

Title:	Humboldt Transit Authority Hydrogen Fueling Station
Project:	Coastal Development Permit CDP-25-4; Environmental Document ED-25-6
Location:	Humboldt Transit Authority’s Operations and Maintenance Facility at 133 V Street
APNs:	002-081-005; 002-091-003, -008, and -010; 002-121-002; and 002-124-008, -009, and -010
Applicant:	Humboldt Transit Authority
Property Owner:	Humboldt Transit Authority
Purpose/Use:	Retrofit HTA’s Operations and Maintenance facility to transition bus and fleet vehicles to hydrogen fuel, including installation of hydrogen storage and fueling systems, upgrades to infrastructure for hydrogen bus servicing, demolition of an office building (104 W Street), construction of a new office building addition at 133 V Street, and completion of related site and utility improvements.
Complete Application:	June 10, 2025
Deadline for Action:	October 12, 2025
General Plan / Zoning	General Service Commercial (GSC) / Service Commercial (CS)
California Environmental Quality Act (CEQA):	Initial Study/Mitigated Negative Declaration (SCH No. 2025080239)
Staff Contact:	Chris Lohofener, Senior Planner
Appeal Status:	The City’s final action on the Coastal Development Permit is appealable to the California Coastal Commission
Recommendation:	Hold a public hearing; and Adopt a resolution adopting the Initial Study/Mitigated Negative Declaration, Mitigation Monitoring and Reporting Program, and Response to Comment and Errata, and conditionally approving the Humboldt Transit Authority Hydrogen Fueling Station Project.
Action:	<i>“I move the Planning Commission adopt a resolution adopting the Initial Study/Mitigated Negative Declaration, Mitigation Monitoring and Reporting Program, and Response to Comment and Errata, and conditionally approving the Humboldt Transit Authority Hydrogen Fueling Station Coastal Development Permit at 133 V Street (APNs 002-081-005; 002-091-003, -008, and -010; 002-121-002; and 002-124-008, -009, and -010).”</i>

LIST OF ACRONYMS

AQ	Air Quality Mitigation Measure designation
AST	Aboveground Storage Tank
BMP	Best Management Practice
Cal/OSHA	California Division of Occupational Safety and Health
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CS	Service Commercial
CUL	Cultural Resources Mitigation Measure designation
DTSC	Department of Toxic Substances Control
EMC	Eureka Municipal Code
ESHA	Environmentally Sensitive Habitat Area
FCEB	Fuel Cell Electric Bus
GSC	General Service Commercial
H35	Hydrogen fuel dispenser standard at 35 MPa (5,000 psi)
H70	Hydrogen fuel dispenser standard at 70 MPa (10,000 psi)
HCDEH	Humboldt County Department of Environmental Health
HMBP	Hazardous Materials Business Plan
HTA	Humboldt Transit Authority
HVAC	Heating, Ventilation, and Air Conditioning
IP	Implementation Plan
IS	Initial Study
LCP	Local Coastal Program
LUP	Land Use Plan
MND	Mitigated Negative Declaration
MS4	Municipal Separate Storm Sewer System
NAHC	Native American Heritage Commission
NCUAQMD	North Coast Unified Air Quality Management District
NFPA	National Fire Protection Association
NOI	Notice of Intent
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PSM	Process Safety Management
SCH	State Clearinghouse
THPO	Tribal Historic Preservation Officer
U.S. EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

Figure 1: Location Map (133 V Street)



PROJECT DESCRIPTION

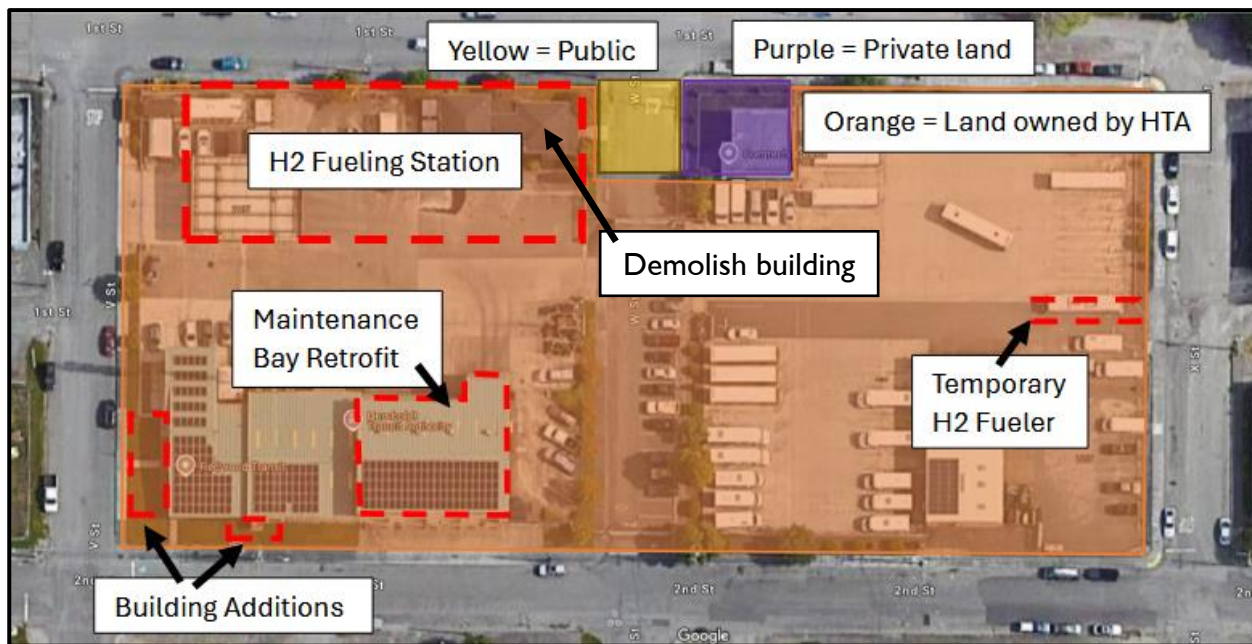
The Applicant, Humboldt Transit Authority (HTA), proposes to retrofit its existing Maintenance and Operations Facility (facility) located at 133 V Street in Eureka to accommodate new hydrogen-powered buses (the Project; see Figures 1 and 2 for the Project's location). The Project is a key part of HTA's Zero Emission Bus Rollout Plan and supports compliance with California's Innovative Clean Transit Regulation that requires all public transit fleets to be fully zero-emission by 2040.

The Project includes the installation of a hydrogen fueling station consisting of an 18,000-gallon liquid hydrogen storage tank designed with seismic-rated supports, along with a gaseous hydrogen compression and storage system. The hydrogen fueling station will be located on the northwest corner of HTA's property, accessible from 1st Street. The fueling station will feature three dispensers, including two H35 dispensers for heavy-duty transit buses and one H70 dispenser serving medium-duty fleet vehicles. The H70 dispenser will also be able to serve passenger vehicles and will be made available to the public via a public fueling island with a point-of-sale system to support retail hydrogen fuel sales. All fueling infrastructure will be located within HTA's property boundaries and will incorporate fire safety features that address existing and proposed on-site hazardous fuel storage, electrical lines, and vehicle parking (Figure 2). HTA will install a temporary fueling station for their existing hydrogen buses while the permanent fueling station is built, ensuring ongoing transit services are not interrupted.

The Project also involves demolishing a wood-frame office building at 104 W Street (formerly a residence), which contains asbestos and lead-based materials. Hazardous materials will be removed in accordance with all applicable safety and environmental regulations. This structure is being removed to make room for the new fueling station and aboveground storage tanks. A new office addition under 2,000 square feet will be constructed on the southwest corner of 133 V

Street to replace the functions of the demolished office building. Demolition and subsequent site preparation will include debris removal, grading, and upgrades to utilities such as new electrical service, switchgear, distribution panels, and a diesel-powered backup generator. The upgraded utilities are designed to meet the fueling station's electrical demands with additional capacity for future growth. Improvements to stormwater management and communications infrastructure will also be made.

