800.4), would be considered a historic property, or for the purposes of CEQA (Title 14 California Code of Regulations, Section 15064.5(a)), would be considered a historical resource, exist in the limits of the proposed project area. Implementation of the proposed project would not cause an effect or change to historic properties or historical resources, as none are present (WRA, 2026).

The Cultural Resources Investigation offered recommendations to follow in the event of inadvertent discovery of cultural resources. These recommendations were designed to ensure that potential project impacts on inadvertently discovered cultural resources are eliminated or reduced to less than significant levels.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?* Less Than Significant with Mitigation Incorporated

As described in the Cultural Resources Setting, a Cultural Resources Investigation was prepared for the proposed project (WRA, 2026). The field survey resulted in the recordation of the Loleta Wastewater Treatment Facility and associated sewer pipes and manholes, on California Department of Parks and Recreation (CDPR) 523-series archaeological site record forms, under the temporary field name "WRA 01 (Loleta Wastewater Treatment Facility)" as they meet the age threshold for identification. The Loleta Wastewater Treatment Facility recorded within the report was recommended not eligible for the NRHP or the CRHR due to its small size and lack of important associations of events, significant persons, or outstanding architectural or engineering design. No other historic period or Native American artifacts, features, sites or other cultural resources were identified during the investigation.

The investigation concluded that no significant archaeological or historic period cultural resources, that for the purposes of NHPA (Code of Federal Regulations, Title 36 Part 800.4), would be considered a historic property, or for the purposes of CEQA (Title 14 California Code of Regulations, Section 15064.5(a)), would be considered a historical resource, exist in the limits of the proposed project area. Implementation of the proposed project would not cause an effect or change to historic properties or historical resources, as none are present (WRA, 2026).

Although discovery of cultural resources (including historical resources) during project construction was not anticipated, the Cultural Resources Investigation offered recommendations to follow in that event. These recommendations were designed to ensure that potential project impacts on inadvertently discovered cultural resources are eliminated or reduced to less than significant levels. Provided that the recommended inadvertent discovery protocols are implemented, the investigation resulted in a finding of no historic properties affected (36 CFR 800.4(d)(1)) and no substantial adverse change to an historical resource (CEQA 15064.5 (a)). For this reason, Protocols for Inadvertent Discovery of Cultural Resources have been included as **Mitigation Measure CR-1** for the proposed project. This measure was designed to ensure that the potential project impacts on inadvertently discovered cultural resources are eliminated or reduced to less than significant levels.

With the implementation of **Mitigation Measure CR-1** and for the reasons explained above, it has been determined that the proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) ***Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*** Less-Than-Significant Impact with Mitigation Incorporated

As described in the Cultural Resources Setting, a Cultural Resources Investigation was prepared for the proposed project (WRA, 2026). The field survey resulted in the recordation of the Loleta Wastewater Treatment Facility and associated sewer pipes and manholes, on CDPR 523-series archaeological site record forms, under the temporary field name "WRA 01 (Loleta Wastewater Treatment Facility)" as they meet the age threshold for identification. The Loleta Wastewater Treatment Facility recorded within the report was recommended not eligible for the NRHP or the CRHR due to its small size and lack of important associations of events, significant persons, or outstanding architectural or engineering design. No other historic period or Native American artifacts, features, sites or other cultural resources were identified during the investigation.

The investigation concluded that no significant archaeological or historic period cultural resources, that for the purposes of NHPA (Code of Federal Regulations, Title 36 Part 800.4), would be considered a historic property, or for the purposes of CEQA (Title 14 California Code of Regulations, Section 15064.5(a)), would be considered a historical resource, exist in the limits of the proposed project area. Implementation of the proposed project would not cause an effect or change to historic properties or historical resources, as none are present (WRA, 2026).

Although discovery of cultural resources (including historical resources) during project construction was not anticipated, the Cultural Resources Investigation offered recommendations to follow in that event. These recommendations were designed to ensure that potential project impacts on inadvertently discovered cultural resources are eliminated or reduced to less than significant levels. Provided that the recommended inadvertent discovery protocols are implemented, the investigation resulted in a finding of no historic properties affected (36 CFR 800.4(d)(1)) and no substantial adverse change to an historical resource (CEQA 15064.5 (a)). For this reason, Protocols for Inadvertent Discovery of Cultural Resources have been included as **Mitigation Measure CR-1** for the proposed project. This measure was designed to ensure that the potential project impacts on inadvertently discovered cultural resources are eliminated or reduced to less than significant levels.

Provided that the recommended inadvertent discovery protocols are implemented, the investigation resulted in a finding of no historic properties affected (36 CFR 800.4(d)(1)) and no substantial adverse change to an historical resource (CEQA 15064.5 (a)).

With the implementation of **Mitigation Measure CR-1** and for the reasons explained above, it has been determined that the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

c) ***Disturb any human remains, including those interred outside of formal cemeteries?*** Less-Than-Significant Impact with Mitigation Incorporated

The Cultural Resources Investigation did not find evidence of human remains, including those interred outside of formal cemeteries. However, there is a possibility that human remains and historic burial sites could exist in the area and may be uncovered during project development. Therefore, Protocols for Inadvertent Discovery of Cultural Resources have been included as **Mitigation Measure CR-1** for the proposed project. This measure was designed to ensure that the potential project impacts on inadvertently discovered cultural resources are eliminated or reduced to less than significant levels.

With the implementation of **Mitigation Measure CR-1** and for the reasons explained above, it has been determined that the proposed project would not disturb any human remains, including those interred outside of formal cemeteries. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

Mitigation Measures: In order for the proposed project to result in a less-than-significant impact on *Cultural Resources*, the following mitigation measures will be implemented:

Mitigation Measure CR-1. Protocols for Inadvertent Discovery of Cultural Resources: If cultural resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist will be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with Native American heritage (precontact sites and select historic period sites), the Tribal Historic Preservation Officer (THPO) for the Tribes listed in Native American Correspondence (Bear River Band of the Rohnerville Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, and Wiyot Tribe) shall be contacted immediately to evaluate the discovery and, in consultation with the project proponents, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Precontact materials which could be encountered include obsidian and chert debitage or formal tools, grinding implements, (for example, pestles, handstones, bowl mortars, slabs), locally darkened midden, deposits of shell, faunal remains, and human burials. Historic archaeological discoveries may include concentrations of artifacts made of glass, ceramics, metal or other materials found in buried pits, wells or privies.

VI. ENERGY

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

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*** Less-Than-Significant Impact

Construction

During the proposed construction activities, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel and hauling truck trips to and from the project site, and operation of generators to provide temporary power for lighting and electronic equipment. There are no unusual project characteristics that would need construction equipment or practices that would be less energy efficient than at comparable construction sites in the region or state. Construction activity would be temporary, and fuel consumption would cease once construction ends. Due to the temporary nature of construction activities, the fuel and energy needed during the project would not be considered a wasteful or inefficient use of energy. As such, it is expected that construction energy consumption associated with the project would be comparable to other similar construction projects, and would, therefore, not be inefficient, wasteful, or unnecessary.

Operation

Energy use during operation of the wastewater system would relate primarily to wastewater treatment and pumping as well as maintenance activity by LCSD personnel. Besides electricity use at the new WWTF, energy resources required for the proposed project would primarily include the use of diesel and petroleum-based fuels during operational activities for employee vehicles and equipment. Individual permanent emergency generator(s) would also be used in case of power failure for the new WWTF.

To reduce energy use at the new WWTF, the project will include variable frequency drives (VFDs) for some of the proposed equipment (for example, pumps, blowers, etc.). This energy management device improves efficiency, performance, and reliability of the system. For example, a VFD will reduce the frequency of the motor, thus reducing the speed and ultimately the discharge of the pumps. By reducing the frequency of the motor, significant energy savings are achievable. Another feature of a VFD is the integrated soft start feature. A VFD employs a soft start feature that conserves energy by gradually increasing the frequency of a pump and reducing the initial current surge when a pump starts. The soft start feature improves efficiency while also reducing stresses to the pump and other system components.

As such, it is expected that operational energy consumption associated with the project would be comparable to other similar WWTFs, and would, therefore, not be inefficient, wasteful, or unnecessary.

Conclusion

For the reasons explained above, construction and operation of the proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources,

during project construction or operation. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*** Less-Than-Significant Impact

The Eel River Area Local Coastal Plan does not include an element related to energy (Humboldt County, 2014). However, the Humboldt County General Plan has an energy element that would apply within the project area (Humboldt County, 2017a). The Humboldt Regional Climate Action Plan (RCAP; Humboldt County, 2025a) establishes a target of 40 percent reduction in greenhouse gas (GHG) emissions below 1990 levels by 2030 through efforts including energy efficiency standards. Implementation of the project would not obstruct a local or state plan for renewable energy. The project would not conflict with or inhibit the implementation of the State Energy Action Plan, or other state regulations. The project would temporarily require the use of equipment to construct the components of the project; however, these activities would be temporary and would not interfere with local energy policies or the broader energy goals of the state.

The majority of California's energy-related plans are not directly applicable to the project or its operations. Operationally, the project would not adversely impact operational wastewater treatment or automobile-related energy consumption. Implementation of the proposed extended aeration system will reduce the amount of biosolids produced compared to the existing system and would reduce the operations and maintenance substantially. To reduce energy use at the new WWTF, the project will include variable frequency drives (VFDs) for some of the proposed equipment (for example, pumps, blowers, etc.). This energy management device improves efficiency, performance, and reliability of the system. For example, a VFD will reduce the frequency of the motor, thus reducing the speed and ultimately the discharge of the pumps. By reducing the frequency of the motor, significant energy savings are achievable. Another feature of a VFD is the integrated soft start feature. A VFD employs a soft start feature that conserves energy by gradually increasing the frequency of a pump and reducing the initial current surge when a pump starts. The soft start feature improves efficiency while also reducing stresses to the pump and other system components.

The project would, therefore, not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and the proposed project would result in a less-than-significant impact on this resource category.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Energy.*

VII. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a.i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake, fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publications 42.			**X**	
a.ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?			**X**	
a.iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?			**X**	
a.iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?			**X**	
b) Result in substantial soil erosion or the loss of topsoil?			**X**	
c) 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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?			**X**	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			**X**	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?			**X**	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		**X**		

Setting: The Humboldt County coast is a highly active tectonic region that has been subjected to numerous earthquakes of low to moderate strength and occasionally to very strong earthquakes. Regional geology is influenced by the Mendocino Triple Junction, which is located approximately 25 miles southwest of the project area. The Mendocino Triple Junction (the intersection of three crustal plates including the North American, Pacific, and Gorda plates) is geologically active, and small earthquakes or other seismic activity are relatively common in the greater project vicinity. According to the California Geological Survey (CGS), the project site is not located within an Alquist-Priolo Earthquake Fault Hazard Zone (CGS, 2026). A segment of the Little Salmon fault zone with documented Holocene age surface rupture is approximately 2 miles northeast of the site. The Table Bluff fault, which is currently not zoned by the state as being active, is approximately 1.5 miles northeast of the site.

The project site is located along the Eel River approximately 8.8 miles east of the Pacific Ocean within the Coastal Range geomorphic province, more specifically the Eel River Basin. The basin includes bedrock composed primarily of Franciscan rock types, more specifically, a generalized rock type Q, which is described as marine and nonmarine sedimentary rocks (Humboldt County, 2017b; DOC, 2010).

The project area is underlain by three soil map units: 110- Weott, 0 to 2 percent slopes; 220- Ferndale, 0 to 2 percent slope; and 230- Hookton-TableBluff complex, 2 to 9 percent slopes (Figure 12). The majority of the project is on Weott soils, which are very poorly drained, with shallow water tables, and have a hydric soil rating. This area is within farmed pasturelands used for livestock grazing or occasionally planted for hay and silage for winter feed. The higher elevation soils on the eastern edge of the project are the Hookton-TableBluff complex, 2 to 9 percent slopes, which are somewhat poorly drained but do not have a hydric soil designation. The discharge pipeline is mostly in the well-drained, non-hydric Ferndale, 0 to 2 percent slope soils. (NRCS, 2026a).

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a.i) ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake, fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*** Less-Than-Significant Impact

According to the CGS, the project site is not located within an Alquist-Priolo Earthquake Fault Hazard Zone (CGS, 2026). A segment of the Little Salmon fault zone with documented Holocene age surface rupture is approximately 2 miles northeast of the site. The Table Bluff fault, which is currently not zoned by the state as being active, is approximately 1.5 miles northeast of the site. The Alquist-Priolo Earthquake Fault Zoning Act was passed by the California Legislature to mitigate the hazard of surface faulting to structures. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards.

The project proposes improvements to LCSD's community wastewater treatment and disposal system including land acquisition and a new wastewater treatment facility, rehabilitation of the existing waste discharge pipe, and land application of treated effluent. As part of the project, a geotechnical investigation will occur that will inform project design. The proposed WWTF improvements would increase earthquake resiliency. The project would not change the exposure of people or structures to injury, loss, or death from fault rupture. Thus, a less-than-significant impact would occur.

a.ii) ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*** Less-Than-Significant Impact

The Humboldt County coast is a highly active tectonic region that has been subjected to numerous earthquakes of low to moderate strength and occasionally to very strong earthquakes. Based on its record of historical earthquakes and its position near the Mendocino Triple Junction, northwestern California is one of the most seismically active regions in the continental U.S. According to the CGS, the project site is not located within an Alquist-Priolo Earthquake Fault Hazard Zone (CGS, 2026). A segment of the Little Salmon fault zone with documented Holocene age surface rupture is approximately 2 miles northeast of the site. The Table Bluff fault, which is currently not zoned by the state as being active, is approximately 1.5 miles northeast of the site.

