INITIAL STUDY

opendoor
Community Health Centers

Arcata Community Health Center at Sunset and Foster Avenues

August 2019

Lead Agency:
City of Arcata
Community Development Department
736 F Street
Arcata, CA 95521

Prepared by:
PLANWEST PARTNERS, INC.

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1.0 Project Information

PROJECT TITLE: **Arcata Community Health Center**

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PROJECT LOCATION: Sunset and Foster Avenues, Arcata, Humboldt County CA

ASSESSOR'S PARCEL NUMBER: APN 505-121-031

GENERAL PLAN DESIGNATION: Public Facility (PF)

ZONING DESIGNATION: Public Facility: Planned Development: Special Consideration Combing Zone (PF: PD: SCP)

PROJECT DESCRIPTION:

Project Overview
Open Door Community Health Centers (ODCHC) is proposing to construct a new consolidated health center (the "Arcata Community Health Center") west of the intersection of Foster and Sunset Avenues in Arcata (Figure 1). The approximately 1.8 acres property, Assessor's Parcel Number 505-121-031 (formerly APN 505-121-019), is currently vacant. The City of Arcata General Plan land use designation is PF: PD, or Public Facility with a Planned Development Overlay.

ODCHC is a 501(c) (3) not-for-profit corporation incorporated in 1971 that provides a robust scope of medical and dental health services to the Humboldt and Del Norte County communities at twelve physical locations including- new health centers in Eureka and Fortuna, and at three mobile dental and medical vans.

The Arcata Community Health Center will replace and consolidate two existing medical health center sites in Arcata that both would require significant modernization to be brought up to current standards: the Humboldt Open Door Clinic (HODC) located at 770 10th Street and the North Country Clinic (NCC), located at 785 18th Street. HODC was ODCHC's first health center; neither building was originally designed to function as a medical health center and both have aging infrastructure. The proposed facility will allow Open Door to provide services in a modern and efficient building, designed specifically

for providing medical health services, and will also create the opportunity for re-use of two centrally-located lots in the heart of Arcata.

Primary Project Objectives

- Increase efficiency by merging two health center facilities (Humboldt Open Door Clinic and North Country Clinic) into a single, easily accessible location
- Improve health center environment for clients and staff
- Build a state-of-the-art facility that will serve as a "medical home"
- Set the stage for Open Door to continue to serve the local community

Project Details

After considering other local options, ODCHC purchased the vacant 1.8-acre lot located at the intersection of Foster and Sunset Avenues in Arcata, California in 2014 with the intention of constructing a community health center. The proposed facility will be two stories of occupied space (approximately 31,000 square feet) with an unoccupied basement/utility level (approximately 3,000 square feet) where the buildings mechanical equipment/systems will be located; see Table 1 below for building and site coverage details. Main vehicular access for staff and clients will be from one driveway on Foster Avenue with an exit only driveway at the end of the proposed drop-off drive lane to re-enter Foster Avenue. Garbage, shipping and receiving, and limited staff parking will have access at the back of the building from a driveway on Sunset Avenue (Figure 2). The site is expected to consist of the following:

Table 1. Site Coverage and Building Area

SITE COVERAGE	**Approximate Area square feet (sf)**
Building (site coverage area)	21,000
Landscaped/ Permeable Areas	23,100
Parking/ Paved Areas	34,300
Site Coverage Total	**78,400**
BUILDING COMPONENTS	
First floor Medical, including Waiting Area, Entry, and Circulation	21,000
Second Floor Behavioral health, Site Administration, Staff Areas, and Circulation	10,000
Subtotal of Occupied Area	***31,000***
Utility Basement (Unconditioned/ unoccupied space)	3,000
Building Total	**34,000**

Proposed Facilities and Operations

The facility is designed specifically for providing medical health services. The First Level will include: main entrance, patient care, waiting areas, laboratory, and medication dispensing. The Second Level will include: behavioral health, conference rooms, administrative and staff areas. The facility will include 34 medical examination rooms, 4 medical consultation rooms, 5 behavioral health offices, a patient support group/education room, 3 conference rooms, a laboratory, medication dispensing area, and

administrative management and support offices. Once completed, the new health center at Foster and Sunset Avenues will provide primary medical services and behavioral health counseling.