Figure 2: Site Map (HTA facility highlighted in orange, main project components outlined in red)



Three semi-enclosed maintenance bays along 2nd Street are currently used to service HTA's diesel and gasoline vehicles (buses and fleet vehicles) but will be retrofitted to also service hydrogen buses. Retrofits will meet Hydrogen Technologies Code standards with enhancements to ventilation, gas detection for hydrogen and other gases, HVAC systems, electrical safety, and emergency alarms. This component of the Project received a Coastal Development Permit Exemption in May of 2025 (CXXD-25-9) but is included in the staff report to provide the full picture of site improvements as HTA transitions to hydrogen buses.

During construction, two separate staging areas are planned to minimize disruption to ongoing operations. Staging Area A is a 0.15-acre site north of 1st Street and Staging Area B is a 0.1-acre area within the existing HTA yard (Figure 3). Staging Area A is adjacent to wetland habitat and appropriate measures will be taken to minimize any impacts (see discussion in the Biological Resources section, below). Construction vehicle access from Highway 101 to the HTA site will be routed along H and I Streets, connecting with Waterfront Drive to T Street and then to 1st Street. This routing avoids smaller residential streets, minimizes disruption to existing traffic patterns, and reduces potential conflicts with ongoing bus operations (Figure 4).

The Project requires a Coastal Development Permit (CDP), Design Review approval, and a property Merger from the City of Eureka. An Initial Study pursuant to the California Environmental Quality Act (CEQA) is also required and has been prepared (Attachment 2). Design Review and the Merger will be completed at a later date.

Figure 3: Overview of Project Components (See Attachment 2 for detailed project description)

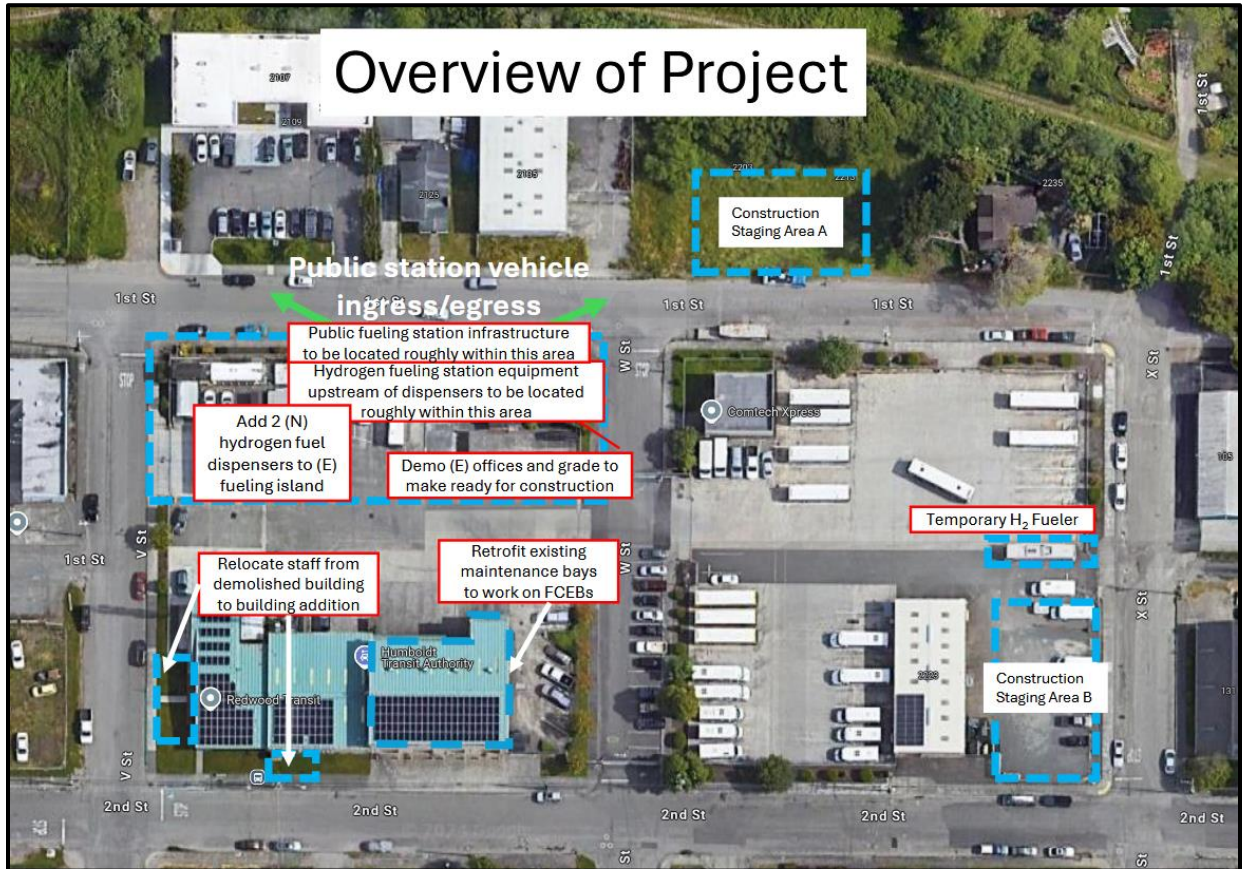


Figure 4: Circulation Pattern and Construction Site Access



Detailed project descriptions and other materials such as existing conditions and photos, site plans, examples of fueling infrastructure, and biological and cultural reports, can be found by clicking the following link: <https://transfer.eureka.gov:5252/sharing/Uz8pymIcC>.

BACKGROUND

HTA was established in 1975 as a Joint Powers Authority between Humboldt County and the Cities of Arcata, Eureka, Fortuna, Rio Dell, and Trinidad. Governed by a seven-member Board of Directors, HTA operates Redwood Transit System, Willow Creek Transit Service, and Southern Humboldt Transit System, providing fixed-route and dial-a-ride services throughout much of Humboldt County, including services from Trinidad south to Benbow and Ukiah, and east to Willow Creek.

The existing HTA facility includes an administrative building with bus maintenance bays and car wash, a gasoline and diesel fueling station, and a secondary administrative office at 104 W Street, formerly a single-family residence. Additional maintenance, storage, and bus parking areas are located at 2223 2nd Street. The approximately three-acre Project site (site) is generally bounded by 1st and 2nd Streets to the north and south, and V and X Streets to the west and east, with an additional 0.15-acre undeveloped area located north of 1st Street which will serve as Staging Area A (the upland portions of HTA-owned APNs 002-081-005 and 002-121-002). Historically, this neighborhood of Eureka was developed with single-family residences from the late 1800's through the mid-1900's, and by the early 2000's, many residential structures had been replaced with commercial and light industrial development.

Surrounding uses include retail, offices, service businesses, light manufacturing, and housing. To the north are light industrial uses, with grasslands, wetlands, the Eureka Waterfront Trail, and Humboldt Bay beyond. To the west and east are commercial/light industrial properties, and to the south are a mix of residential and commercial properties. The site is designated General Service Commercial (GCS) and zoned Service Commercial (CS), and is located in the Coastal Zone's "Bridge District," an area envisioned in the 2040 General Plan as a diverse, mixed-use district.

HTA's facility includes offices, maintenance bays, bus storage, and gasoline and diesel fueling infrastructure, with portions of the facility dating back to the 1970s, and significant site additions in 1999 (see City of Eureka Permit History list below). As such, many facility components, including lifts, cranes, and bay doors, have exceeded their anticipated service life. In 2023, HTA was awarded a \$38.7 million grant through the California State Transportation Agency's Transit and Intercity Rail Capital Program to support the agency's transition to a zero-emission fleet. This funding will facilitate the procurement of 10–15 hydrogen fuel cell electric buses (FCEBs), construction of a hydrogen fueling station to serve both HTA and other fleet/private vehicles, and other site improvements.