It is likely that the project site will be subject to strong seismic shaking or other geologic hazards during the project lifespan (DOC, 2026c). However, the exposure to strong ground shaking is no greater at this site than elsewhere in the region. The proposed replacement WWTF and effluent discharge modifications will not result in an increase in the exposure to regional seismic hazards or other geologic hazards beyond the existing conditions.

As part of the project, a geotechnical investigation will occur that will inform project design. As the project will be designed following available building codes and applicable regulations, seismic ground motion hazards will be accounted for in the project design and construction. The proposed project will not expose additional people or structures to the shaking hazard. Therefore, the potential impact is less than significant.

a.iii) ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*** Less-Than-Significant Impact

Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. According to the Humboldt County GIS system, the project is within an area of potential liquefaction but is located in an area with relatively stable slopes (Humboldt County, 2026a). The project does not include structures for human occupancy and, therefore, would not expose people to seismic-related ground failure or liquefaction above and beyond existing conditions. As part of the project, a geotechnical investigation will occur which would inform project design. Design and construction of the project would incorporate appropriate engineering practices to ensure seismic stability as required by the California Building Code (CBC).

In compliance with existing laws and regulations, and based on the information provided above, it has been determined the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

a.iv) ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*** Less-Than-Significant Impact

Slope failures, commonly referred to as landslides, include many phenomena that involve the downslope displacement and movement of material, either triggered by static (such as gravity) or dynamic (such as earthquake) forces. Earthquake motions can induce significant horizontal and vertical dynamic stresses in slopes that can trigger failure. Earthquake-induced landslides can occur in areas with steep slopes that are susceptible to strong ground motion during an earthquake. The project area is generally flat (slopes are less than 10 percent) and is located within an area of relatively stable slopes (Humboldt County, 2026a). The potential for landslide occurrence would not be increased by the project. Thus, a less-than-significant impact would occur.

b) ***Result in substantial soil erosion or the loss of topsoil?*** Less-Than-Significant Impact

Construction activities, including the operation of heavy machinery, would disturb soil and, therefore, have the potential to cause erosion. A number of best management practices listed in the project description (Section 2.0) would reduce the project's potential to cause erosion or the loss of topsoil, such as that repairs of the wastewater discharge pipeline and construction of the new land application irrigation pipeline including all work in wetlands will occur during the dry season only (from May 15 through September 30).

The proposed project is anticipated to disturb over 1 acre of land; therefore, compliance with State Water Resources Control Board (SWRCB) Order No. 2022-0057 would be required, which would regulate stormwater runoff from project construction activities. Project operations would obtain coverage under SWRCB's Order No. 2022-0057-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. In compliance with the National Pollutant Discharge Elimination System requirements, a Notice of Intent would be prepared and submitted to the North Coast Regional Water Quality Control Board prior to undertaking construction, providing notification and intent to comply with the State of California Construction General Permit (CGP). In addition, a stormwater pollution prevention plan (SWPPP) would be prepared for pollution prevention and control prior to initiating site construction activities.

The construction SWPPP would be written by a Qualified SWPPP Developer (QSD) and would identify and specify the use of erosion control measures, sediment control, off-site tracking control, wind erosion control, non-stormwater management control, and waste management and materials pollution control. A sampling and monitoring program would be included in the construction SWPPP that meets the requirements of the CGP to ensure the erosion control measures are effective. A Qualified SWPPP Practitioner (QSP) would oversee implementation of the Plan, including visual inspections, sampling and analysis, and overall compliance with the SWPPP and CGP. These mandatory requirements are designed to maintain potential water quality impacts at a less than significant level during and post construction. The project would be required to adhere to erosion control

measures to be included in a SWPPP and to permit conditions from USACE, RWQCB, and CCC to prevent erosion-related impacts during construction. Therefore, the potential soil erosion impact would be less than significant.

c) ***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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?*** Less-Than-Significant Impact

According to the Humboldt County GIS system, the project area is generally flat (slopes are less than 10 percent), has relatively stable slopes, and is within an area of potential liquefaction (Humboldt County, 2026a). Project implementation would not increase the risk of liquefaction or exposure to liquefaction above existing conditions because liquefaction is caused by ground shaking (i.e., seismic events), and the project does not propose elements that would cause ground shaking. The Humboldt County GIS system does not show any historical landslides within the project area, and the potential for landslide occurrence would not be increased by the project. The project does not include structures for human occupancy. A geotechnical investigation would inform project design. Design and construction of the project would incorporate appropriate engineering practices to ensure seismic stability as required by the CBC. Therefore, the potential impact would be less than significant.

d) ***Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*** Less-Than-Significant Impact

Expansive soils are those that undergo a change in volume when exposed to fluctuations in moisture, causing shrinking when dry and swelling when moist. Typically, soils with high clay contents are most susceptible to these processes. Structural damage may occur over a long period of time due to expansive soils, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. Expansive soils can also be defined as those with a plasticity index (PI) of greater than 12 (Caltrans, 2023).

According to the U.S. Natural Resources Conservation Service (NRCS) Custom Soil Resource Report, the project area is underlain by three soil map units: 110- Weott, 0 to 2 percent slopes; 220- Ferndale, 0 to 2 percent slope; and 230- Hookton-TableBluff complex, 2 to 9 percent slopes (Figure 12). The majority of the project is on Weott soils, within farmed pasturelands used for livestock grazing or occasionally planted for hay and silage for winter feed. The higher elevation soils on the eastern edge of the project are the Hookton-TableBluff complex. The discharge pipeline is mostly in the Ferndale soils. (NRCS, 2026a). Mapping by the NRCS provides the PI of the soils in the project area (NRCS, 2026b). None of the soils have a PI greater than 12, so none are considered expansive soils. Therefore, the potential impact would be less than significant.

e) ***Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*** Less-Than-Significant Impact

The project proposes improvements to LCSD's community wastewater treatment and disposal system including land acquisition and a new wastewater treatment facility, rehabilitation of the existing waste discharge pipe, and land application of treated effluent. It does not include the placement of a septic tank. A Preliminary Anti-Degradation Analysis (SHN, 2018) was prepared to assess potential impacts to groundwater from discharging treated effluent to the proposed land application area between May 15 and September 30, and to evaluate whether the proposed project will comply with federal and state antidegradation requirements. The analysis determined that application rates would not exceed agronomic rates at the land application area; thus, no effluent would reach groundwater, and the project would comply with federal and state antidegradation requirements. Therefore, the proposed project would have a less-than-significant impact on this resource category.

f) ***Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*** Less-Than-Significant with Mitigation

Paleontological resources are the remains or traces of prehistoric animals and plants. Paleontological resources, which include fossil remains and geologic sites with fossil-bearing strata, are non-renewable and scarce and are a sensitive resource afforded protection under environmental legislation in California. Under California PRC §5097.5, unauthorized disturbance or removal of a fossil locality or remains on public land is a misdemeanor. State law also

requires reasonable mitigation of adverse environmental impacts that result from development of public land and affect paleontological resources (PRC § 30244).

Due to the marine parent material of the bedrock in the project area (a generalized rock type Q, which is defined as Quaternary-aged alluvium composed of lake, playa, and terrace deposits; unconsolidated and semi-consolidated deposits of sedimentary material [CDC, 2015]), it is possible that project construction would impact potentially significant paleontological resources. In the event that fossils or other paleontological resources are encountered during construction (that is, bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities would be diverted away from the discovery within 50 feet of the find, and a professional paleontologist would be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. This inadvertent discovery protocol is incorporated as **Mitigation Measure GEO-1**. Implementation of **Mitigation Measure GEO-1** would reduce the impact of construction activities on potentially unknown paleontological resources by addressing discovery of unanticipated buried resources and preserving and/or recording those resources consistent with appropriate laws and requirements.

With the implementation of **Mitigation Measure GEO-1** and based on the information provided above, it has been determined the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

Mitigation Measures: In order for the proposed project to result in a less-than-significant impact on *Geology and Soils*, the following mitigation measures will be implemented:

Mitigation Measure GEO-1. **Inadvertent Discovery Protocol – Paleontological Resources:** In the event that fossils or other paleontological resources are encountered during construction (that is, bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they will be properly curated and preserved.

VIII. GREENHOUSE GAS EMISSIONS

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

Setting: Greenhouse gases (GHGs) are gases in the atmosphere that absorb and emit radiation. The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short wave radiation emitted by the sun is absorbed by the Earth, the Earth emits a portion of this energy in the form of longwave (thermal) radiation, and GHGs in the upper atmosphere absorb and emit this longwave radiation into space and toward the Earth. This "trapping" of the longwave radiation emitted back toward the Earth is the underlying process of the greenhouse effect. Other than water vapor, the primary GHGs contributing to global climate change include the following gases:

- carbon dioxide (CO_2), primarily a byproduct of fossil fuel combustion in stationary and mobile sources;
- nitrous oxide (N2O), a byproduct of fuel combustion and also associated with agricultural operations such as the fertilization of crops;
- methane (CH_4), commonly created by off-gassing from agricultural practices (for example, livestock), wastewater treatment, and landfill operations;
- chlorofluorocarbons (CFCs), which were used as refrigerants, propellants, and cleaning solvents, although their production has been mostly prohibited by international treaty;
- hydrofluorocarbons (HFCs), which are now widely used as a substitute for chlorofluorocarbons in refrigeration and cooling; and
- perfluorocarbons (PFCs) and sulfur hexafluoride (SF_6) emissions, which are commonly created by industries such as aluminum production and semiconductor manufacturing.

Global climate change is not confined to a particular project area and is generally accepted as the consequence of GHG emissions from global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Statewide

As noted above, GHG emissions are attributable in large part to human activities. The total GHG emissions for California in 2023 was 360.4 million metric tons of carbon dioxide equivalent ($MTCO_2e$) (CARB, 2025). Transportation (38 percent), industry (22 percent), and electricity generation (16 percent) are the largest GHG emission sectors. Emissions of CO_2 are byproducts of fossil fuel combustion. Methane, a highly potent GHG, primarily results from off-gassing (the release of chemicals from non-metallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Nitrous oxide is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution (CO_2 dissolving into the water), respectively, two of the most common processes for removing CO_2 from the atmosphere.

Regulatory Framework

State

CEQA Guidelines – Significance Criteria

Section 15064.4 of the CEQA guidelines specifies how the significance of impacts from greenhouse gas (GHG) emissions is to be determined. The Lead Agency is to make a good faith effort to describe, calculate, or estimate the amount of

GHG emissions that will result from a project. The Lead Agency is also to consider the following factors when accessing the impacts of the GHG emissions on the environment:

1. Extent to which the project may increase or reduce GHG emissions, relative to the existing environmental setting.
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
3. Extent to which the project complies with regulations adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

California Air Resources Board – Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least once every 5 years, as required by AB 32. It lays out the transformations needed across our society and economy to reduce emissions and reach our climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants (SLCPs). The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The actions and outcomes in the plan will achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in SLCPs; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB, 2022).

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*** Less-Than-Significant Impact

The project proposes improvements to LCSD's community wastewater treatment and disposal system including land acquisition and a new wastewater treatment facility, rehabilitation of the existing waste discharge pipe, and land application of treated effluent. Any GHG emissions currently being emitted by operation of the existing wastewater treatment and disposal system would be considered part of the existing baseline conditions. The proposed project would generate both direct and indirect GHG emissions. Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Indirect GHG emissions include emissions from energy consumption and solid waste.

Both construction and operational GHG emissions for the proposed project were estimated using the California Emissions Estimator Model (CalEEMod; CAPCOA, 2022), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operation of a variety of land use projects. The model applies inherent default values for various land uses, including trip generation rates based on the Institute of Transportation Engineers (ITE) Manual, vehicle mix, trip length, average speed, and so on. However, where project-specific data is available, such data should be input into the model. Project-specific information input into the model was derived from project description at the beginning of this document and from supplemental information provided by the project engineer related to the size of proposed structures and equipment, area of grading and site preparation, equipment that would be used for construction, number of days for each construction activity, the quantity of materials that would be imported and exported, and information on the proposed backup generators. Otherwise,

where project-specific information was not available, the model default values were used for estimating emissions from the project.
Table 7 presents the estimates of unmitigated annual GHG emissions from construction and operation of the proposed project as compared to the 1,100 MTCO2e/yr threshold of significance.

Table 7. Maximum Construction and Operational GHG Emissions (Unmitigated)

Project Phase	GHG Emissions (MTCO2e/yr)	Threshold of Significance (MTCO2e/yr)	Significant Impact?
Construction	222	1,100	No
Operation	388	1,100	No

Source: CAPCOA, 2022

As shown in Table 7, the construction and operational GHG emissions from the proposed project are well below the threshold of significance. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*** Less-Than-Significant Impact

The project proposes improvements to LCSD's community wastewater treatment and disposal system including land acquisition and a new wastewater treatment facility, rehabilitation of the existing waste discharge pipe, and land application of treated effluent. The proposed project would result in GHG emissions from construction and operation. A GHG impact would be significant if the project would conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. As discussed in the Energy Section, Humboldt County has adopted a Regional Climate Action Plan that establishes GHG emissions thresholds for the County. These thresholds are used for guidance and informational purposes only, as no specific regulatory requirements apply to the project.