It is projected that the Arcata Community Health Center will serve approximately 14,000 annual patients, with up to 150 patient visits each day. This is a slight increase in the numbers of patients and visits the two clinics combined currently serve (see Table 2 below). The new heath center is proposed to be open six days per week, Monday through Saturday, and will be closed on Sundays. Hours of operation will be Monday through Friday, 8:00AM to 5:00PM, and Saturdays from 9:00AM to 1:00PM. Staffing will consist of approximately 65 to 70 employees per shift.

Table 2. Existing vs. Proposed Facilities & Services

	Current			**Proposed**
	Humboldt Open Door Clinic	**North Country Clinic**	**Current Combined**	**Consolidated Arcata Community Health Center**
Square Feet	12,200	9,600	21,800	**34,000**
Exam Rooms	15	18	33	**34**
Patients	6,323	7,073	13,396	**14,000**
Visits	21,901	21,405	43,306	**44,000**
FTE Employees	46	45	91	**74**

The first floor of the building will support four medical care teams, each team to include three full time equivalent medical providers, one registered nurse, four to five medical assistants and one behavior health provider. Each team will have co-located office space adjacent to a designated patient services area. The patient service area will include medical examination rooms (including one oversized room), intake and vitals station, reception area, consultation room and restroom. Also located on the first floor of the new facility will be reception and waiting areas with bathrooms, triage nurse office, office management, sterilization and sanitation, laboratory, and medication dispensing. The second floor will support a behavioral health suite with four counseling offices and a support/education group room. Other spaces on the second floor include large and small conference rooms, center administration offices, and office space for referral personnel, call center personnel and other support staff. A kitchen will also allow catering for the conference rooms. Conference room access will allow secure afterhours use. A staff break room, lactation room, and exercise space including showers and changing facilities. The basement will house the building utility and mechanical systems.

Other Project Elements

The building will have energy efficient design elements including near net-zero energy design with lighting above Title 24 standards, occupancy sensors, and likely a solar array. There is also potential for no natural gas use. An emergency generator will allow all health center functions to be powered for extended periods in the event of power grid outages. The generator will be located in the northwest corner of the project site, at least partially enclosed.

The project includes on-site bike parking and an electric vehicle charging station. Proposed signage includes a monument style entrance sign and signage denoting parking, drop-off, deliveries, etc. (see attached Sign Plan). The project also includes sidewalks, curb, and gutter along both Foster and Sunset

Avenues connecting to existing sidewalks. A pedestrian pathway is proposed along the western project site boundary to provide a connection from the Sunset neighborhood to the sidewalk and trail along Foster Avenue. Designs for improvements to an off-site west bound bus stop at the Skate Park will be included in the project, but Open Door expects to cost share with the City for construction. The project will contribute funding into a City-held account towards future intersection improvements at Foster/Alliance and Sunset/ LK Wood as identified in the *Central Arcata Areawide Traffic Impact Study* (W-Trans, 2017).

Landscape and Stormwater Design Summary

The site landscape plan includes trees, shrubs and other vegetation to enhance project features such as bioretention areas and to provide onsite green screens and natural areas. The landscape plan incorporates low maintenance and native species that were selected based on specific site conditions and desired function (i.e. wet/dry conditions, visual buffers, etc.). The site entry and parking lot landscape areas soften views into the parking lot from the adjacent neighborhood and perimeter streets. The south facing plaza at the main building entrance is a pedestrian focused area that will include gathering/resting space and plants selected for seasonal interest. The north side of the building has shady, moist conditions and plants were selected for low maintenance and for softening building views from the neighborhood. Green screens are proposed on the east-facing and north-facing walls. Vines were selected that are fast growing and are a mix of evergreen and deciduous for seasonal interest and textural contrast. Bioretention cells are integrated into perimeter and parking lot planting features. Based on the Preliminary Drainage Report, the proposed site plan provides adequate stormwater features to satisfy the requirements of a hydromodification project in accordance with the Humboldt LID Stormwater Manual v2.0.