For additional information regarding development of the HTA facility, including background, setting, and overall need of the proposed infrastructure project, see Sections 1.2 – 1.5 of the project's environmental document (Attachment 2).

City of Eureka Permit History

- CDP-06-99: Expansion and renovation of HTA, renovate offices, replace roof, ADA code requirements, four new Maintenance Bays; 100' communication tower, new bus wash and water treatment.
- CDP-06-99 (MOD): Replace three Underground Storage Tanks with 3 Aboveground Storage Tanks, new fueling terminal and canopy, relocation of V St. drop curb.
- Conditional Use Permit (CUP) C-07-99: Approved for expansion and renovation.
- CDP-03-05: House relocation.

- Coastal Exemption (XD) XD 09-0007: Antenna replacement.
- CX-16-0007: Tree root removal.
- Modification (MOD) MOD-14-0006: Expand fuel facility.
- Modification (MOD) MOD-14-0007: Expand fuel facility.
- XD-17-0015: Antennae for communications tower.
- XD-18-0003: Communications tower structure addition.
- XD-18-0020: Two temporary charging stations.
- XD-18-0023: Addition of solar panels.
- SV-18-0001: Vacation of a portion of W Street owned in fee by HTA.
- CX-20-0001: Nixon House demolition.
- XD-21-0019: Electrical service panel and transformer.
- CX-21-0012: ADA parking at 104 W Street.
- XD-22-0005: Removal of Sprint equipment.
- XD-22-0014: Installation of backup generator.
- XD-24-37: Installation of two electric vehicle (EV) charging stations.
- XD-25-9: Tenant improvements to three existing maintenance bays and a wash bay.

The Project does not require a modification to HTA's CUP (C-07-99) because the bus depot use remains unchanged. The Project, including building demolition, office addition, and the installation of a new fuel source, does not alter the original CUP, and fueling stations are principally permitted in the CS Zoning District.

Typically, the Director of Development Services (Director) acts on CDP's when no other discretionary permits are required. However, Eureka Municipal Code (EMC) §10-5.29304.6(b) allows the Director to refer a CDP to the Planning Commission at their discretion. The Director has chosen to do so for this Project due to the potential for increased public interest. In this case, Design Review will be a subsequent discretionary action handled later by the Design Review Committee, while the required property Merger is a ministerial action by the Director; and both will occur prior to construction.

The Project was analyzed in detail in an Initial Study/Mitigated Negative Declaration (IS/MND), prepared in 2025 and included as Attachment 2. Additional information on the environmental review process can be found in the Environmental Assessment section below. The City's final decision on the Coastal Development Permit is appealable to the California Coastal Commission because Staging Area A is within 100 feet of a wetland in accordance with EMC §10-5.2906.2(f)(2).

COASTAL DEVELOPMENT PERMIT ANALYSIS

Pursuant to EMC §10-5.29310.1, to approve the CDP, the Planning Commission must find the Project conforms to the policies of the certified Local Coastal Program (LCP). The LCP is divided into two components: The Land Use Plan (LUP) and Implementation Plan (IP). The LUP is the General Plan specific to land in the Coastal Zone and outlines the permitted uses and policies needed to achieve the goals of the Coastal Act and includes the General Plan land use designation map. The IP includes zoning regulations and the zoning map for land in the Coastal Zone, as well as specific regulations necessary to implement the policies of the LUP. The LUP and IP together (the City's LCP) implement the provisions and policies of the California Coastal Act at the local level by:

- I. Protecting public access;

2. Prioritizing coastal-dependent, coastal-related, visitor-serving, recreational, and agricultural uses;
3. Conserving biological resources;
4. Preserving archaeological resources;
5. Ensuring adequate services;
6. Minimizing coastal hazard risk; and
7. Protecting the scenic and visual qualities of coastal areas.

LUP Goals and Policies

Table I identifies the specific certified LUP goals and policies applicable to this Project, along with the subsections of the analysis where each is applied. Several policies appear in multiple subsections due to their broad relevance to public access, infrastructure, environmental protection, and hazard management.

Table I: LUP Policy Cross-Reference Table	
Goal / Policy	LUP Subsections Where Analyzed
Goal I.A – To establish and maintain a land use pattern and mix of development in the Eureka area that protects residential neighborhoods, promotes economic expansion, facilitates logical and cost-effective service extensions, and protects valuable natural and ecological resources.	1. Public Access 4. Archaeological Resources 5. Adequate Services
Policy I.A.4 – To promote the public safety, health, and welfare, and to protect private and public property, to assure the long-term productivity and economic vitality of coastal resources, and to conserve and restore the natural environment, the City shall protect the ecological balance of the coastal zone and prevent its deterioration and destruction.	3. Biological Resources
Policy I.A.5 – Within the coastal zone, the City shall ensure that coastal-dependent developments have priority over other developments on or near the shoreline. Except as provided elsewhere in this General Plan, coastal-dependent development shall not be sited in a wetland. Coastal-related developments shall generally be accommodated proximate to the coastal-dependent uses they support.	2. Priority Uses
Goal 4.A – To ensure the effective and efficient provision of public facilities and services for existing and new development.	5. Adequate Services
Policy 4.A.4 – Existing public works facilities, including water, wastewater, stormwater, highway, and railroad facilities serving the Planning Area are essential to the economic and social well-being of the people and shall be maintained, enhanced, and restored to assure the orderly and balanced utilization and conservation of natural and human-created resources.	2. Priority Uses 5. Adequate Services

<p>Policy 4.A.6 – The City shall ensure that new or expanded public works facilities within the Coastal Zone will be designed and limited to accommodate needs generated by permitted uses and development consistent with the provisions of this General Plan.</p>	<p>5. Adequate Services</p>
<p>Goal 5.B – To provide public open space and shoreline accessways throughout the Coastal Zone, consistent with protecting environmentally sensitive habitats and other coastal priority land uses.</p>	<p>1. Public Access</p>
<p>Policy 5.B.1 – The City shall provide public open space and shoreline access through the Coastal Zone, particularly along the waterfront and First Street, through all of the following: (d) Consider and protect the scenic and visual qualities of coastal areas that are visible from scenic public vista points and waterfront walkways.</p>	<p>7. Scenic and Visual Qualities</p>
<p>Goal 6.A – To protect and enhance the natural qualities of the Eureka area’s aquatic resources and to preserve the area’s valuable marine, wetland, and riparian habitat.</p>	<p>3. Biological Resources</p>
<p>Policy 6.A.1 – The City shall maintain, enhance, and, where feasible, restore valuable aquatic resources, with special protection given to areas and species of special biological or economic significance. The City shall require that uses of the marine environment are carried out in the manner that will sustain the biological productivity of coastal waters and that will maintain health populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.</p>	<p>3. Biological Resources</p>
<p>Policy 6.A.3 – The City shall maintain and, where feasible, restore biological productivity and the quality of coastal waters, streams, wetlands, and estuaries appropriate to maintain optimum populations of aquatic organisms and for the protection of human health through, among other means, minimizing adverse effects of wastewater and stormwater discharges and entrainment, controlling the quantity and quality of runoff, preventing depletion of groundwater supplies and substantial interference with surface water flow, encouraging wastewater reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.</p>	<p>3. Biological Resources</p>
<p>Policy 6.A.6 – The City declares the following to be environmentally sensitive habitat areas within the Coastal Zone: a. Rivers, creeks, sloughs, gulches and associated riparian habitats, including but not limited to Eureka Slough, Fay Slough, Cut-Off Slough, Freshwater Slough, Cooper Slough, Second Slough, Third Slough, Martin Slough, Ryan Slough, Swain Slough, and Elk River.</p>	<p>3. Biological Resources</p>