The proposed project is subject to myriad state and local regulations applicable to project design, construction, and operation that would reduce GHG emissions, increase energy efficiency, and provide compliance with the CARB Climate Change Scoping Plan (CARB, 2017). The State of California has the most comprehensive GHG regulatory requirements in the U.S., with laws and regulations requiring reductions that affect project emissions. Legal mandates to reduce GHG emissions from vehicles, for example, reduce project-related vehicular emissions. Legal mandates to reduce per capita water consumption and impose waste management standards to reduce methane and other GHGs from solid wastes are all examples of mandates that reduce GHGs. It is noted that according to CARB, in 2019, emissions from GHG-emitting activities statewide were 418.2 $MMTCO_2e$, 7.2 $MMTCO_2e$ lower than 2018 levels and almost 13 $MMTCO_2e$ below the 2020 GHG limit of 431 $MMTCO_2e$ (CARB, 2021).

As discussed above under subsection a), GHG emissions from the proposed project's construction and operational activity are well below the threshold of significance of 1,100 $MMTCO_2e$ per year that is used by several air districts in the state to determine the significance of impacts from GHG emissions. As such, construction and operational emissions from the proposed project would be less-than-significant and would not conflict with any plans policies, or regulations related to GHG emissions.

Therefore, the proposed project as designed and in compliance with existing laws and regulations, would not generate GHG emissions that would conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Greenhouse Gas Emissions.*

IX. HAZARDS AND HAZARDOUS MATERIALS

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

Setting: A regulatory database review of available online government records was evaluated within the project area to determine the presence and location of existing and/or historical soil and groundwater contamination, including the SWRCB's Geotracker database and the California Department of Toxic Substances Control's (DTSC) EnviroStor database. The regulatory database review was completed to identify contamination that could potentially pose an exposure risk to humans and/or the environment.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*** Less-Than-Significant Impact

Construction

The project would involve construction and operation of a new wastewater treatment facility, rehabilitation of the existing waste discharge pipe, and land application of treated effluent. The project would necessitate the transportation and utilization of standard hazardous materials inherent in construction, including petroleum

products like fuel and lubricants for construction equipment and vehicles. These materials are commonly utilized in construction, pose no immediate hazard, and would be employed in limited quantities.

Compliance with a comprehensive network of local, state, and federal laws is mandatory for the storage, handling, and transportation of hazardous materials. The use of hazardous materials during project construction would be subject to relevant regulations, such as California Health and Safety Code Section 25531, Division 20, Chapter 6.5, and other standards enforced by departments and boards under the California Environmental Protection Agency (Cal/EPA). The Project would adhere to Cal/EPA hazardous materials regulations consolidated under the Unified Program, administered by the DTSC, the State Water Resources Control Board (SWRCB), North Coast Unified Air Quality Management District (NCUAQMD), and the Department of Resources Recycling and Recovery (CalRecycle). Local Certified Unified Program Agencies (CUPAs), such as the Humboldt County Division of Environmental Health (HCDEH), oversee Unified Program enforcement, including inspections and compliance with hazardous materials regulations set forth by the Unified Program within the project area.

Worker exposure to hazardous materials would be regulated by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA), ensuring worker safety through hazard communication regulations, worker training, and compliance with signage/postings requirements. Hazard communication protocols would include identifying and labeling hazardous substances, conveying information regarding storage, handling, and transportation of hazardous substances, and developing health and safety plans to safeguard employees.

Construction specifications for the project would mandate hazardous materials management in accordance with applicable laws and regulations. Contractors would be responsible for containing hazardous materials; preventing worker, public, and environmental exposure during construction; and legally disposing of potential generated hazardous materials (which is not anticipated to occur).

Project construction would be required to implement stormwater management requirements during construction in accordance with the SWRCB's Construction General Permit. Stormwater management requirements for addressing materials management would be required, including proper material delivery and storage, spill prevention and control, and management of concrete and other wastes, as described in Section 3.X – Hydrology and Water Quality.

The regulatory framework and construction protocols ensure appropriate risk mitigation and hazard protections, resulting in no significant hazard to the public or environment from hazardous materials during project construction. Compliance with existing and future hazardous materials laws and regulations would mitigate the potential for significant hazards during construction.

Operation

Following construction, operational use of hazardous materials will be reduced compared to the baseline condition. The new WWTF will use ultraviolet (UV) lamps to disinfect wastewater effluent, eliminating the use and transportation of hazardous chlorine and sulfur dioxide gases. Intermittent maintenance and repair of the WWTF, discharge pipe, and land application system would likely involve fuels or lubricants that are considered hazardous materials; however, the operational risk associated with these activities is low, resulting in no significant hazard to the public or environment during Project operation. This potential impact would be less than significant.

Based on the information provided above, it has been determined the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*** Less-Than-Significant Impact

Construction

As noted above, construction of the project would require the temporary use and transport of fuels, oils, solvents, and other chemicals used during construction activities. Improper use and transportation of hazardous materials

could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. These activities are controlled by state and federal regulations. Throughout the transport, use, or disposal of potentially hazardous materials, the contractor is required to employ standard cleanup and safety procedures to minimize the potential for public exposure from upset and accident conditions involving the release of hazardous materials into the environment. Additionally, construction activities at the project site would require implementation of a SWPPP that would incorporate best management practices (BMPs) for construction, including site housekeeping practices, hazardous material storage, inspections, maintenance, worker training in pollution prevention measures, and secondary containment of releases to prevent pollutants from being carried offsite via runoff. With appropriate storage, handling, and application practices, it is unlikely that any hazardous materials used during construction activity would be released in a manner that would create a significant hazard to the public or the environment.

Operation

As previously noted, operational use of hazardous materials will be reduced compared to the baseline condition. The new WWTF will use UV lamps to disinfect wastewater effluent, eliminating the use and transportation of hazardous chlorine and sulfur dioxide gases. Intermittent maintenance and repair of the WWTF, discharge pipe, and land application system would likely involve fuels or lubricants which are considered hazardous materials; however, the operational risk associated with these activities is low, resulting in no significant hazard to the public or environment during Project operation. This potential impact would be less than significant.

Based on the information provided above, it has been determined that the proposed project would not 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. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*** No Impact

No existing or proposed school is located within one-quarter mile of the project. The nearest school is the Loleta Grammar School, located approximately one-half mile northeast of the project. Construction activities are assumed to include the use of hazardous materials such as fuels, lubricants, degreasers, paints, and solvents. These materials are commonly used during construction, are not acutely hazardous, and would be used in small quantities. Numerous laws and regulations ensure the safe transportation, use, storage, and disposal of hazardous materials (see subsection a). Because the schools are beyond one-quarter mile and LCSD and its contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use, and disposal of hazardous materials, there would be no impact related to the use of hazardous materials and schools during construction. Project operations would also have no impact.

Based on the information provided above, it has been determined the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the proposed project would result in no impact on this resource category.

d) ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*** Less than Significant Impact

A search was conducted of hazardous materials sites compiled in accordance with Government Code Section 65962.5, which includes databases such as the DTSC Envirostor database (DTSC, 2026) and the SWRCB GeoTracker database (SWRCB, 2026). There are four sites within 0.25 miles of the project area as mapped in the GeoTracker database. Three of these sites are closed Leaking Underground Storage Tank (LUST) sites associated with Elliot's Service Center (T0602300155; 420 feet from north end of project), Exxon-Mobile Oil Company Struve Property (T0602393591; 260 feet from north end of project), and Private Residence (T0602300025; 1,280 feet from north end of project). These sites were closed in 2014, 2004, and 2004, respectively. The other site mapped by Geotracker within 0.25 miles of the project area is an open Cleanup Program Site associated with Nielsen Dairy (T0602393462; 10 feet from north end of project). The Nielsen Dairy site has been inactive since 2009 (SWRCB, 2026). Off-site construction activities are not planned, and impacts related to these four hazardous materials sites would not

occur. The project area is also not located on or within 0.25 miles of a site listed in the DTSC EnviroStor database. Given that the project is not in proximity to an active hazardous materials site, there would be no significant risk posed to the public or the environment from implementation of the project, and the impact would be less than significant.

e) ***For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project site****?* No Impact

There are no public airports or public use airports within 2 miles of the project site. The project is not located within the vicinity of any airport or airport land use plan. The nearest airport is the Rohnerville airport located approximately 7 miles to the south.

Based on the information provided above, it has been determined the proposed project would not result in a safety hazard or excessive noise from an airport for people residing or working in the project site. Therefore, the proposed project would result in no impact on this resource category.

f) ***Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*** Less-Than-Significant Impact

The project area is covered under the 2015 Humboldt County Emergency Operations Plan (EOP). The Humboldt County EOP identifies the emergency response and evacuation policies and procedures for hazards related to earthquake, tsunami, extreme weather, flooding/flash flooding, landslides, transportation accidents, hazardous materials, interface wildland fire, energy shortage, offshore toxic spill, civic disturbance, terrorist activities, and national security (Humboldt County, 2015).

The Humboldt County EOP establishes a structure for Humboldt County Operation Area agencies to respond to large-scale emergencies requiring multiagency participation or activation of the Humboldt County Emergency Operations Center (Humboldt County, 2015). Hazard mitigation and risk assessment strategies for Humboldt County Operation Area are formalized in the Humboldt County Operational Area Hazard Mitigation Plan (HMP; Humboldt County, 2025b).

The project would not impair implementation or physically interfere with the established Humboldt County EOP or Humboldt County HMP because the project would not block roadways or other access points that may be needed by emergency vehicles. The project construction may require temporary encroachment within the County right-of-way (ROW) along Eel River Drive. The encroachment permit application for Humboldt County would require preparation of traffic control plans for work that would block the right-of-way, and plans for re-routing of vehicles, bicycles, and pedestrians, as needed. Implementation of traffic controls would be required in accordance with County standards, and contractors would be required to comply with the general conditions of the encroachment permit, including restoration of any damage to ROW improvements. The project would also increase reliability of wastewater infrastructure following a severe earthquake event. Through compliance with County requirements, and for the reasons explained above, construction activities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

g) ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?*** Less-Than-Significant Impact

The California Department of Forestry and Fire Protection (CAL FIRE) designates lands in three general classifications, “Moderate,” “High,” and “Very High” Fire Hazard Severity Zones (FHSZs). CAL FIRE assigns FHSZs based on existing vegetation, topography, weather, crown fire potential, ember production and movement, and the likelihood of a site to burn over a 30- to 50-year time period. CAL FIRE delineates most of the project area as unclassified and parts as “Moderate” FHSZ (CAL FIRE, 2026). The only parts of the project area classified as “Moderate” FHSZ are the southernmost 500 feet of the discharge pipe alignment and the northeast corner of the land application area. As discussed in Section 3.XX (Wildfire), the construction of the project would not pose risk above and beyond the existing risk to individuals or structures. The project area is relatively flat (slopes are typically

less than 10 percent). The existing WWTF parcel is developed with WWTF infrastructure, and most of the parcel is graveled for parking and all-weather access. The surrounding fields including the location of the discharge pipe and proposed land application site are used for agriculture, primarily grazing and cultivation, and mostly have 0 to 2 percent slopes. The risk of fire ignition associated with construction activities is minimal because much of the vegetation within the agricultural field portion of the project area would be mowed prior to construction. Fire risk is also abated by moist conditions from morning fog. Project operation would involve essentially the same wildfire risk as is present under existing conditions, and therefore, no impact would occur from project operation. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Hazards and Hazardous Materials*.

X. HYDROLOGY AND WATER QUALITY

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

Setting: The existing WWTF system currently discharges effluent to the wetland year-round and is in violation of the Basin Plan's seasonal discharge prohibition.

The project site is located on a low-lying alluvial terrace of the lower Eel River Valley, approximately 0.5 miles north of the main branch of the Eel River and approximately 8.8 miles east of the Pacific Ocean. The existing WWTF is constructed on the toe of a slope associated with Table Bluff and contains slopes ranging from 3 to 7 percent and a steep embankment

constructed for Eel River Drive on the eastern portion of the WWTF parcel. The (adjacent) location proposed for the new WWTF has similar topography. The surrounding fields, including the location of the discharge pipe and proposed land application site, are used for agriculture, primarily grazing and cultivation, and mostly have 0 to 2 percent slopes. The highest elevations in the project area are along Eel River Drive at the WWTF entrance (approximately 38 feet above mean sea level). The lowest elevations in the project area are at the outfall of the discharge pipe (approximately 19 feet above mean sea level).

The project site is located in the Eel River Hydrologic Unit, Salt River-Eel River Watershed, and North Coast Region. The RWQCB adopts and implements the Water Quality Control Plan (Basin Plan) for the North Coast Region, which identifies beneficial uses and recognizes water quality problems unique to the region. The Lower Eel River Watershed is listed as a 303(d) impaired water body for sediment, temperature, and aluminum (RWQCB, 2026; Caltrans, 2026b). Sediment and temperature are being addressed with total maximum daily loads (TMDLs) issued by the RWQCB, whereas a TMDL for aluminum is still being developed. Aluminum is not expected to be present in high amounts in WWTF effluent because there are no commercial or industrial facilities discharging to the sewer in Loleta.