Wetland Impacts and Mitigation Summary

The proposed project will impact 100 percent of the project site and would directly fill the approximately 0.0267 acres (1,163 square feet) of a potential 3-parameter wetlands. This total acreage occurs over two areas in the western portion of the site, separated by approximately 25 feet. The northern feature is approximately 0.0143 acres in size, and the southern feature is 0.0124 acres (Figure 5). There is not sufficient area on-site to mitigate for the wetland loss caused by the project. Open Door will implement mitigation at either the adjacent Shay Park and/or the Arcata High Pond to provide off-site replacement wetlands or invasive species removal/ enhancement of existing wetlands. If wetland mitigation program will: (1) have a created-to-fill ratio of 2:1 for the permanently impacted wetlands; (2) include a planting plan that compliments the existing native plant species adjacent to the mitigation site; and (3) include monitoring and maintenance for at least 5 years, including the replanting of any dead or dying plants within the created wetlands. The mitigation would exchange isolated, low quality habitat with connected, moderate quality habitat. Mitigation will be coordinated with the applicable property owner(s), the City, and permitting agencies (U.S. Army Corps of Engineers and Regional Water Quality Control Board). Additional analysis and mitigation are discussed in the Biological Resources section of this document.

Special Studies

Several special studies have been conducted in the project area and for the proposed project including archaeological, historic, traffic, biological, geotechnical, and hydrological. Analyses was also completed for other projects in the immediate vicinity and for a previous proposed use on this site. This Initial Study utilizes data and recommendations from the project specific studies in addition to previous studies and environmental documents as applicable.

Construction Best Management Practices

The following actions and practices are included as part of the project to reduce or avoid adverse effects that could result from construction or operation of the improvements. Additional resource specific mitigation measures are presented in the analysis sections (Section 3.0).

Erosion Control – Erosion control measures will be implemented during construction to address how the contractor will manage erosion and sediment control actions, general site and materials management, and inspection and maintenance. Below are examples of actions to prevent soil erosion and sedimentation during construction and protect water quality.

1. Erosion and sediment control actions will be in effect and maintained by the contractor on a year-round basis until all disturbed areas are stabilized.
2. Fiber rolls or similar products will be utilized to reduce sediment runoff from disturbed soils.
3. A stabilized construction entrance will be maintained to minimize tracking of mud and dirt from construction vehicles onto public roads.
4. Storm drain inlets receiving stormwater runoff will be equipped with inlet protection.
5. A concrete washout area will be designated to clean concrete trucks and tools, if necessary.

Stormwater Pollution Prevention Plan (SWPPP) – The proposed project would result in over one acre of disturbance and would be subject to the provisions of the SWRCB Construction General Permit (CGP); which requires the preparation and implementation of a SWPPP designed to reduce potential adverse impacts on surface water quality through the project construction period. The SWPPP will address pollutant sources, non-stormwater discharges resulting from construction, best management practices (BMPs), and other Water Board requirements. The BMPs will include any measures included in the Project's erosion control plans. The SWPPP will also include dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A qualified SWPPP practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.

Surrounding Land Use and Setting

The surrounding land uses are predominantly residential (zoned RL, RM, RH) and educational (zoned PF). The site is located within 500 feet of the Arcata High School lower fields, 1,000 feet of Arcata Elementary School, and one mile of Humboldt State University. The parcel is directly north of the Arcata High School lower sports fields and a railroad alignment (no longer in operation), south of Sunset Avenue and the Sunset residential neighborhood, west of the Arcata Skate Park and the Sunset Avenue/ Highway 101 on- and off-ramps, and east of a residential medium density designated parcel that is currently being development with 142 one-bedroom apartment type units (Sunset Terrace). The project site is near Shay Park, which includes multi-use trails that connect to the larger City of Arcata trail system. Jolly Giant Creek daylights on the Arcata High School property southwest of the project site and continues to flow towards Humboldt Bay through Shay Park.

The project is one of six development projects either in planning or implementation stages within a three-quarter mile radius of one another. All of the other projects are single- or multi-family residential developments that will result in the creation of up to 685 new housing units.

Anticipated Permits and Approvals

The site is designated in the City of Arcata General Plan 2020 as Public Facility (PF) and is zoned Public Facility, Planned Development with a Special Considerations overlay (PF:PD:SC). This special

consideration overlay allows for various types of public facility uses and associated incidental uses. A Community Health Clinic is conditionally permitted in the PF zone and will require a Minor Use Permit and a "Type B" Planned Development Permit with design review. In addition, permits/approvals from the following agencies may be required:

- North Coast Regional Water Quality Control Board (NCRWQCB)
- California Department of Fish and Wildlife (CDFW)
- U.S. Army Corps of Engineers (USACE)