<ul style="list-style-type: none"> b. Wetlands and estuaries, including that portion of Humboldt Bay within the City’s jurisdiction, riparian areas, and vegetated dunes. c. Indian Island, Daby Island, and the Woodley Island wildlife area. d. Other unique habitat areas, such as waterbird rookeries, and habitat for all rare or endangered species on state or federal lists. e. Grazed or farmed wetlands (i.e., diked former tidelands). 	
<p>Policy 6.A.7 – Within the Coastal Zone, the City shall ensure that environmentally sensitive habitat areas are protected against any significant disruption of habitat values, and that only uses dependent on such resources shall be allowed within such areas. The City shall require that development in areas adjacent to environmentally sensitive habitat areas be sited and designed to prevent impacts which would significantly degrade such areas, and be compatible with the continuance of such habitat areas.</p>	<p>3. Biological Resources</p>
<p>Policy 6.A.8 – Within the Coastal Zone, prior to approval of a development, the City shall require that all development on lots or parcels designated NR (Natural Resources) on the Land Use Diagram or within 250 feet of such designation, or development potentially affecting an environmentally sensitive habitat area, shall be found to be in conformity with the applicable habitat protection policies of the General Plan. All development plans, drainage plans, and grading plans submitted as part of an application shall show the precise location of the habitat(s) potentially affected by the proposed project and the manner in which they will be protected, enhanced or restored.</p>	<p>3. Biological Resources</p>
<p>Policy 6.A.19 – The City shall require establishment of a buffer for permitted development adjacent to all environmentally sensitive areas. The minimum width of a buffer shall be 100 feet, unless the applicant for the development demonstrates on the basis of site-specific information, the type and size of the proposed development, and/or proposed mitigation (such as planting of vegetation) that will achieve the purpose(s) of the buffer, that a smaller buffer will protect the resources of the habitat area. As necessary to protect the environmentally sensitive area, the City may require a buffer greater than 100 feet. The Buffer shall be measured horizontally from the edge of the environmental sensitive area nearest the proposed development to the edge of the development nearest to the environmentally sensitive area. Maps and supplemental information submitted as part of the application shall be used to specifically define these boundaries.</p>	<p>3. Biological Resources</p>

Goal 7.B – To minimize loss of life, injury, and property damage due to geological hazards	6. Coastal Hazard Risk
Policy 7.B.2 – The City shall ensure that development on or near the shoreline of Elk River, Humboldt Bay, and Eureka Slough neither contributes significantly to, nor is subject to, high risk of damage from shoreline erosion over the life span of the development.	6. Coastal Hazard Risk
Goal 7.D – To minimize the risk of loss of life, injury, damage to property and economic and social dislocations resulting from flood hazards.	6. Coastal Hazard Risk

I. Public Access

A designated trailhead for the Waterfront Trail is located at the northeast corner of 1st and X Streets, across X Street from the Project site. To minimize disruptions to this trailhead and public access along the Waterfront Trail during construction, conditions have been added requiring that construction traffic use designated arterial routes and that staging activities remain limited to approved sites. There may be times during project construction when the adjacent X Street trailhead will be temporarily blocked; therefore, a condition has been added requiring development of an Access Management Plan to ensure any temporarily closure of the trailhead for construction-related public safety purposes is minimized and adequate signage is posted informing the public about the closure and directing the public to nearby trailheads.

All improvements will occur within HTA’s existing facility in an urbanized area that contains no designated public access points or coastal trails beyond the nearby Waterfront Trail trailhead. While avoiding any permanent impacts to existing access, the Project also enhances long-term mobility by supporting HTA’s transition to a zero-emission fleet, strengthening the reliability and sustainability of regional bus service, including along major coastal corridors from Trinidad to Scotia. Improved transit service increases coastal access for residents, visitors, and workers, particularly those who rely on public transportation.

In addition, conditions have been added to ensure that public fueling access remains clearly separated from HTA’s operational bus circulation areas and that the new fuel pump meets ADA accessibility requirements. These measures reinforce the Project’s public-serving nature and ensure safe, equitable access consistent with the Coastal Act. Overall, the Project is consistent with LUP objectives related to public access by maintaining current access conditions while expanding mobility options throughout the Coastal Zone.

2. Priority Uses

The Project will not displace or interfere with existing or planned coastal-dependent, coastal-related, visitor-serving, recreational, or agricultural uses. The City’s certified LCP implements the Coastal Act’s priority use provisions in part through land use designations and corresponding zoning districts that reserve sites exclusively or primarily for such uses. The Project site is not located within any of these designations or districts. Instead, its land use designation and zoning allows for a broad mix of general residential, commercial, light industrial, and public facility uses, and the site is already developed and serves as HTA’s primary transit operations facility. All improvements will occur entirely within the existing development footprint of HTA’s facility, which is separated from the shoreline by 1st Street and private properties, avoiding encroachment on waterfront land, open space, or other areas suitable for priority

coastal uses. Staging Area A, located north of 1st Street and between the first public road and the shoreline, will be used temporarily for construction staging, ensuring that scenic vistas, public coastal access, and opportunities for priority uses remain fully protected.

While the Project is not itself a coastal-dependent or coastal-related use, the proposed hydrogen fueling infrastructure will strengthen regional public transportation services, directly supporting visitor-serving, recreation, and coastal-dependent and -related activities by enhancing the ability of these services to support priority uses along the shoreline. In this way, the Project is consistent with LCP Goal I.A, Policy I.A.5, and Policy 4.A.4, which collectively prioritize protection of scenic resources, public access, and coastal-dependent uses while accommodating necessary infrastructure improvements.

3. Biological Resources

The Project will not result in significant adverse impacts to environmentally sensitive habitat areas (ESHAs), wetlands, or other protected biological resources. HTA's facility is fully developed with buildings, paved surfaces, and limited ornamental landscaping. The installation of hydrogen fueling infrastructure, electrical upgrades, and an office addition will occur entirely within previously disturbed, compacted, or paved areas. However, there are wetlands near the project site, north of 1st Street. These wetlands could be impacted by runoff and erosion during Project construction and for the life of the development. To address this potential impact, Mitigation Measure BIO-3 is included in the IS/MND requiring a construction-phase erosion and sediment control plan, and a post-construction stormwater control plan, in compliance with the City's Urban Storm Water Quality Management and Discharge Control Ordinance and Municipal Separate Storm Sewer System (MS4) permit requirements. Although these plans are already required by the City's MS4 permit and apply regardless of CEQA, they have been included as mitigation measures to ensure HTA's awareness of the requirements and to support the conclusion that the Project will not result in potentially significant impacts to biological resources or water quality, and to reinforce their adequate long-term protection.

Offsite wetlands could also be indirectly affected by spillover light from new exterior lighting fixtures, which can disrupt wildlife behavior, or by the spread of invasive ornamental plants from onsite landscaping. To avoid these potential impacts, conditions of approval have been added requiring new exterior lighting to be fully shielded, directed downward, and dark-sky compliant, and requiring the exclusive use of non-invasive, preferably native, plant species on the Project site.

While the National Wetlands Inventory indicates that there are no designated ESHA, wetlands, or riparian corridors within the developed HTA facility site, construction Staging Area A contains wetlands mapped by J.B. Lovelace & Associates in a 2015 delineation (Figure 5), with conditions confirmed again in 2025. These palustrine emergent and palustrine forested/scrub-shrub wetlands are considered ESHA under LUP Policy 6.A.6. This staging area is intended to be used for temporary vehicle parking and equipment staging, including installation of gravel and/or pavers, and temporary security lighting and fencing. HTA has also indicated they would like to use this area post-construction on an ongoing basis for overflow parking.