The project site is located in the Eel River Groundwater Basin (Basin No. 1-10). The area includes the lower 8 miles of the Van Duzen River Valley and the Eel River Valley (California Department of Water Resources [DWR], 2004). Following the adoption of the Sustainable Groundwater Management Act (SGMA) in 2014, the Eel River Groundwater Basin was designated as “Medium” priority by DWR (DWR, 2026) and subject to mandatory compliance requirements under SGMA. In 2022, the Eel River Valley Groundwater Sustainability Plan was adopted by the Humboldt County Groundwater Sustainability Agency and submitted to DWR (Humboldt County, 2022).

The Eel River Groundwater Basin (Basin No. 1-10) is not mapped by the Environmental Protection Agency (EPA) as a sole source aquifer recharge area and is not identified as an overdrafted groundwater basin (DWR, 2026).

Flood zones are geographic areas that the Federal Emergency Management Agency (FEMA) has defined according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM). Each flood zone reflects the anticipated type of flooding in the area. According to FIRM Panel 06023C1015G, most of the project is located in a Special Flood Hazard Area (100-Year Flood Zone [AE]), with the exception of most of the existing WWTF parcel and proposed WWTF expansion area (FEMA, 2026). The existing wastewater discharge pipe and proposed land application area are located entirely within the 100-Year Flood Zone (Zone AE). The existing WWTF location and the proposed WWTF expansion location are mostly within Areas of Minimal Flood Hazard (Zone X) and only the lowest elevations being within FEMA’s 100-Year Flood Zone (Zone AE).

An Aquatic Resources Delineation (ARD; SHN, 2026d) was prepared for this project, which investigated the project location for wetlands, streams and other waterbodies, and riparian habitat that could be affected by the project. The study area contains seven three-parameter wetlands (Figures 14 through 18). The total wetland area documented within the study area is approximately 2,130,986 sf (48.92 ac), as detailed in Table 6 and Figures 14 through 18. Wetlands 1, 3, 4, 5, and 6, and portions of Wetlands 2 and 7 are historically farmed wetlands that have been graded and drained and are used for livestock pasture grazing or for the occasional hay or silage crop. Portions of Wetlands 2 and 7 are part of higher functioning wetlands. No ordinary high water marks were observed within the study area. Table 6 identifies which permitting agencies have jurisdiction over the documented aquatic resources. Wetland 7 is the only federally jurisdictional wetland, as it is the only wetland feature with connectivity to the Eel River (a traditional navigable water). All of the wetlands delineated within the study area are state jurisdictional under the RWQCB and the CCC. Project permitting falls under the jurisdiction of the USACE, RWQCB, the County of Humboldt, and the California Coastal Commission.

Construction of the proposed project will involve temporary impacts to grazed agricultural wetlands (but outside of slough remnant and riparian areas), including portions of Wetlands 1, 2, 3, 4, 5, and 7 (Figure 19). Construction of the proposed land application pipe will involve excavating a trench within approximately 1,948 linear feet of grazed agricultural wetlands that will be 3 feet deep by 3 feet wide. All construction activities and staging will occur within 15 feet of the land application pipeline centerline. Excavated soil from the land application pipeline trench will be temporarily placed within a 15-foot-wide area along (and including) the trench before replacement into the trench. A total of 29,215 sf (0.671 acres) of temporary wetland impact is associated with construction of the land application pipe. Rehabilitation of the discharge pipe will involve excavating a trench within approximately 495 linear feet of grazed agricultural wetlands. The discharge pipe trench will be 2.5 feet deep and 2 feet wide near the WWTF and up to 13 feet

deep and 4 feet wide near the outfall headwall. All construction activities and staging will occur within 25 feet of the discharge pipe centerline. Excavated soil from the trench will be temporarily placed within a 25-foot-wide area along (and including) the trench before replacement into the trench. A total of 11,632 sf (0.267 acres) of temporary wetland impact is associated with rehabilitation of the discharge pipe. Including both the land application pipe and the discharge pipe, the project includes a total of 40,847 sf (0.938 acres) of temporary wetland impact to grazed agricultural wetlands.

Limited constructed stormwater facilities exist within the project area and are typically limited to roadside drainage ditches.

A concrete retaining wall will be constructed along the western edge of the new WWTF, and all new WWTF structures will be elevated (or flood-proofed) to at least 1 foot above the 100-year base flood elevation. The ground surface at the WWTF will be a combination of asphalt pavement and graveled surfaces. Stormwater management facilities will be constructed in compliance with a post-development stormwater management plan (to be developed as part of the final design) that addresses runoff from all new and/or replaced impervious and semi-pervious surfaces, as required by the permitting agencies and in accordance with Humboldt County development standards, which include detaining and infiltrating all stormwater on site such that post-project stormwater runoff does not exceed pre-project runoff.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*** Less-Than-Significant Impact with Mitigation Incorporated

Construction

Construction activities such as site clearing, grading, excavation, material stockpiling, placement of aggregate base, and related construction activities could leave soils exposed to rain or surface water runoff that may carry soil contaminants (for example, nutrients or other pollutants) into waterways adjacent to the site, degrade water quality, and potentially violate water quality standards for specific chemicals, dissolved oxygen, suspended sediment, or nutrients to surface waters.

The proposed project is anticipated to disturb over 1 acre of land; therefore, compliance with State Water Resources Control Board (SWRCB) Order No. 2022-0057 would be required, which would regulate stormwater runoff from project construction activities. Project operations would obtain coverage under SWRCB's Order No. 2022-0057-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. In compliance with the National Pollutant Discharge Elimination System requirements, a Notice of Intent would be prepared and submitted to the North Coast Regional Water Quality Control Board (RWQCB) prior to undertaking construction, providing notification and intent to comply with the State of California Construction General Permit (CGP). In addition, a stormwater pollution prevention plan (SWPPP) would be prepared for pollution prevention and control prior to initiating site construction activities.

The construction SWPPP would be written by a Qualified SWPPP Developer (QSD) and would identify and specify the use of erosion control measures, sediment control, off-site tracking control, wind erosion control, non-stormwater management control, and waste management and materials pollution control. A sampling and monitoring program would be included in the construction SWPPP that meets the requirements of the CGP to ensure the erosion control measures are effective. A Qualified SWPPP Practitioner (QSP) would oversee implementation of the plan, including visual inspections, sampling and analysis, and overall compliance with the SWPPP and CGP.

Permits would be obtained from USACE, RWQCB, and the CCC for the proposed temporary wetland impacts. All permit terms and conditions would be followed, reducing the potential for significant impacts to surface and groundwater quality.

As discussed under Section 3.IV-Biological Resources, two mitigation measures have been incorporated into the project to ensure that impacts to biological resources associated with ground disturbing activities are avoided or reduced to less than significant. These will also serve to mitigate potential impacts to water quality. **Mitigation Measure BIO-4** (Stockpile and Replace Topsoil in Agricultural and Wetland Areas) will ensure that topsoil gets

separately stockpiled by the contractor and reintroduced as the top fill material in the restored trench section. **Mitigation Measure BIO-5** (Revegetate Temporarily Disturbed Agricultural Lands) requires that upon completion of component construction activities and prior to October 15, all temporarily disturbed agricultural lands shall be decompacted, recontoured, and reseeded, as needed, to restore pre-project conditions. These measures will reduce the project's potential to cause erosion, impact water quality, and alter the site's existing drainage pattern.

Operation

The existing WWTF system currently discharges effluent to the wetland year-round and is in violation of the Basin Plan's seasonal discharge prohibition. The project is designed to resolve this issue and bring LCSD into compliance with the terms of its NPDES permit.

Following construction, the project would not negatively affect surface or groundwater quality. During the winter discharge period, from October 1 through May 14, when it is allowed by LCSD's NPDES permit, LCSD would continue to use the existing discharge location. During the summer prohibition period, from May 15 through September 30, treated effluent would be discharged by land application (Figure 2). A Preliminary Anti-Degradation Analysis was prepared to evaluate the potential for impacts to groundwater of discharging treated effluent from the LCSD WWTF to the proposed land application area annually between May 15 and September 30 (SHN, 2018). The analysis involved preparing a water balance comparing the agronomic demand of the proposed land application area to proposed WWTF discharge flow rates to determine if any of the applied treated effluent would infiltrate into the soil and ultimately reach and impact groundwater. The objective of the Preliminary Anti-Degradation Analysis was to evaluate whether the proposed project will comply with federal and state antidegradation requirements. The analysis concluded that the proposed application rates would not exceed agronomic rates at the land application area; thus, no effluent would reach groundwater, and the land application would comply with federal and state antidegradation requirements.

Conclusion

With the incorporation of **Mitigation Measures BIO-4** and **BIO-5**, and based on the information provided above, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the proposed project would result in a less-than-significant impact with mitigation on this resource category.

b) ***Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*** Less-Than-Significant Impact

The project is located in the Eel River Groundwater Basin (Basin No. 1-10), which has a Sustainable Groundwater Management Act (SGMA) Basin Priority of "Medium" and is not listed as Critically Overdrafted (DWR, 2026). Construction of the project would require relatively small quantities of water during the construction phase (for example, for dust control and concrete/asphalt applications). LCSD's domestic water supply and/or contractor-supplied water would be used during construction for dust suppression on work areas. Use of groundwater is not necessary to construct the project. Similarly, the project would not decrease groundwater supplies or interfere with groundwater management. During construction, isolated and short duration groundwater dewatering may occur as needed and would be small in scale and limited to shallow groundwater only. Construction-related impact on groundwater levels would not result.

Following construction, the project would not utilize groundwater or result in an increase in population or employment that would indirectly increase groundwater demand. The project is not expected to result in any change in the use or recharge of groundwater. Therefore, the project would not create a deficit in aquifer volume or a lowering of water levels. Therefore, the potential impact would be less than significant.

c.i) ***Substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or offsite?*** Less-Than-Significant Impact

The project would not alter the course of a stream or river. The surface water features on the project site include seven three-parameter wetlands (Figures 13 through 17), as described in the Hydrology and Water Quality Setting. Repairs to the existing wastewater discharge pipe and construction of the proposed land application system will

involve temporary impacts to grazed agricultural wetlands (but outside of slough remnant and riparian areas), including portions of Wetlands 1, 2, 3, 4, 5, and 7 (Figure 19). Permits would be obtained from USACE, RWQCB, and the CCC for the proposed temporary wetland impacts. All permit terms and conditions would be followed, reducing the potential for significant impacts to water quality. Drainage patterns would not be permanently altered as a result of discharge pipe repairs or constructing the land application system, as these are located belowground. Construction of the proposed new WWTF facility would include grading and much of the site, potentially increasing impervious surfaces by up to approximately 0.8 acres. However, the WWTF improvements will be designed in accordance with Humboldt County development standards, which include detaining and infiltrating all stormwater on site such that post-project stormwater runoff does not exceed pre-project runoff. Project elements would not result in significant alteration of the existing drainage pattern of the site.

A number of best management practices listed in the project description (Section 2.0) would reduce the project's potential to cause erosion or siltation, such as that repairs of the wastewater discharge pipeline and construction of the new land application irrigation pipeline including all work in wetlands will occur during the dry season only (from May 15 through September 30). The project would be required to adhere to erosion control measures and conditions to be included in a SWPPP and permit conditions from USACE, RWQCB, and CCC to prevent erosion-related impacts during construction. Substantial on- or off-site erosion and siltation would not result, and the potential construction-related impact with regard to erosion and siltation would be less than significant. Therefore, the potential impact would be less than significant.

c.ii) ***Substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*** Less-Than-Significant Impact

The project would not alter the course of a stream or river. Repairs to the existing wastewater discharge pipe and construction of the proposed land application system will involve temporary impacts to grazed agricultural wetlands (but outside of slough remnant and riparian areas). Drainage patterns would not be permanently altered as a result of discharge pipe repairs or constructing the land application system, as these are located belowground and the ground surface would be restored following construction. Construction of the proposed new WWTF facility would include grading and paving much of the site. A concrete retaining wall will be constructed along the western edge of the new WWTF, and all new WWTF structures will be elevated (or flood-proofed) to at least 1 foot above the 100-year base flood elevation. The ground surface at the WWTF will be a combination of asphalt pavement and graveled surfaces, potentially increasing impervious surfaces by up to approximately 0.8 acres. Stormwater management facilities will be constructed in compliance with a post-development stormwater management plan (to be developed as part of the final design) that addresses runoff from all new and/or replaced impervious and semi-pervious surfaces, as required by the permitting agencies and in accordance with Humboldt County development standards, which include detaining and infiltrating all stormwater on site such that post-project stormwater runoff does not exceed pre-project runoff. Project elements would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, the impact would be less than significant.

c.iii) ***Substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?*** Less-Than-Significant Impact

The project would not alter the course of a stream or river. Drainage patterns would not be permanently altered as a result of discharge pipe repairs or constructing the land application system, as these are located belowground and the ground surface would be restored following construction. Construction of the proposed new WWTF facility would include grading and paving much of the site. A concrete retaining wall will be constructed along the western edge of the new WWTF and all new WWTF structures will be elevated (or flood-proofed) to at least 1 foot above the 100-year base flood elevation. The ground surface at the WWTF will be a combination of asphalt pavement and graveled surfaces, potentially increasing impervious surfaces by up to approximately 0.8-acres. Stormwater management facilities will be constructed in compliance with a post-development stormwater management plan (to be developed as part of the final design) that addresses runoff from all new and/or replaced impervious and

semi-pervious surfaces, as required by the permitting agencies and in accordance with Humboldt County development standards, which include detaining and infiltrating all stormwater on site such that post-project stormwater runoff does not exceed pre-project runoff. The project would be required to adhere to erosion control measures and conditions to be included in a SWPPP to prevent erosion-related impacts during construction, and the project would be designed to meet applicable stormwater requirements. Therefore, the impact would be less than significant.