Figure 1. Project Location

Figure 2. Site Plan

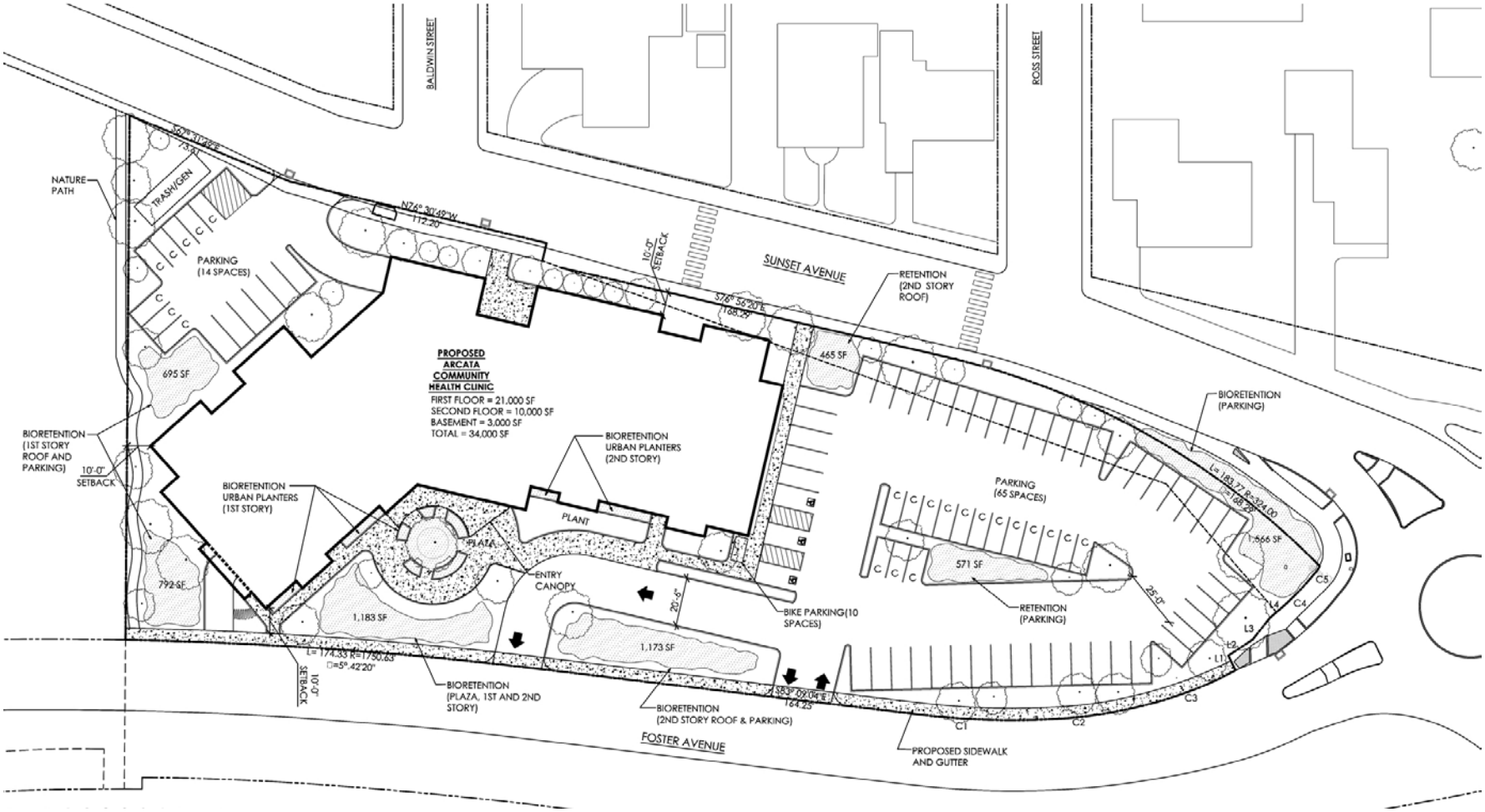


Figure 3 Floorplan

Figure 4 Preliminary Building Elevations

2.0 Statement of Findings and Determination

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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	☐ Greenhouse Gas Emissions	☐ Population/Housing
☐ Agricultural & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Public Services
☐ Air Quality	☐ Hydrology/Water Quality	☐ Recreation
☒ Biological Resources	☐ Land Use/Planning	☒ Transportation
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology/Soils	☐ 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 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