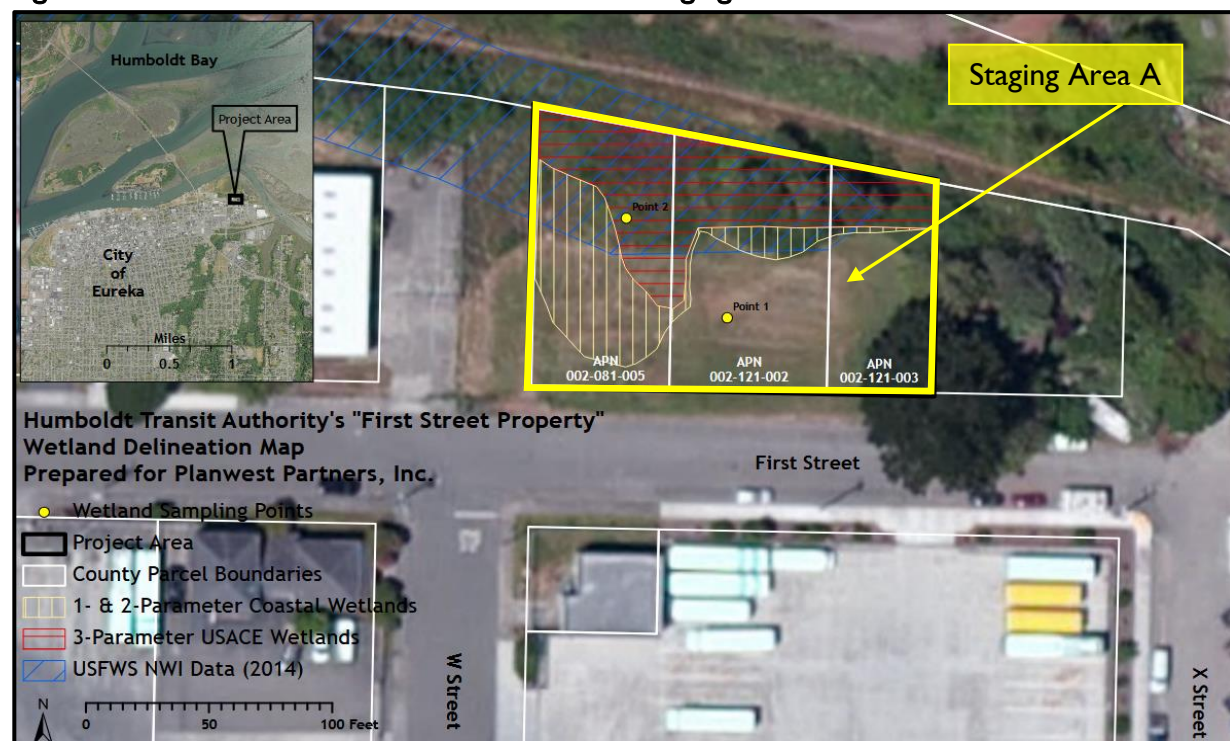
To avoid the wetland portions of Staging Area A, Mitigation Measures BIO-2 was added to the IS/MND requiring identification and flagging of the wetlands by a qualified biologist prior to construction activities taking place and installation of signage explaining the protected status. Mitigation Measures BIO-2 also requires a number of runoff and erosion control measures to

protect the wetlands including placing temporary straw wattles and silt fencing downslope of Staging Area A to control sediment and direct runoff toward 1st Street and existing stormwater infrastructure, and installing semi-permanent infiltration features such as gravel infiltration ditches around the staging area, which will then be surfaced with permeable materials (e.g., crushed aggregate, open pavers with grass or gravel) to minimize long-term hydrological impacts. As outlined in Mitigation Measure BIO-2, post-construction, silt fencing will be removed and the site will remain stabilized with permeable surfacing.

Due to the limited upland area in Staging Area A, the Project originally included a request to reduce the standard 100-foot wetland buffer (Policy 6.A.19, EMC §10-5.2942.15) to a 0-foot buffer to accommodate staging and future overflow bus parking. However, based on Coastal Commission staff comments, IS/MND Mitigation Measure BIO-2 has been updated to require a minimum five-foot buffer from wetland boundaries, managed with BMPs to avoid disruption of habitat values, consistent with Policy 6.A.7. IS/MND Mitigation Measure BIO-2 has also been updated to require protective fencing to be installed along the wetland buffer boundary (as opposed to flagging the edge of the wetland itself), and to require a qualified biologist to monitor the wetland at a minimum bi-annually during construction and immediately following construction to ensure conditions remain stable and resources are protected. A condition of approval has been added to the CDP requiring submittal of monitoring reports, and if impacts are detected, a restoration plan, to Development Services – Planning for review and approval.

In response to Coastal Commission staff concerns, Mitigation Measure BIO-2 has been further updated and the CDP has been further conditioned to clarify that any post-construction or ongoing operational use of Staging Area A for permanent overflow bus parking or other activities will require HTA to submit a long-term site plan and obtain the appropriate CDP authorization (new permit, modification or exemption). This ensures that any future use of Staging Area A is fully reviewed for consistency with Coastal Act and City LCP biological resource polices.

Figure 5: Wetland Delineation for Construction/Staging Area A



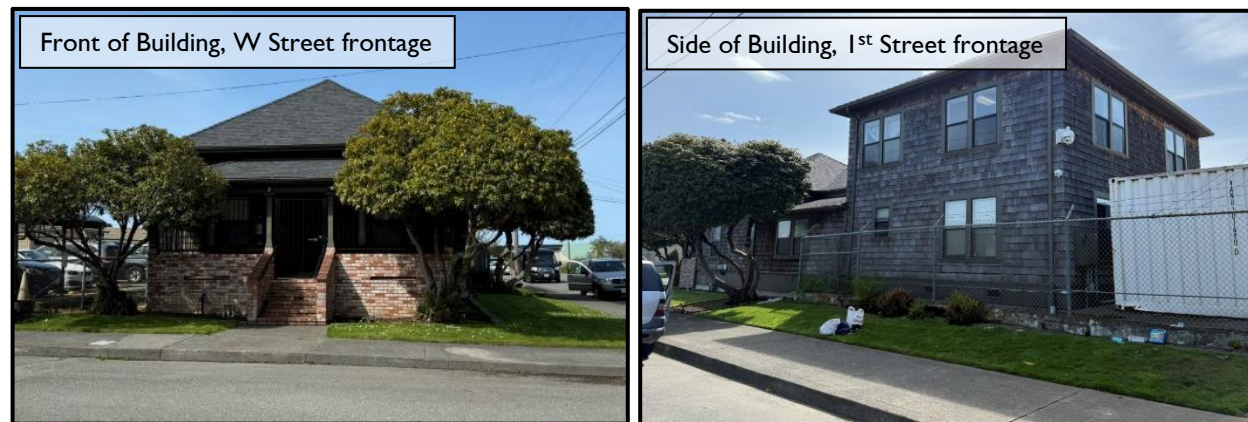
Additionally, the Project involves vegetation removal, limited to on-site ornamental landscaping trees, which could affect nesting birds. To address this potential impact, the IS/MND includes Mitigation Measure BIO-1. Under this measure, vegetation removal must occur outside the nesting season (August 16–March 14) or, if scheduled during the nesting season (March 15–August 15), a qualified biologist must survey the site within seven days prior to disturbance. If active nests are found, species-specific buffers will be established in consultation with USFWS and CDFW until the nests are no longer active.

By concentrating improvements within developed areas, applying habitat protection measures in Staging Area A, implementing stormwater BMP's, adhering to outdoor lighting limitations and post-construction landscaping requirements, and observing all ESHA protection standards, the Project is consistent with LUP Goal 6.A and Policies 6.A.1, 6.A.3, and 6.A.7 to maintain, protect, and enhance aquatic and biological resources, while ensuring disturbance to ESHAs is minimized. With the conditioned five-foot buffer and BMPs, the Project is also consistent with Policy 6.A.19 regarding wetland buffer reductions.