c.iv) ***Substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff which would impede or redirect flood flows?*** Less-Than-Significant Impact

The project would not alter the course of a stream or river. According to FIRM Panel 06023C1015G, most of the project is located in a Special Flood Hazard Area (100-Year Flood Zone [AE]), with the exception of most of the existing WWTF parcel and proposed WWTF expansion area (FEMA, 2026). The existing wastewater discharge pipe and proposed land application area are located entirely within the 100-Year Flood Zone (Zone AE). Construction in these areas will occur during the dry season. These project elements are located below ground, so they would not have potential to impede or redirect flood flows. The existing WWTF location and the proposed WWTF expansion location are mostly within Areas of Minimal Flood Hazard (Zone X) with only the lowest elevations being within FEMA's 100-Year Flood Zone (Zone AE). Construction of the new WWTF will involve grading to create a level bench and elevating with earthen fill the lower portion of the site where structures would be placed to ensure the structures are located above the floodplain elevation. This will require an engineer's determination that the placement of fill within the 100-year flood plain will not effectively raise the flood elevation. However, based on the width of the 100-year flood plain at this location and the relatively small amount of fill required, it is assumed that this determination will be able to be made. A concrete retaining wall will be constructed along the western edge of the new WWTF, and all new WWTF structures will be elevated (or flood-proofed) to at least 1 foot above the 100-year base flood elevation. The Humboldt County local zoning code requires that structures be constructed with a floor area at an elevation of at least 1 foot above the base flood elevation. More specifically, for nonresidential construction, Humboldt County requires that either a) the lowest floor be elevated to 1 foot above base flood elevation, or b) the structure be flood-proofed so that 1 foot above the base flood elevation, the structure is watertight with walls substantially impermeable to the passage of water and with structural components having the capacity of resisting hydrostatic and hydrodynamic loads and effects of buoyancy (Section 335-5(a)(3)). Stormwater management facilities will be constructed in compliance with a post-development stormwater management plan (to be developed as part of the final design) that addresses runoff from all new and/or replaced impervious and semi-pervious surfaces, as required by the permitting agencies and in accordance with Humboldt County development standards, which include detaining and infiltrating all stormwater on site such that post-project stormwater runoff does not exceed pre-project runoff. The project would be required to adhere to erosion control measures and conditions to be included in a SWPPP to prevent erosion-related impacts during construction, and the project would be designed to meet applicable stormwater requirements. Therefore, the impact would be less than significant.

d) ***In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*** Less-Than-Significant Impact

Portions of the existing discharge pipe and proposed land application system are located within the tsunami inundation zone (Humboldt County, 2026a). The existing/proposed WWTF site is outside of the tsunami inundation zone at an elevation that precludes inundation by a tsunami. There is the potential that a tsunami could occur during construction of the force main and land application system, however the likelihood of this happening is low. Therefore, the potential impact from tsunami is less than significant.

The project area is not located near a larger isolated body of water that may be affected by a seiche and, therefore, no impact from a seiche would occur.

Repairs of the wastewater discharge pipeline and construction of the new land application irrigation pipeline will occur during the dry season only (from May 15 through September 30) and would, therefore, not occur during typical flood conditions. The proposed WWTF construction would occur year-round starting at the beginning of the dry season, and most of the WWTF site is located within Areas of Minimal Flood Hazard (Zone X). Thus, there would be minimal potential for a flood-related release of pollutants during construction. In the event of a very significant

flood that might inundate, scour, or wash away water infrastructure, the flood magnitude associated with such an event would be both uncommon and substantial. Thus, the risk of releasing pollutants as a result of a flood during operations would be less than significant.

e) ***Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*** No Impact

The relevant water quality control plan is the Water Quality Control Plan for the North Coast Region (Basin Plan; RWQCB, 2026), which establishes thresholds for key water resource protection objectives for both surface waters and groundwater. The existing WWTF system currently discharges effluent to the wetland year-round and is in violation of the Basin Plan's seasonal discharge prohibition. The project is designed to resolve this issue and bring LCSD into compliance with the terms of its NPDES permit. Additionally, the project would obtain coverage under SWRCB's Order No. 2022-0057-DWQ, Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction and Land Disturbance Activities, which would include a SWPPP. Permits would be obtained from USACE, RWQCB, and the CCC for temporary wetland impacts, and all permit terms and conditions would be followed. These regulatory requirements and associated requisite monitoring would ensure a conflict with the Basin Plan does not occur. The relevant groundwater management plan is the Eel River Valley Groundwater Sustainability Plan (Humboldt County, 2022). A Preliminary Anti-Degradation Analysis was prepared to evaluate the potential for impacts to groundwater of discharging treated effluent from the LCSD WWTF to the proposed land application area annually between May 15 and September 30 (SHN, 2018). The analysis concluded that the proposed application rates would not exceed agronomic rates at the land application area; thus, no effluent would reach groundwater. Therefore, no conflict with the Eel River Valley Groundwater Sustainability Plan would occur. No impact would result.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Hydrology and Water Quality.*

XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Physically divide an established community?				**X**
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				**X**

Setting: The project is located in the unincorporated community of Loleta in Humboldt County. The project is located entirely within the Coastal Zone, with parts located in both "Appeal" and "State" coastal development permit (CDP) jurisdictions. The Humboldt County General Plan Volume II Eel River Area Plan of the Humboldt County Local Coastal Program (Eel River Area Plan; Humboldt County, 2014) serves as the basis for land use planning within this portion of the Coastal Zone. As defined in the Humboldt County General Plan (Humboldt County, 2007) and the Eel River Area Local Coastal Plan, the project area spans the following land use designations: Agricultural Exclusive (AE) and Public Facilities (PF). All project parcels are zoned Agriculture Exclusive-60 Acre Minimum Parcel Size, with combining zones indicating potential Coastal Wetland Areas, Flood Hazard Areas, Streams and Riparian Corridors Protection, and Transitional Agricultural Lands (AE-60/W,F,R,T; Table 1). LCSD proposes to expand the existing 0.48-acre WWTF parcel (APN 309-211-006) into an approximately 0.77-acre portion of an adjacent 55.47-acre agricultural parcel (APN 309-191-012) using a lot line adjustment (Figures 2 and 3). Because the adjacent parcel has a general plan (Eel River Area Plan) land use designation of AE and is zoned AE-60/W,F,R,T, the County of Humboldt and California Coastal Commission (CCC) have indicated that an amendment to the local coastal plan (Eel River Area Plan) and a zone reclassification are required. Also, the zoning of the existing WWTF parcel is AE-60/W,F,R,T which is inconsistent with the plan designation of Public Facilities (PF). That inconsistency is also proposed to be resolved concurrently. Following the land acquisition, the LCSD WWTF parcel will be approximately 1.25 acres in size.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Physically divide an established community****?* No Impact

The proposed project would not divide an existing neighborhood or community. The proposed discharge pipe rehabilitation and land application system would both involve improvements in agricultural land that are mostly belowground and that would not divide the community. The proposed expansion of the existing 0.48-acre WWTF parcel into an approximately 0.77-acre portion of an adjacent 55.47-acre agricultural parcel using a lot line adjustment (Figures 2 and 3) is located along the interface between the residential boundary of the unincorporated community of Loleta and the expansive pasturelands to the west. The lot line adjustment and WWTF expansion would not divide the community and would involve approvals from Humboldt County and the CCC, ensuring consistency with the Humboldt County General Plan and the Eel River Area Plan. The proposed project would improve wastewater treatment and disposal infrastructure that is an integral part of the local community. Therefore, no impact would occur.

b) ***Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*** No Impact

As defined in the Humboldt County General Plan and the Eel River Area Plan, the project area spans the following land use designations: Agricultural Exclusive (AE) and Public Facilities (PF). All project parcels are zoned Agriculture Exclusive-60 Acre Minimum Parcel Size, with combining zones indicating potential Coastal Wetland Areas, Flood Hazard Areas, Streams and Riparian Corridors Protection, and Transitional Agricultural Lands (AE-60/W,F,R,T; Table 1).

The project would not conflict with the Humboldt County General Plan or the Eel River Area Plan because the project includes a Local Coastal Plan (Eel River Area Plan) amendment and a zone reclassification to facilitate the proposed project and to resolve the existing WWTF zoning designation of AE-60/W,F,R,T which is inconsistent with the existing general plan designation of Public Facilities (PF). Permits would be obtained as needed from applicable agencies such as Humboldt County, CCC, USACE, and RWQCB. As a result, implementation of the project would not result in a significant environmental impact. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Land Use and Planning*.

XII. MINERAL RESOURCES

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

Setting: A mineral resource is land on which known deposits of commercially viable mineral or aggregate deposits exist. The designation is applied to sites determined by the California Geological Survey as being a resource of regional significance and is intended to help maintain any quarrying operations and protect them from encroachment of incompatible uses.

The nearest mining operation is over 2 miles from the project site (DOC, 2026b). Mineral resources in the vicinity of the community of Loleta are primarily aggregate deposits found along the Eel River. Areas along the Eel River are currently used for aggregate resource extraction (gravel). Other than instream aggregate, no locally important mineral resources have been identified in the vicinity of the project site.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?*** No Impact

The project would require rock, gravel, sand, and other similar materials for construction. However, there are no active mines, no known areas with mineral resource deposits, and no mapped Surface Mining and Reclamation Act parcels within the project area (Humboldt County 2026a). Additionally, the project area is also not designated by the Humboldt County General Plan, Eel River Area Plan, or other local land use plans as having locally important mineral resources within the project area (Humboldt County, 2007; Humboldt County, 2014). Thus, the project would not have a significant impact on known mineral resources valuable to the region or the state. No impact would result.

b) ***Result in the loss of availability of a locally important mineral resource recovery site delineated on a local General Plan, specific plan or other land use plan?*** No Impact

The project would require rock, gravel, sand, and other similar materials for construction. However, there are no active mines, no known areas with mineral resource deposits, and no mapped Surface Mining and Reclamation Act parcels within the project area (Humboldt County 2026a). Additionally, the project area is also not designated by the Humboldt County General Plan, Eel River Area Plan, or other local land use plans as having locally important mineral resources within the project area (Humboldt County, 2007; Humboldt County, 2014). Thus, the project would not have a significant impact on locally important minerals. No impact would result.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Mineral Resources.*

XIII. NOISE

Would the project result in:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			**X**	
b) Generation of excessive groundborne vibration or groundborne noise levels?			**X**	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project site to excessive noise levels?				**X**

Setting: Noise in the project area is primarily generated by vehicle traffic on Eel River Drive and other local roadways. Additional sources include nearby residential, agricultural, and commercial activities, as well as Highway 101. The Humboldt County General Plan does not identify any prominent noise sources within the community of Loleta, such as roads, airports, railroads, or stationary sources (Humboldt County, 2017a).

The nearest known potential sensitive receptors to the project site are the residences east of Eel River Drive within the developed town of Loleta (Figure 2). The nearest are approximately 80 feet away from the existing and proposed WWTF, across the street. The nearest school is the Loleta Grammar School, located approximately 0.5-miles northeast of the project.

Standard N-S1 of the Humboldt County General Plan (Humboldt County, 2017a) specifies that the Land Use/Noise Compatibility Standards shall be used as a guide to ensure compatibility of land uses (shown as Table 13-C in the Humboldt County General Plan), and Implementation Measure N-IM6 (Noise Control Ordinance) states that an ordinance shall be prepared, which would include definitions of excessive levels of noise for construction activities. As of the date of this IS/MND, Humboldt County has not adopted a noise ordinance with defined limits on noise levels at construction sites, or land use and noise compatibility standards for construction noise.

The project is not located within the vicinity of any airport, airstrip, or airport land use plan. The nearest airport is the Rohnerville airport located approximately 7 miles to the south.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*** Less-Than-Significant Impact

Construction

Construction of the project would temporarily increase noise in the immediate vicinity of the project area over an approximately 18-month period due to the use of construction equipment as well as from increased traffic as construction workers commute to and from the project site. Construction is expected to require up to 18 months to complete and would occur between 7 a.m. to 7 p.m. Monday through Saturday. Noise impacts resulting from construction would depend upon the types of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (for example,

early morning, evening, or nighttime hours); the construction occurs in areas near noise sensitive land uses; or when construction lasts over extended periods of time.

Equipment for construction of the project would include pickup trucks, commercial delivery trucks, flatbed trucks, dump trucks, concrete trucks, backhoes, excavators, and cranes, a drill rig during geotechnical borings, and potentially other specialized equipment. Construction noise levels would vary based on the type of equipment as summarized in Table 8 below.

Table 8. Construction Equipment Reference Noise Levels as Measured at 50 Feet

Equipment	Noise Level (dB)[a]
Backhoe	80
Concrete Mixer Truck	85
Crane (mobile or stationary)	85
Drill Rig Truck	84
Dump Truck	84
Excavator	85
Front End Loader	80
Grader	85
Large Generator	82
All other equipment > 5 horsepower (HP)	85

a. dB: decibel

Source: Federal Highway Administration, 2006

Sound from a point source is known to attenuate at a rate of -6 decibels (dB) for each doubling of the distance to the receptor. For example, a noise Equivalent Continuous Level (Leq) of 84 dB as measured at 50 feet from the noise source would attenuate to 78 dB Leq at 100 feet from the source and to 72 dB Leq at 200 feet from the source to the receptor. Based on the reference noise levels in Table 8, the noise levels generated by construction equipment at the project area may reach a maximum of approximately 85 dB Leq at 50 feet during site excavation and construction.