_____ _____

Printed Name For

3.0 Environmental Impacts Evaluation and Checklist

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 (e.g., 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 (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, 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 "Earlier Analyses," as described in (5) below, 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 Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed 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 were incorporated or refined from the earlier document and the extent to 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 (e.g., general plans, 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 citied 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 analysis of each issue should identify:

   a) the significance criteria or threshold used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

AESTHETICS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Except as provided in Public Resources Code Section 21099**,** would the project:				
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) 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 a 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 project site is located south of Sunset Avenue on the southern edge of the Sunset neighborhood, which is the "meeting point" in zoning between a variety of publicly zoned uses and medium to low density residential areas. The view to the north is of the single family residential properties on Sunset Avenue. The residential medium density designated parcel adjacent to and west of the site is currently under construction and is being developed with 142 one-bedroom apartments. The undeveloped project site currently affords views of the high school lower fields and forested hillside to the south and Shay Park in the distance to the south west. The proposed project would develop a currently undeveloped site with urban uses including buildings for medical offices and paved parking areas. The project is subject to City of Arcata Design Review through the Planning Commission as part of the Planned Developed (PD) permit process, which will include review and consideration of building elevations, materials, and the project's lighting plan.

Discussion

a,b) There are no designated scenic vistas at or near the site and the site is not considered a unique scenic vista or scenic resource. The project site is not located adjacent to a state-designated scenic highway. Therefore, the proposed project would have **no impact** on scenic vistas or scenic resources within a state scenic highway.

c) This project will change the visual streetscape of the intersection of Sunset and Foster and will be in the immediate view of residences from Sunset Avenue. Views looking south and southwest from the project site are of the high school sports field in the foreground and a forested hillside in the background, and views looking north and east are of urban uses including city streets and residences. Views of the site from Sunset Avenue and the residences along the north side of Sunset Avenue would change from the view of the undeveloped partially vegetated parcel with the forested hillside in the background, to a view of buildings with the forested hillside in the background.

However, the land is in an urbanized environment, is zoned for development, and will be subject to design review. The project has been designed in compliance with City development and design standards put in place to guide new development in a manner compatible with the surrounding community such as facade materials, massing, height restrictions, landscaping, and screening. The City has not identified the open space view as a scenic vista or protected visual resource and has designated the site for public facility use. As the parcel is surrounded by urban uses and the site is zoned to allow for public facility use and will be guided by City design standards, the development of a community health center does not conflict with City zoning or other applicable plans governing scenic quality. A **less than significant impact** would occur.

d) The project site is adjacent to city streets, residential development, and park space, all of which generate light and glare associated with nighttime driving, streetlights and residential lights. The adjacent high school sports field is lit periodically during nighttime events. The project site itself is currently vacant and does not contain sources of light or glare. The proposed project would introduce new light sources associated with outdoor building and parking lot lighting. The project lighting design intentionally concentrates light onsite, and lights would generally be timed to turn off after hours. A few key lights would remain on all hours for safety and security purposes.

To minimize potential impacts, the City has General Plan and Land Use Code policies to control light impacts on- and off-site. The proposed outdoor lighting would be designed and planned to conform to all applicable City performance standards for light and glare including shielding and focusing all nighttime lighting downward and away from the residential structures. All lighting will be subject to light shielding and brightness requirements as outlined in Arcata's Municipal Code (9.030.070-Standards for Outdoor Lighting). Compliance with these performance standards, light and glare under the proposed project would be similar to what is currently generated along Sunset Avenue and the surrounding residences. As the project will adhere to relevant lighting requirements including lighting features that will be down-shielded, energy efficient, and "night sky" compliant, the project's impact would be **less than significant**.

Conclusion

No potentially significant aesthetic impacts were identified; therefore no further analysis or mitigation is required.

AGRICULTURE AND FOREST RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of 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 forestland to non-forest use?				X

Setting

The project site is in central Arcata on land zoned for Public Facility development and not used for agricultural purposes. It is surrounded by urban uses not adjacent to lands that are currently in agricultural production. The project site was historically used as a mill site and remains unsuitable for agriculture. The site is surrounded by residential uses to the north and west, and public facility uses to the south and east.