4. Archaeological Resources

The Project site is located within an urbanized area previously disturbed by development and ongoing transit operations. However, determining cultural significance requires careful consideration of archaeological and tribal cultural resources. A Cultural Resource Technical Report, prepared by Chronicle Heritage (June 2025), identified no archaeological sites or artifacts within the Project area. Within the site, the building at 104 W Street (Figure 6) was identified as a potential historic resource due to its 1896 construction date and listing in the Eureka Heritage Society's "Green Book" and the City's Historic Mapper. Historically a residence and later converted to commercial use, the building has undergone substantial alterations, including additions, new siding, windows, and porch, compromising its historic integrity. An architectural historian concluded it does not meet eligibility criteria for the National Register of Historic Places, the California Register of Historical Resources, or the Local Register. Demolition will therefore not result in a significant impact to a historical resource.

Figure 6: 104 W Street (Building to be demolished)



To ensure protection of unknown cultural resources, the Project will implement Mitigation Measure CUL-1. If archaeological resources are encountered during construction, work will immediately cease within at least 50 feet of the find. A qualified archaeologist will assess the resource's significance and, if associated with Native American heritage, the Tribal Historic

Preservation Officers (THPOs) for the Wiyot Tribe, Bear River Band, and Blue Lake Rancheria will be contacted immediately. A treatment plan will be developed in consultation with the THPOs, City of Eureka, and the archaeologist. If paleontological resources discovered, work will stop within 100 feet until a qualified paleontologist evaluates the find and, if necessary, prepares a treatment plan consistent with local and regional standards.

The Project will also comply with Mitigation Measure CUL-2 for inadvertent discovery of human remains. If remains are found, work will stop within 100 feet, and the Humboldt County Coroner will be contacted to determine whether investigation is needed. If the remains are determined or believed to be Native American, the Native American Heritage Commission (NAHC) will be notified within 24 hours, and will make recommendations for respectful treatment in accordance with Public Resources Code § 5097.98.

The City referred the Project to the THPOs of the Wiyot Tribe, Bear River Band, and Blue Lake Rancheria on June 27, 2025. The Wiyot Tribe, Bear River Band, and Blue Lake Rancheria all responded with a request to include inadvertent discovery procedures as conditions of approval; this request is fulfilled through Mitigation Measures CUL-1 and CUL-2.

5. Adequate Services

The Project is essential to maintaining reliable, modern, and efficient public transit service within Eureka's Coastal Zone and throughout HTA's service area. The improvements directly support HTA's transition to a zero-emission fleet, advancing local and State climate goals while ensuring continued transportation access for the community. The Project includes installation of a liquid hydrogen storage tank, hydrogen compression and gas storage systems, two private fueling dispensers, and one public fueling dispenser, designed to meet HTA's current and projected fleet needs through 2040. Electrical upgrades will provide sufficient service capacity, including a dedicated diesel-fueled backup generator to maintain uninterrupted operations during power outages. As conditioned, any necessary utility relocations or upgrades will be coordinated with the appropriate service providers and completed in compliance with City standards, and all Engineering Department referral comments (Attachment 5) will be addressed prior to issuance of building permits.

During construction, the Project will implement Mitigation Measures AQ-1 and AQ-2 to control air pollutants and diesel emissions. Measures include watering exposed surfaces, covering haul truck loads, limiting speeds on unpaved areas, minimizing idling to five minutes, and maintaining all construction equipment in accordance with manufacturer specifications. A Construction Management Plan will require that heavy-duty diesel vehicles have 2010 or newer engines, that non-road diesel construction equipment meet at least Tier 3 emission standards, and that alternative fuels (e.g., compressed natural gas, propane, electricity, or biodiesel) be used where feasible. Signage will be posted with contact information for dust complaints to ensure compliance with local air quality regulations. These measures will minimize construction-phase air quality impacts while maintaining compliance with North Coast Unified Air Quality Management District (NCUAQMD) standards.

Additionally, the Project is conditioned to obtain approvals from all applicable regulatory agencies, including the NCUAQMD, Humboldt Bay Fire, Humboldt County Department of Environmental Health (HCDEH), and any other necessary permits or authorizations, prior to commencement of construction of relevant components of the Project.

The Project is consistent with LUP Goal 4.A, which emphasizes the effective and efficient provision of public facilities and services. It supports Policy 4.A.4 by maintaining and enhancing public works to ensure balanced resource use. It also fulfills Policy 4.A.6 by designing facilities to meet projected needs without overbuilding, and supports Goal 1.A by coordinating public and private facilities to avoid unnecessary duplication.

The Project advances public health and environmental goals consistent with Policy 1.A.4, which directs the City to conserve and restore the natural environment while promoting public safety and welfare. The transition to zero-emission buses will reduce greenhouse gas emissions, improve air quality, and contribute to regional climate resilience. Construction and operational plans will be implemented to minimize service disruptions, ensuring continued access to transit during facility upgrades. The improvements are designed for compatibility with existing urban uses and fulfill the City's objectives for high-quality, well-integrated public infrastructure.

6. Coastal Hazard Risk

The Project has been planned to minimize risks associated with coastal hazards such as flooding, seismic activity, and soil instability, consistent with the City's commitment to resilient and safe development within the Coastal Zone. The liquid hydrogen storage tank features a horizontal design engineered and supported to meet seismic requirements under the California Building Code, ensuring safety and operational reliability during earthquakes.

Site preparation includes grading and demolition of an existing wood-frame building at 104 W Street. Pre-demolition surveys identified lead-based paint and asbestos-containing materials, which will be removed and contained in compliance with federal and State regulations, including OSHA/Cal-OSHA worker safety standards, U.S. EPA and Department of Toxic Substances Control (DTSC) hazardous waste rules, and NCUAQMD asbestos removal requirements. Licensed contractors will perform abatement with disposal at approved facilities, and other hazardous components such as PCB-containing ballasts and mercury devices will be removed per the California Universal Waste Rule. Compliance with hazardous waste and toxic substances rules during site preparation and demolition activities are part of the overall construction plan proposed by the Applicant.

During construction, hazardous materials including fuels, lubricants, and solvents will be managed in accordance with the EMC §94.45 and §150.304.110 and HCDEH requirements. BMP's such as secondary containment, spill kits, and immediate cleanup will prevent accidental releases, and soil excavation near existing fuel facilities will include testing and remediation as required by State standards. These measures are incorporated into the construction plans proposed by the Applicant as well as included in project conditions of approval.

Operationally, the facility will store over 10,000 pounds of hydrogen, classified as a Category 1 flammable gas under OSHA's Process Safety Management (PSM) Standard (29 Code of Federal Regulations (CFR) 1910.119). HTA will maintain an OSHA-compliant PSM Plan and a Hazardous Materials Business Plan (HMBP) with HCDEH, ensuring emergency coordination with local responders. The hydrogen fueling system will comply with NFPA 2 Hydrogen Technologies Code and incorporate safety features such as barrier walls, flame and gas detectors, emergency shutoff systems, and vehicle impact protection.

The hydrogen fueling station will not create new sources of odors, explosion risks, or environmental contamination. Hydrogen is non-toxic, odorless, and unlike gasoline or diesel, does

not produce lingering vapors or liquid spills. As the lightest element, it disperses rapidly in open air, making sustained accumulation highly unlikely. While flammable, ignition requires a narrow concentration range combined with an ignition source, conditions that are prevented by the NFPA 2-compliant design, continuous monitoring, and automatic shutoff systems. These safeguards ensure no credible risk of odor nuisance, explosion hazard, or environmental contamination to the surrounding community. While the Project introduces hydrogen as a new hazardous material, it replaces existing diesel and gasoline fueling operations at the facility, which already involve flammable fuels and associated hazards. Because hydrogen’s safety profile for long-term operations is comparable, and in some respects superior, to the existing diesel and gasoline infrastructure, the Project does not exacerbate potential risks to life and property.