Currently, Humboldt County has not established construction-related noise standards. Given that construction would be temporary and intermittent, would not include excessively noisy equipment, and would only occur during daytime hours, potential noise impacts generated during the construction phase would be less than significant.

Operation

The areas surrounding the wastewater discharge pipe and land application system and west of the WWTF have a general plan land use designation of Agricultural Exclusive (AE). Per Humboldt County General Plan Standard N-S1 and Table 13-C (Land Use/Noise Compatibility Standards), the "normally acceptable noise levels" range from approximately 75 to 91+ A-weighted decibel (dBA). The areas east of Eel River Drive and the existing and proposed WWTF have general plan land use designations of Residential Low Density (RL), Residential Medium Density (RM), and Commercial General (CG). Per Humboldt County General Plan Standard N-S1 and Table 13-C (Land Use/Noise Compatibility Standards), the "normally acceptable noise levels" range from approximately 55 to 60 dBA for residential and 65 to 80 dBA for commercial land uses. The nearest sensitive receptors (residences) are within the residential land use category, and the "normally acceptable noise levels" are approximately 55 to 60 dBA.

The project proposes improvements to LCSD's community wastewater treatment and disposal system including a land acquisition and new wastewater treatment facility component, rehabilitation and continued use of the existing waste discharge pipe component, and land application of treated effluent component. The continued discharge of treated wastewater through the existing discharge pipe would not increase ambient noise levels in the project vicinity as this is currently part of the baseline conditions. The discharge of treated wastewater through the proposed land application system also would not increase ambient noise levels in the project vicinity, as irrigation in the land application area is currently part of the baseline conditions. The operation of the new WWTF will replace the operation of the existing WWTF and will generate similar noise levels. The majority of the blowers, compressors,

pumps, and motors will be housed within the new operations building, which will have insulated walls. The new WWTF will be sized to meet LCSD's existing needs plus future demands estimated using a 0.95 percent growth rate (which was based on a comparison of the number of LCSD water service connections between 2005 and 2013 [SHN, 2016]). As such, operation of the new WWTF is not anticipated to be substantially noisier than the existing WWTF to be replaced and the operational noise impact would be less than significant.

Conclusion

Based on the information provided above, it has been determined that the proposed project's construction and operation would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the proposed project would result in a less-than-significant impact.

b) ***Generation of excessive groundborne vibration or groundborne noise levels?*** Less-Than-Significant Impact

Construction

The County has not established vibration limits to minimize the potential for cosmetic damage to buildings. However, California Department of Transportation (Caltrans) recommends a vibration limit of 0.5 inches per second (in/sec) peak particle velocity (PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 in/sec PPV for ancient buildings or buildings that are documented to be structurally weakened. No known buildings that are documented to be structurally weakened or ancient adjoin the project area. Therefore, the 0.5 in/sec PPV limit would apply when considering the potential for groundborne vibration levels to result in a significant vibration impact.

The noise and vibration evaluation assessed typical vibration levels that could be expected from construction equipment at a distance of 25 feet, inclusive of required equipment and methods for construction. Project construction activities, such as drilling and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, and so on) may generate substantial vibration in the immediate vicinity.

Table 9 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet (Caltrans, 2020). High-power or vibratory tools and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Vibration levels are highest close to the source and attenuate with increasing distance. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

Table 9. Typical Vibration Levels for Construction Equipment Used During Project Construction

Equipment	Reference PPV[a] at 25 feet (in/sec)
Large Bulldozer	0.089
Caisson drilling	0.089
Loaded trucks	0.076
Jackhammer	0.035
Small bulldozer	0.003

a. PPV: peak particle velocity
Source: Caltrans, 2020

Project-related activities would not involve the use of explosives or other intensive construction techniques that could generate significant groundborne vibration or noise. The proposed project would comply with Humboldt County General Plan Implementation Measure N-IM6, which requires limiting construction activity to specified daytime hours and regulating vibration sources.

Vibration impacts to residences are anticipated to be minor and below the Caltrans advisory of 0.5 in/sec PPV for buildings that are found to be structurally sound but where structural damage is a major concern, as the closest residences are located approximately 80 feet away from the project area. Minor vibration adjacent to mechanized

equipment and road treatments during construction work would be generated only on a short-term basis. Therefore, groundborne vibration and noise during construction would have a less-than-significant impact.

Operation

As discussed under subsection a), the project proposes improvements to LCSD's community wastewater treatment and disposal system including a land acquisition and new wastewater treatment facility component, rehabilitation and continued use of the existing waste discharge pipe component, and land application of treated effluent component. The continued discharge of treated wastewater through the discharge pipe would not increase vibration levels in the project vicinity as this is currently part of the baseline conditions. The discharge of treated wastewater through the proposed land application system also would not increase vibration levels in the project vicinity, as irrigation in the land application area is currently part of the baseline conditions. The operation of the new WWTF will replace the operation of the existing WWTF and will generate similar vibration levels. The majority of the blowers, compressors, pumps, and motors will be housed within the operations building, which will have insulated walls. As such, operation of the new WWTF is not anticipated to produce more vibrations than the existing WWTF to be replaced, and the operational vibration and groundborne noise impact would be less than significant.

Conclusion

For the reasons discussed above, it has been determined that the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. Therefore, the proposed project would result in a less-than-significant impact.

c) ***For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project site to excessive noise levels?*** No Impact

The project is not located within the vicinity of any airport, airstrip, or airport land use plan. The nearest airport is the Rohnerville airport located approximately seven miles to the south. Therefore, project construction would not exacerbate existing airport noise. No impact would result.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Noise*.

XIV. POPULATION AND HOUSING

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

Setting: The 2020 population for the community of Loleta was estimated to be 828 people with 417 housing units (U.S. Census, 2020).

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*** Less-Than-Significant Impact

The project proposes improvements to LCSD's community wastewater treatment and disposal system including a land acquisition and new wastewater treatment facility component, rehabilitation of the existing waste discharge pipe component, and land application of treated effluent component. The project does not propose new housing, businesses, or other infrastructure that would have the potential to induce substantial population growth. The proposed WWTF improvements have been sized based on LCSD's current population plus an assumed population growth rate of 0.95 percent over the 20-year project planning horizon (SHN, 2016; Humboldt LAFCo, 2008). This 0.95 percent growth rate was used to estimate future demands on the WWTF. Because this project has been sized based on the above factors, it will not increase demand on the wastewater treatment plant in a way that is inconsistent with governmental planning efforts. For these reasons, it has been determined that the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*** No Impact

The proposed project does not involve demolition of any existing housing structures and would not displace any existing people or housing. No impact would occur.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Population and Housing.*

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less-Than-Significant with Mitigation Incorporated**	**Less-Than-Significant Impact**	**No Impact**
a) Fire Protection?				**X**
b) Police Protection?				**X**
c) Schools?				**X**
d) Parks?				**X**
e) Other public facilities?				**X**

Setting: Currently, fire protection services for the project area are provided by the Loleta Fire Protection District, while police services are managed by the Humboldt County Sheriff's Office. The nearest school is the Loleta Grammar School, located approximately ½ mile northeast of the project. The nearest park is Humboldt Bay National Wildlife Refuge, located approximately 3.5 miles to the north of the project site. Other public facilities in the vicinity include the Loleta Post Office, located approximately 350 feet east of the project.

The proposed WWTF improvements have been sized based on LCSD's current population plus an assumed population growth rate of 0.95 percent over the 20-year project planning horizon (SHN, 2016; Humboldt LAFCo, 2008). This 0.95 percent growth rate was used to estimate future demands on the WWTF. Because this project has been sized based on the above factors, it will not increase demand on the WWTF in a way that is inconsistent with governmental planning efforts.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection*****?** No Impact

Implementation of the proposed project would not result in an increase in demand for fire protection services that would require new or expanded fire protection facilities. The project would not increase Loleta's population or generate substantial employment growth and, therefore, would not increase the demand for fire protection services. In addition, project implementation would not adversely affect emergency response times or otherwise create an additional burden on existing fire protection facilities. Accordingly, the proposed project would not require the construction or expansion of fire protection facilities, and no impact would occur in this regard.

b) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection*****?** No Impact

Implementation of the proposed project would not result in an increase in demand for law enforcement services that would require new or expanded law enforcement facilities. The project would not increase Loleta's population or generate substantial employment growth and, therefore, would not increase the demand for law enforcement services. In addition, project implementation would not create conditions that would require additional law

enforcement personnel, equipment, or facilities. Accordingly, the proposed project would not require the construction or expansion of law enforcement facilities, and no impact would occur in this regard.

c) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools*****?** No Impact

Implementation of the proposed project would not include the construction of residential uses and would not increase the local population. As a result, the project would not generate additional student enrollment that would require the construction of new school facilities or the expansion of existing school facilities serving Loleta. Therefore, no impact would occur in this regard.

d) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks*****?** No Impact

As discussed in Section 3.XVI – Recreation, implementation of the proposed project would not increase the demand for parks or recreational facilities and would not result in the physical deterioration of existing park facilities. In addition, the project would not require the construction or expansion of park or recreational facilities that could result in adverse physical environmental effects. Therefore, no impact would occur in this regard.

e) ***Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*** No Impact

The proposed project would not involve a substantial change in land use, substantially increase employment in the region, induce population growth, or create a demand for new housing or related facilities. As a result, the project would not generate a need for new or expanded public facilities beyond those evaluated elsewhere in this document. Accordingly, increased demand on other public facilities is not anticipated, and no impact would occur in this regard.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Public Services.*

XVI. RECREATION

	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				**X**
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				**X**

Setting: There are no parks or recreational facilities in Loleta.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*** No Impact

The project proposes improvements to LCSD's community wastewater treatment and disposal system including a land acquisition and new wastewater treatment facility component, rehabilitation of the existing waste discharge pipe component, and land application of treated effluent component. The project does not propose the development of housing and would not result in an increase in population growth. As such, the proposed project is not of the nature to increase the use of recreational facilities in the area such that substantial physical deterioration of these facilities would occur or be accelerated. Therefore, the proposed project would have no impact on this resource category.

b) ***Does the project include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment?*** No Impact

The project proposes improvements to LCSD's community wastewater treatment and disposal system including a land acquisition and new wastewater treatment facility component, rehabilitation of the existing waste discharge pipe component, and land application of treated effluent component. The proposed project would not include the development of recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. Therefore, the proposed project would have no impact on this resource category.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Recreation.*

XVII. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			**X**	
b) Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			**X**	
c) Substantially increase hazards due to a geometric design feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?			**X**	
d) Result in inadequate emergency access?			**X**	

Setting: Access to the existing and proposed WWTF is from Eel River Drive (Figure 6). A new WWTF facility entrance will be constructed within Humboldt County's ROW along Eel River Drive. Construction equipment and materials for WWTF work will be staged on upland portions of the WWTF site or on upland portions of adjacent areas that may be leased from adjacent landowners. For discharge pipe rehabilitation, trucks and equipment will need to drive across and park on the pasture lands to access the pipe and manholes for construction. Construction access for the work done on sections of pipe located on APNs 309-211-002 and 309-211-007 will be from Eel River Drive (Figure 6). Construction access for the work done on the sections of pipe on APN 309-251-002 will be from Duncan Road (Figure 6). Construction equipment and materials for discharge pipe rehabilitation will be staged on upland portions of the WWTF site on Eel River Drive or on upland portions of adjacent areas that may be leased from adjacent landowners. For the land application component, trucks and equipment will need to drive across and park on the pasture lands to construct the force main and associated infrastructure for land application. Construction access for work done on APN 309-191-012 will be from Duncan Road (Figure 6). Construction equipment and materials will be staged on upland portions of the WWTF site on Eel River Drive or on upland portions of adjacent areas that may be leased from adjacent landowners.

There are currently little to no pedestrian or bicycle facilities located near the project area. No specific plans are known for improvements to the roadways in the vicinity of the project. The Redwood Transit System offers service to Loleta, 6 days per week, Monday through Saturday, but does not provide a service route to the project parcels.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*** Less-Than-Significant Impact

Construction

A new WWTF facility entrance will be constructed within Humboldt County's ROW along Eel River Drive, in accordance with Humboldt County Public Works requirements. The proposed project would not include elements that constitute an extension of the roadway network. Construction traffic for the proposed project would result in a short-term increase in construction-related vehicle trips on Highway 101, Eel River Drive, Duncan Road, Loleta Drive, Cannibal Island Road, and area roadways. Construction would result in vehicle trips by construction workers, haul-truck trips for delivery, and disposal of construction materials and spoils to and from construction areas. The project construction may require temporary encroachment within the Humboldt County ROW along Eel River Drive. The encroachment permit application for Humboldt County requires preparation of traffic control plans for work that would block the right-of-way, and plans for re-routing of vehicles, bicycles, and pedestrians, as needed.

Implementation of traffic controls would be required in accordance with Humboldt County standards, and contractors would be required to comply with the general conditions of the encroachment permit, including restoration of any damage to ROW improvements. Therefore, the temporary construction impact on the circulation system would be less than significant.