Discussion

a, b) The project site is in a relatively urban context in central Arcata and is surrounded by residential and public uses. The site neither contains nor is adjacent to designated Prime Farmland, Unique Farmland, or Farmland of Statewide importance and is not zoned for agricultural uses or under a Williamson Act contract. Hence, the proposed project would not convert farmland to non-agricultural uses or conflict with existing zoning for agricultural use. Therefore, **no impact** would occur.

c, d) The project site is zoned public facility and is not adjacent to lands containing or zoned forest or timberland. Therefore, the proposed project would not result in the loss or conversion of forest land to non-forest use. **No impact** would occur.

e) The site and surrounding area are not zoned or used for agricultural purposes and does not contain forest land or timberland. The proposed project would develop a site zoned for public facilities to a community health center use and would not result in any other changes to the existing environment which would result in the conversion of agricultural lands or timber lands to non-agricultural or non-timber uses. Therefore, **no impact** would occur.

Conclusion
No significant agriculture or forest resource impacts were identified; therefore no further analysis or mitigation is required.

AIR QUALITY	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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 project site is located within the North Coast Air Basin (NCAB) which is in the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD) that includes Humboldt, Trinity, and Del Norte counties. The NCUAQMD's primary responsibility is the control of air pollution from stationary sources. The California Air Regulatory Board (CARB) regulates construction equipment emissions. Humboldt County generally has good air quality and is in attainment for all federal air quality standards and all state standards except for particulate matter less than 10 microns in size (PM_{10}). To address this, the NCUAQMD adopted a Particulate Matter Attainment Plan in 1995. This plan presents available information about the nature and causes of PM_{10} standard exceedance and identifies cost-effective control measures to reduce PM_{10} emissions to levels necessary to meet California Ambient Air Quality Standards.

In addition to the NCUAQMD PM_{10} Attainment Plan discussed above, the *City of Arcata General Plan: 2020 Design Element* includes the following policies to reduce PM_{10} and other emissions associated with development, including:

- AQ-2a: Implement land use measures to reduce vehicle trips, miles traveled, and air pollutant emissions.
- AQ-2b: Implement transportation measures to reduce vehicle trips, miles traveled and air pollutant emissions.
- AQ-2f: Enforce air quality control measures and monitoring at construction sites.

Sensitive receptors in the project area include patients of the health center itself, students at the near-by elementary and high schools, and nearby residents. Particulate matter (both PM_{10} and $PM_{2.5}$) can be inhaled and cause adverse health effects. Particulate matter in the atmosphere results from many kinds of dust- and fume-producing industrial, agricultural and logging operations, combustion, driving on unpaved roads, and atmospheric photochemical reactions. In urban areas vehicle and equipment use, demolition activities, and construction activities are the major sources of particulate matter.

Project related air quality emissions include (1) short-term construction activities related to grading and other earth moving activities, operation of construction equipment, and travel to and from the project site by workers and equipment; and (2) long-term operational emissions, primarily related to motor vehicle traffic trips to and from the project site.

Discussion

a) The California Clean Air Act (CCAA) requires the NCUAQMD to achieve and maintain state ambient air quality standards for PM_{10} by the earliest practicable date. The NCUAQMD Particulate Matter Attainment Plan (1995) includes a description of the planning area, emissions inventory, general attainment goals, and a list of cost-effective control strategies. The PM_{10} Attainment Plan establishes goals to reduce PM_{10} emissions and includes three areas of recommended control strategies to meet these goals. Control strategies include transportation control measures such as encouraging car-pooling and bicycle commuting, removal or repair of vehicles with inefficient emission control systems, and traffic flow improvements that reduce idling and vehicle miles traveled (VMT). Land use control measures encourage mixed use or more dense development. The PM_{10} Attainment Plan also includes measures that limit residential burning as well as various measures to encourage the installation of EPA-certified woodstoves. The project does not include wood burning stoves and incorporates transportation and land use control measures, such as:

- The proposed project will be developed on a centrally located infill site near main transportation corridors including U.S. Highway 101.
- The project will install a bus stop near the project site and encourage transit use.
- The project includes on-site bike parking and an electric vehicle charging station.
- The project will provide employees with incentives for ridesharing and transit use, such as preferred parking for those who carpool or drive fuel efficient or low-emitting vehicles.

The project would generate particulate emissions over the duration of construction and operation in the form of dust and vehicle emissions as a result of earthwork, paving, and other construction activities. To reduce potential impacts to air quality, standard construction BMPs, including several measures that would substantially reduce dust and other air pollutants during the construction

period have been incorporated into the project as specified in the project description. Construction activities and equipment (i.e. ready mix truck, excavator, grader, etc.) would also be required to comply with all rules and regulations of the NCUAQMD and the Air Resources Board.