The Project complies with Policy 7.B.2 because it avoids construction in areas subject to wave run-up, erosion, or tsunami hazards (discussed below), as the site lies inland of the Humboldt Bay shoreline and is buffered by existing development. The Project is also consistent with Goal 7.D and Policy 7.D.1, which discourage development in areas of high flood hazard. The Project site is located outside of the FEMA 100-year and 500-year flood hazard zones, and no flood hazard is anticipated with the proposed improvements (Figure 7). The site ranges from approximately 12 to 19 ft in elevation, with the existing and proposed buildings at or above 15 feet in elevation (North America Vertical Datum, 1988 [NAVD88]). Staging Area A is located at a slightly lower elevation than the main HTA facility, averaging roughly 12 ft in elevation; however, given the proposed temporary use of this area (for staging and bus parking), there are no risks associated with this project. Additionally, the existing and proposed buildings are not located in a tsunami hazard zone (Figure 8).

Figure 7. FEMA Flood Map and Coastal Flood Risk (133 V Street)

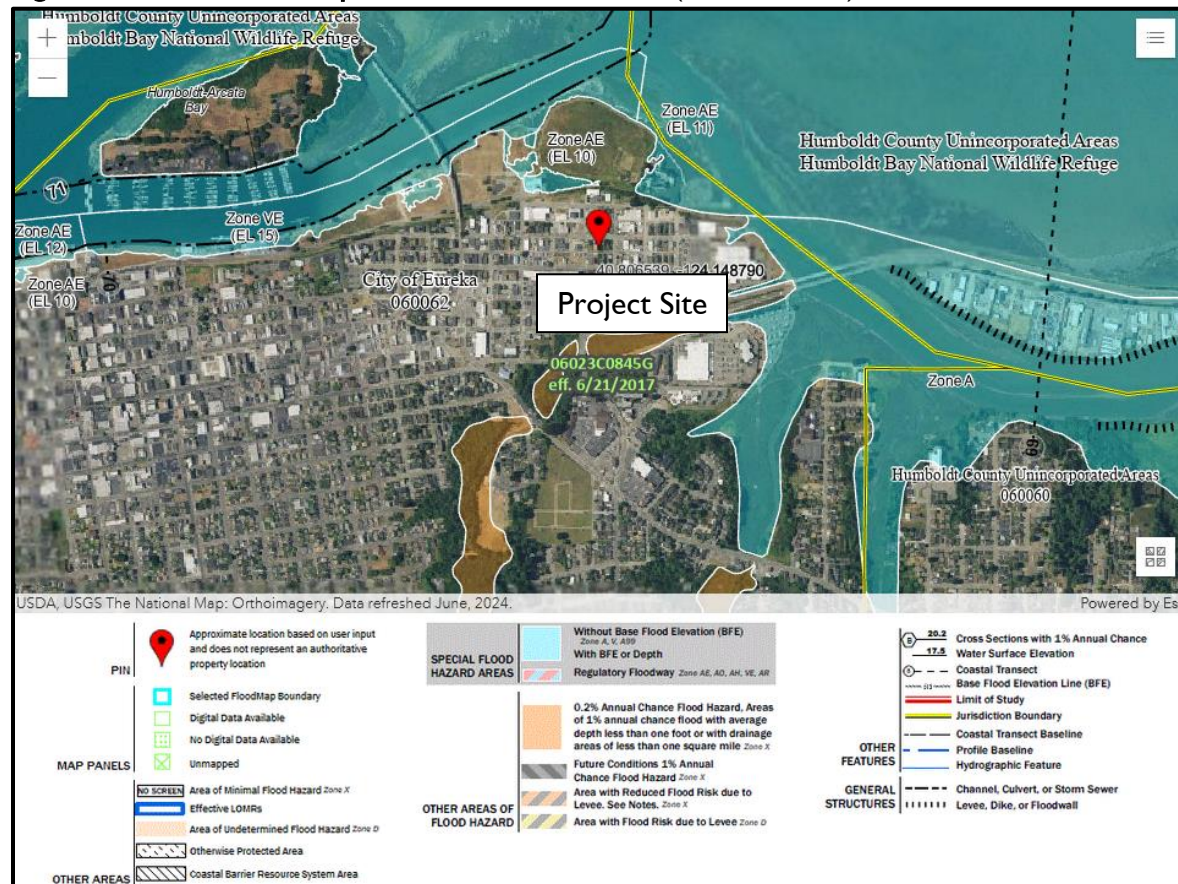
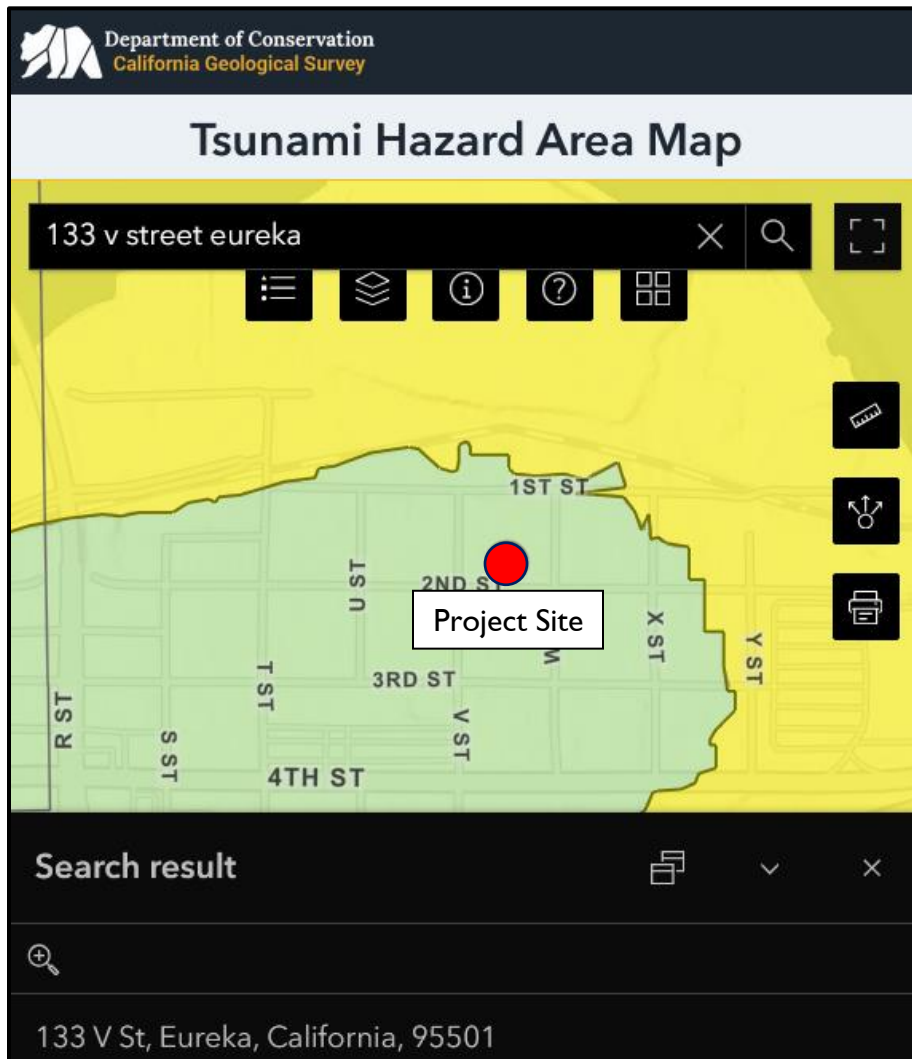


Figure 8. Tsunami Hazard Area Map (Inundation in yellow)



The project's structures are safe from flooding given current flood levels, but the extent of the flood hazard area is expected to increase in the future with sea level rise (SLR), with projections ranging from 1.8 to 7.3 ft of SLR by 2100 based on the 2024 Ocean Protection Council's State of California Sea-Level Rise Guidance. The current 100-year still-water level at the North Spit tide gate is 10.2 ft in elevation. With projected SLR, this 100-year water level could increase to 12 to 17.5 ft in elevation by 2100. Although worst-case SLR could result in flooding impacts in the future, the Project consists of development within an existing space and is not exacerbating any potential hazards with flooding.