Operation

Transportation related to project operation would be essentially the same as the existing conditions. As with the current wastewater system operation, LCSD's wastewater operators would continue to make regular operation- and maintenance-related visits to the WWTF facilities. Operations-related traffic is not anticipated to increase and may be reduced because less sludge will be generated by the new WWTF compared to the existing WWTF (due to the use of a belt filter press for dewatering). Vehicular access to the facilities would be substantially similar. Pedestrian, bicycle, and transit access to the project site would be unaffected.

Conclusion

Based on the information provided above, it has been determined that the proposed project's construction and operation would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*** Less-Than-Significant Impact

The amended CEQA Guidelines (Section 15064.3) have replaced level of service (LOS) with vehicle miles traveled (VMT) as the most appropriate measure of a project's transportation impacts. For a land use project, VMT exceeding an applicable threshold of significance may indicate a significant impact. At this time, Humboldt County has not adopted thresholds to determine VMT impacts as a result of land use projects. If existing models or methods are not available to estimate VMT for the project being considered, a lead agency may analyze the project's VMT qualitatively (CEQA Guidelines Section 15064.3[b][3]). Due to the absence of existing models or methods for analyzing VMT impacts in Humboldt County, this section includes a qualitative analysis of VMT impacts from the proposed project.

Construction

Construction traffic for the proposed project would result in a short-term increase in construction-related vehicle trips. Construction would result in vehicle trips by construction workers, haul-truck trips for delivery, and disposal of construction materials and spoils to and from construction areas. Because construction of the proposed improvements would be temporary, construction activities would not be expected to result in significant impacts related to VMT.

Operation

As described under a) above, transportation related to project operation would be essentially the same or less than the existing conditions. As with the current wastewater system operation, LCSD's wastewater operators would continue to make regular operation- and maintenance-related visits to the WWTF facilities. No increase in operations-related traffic is anticipated.

Conclusion

Based on the information provided above, it has been determined that the proposed project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) ***Substantially increase hazards due to a geometric design feature (for example, sharp curves or dangerous intersections) or incompatible uses (for example, farm equipment)?*** Less-Than-Significant Impact

A new WWTF facility entrance will be constructed within Humboldt County's ROW along Eel River Drive, in accordance with Humboldt County Public Works requirements. The project does not propose an alteration in the geometric design of a street or road. The project would not change the existing land uses of the site in a way that

would result in use of vehicles or equipment, such as farm equipment or tractors, that would be incompatible with existing land uses in the surrounding area.

Based on the information provided above, it has been determined that the proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

d) ***Result in inadequate emergency access****?* Less-Than-Significant Impact

Construction traffic for the proposed project would result in a short-term increase in construction-related vehicle trips. Construction would result in vehicle trips by construction workers, haul-truck trips for delivery, and disposal of construction materials and spoils to and from construction areas. These vehicle trips would include construction workers traveling to the site and delivery trips associated with construction equipment and materials. Delivery of construction materials to the site would likely require oversized vehicles that may travel at slower speeds than existing traffic.

A new WWTF facility entrance will be constructed within Humboldt County's ROW along Eel River Drive, in accordance with Humboldt County Public Works requirements. Compliance with County Public Works requirements would ensure that the project would not result in inadequate emergency access. The project construction may require temporary encroachment within the Humboldt County ROW along Eel River Drive. The encroachment permit application for Humboldt County requires preparation of traffic control plans for work that would block the right-of-way and plans for re-routing of vehicles, bicycles, and pedestrians, as needed. Implementation of traffic controls would be required in accordance with Humboldt County standards, and contractors would be required to comply with the general conditions of the encroachment permit, including restoration of any damage to ROW improvements.

Based on the information provided above, it has been determined that the proposed project would not result in inadequate emergency access. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Transportation*.

XVIII. TRIBAL CULTURAL RESOURCES

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

Archaeological and other resources can be damaged through uncontrolled public disclosure. Archeological site locations and culturally sensitive information are considered confidential and public access to such information is restricted by state and federal law. Therefore, this information has been redacted for use in the Mitigated Negative Declaration (MND). Professionally qualified individuals, as determined by the California Office of Historic Preservation, may contact the lead agency in order to inquire about its availability.

Information regarding the location, character, or ownership of a historic resource is exempt from the Freedom of Information Act pursuant to 16 U.S.C. 470w-3 (National Historic Preservation Act) and 16 U.S.C. § 470hh (Archaeological Resources Protection Act) and California State Government Code, Section 6254.10.

Setting: CEQA requires lead agencies to determine if a proposed project would have a significant effect on Tribal cultural resources. The CEQA Guidelines define Tribal cultural resources as: 1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or 2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

A Cultural Resources Investigation was completed for the proposed project by William Rich and Associates (WRA). The purpose of this cultural resources investigation was to document the presence of significant cultural resources within the proposed Area of Potential Effect (APE), pursuant to Section 106 of the NHPA and Section 15064.5 of CEQA, and Public Resources Code (PRC) 21074. The environmental review process requires that state and federal agencies implement procedures to inventory and evaluate cultural resources and to assess potential effects on those cultural resources which may be listed in, or be eligible for listing, to the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR). The investigation methods utilized included a review of the files at the Northwest Information Center (NWIC), a review of archaeological and historical literature pertinent to the APE and general region, correspondence with Native Americans and other knowledgeable individuals regarding the history of the area, and an intensive field survey (WRA, 2026). The Cultural Resources Investigation did not identify any Tribal cultural resources (PRC 21074).

LCSD requested a list of regional Tribes from the Native American Heritage Commission (NAHC). Under Assembly Bill (AB) 52, LCSD sent notification letters to local Native American Tribes on June 16, 2026 (Bear River Band of the Rohnerville Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, and Wiyot Tribe). The only response received

was on June 23, 2026, from Edwin Smith of Bear River Band of the Rohnerville Rancheria who had no comment and no concerns.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*** Less Than Significant with Mitigation Incorporated

As discussed above under Tribal Cultural Resources Setting, the Cultural Resources Investigation (WRA, 2026) did not identify any Tribal cultural resources (PRC 21074).

LCSD requested a list of regional Tribes from the NAHC. Under AB 52, LCSD sent notification letters to local Native American Tribes on June 16, 2026 (Bear River Band of the Rohnerville Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, and Wiyot Tribe). The only response received was on June 23, 2026, from Edwin Smith of Bear River Band of the Rohnerville Rancheria who had no comment and no concerns.

As such, the proposed project would not cause a substantial adverse change in the significance of a known Tribal cultural resource. However, there remains the possibility that Tribal cultural resources could exist in the area and may be uncovered during project development. To prevent potential impacts to unknown Tribal cultural resources at the project site, Protocols for Inadvertent Discovery of Cultural Resources have been included as **Mitigation Measure CR-1** for the proposed project (see Section V – Cultural Resources).

With the implementation of **Mitigation Measure CR-1**, it has been determined that the proposed project would not cause a substantial adverse change in the significance of a Tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) ***Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.?*** Less Than Significant with Mitigation Incorporated

As discussed above under Tribal Cultural Resources Setting, the Cultural Resources Investigation (WRA, 2026) did not identify any Tribal cultural resources (PRC 21074).

LCSD requested a list of regional Tribes from the NAHC. Under AB 52, LCSD sent notification letters to local Native American Tribes on June 16, 2026 (Bear River Band of the Rohnerville Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, and Wiyot Tribe). The only response received was on June 23, 2026, from Edwin Smith of Bear River Band of the Rohnerville Rancheria who had no comment and no concerns.

As such, the proposed project would not cause a substantial adverse change in the significance of a known Tribal cultural resource. However, there remains the possibility that Tribal cultural resources could exist in the area and may be uncovered during project development. To prevent potential impacts to unknown Tribal cultural resources at the project site, Protocols for Inadvertent Discovery of Cultural Resources have been included as **Mitigation Measure CR-1** for the proposed project (see Section V – Cultural Resources).

With the implementation of **Mitigation Measure CR-1**, it has been determined that the proposed project would not cause a substantial adverse change in the significance of a Tribal cultural resource that is that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant

to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

Mitigation Measures: The following mitigation measures have been required in other sections of this document, so that when implemented, the proposed project will have a less significant impact:

Mitigation Measure CR-1 (Protocols for Inadvertent Discovery of Cultural Resources) – See Cultural Resources (Section V).

XIX. UTILITIES AND SERVICE SYSTEMS

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

Setting: Utilities and service systems in the project area are described below.

Electricity

Electricity in the Loleta area is provided through the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program. The electricity is distributed and delivered over the existing power lines by PG&E (RCEA, 2026a).

Wastewater

LCSD maintains and operates a wastewater treatment facility (WWTF) that serves the community of Loleta. The proposed project (Section 2.0) is to modify LCSD's WWTF and effluent discharge system to meet the terms of the current NPDES permit, including waste discharge requirements (WDR) for recycled water (beneficial reuse for irrigation of agricultural land becomes the discharge point instead of surface water [SHN, 2016; SHN, 2022]).

Water

LCSD provides and maintains water service to the community of Loleta and the WWTF.

Stormwater

Limited constructed stormwater facilities exist within the project area.

Solid Waste

Contracted solid waste services in Loleta are provided by Recology Eel River. Active permitted in-County transfer stations include the Recology Eel River facility in Fortuna, California; the Humboldt Waste Management Authority (HWMA) facilities in Eureka or Samoa, California; and the Recology Transfer Station in Redway, California. Large recyclable materials (scrap metal, wood, and concrete) and hazardous materials (washers, dryers, televisions, tires, and so on) are pulled from the waste stream at the Eureka facility, and the remaining solid waste is shipped to the Dry Creek Landfill in Medford, Oregon, and the Anderson Landfill in Anderson, California. There are also recycling drop off centers at Recology Eel River in Fortuna, Humboldt Sanitation in McKinleyville, Eel River Resource Recovery in Samoa, and Humboldt Waste Management Authority HWMA in Eureka.

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*** Less-Than-Significant with Mitigation

LCSD's WWTF discharges to surface waters, and LCSD is required to obtain a National Pollutant Discharge Elimination System (NPDES) permit that sets forth specific discharge requirements to ensure protection of public health, environmental health, and water quality. This permit is renewed every 5 years by the North Coast Regional Water Quality Control Board (RWQCB). At each renewal, the permit may incorporate new treatment objectives and discharge standards that require an upgrade or modification to the facility to meet new regulatory requirements. Due to the existing WWTF's inability to meet permit requirements implemented with the most recent NPDES permit (Order No. R1-2020-0002 adopted April 16, 2020), the RWQCB adopted Time Schedule Order (TSO) R1-2020-0003, which instituted increased interim limits for constituents the current plant is unable to treat effectively. TSO R1-2020-0003 required the District to upgrade or replace the existing WWTF to achieve compliance with all limits in Order No. R1-2020-0002 by October 31, 2023. Subsequent extensions to the TSO have been requested through the RWQCB such that the final compliance date will be determined once a firm schedule can be established. The proposed project would bring the WWTF into compliance with LCSD's existing NPDES permit. As described in Section 2.0, the project proposes improvements to LCSD's community wastewater treatment and disposal system including a land acquisition and new wastewater treatment facility component, rehabilitation of the existing waste discharge pipe component, and land application of treated effluent component. The project would also include installation of new influent and effluent conveyance pipelines and utility connections to serve the new facility.

Construction

Construction-related wastewater facility needs would be limited to sanitary wastewater generated by construction personnel and would be managed through the use of portable toilet facilities. No temporary construction wastewater
treatment facilities would be required. Construction of the new WWTF and associated utility infrastructure would involve typical earthwork, grading, trenching, pipeline installation, and facility construction activities. These activities are evaluated throughout this document for potential environmental effects, including Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Tribal Cultural Resources.

Operation

The new WWTF is sized to meet LCSD's existing needs plus future demands estimated using a 0.95 percent growth rate (which was based on a comparison of the number of LCSD water service connections between 2005 and 2013 [SHN, 2016]). The project is designed to bring the WWTF into compliance with LCSD's existing NPDES permit. The new facilities would not result in expansion of LCSD's service area. All environmental effects associated with project construction and associated utility infrastructure are evaluated throughout this document and would be mitigated as identified (refer to Mitigation Measures AQ-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, CR-1, and GEO-1).

Conclusion

The proposed project would require construction of new wastewater treatment facilities and associated utility infrastructure; however, these facilities would replace existing WWTF operations and would not result in expanded service capacity beyond existing and planned development. All construction-related environmental impacts associated with the new facilities and utility improvements are addressed in the respective resource sections of this document and would be less than significant with implementation of mitigation measures. The project would not result in the construction or expansion of utilities that would cause significant environmental effects beyond those analyzed in this document. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) ***Have sufficient water supplies available to serve the project and/or reasonably foreseeable future development during normal, dry and multiple dry years?*** Less-Than-Significant Impact

Like the existing WWTF, the proposed new WWTF would be served domestic water by LCSD. Construction of the project would require relatively small quantities of water during the construction phase (for example, for dust control and concrete/asphalt applications). During operations, the lab/bathroom would use domestic water, which would be equivalent to existing domestic water demand. The new WWTF will use treated wastewater for onsite washdown and utility equipment water demands. The project would not induce population growth or result in land uses that would increase demand for water supplies. Therefore, the project would not result in the need for the construction of new water facilities, or the expansion of existing facilities, and a less-than-significant impact would result.

c) ***Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*** No Impact

LCSD's WWTF discharges to surface waters, and LCSD is required to obtain an NPDES permit that sets forth specific discharge requirements to ensure protection of public health, environmental health, and water quality. This permit is renewed every 5 years by the RWQCB. At each renewal, the permit may incorporate new treatment objectives and discharge standards that require an upgrade or modification to the facility to meet new regulatory requirements. Due to the existing WWTF's inability to meet permit requirements implemented with the most recent NPDES permit (Order No. R1-2020-0002 adopted April 16, 2020), the RWQCB adopted Time Schedule Order (TSO) R1-2020-0003, which instituted increased interim limits for constituents the current plant is unable to treat effectively. TSO R1-2020-0003 required the District to upgrade or replace the existing WWTF to achieve compliance with all limits in Order No. R1-2020-0002 by October 31, 2023. Subsequent extensions to the TSO have been requested through the RWQCB such that the final compliance date will be determined once a firm schedule can be established. The proposed project would bring the WWTF into compliance with LCSD's existing NPDES permit. Therefore, the proposed project would result in no impact on this resource category.

d) ***Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*** Less-Than-Significant Impact

Construction

The amount of solid waste generated during project construction would be typical of construction activities of similar size and type and is not expected to exceed applicable state or local standards, substantially affect landfill capacity, or impede attainment of solid waste reduction or diversion goals. Construction waste would be managed in accordance with applicable regulations, including California Green Building Standards Code (CALGreen) requirements for construction and demolition debris recycling and diversion, as well as applicable local requirements implemented to meet State diversion mandates.

Operation

Operation of the proposed project would not result in an increase in solid waste generation associated with residential development, as the project does not include residential uses. Solid waste generated during facility operations would be limited to minor quantities of routine materials typical of WWTF operations and would be disposed of through Loleta's existing solid waste collection system. Sludge generated by the new WWTF is anticipated to be less than existing sludge volumes produced by the current facility. Currently, LCSD uses an onsite concrete tank for sludge storage and a local septic disposal service to periodically remove sludge from the tank and properly dispose of it. The new WWTF will include sludge dewatering equipment (belt filter press), which will substantially reduce the volume of waste required to be transported offsite. Sludge disposal practices would remain consistent with existing operations.

Solid waste handling and diversion practices in Loleta are required to comply with State solid waste reduction mandates, including Senate Bill 1383 (SB 1383), which establishes requirements for the reduction of short-lived climate pollutants and the recovery of organic waste from the waste stream. The proposed project would not generate a new or substantial source of organic waste beyond existing WWTF operations, and any applicable organic waste streams generated during operation would be handled in accordance with SB 1383 requirements through Loleta's contracted solid waste services.

Conclusion

Overall, the proposed project would not substantially increase solid waste generation, would not require expansion of landfill or solid waste facilities, and would not conflict with state or local solid waste reduction or diversion requirements, including SB 1383. Therefore, impacts related to solid waste would be less than significant.

e) ***Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***
Less-Than-Significant Impact

Solid waste collected as part of the project would be disposed of through the services provided by Humboldt Sanitation or HWMA. The project solid waste generation would not exceed state or local standards, nor would it overwhelm the capacity of local infrastructure. Furthermore, the project would not impede the achievement of solid waste reduction objectives. Its primary focus remains on improving LCSD's wastewater treatment and disposal infrastructure to meet the terms of the current NPDES permit. Therefore, a less-than-significant impact would result.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Utilities and Service Systems.*

XX. WILDFIRE

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

Setting: Fire protection in Humboldt County is provided by a combination of local fire districts, municipal agencies, and the California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE designates lands in three general classifications, "Moderate," "High," and "Very High" Fire Hazard Severity Zones (FHSZs). CALFIRE assigns FHSZs based on existing vegetation, topography, weather, crown fire potential, ember production and movement, and the likelihood of a site to burn over a 30- to 50-year time period. CAL FIRE delineates most of the project area as unclassified and parts as "Moderate" FHSZ (CAL FIRE, 2026). The only parts of the project area classified as "Moderate" FHSZ are the southernmost 500 feet of the discharge pipe alignment and the northeast corner of the land application area. The site is within a Local Responsibility Area (LRA). In LRAs, local agencies have primary responsibility for funding wildfire prevention and suppression activities (CAL FIRE, 2026). The project is located within the boundaries of the Loleta Fire Protection District. The Loleta Fire Station is located approximately 2,000 feet northeast of the project.

The project site is primarily located on a broad, flat to gently sloping topography. The WWTF is constructed on the toe of a slope associated with Table Bluff and contains slopes ranging from 3 to 7 percent and a steep embankment constructed for Eel River Drive on the eastern portion of the WWTF parcel. The surrounding fields, including the location of the discharge pipe and proposed land application site, are used for agriculture, primarily grazing and cultivation, and mostly have 0 to 2 percent slopes. These and the other adjacent fields have been used in the same manner for over 100 years. As such, vegetation is generally grazed. The existing WWTF parcel is developed with WWTF infrastructure, and most of the parcel is graveled for parking and all-weather access. Elevations at the project site range from approximately 10 to 30 feet, with the highest elevations represented at the WWTF and dropping to slightly less than 10 feet at the outfall pipe discharge point (Figure 2).

The climate in Humboldt County is moderate, with the predominant weather factor being moist air masses from the ocean. Average annual rainfall in the area is approximately 48 inches with the majority falling between October and April. Predominant wind direction is typically from the northwest during summer months and from the southwest during storm events occurring during winter months. Typically, this area has a shorter wildland fire season because this area receives more rainfall, has cooler and wetter spring seasons, and has cooler temperatures (Humboldt County, 2017b).

Discussion: Based on a field review with LCSD staff, existing information available to LCSD, and observations made on the project site and in the vicinity, the following findings can be made:

a) ***Substantially impair an adopted emergency response plan or emergency evacuation plan?*** Less-Than-Significant Impact

The project area is covered under the 2015 Humboldt County Emergency Operations Plan (EOP). The Humboldt County EOP identifies the emergency response and evacuation policies and procedures for hazards related to earthquake, tsunami, extreme weather, flooding/flash flooding, landslides, transportation accidents, hazardous materials, interface wildland fire, energy shortage, offshore toxic spill, civic disturbance, terrorist activities, and national security. The Humboldt County EOP establishes a structure for Humboldt County Operation Area agencies to respond to large-scale emergencies requiring multiagency participation or activation of the Humboldt County Emergency Operations Center (Humboldt County, 2015). Hazard mitigation and risk assessment strategies for Humboldt County Operation Area are formalized in the Humboldt County Operational Area Hazard Mitigation Plan (HMP; Humboldt County, 2025b).

The Project would not impair implementation or physically interfere with the established Humboldt County EOP or Humboldt County HMP because the project would not block roadways or other access points that may be needed by emergency vehicles. Project construction will require temporary encroachment within the Humboldt County right-of-way (ROW) along Eel River Drive. The encroachment permit application for Humboldt County would require preparation of traffic control plans for work that would block the right-of-way, and plans for re-routing of vehicles, bicycles, and pedestrians, as needed. Implementation of traffic controls would be required in accordance with County standards, and contractors would be required to comply with the general conditions of the encroachment permit, including restoration of any damage to ROW improvements. The project would also increase the reliability of wastewater treatment and disposal infrastructure following a severe earthquake event. Through compliance with County requirements, and for the reasons explained above, construction activities would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) ***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*** Less-Than-Significant Impact

As described in the Setting, the existing WWTF is constructed on the toe of a slope associated with Table Bluff and contains slopes ranging from 3 to 7 percent and a steep embankment constructed for Eel River Drive on the eastern portion of the WWTF parcel. The existing wastewater discharge pipe easement, the proposed land application site, and the proposed new WWTF site are currently used and have been used for agriculture. Slopes in the agricultural areas are typically 0 to 2 percent slopes, and the proposed new WWTF site has similar topography to the existing WWTF. CAL FIRE delineates most of the project area as unclassified and parts as “Moderate” FHSZ (CAL FIRE, 2026). The only parts of the project area classified as “Moderate” FHSZ are the southernmost 500 feet of the discharge pipe alignment and the northeast corner of the land application area. The proposed discharge pipe repairs and land application system will not include habitable structures or permanent occupancy. The proposed new WWTF will replace the old WWTF and will not increase the number of habitable structures. Fire ignition risk associated with construction activities is low because vegetation would be mowed prior to construction activities and would be limited to accidental ignition associated with a potential heavy machinery-related incident. The project would not otherwise increase exposure to wildlife fire above existing conditions. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) ***Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*** Less-Than-Significant Impact

A new WWTF facility entrance will be constructed within Humboldt County’s ROW along Eel River Drive, in accordance with Humboldt County Public Works requirements. Power lines (PG&E) and municipal water service (LCSD) will be extended to the new WWTF. These project elements have been included in the project description evaluated throughout this document. The project does not include other associated infrastructure that may

exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

d) ***Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*** Less-Than-Significant Impact

Elevations at the project site range from approximately 10 to 30 feet, with the highest elevations represented at the WWTF and dropping to slightly less than 10 feet at the outfall pipe discharge point. According to FIRM Panel 06023C1015G, most of the project is located in a Special Flood Hazard Area (100-Year Flood Zone [AE]), including most of the discharge pipe and land application system (FEMA, 2026). The existing WWTF location and the proposed WWTF expansion location are mostly within Areas of Minimal Flood Hazard (Zone X), and only the lowest elevations are within FEMA's 100-Year Flood Zone (Zone AE). As discussed in Section 3.X – Hydrology and Water Quality, the proposed project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site or substantially increase the area of impervious surface.

The construction of the project would not pose risk above and beyond existing risk to individuals or structures. The project area is relatively flat (slopes are typically less than 10 percent). The existing WWTF parcel is developed with WWTF infrastructure, and most of the parcel is graveled for parking and all-weather access. The surrounding fields including the location of the discharge pipe and proposed land application site are used for agriculture, primarily grazing and cultivation, and mostly have 0 to 2 percent slopes. The risk of fire ignition associated with construction activities is minimal because much of the vegetation within the agricultural field portion of the project area would be mowed prior to construction. Fire risk is also abated by moist conditions from morning fog. Few scattered rural residences and structures exist downslope of the project. Due to the minimal fire risk, and absence of residences or structures downslope of the project area, this potential impact is considered less than significant.

Project operation would involve essentially the same wildfire risk as is present under existing conditions; therefore, no impact would occur from project operation.

Based on the information provided above, it has been determined that the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

Mitigation Measures: No mitigation measures are required for the project to result in a less-than-significant impact on *Wildfire*.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

Discussion: The project information provided for each of the topics above has been reviewed for all actions associated with the proposed project during both temporary construction and long-term operation. Based on the description of the proposed project and its location, the project would not result in any significant impacts with the incorporated project design elements, mitigation measures, as well as compliance with the standards and requirements of other regulating resource agencies. Based on the analysis undertaken as part of this Initial Study, the following findings can be made:

a) ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*** Less Than Significant with Mitigation Incorporated

All impacts to the environment, including impacts to habitat for fish and wildlife species, fish and wildlife populations, plant and animal communities, rare and endangered plants and animal species, and historical and prehistorical resources were evaluated as part of the analysis in this document. Where impacts were determined to be potentially significant, mitigation measures have been imposed to reduce those impacts to less-than-significant levels. In other instances, the project design and compliance with existing laws and regulations would reduce impacts of the project to less-than-significant levels. Therefore, the proposed project as designed, mitigated, and in compliance with existing regulatory requirements, would not substantially degrade the quality of the environment and impacts would be less than significant with mitigation incorporated.

b) ***Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection the***

effects of past projects, the effects of other current projects, and the effects of probable future projects)? Less Than Significant with Mitigation Incorporated

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. As discussed throughout this document, implementation of the proposed project has the potential to result in impacts to the environment that are individually limited but are not cumulatively considerable, including impacts to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Tribal Cultural Resources. In most instances where the project has the potential to result in individually limited significant impacts to the environment (including the resources listed above), mitigation measures have been imposed to reduce the potential effects to less-than-significant levels. In other instances, the project design and compliance with existing laws and regulations would reduce impacts of the project to less-than-significant levels.

Humboldt County has approved several permits for residential, commercial, industrial, public facility, and infrastructure projects in the project area. Due to the disturbed condition of the project site from past and present land uses, the proposed mitigation measures, and compliance with existing regulatory requirements, the potential for the project to make a considerable contribution to potential cumulative impacts from the construction and operation of a new watermain is limited.

Therefore, the proposed project as designed, mitigated, and in compliance with existing regulatory requirements, would not have impacts that are individually limited, but cumulatively considerable. Therefore, impacts would be less than significant with mitigation incorporated.

c) *Does the project have potential environmental effects which may cause substantial adverse effects on human beings, either directly or indirectly?* Less Than Significant with Mitigation Incorporated

The proposed project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this document. In instances where the proposed project has the potential to result in direct or indirect adverse effects to human beings, including impacts to Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Tribal Cultural Resources, mitigation measures have been applied to reduce the impact to below a level of significance. With required implementation of mitigation measures identified in this document, construction and operation of the proposed project would not involve any activities that would result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly. Therefore, impacts would be Less Than Significant with Mitigation Incorporated.

Mitigation Measures: All Mitigation Measures discussed in this document shall apply.

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The following documents were used in preparation of this Initial Study. The reference documents are available from LCSD upon request. Please contact LCSD's General Manager by e-mail at generalmanagerlcsd@gmail.com.

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