Further, the effective lifespans of the buildings and technologies included with this Project are likely to change significantly over the coming decades, giving opportunity to periodically address the siting and other considerations for facility infrastructure. Furthermore, HTA has enlisted a consultant to develop a SLR adaption plan for their facility. Therefore, the project as conditioned, will minimize risk to life and property from seismic, geologic, and flooding hazards, consistent with the goals and policies outlined in this section.

7. Scenic and Visual Qualities

The Project is located within a developed portion of the City that is primarily surrounded by residential and commercial uses. The proposed fueling station improvements are modest in scale and consistent with the size and massing of the existing HTA facilities. The fueling canopy and related infrastructure are comparable in height and footprint to a typical gas station, a form already common and familiar in commercial areas, and therefore will not appear visually intrusive or out of place. As such, the project will not introduce new elements out of proportion with the surrounding neighborhood or exacerbate potential viewshed concerns. Because the project is located approximately three blocks inland from the Highway 101 corridor (eligible as a designated Scenic Highway), and a similar distance from the Eureka waterfront, it will not interfere with public views of the shoreline or other scenic coastal resources.

The new office addition and any other new structures will undergo Design Review prior to building permit issuance. Additionally, to protect the scenic and visitor-serving qualities of the Waterfront Trailhead located at the northeast corner of 1st and X Streets, project conditions have been added requiring that construction traffic utilize designated arterial routes and that all staging activities be confined to approved locations.

Finally, to reduce potential visual effects related to nighttime operations, project lighting is conditioned to be shielded and directed downward, avoiding glare or light spillover onto nearby residences and the nearby ESHA. With these measures, the project will avoid long-term degradation of visual resources, maintain the character of the surrounding area, and remain consistent with Coastal Act Policy 5.B.1 regarding protection of scenic and visual qualities in coastal areas.

IP Development Standards

The Project is consistent with the CS zoning designation in the IP. The CS zone accommodates a mix of commercial, light industrial, public, and service-oriented uses, including public utilities, transportation services, and facilities that require large sites for vehicle fleets. The HTA facility has long served as a regional public transit hub and maintenance yard, aligning with the CS zone's purpose to support community-serving infrastructure.

The Project includes upgrades to expand an existing public transit use that is both permitted and conditionally allowed in the CS zone. No rezoning or use permit is required and the proposed project meets CS zone development standards by maintaining all improvements within the existing facility footprint, staying within height limits, and keeping lot coverage within allowable thresholds. Existing circulation patterns will remain intact, and off-street parking for staff and transit vehicles will continue to meet zoning requirements.

The Project, as conditioned, avoids adverse effects on ESHAs, public views, and coastal access, and BMP's are incorporated for stormwater control, noise reduction, and construction management. The Project is also conditioned to ensure fire safety and hazardous materials handling will comply with California Building Code, Fire Code, Cal/OSHA standards, and other applicable regulations for developments in the Coastal Zone that involve potentially hazardous materials.

The Project is consistent with the CS zone's intent and standards, supporting transportation infrastructure while meeting requirements for environmental protection, and public safety. The

new office addition and any other new structures will undergo Design Review prior to building permit issuance, and a property Merger will be completed so that all HTA operations are located on one legal parcel, consistent with EMC §10-5.202. The Applicant is aware of the Merger requirement, review process, related development standards, and additional permits, which are included as conditions of project approval.

Based on the discussion above, the finding can be made that the Project, as conditioned, conforms with the certified LCP.

ENVIRONMENTAL ASSESSMENT

The City of Eureka, as Lead Agency, has determined the Project requires an Initial Study (IS) pursuant to the California Environmental Quality Act (CEQA). An IS and Mitigated Negative Declaration (MND) was prepared and posted for review and comment in accordance with the provisions of CEQA. The draft IS/MND concludes that with mitigation, no substantial adverse environmental impact will result from the Project (Attachment 2). Included in the IS/MND are the following mitigation measures, with adherence to those mitigation measures included as a condition of approval of the CDP:

1. Mitigation Measure AQ-1: Measures to Reduce Air Pollution
2. Mitigation Measure AQ-2: Measures to Reduce Diesel Emissions During Construction
3. Mitigation Measure BIO-1: Migratory Bird Surveys
4. Mitigation Measure BIO-2: Wetland Protection and Erosion Control Measures
5. Mitigation Measure BIO-3: Construction-Phase Erosion and Sediment Control Plan and Post-Construction Stormwater Control Plan
6. Mitigation Measure CUL-1: Inadvertent Discovery of Cultural Resources
7. Mitigation Measure CUL-2: Inadvertent Discovery of Human Remains

The City submitted the draft IS/MND to the State Clearinghouse (SCH No. 2025080239) for a public comment period from August 6 to September 5, 2025. In addition, a notice of the public comment period on the draft IS/MND and Notice of Intent (NOI) to Adopt the MND was posted at the Humboldt County Clerk's office on July 31, 2025, and mailed to property owners within 300 feet of the Project site. The notice and IS/MND were also posted on the City's website and a hardcopy of the IS/MND was made available for public review at Eureka City Hall.

Due to a processing error, the local review period for this IS/MND began before the State review period. As a result, the State Review period will extend beyond the date the Notice of Public Hearing is posted and mailed for this CDP. To ensure the Planning Commission has the benefit of the full State review record, City staff will prepare and provide a supplemental report to the Planning Commission after the close of the State review period on September 5, 2025, and prior to the public hearing. The supplemental report will include any comments received on the IS/MND after the publication of this staff report on the City's website (i.e. the Planning Public Notices webpage) and through the end of the State review period (ending on September 5th).

Pursuant to CEQA Guidelines §15074(b), the decision-making body of the lead agency must consider a proposed MND together with any comments received during the public review process prior to approving a project. The City received comments in response to the proposed MND from the Coastal Commission on August 21, 2025. The submitted comments and the

response to comments are contained in Attachment 4, along with an Errata containing minor corrections and clarifications to the IS/MND. CEQA requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with the project, and Staff recommends the Planning Commission adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program, and Response to Comments and Errata, included in Attachments 3 and 4.

The decision-making body can adopt the proposed MND only if it finds on the basis of the whole record before it (including the IS and any comments received), that there is no substantial evidence the Project will have a significant effect on the environment and the MND reflects the lead agency's independent judgment and analysis.

Pursuant to CEQA Guidelines §15074(d), when adopting an MND, the lead agency must also adopt a program for reporting on or monitoring the changes which are either required in the project or made a condition of approval to mitigate or avoid significant environmental effects. To meet this requirement, a Mitigation, Monitoring, and Reporting Program has been prepared and is included as Attachment 3 to this report.

CONCLUSION

Based on the analysis above, as well as the IS/MND, the Project, as conditioned, is consistent with the policies of the certified LCP, and the proposed improvements will not adversely affect coastal resources, public access, or community safety. Instead, the Project advances environmental protection and public health by reducing reliance on fossil fuels and supporting compliance with clean transit and greenhouse gas reduction standards.

PUBLIC HEARING NOTICE

Public notification for this CDP consisted of notification by mail to property owners and residents within a 300-foot radius of the Project site on or before August 29, 2025. In addition, the notice was posted on the City's website and bulletin boards. Additionally, two public hearing notice signs were posted on the site, one in front of the building at 133 V Street and one in front of the wood-frame office building at 104 W Street, on or before August 29, 2025.

DOCUMENTS ATTACHED

Attachment 1: Resolution

Attachment 2: Initial Study/Mitigated Negative Declaration and Applicant's Submitted Materials

Attachment 3: Mitigation, Monitoring, and Reporting Program

Attachment 4: Response to Comment and Errata

Attachment 5: Engineering Department Referral Comments