The proposed project involves infill development located near main transportation corridors, incorporates appropriate control measures, and would not conflict with or obstruct implementation of the NCUAQMD PM_{10} Attainment Plan. Therefore, the impact would be **less than significant.**

b) As mentioned previously, the NCUAQMD is in non-attainment for California's 24-hour PM_{10} standard, but it does not violate other federal, state or local air quality standards. In the NCAB, most particulate matter is caused by vehicle emissions, wind generated dust, construction dust, wildfire and human caused wood smoke, and sea salts. Though it has developed a draft particulate matter attainment plan, the NCUAQMD has not established screening criteria for air quality analysis or specific thresholds of significance for criteria pollutants. As such, the Bay Area Air Quality Management District's (BAAQMD) screening criteria was used as a basis for determining whether a quantitative analysis should be conducted for the proposed project.

The BAAQMD CEQA Air Quality Guidelines (2017) has developed screening criteria for the sizes of land use projects that could result in significant air pollutant emissions. Projects that fall below the screening level size and meet all screening criteria are considered to result in a less than significant impact from criteria air pollutant and precursor emissions (BAAQMD, 2017). The BAAQMD thresholds apply to both construction and operational impacts. For medical office building construction impacts the screening size is 277,000 square feet and the operational screening size is 117,000 square feet. Projects smaller than these sizes would be expected to have less than significant impacts with respect to construction and operational emissions and a quantitative analysis (i.e., air emissions modeling) is not recommended. Since the proposed project is well below these thresholds (34,000 square feet), it is concluded that construction and operational air emissions would be less than significant as further described below.

Site grading and other construction activities would cause the release of a small amount of particulate matter emissions (i.e., dust, vehicle exhaust). As such, construction activities would have the potential to increase the emissions of an air pollutant for which the project region is in nonattainment. However, because of the relatively small footprint, limited duration of construction activities, and with the BMP's incorporated into the project, the project would not cause a violation of air quality standards or contribute substantially to existing or projected air quality violations. In addition, the City of Arcata's standard permit conditions regulate construction practices to avoid and minimize adverse effects on air quality. The proposed project will carry out the City's standards and best management practices during the construction phase, and thereby minimize the project's short-term PM_{10} impacts.

The proposed project would develop a vacant infill site with a community health center that when constructed would generate operational emissions primarily associated with daily motor vehicle trips. The project site is zoned for public facility type use and the proposed project meets all development standards. Because the development is consistent with planned uses and densities, the proposed project would not contribute to non-attainment for PM_{10} beyond levels considered in approved land use plans. The proposed project will not 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. As such a **less than significant** impact would occur.

c,d) The project site is located in the vicinity of several existing uses with sensitive receptors, including less than 1,000 feet from Arcata Elementary School and Arcata High School and adjacent residential uses. As discussed above, the project would result in minor and short-term construction related air emissions. Incorporation of BMP's would keep diesel PM exhaust emissions at lower levels. As these emissions are temporary in nature, health risks from project construction are not anticipated.

The project design hopes to achieve near net zero emissions during operation and there is no indication that the project's construction or operation would result in substantial air pollutant concentrations, and thus would not significantly impact these sensitive receptors. In addition, as the project is a community health center, sensitive receptors could be the patients at the site, and all necessary precautions will be taken to ensure clients and others in the surrounding area will not be exposed to any pollutants that could negatively impact their health. Because construction activities would be of limited duration, the project site is zoned for public facility development, and project operational emissions would be minimal, the proposed project would not expose sensitive receptors to significant pollutant concentrations. Therefore, this impact is considered **less than significant impact**.

Conclusion

No potentially significant air quality impacts were identified; therefore no further analysis or mitigation is required.

BIOLOGICAL RESOURCES	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
a) Have a substantial adverse 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 Depart. 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 or regional plans, policies, and regulations or by the California Depart. of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	

BIOLOGICAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
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	

Physical Setting

The subject parcel is located on a former mill site primarily surrounded by urban uses. The area directly north and west of the site are densely developed, mostly with single or multiple family residences. To the south lies Foster Avenue, sports fields associated with Arcata High School, and Shay Park. A 2009 Geologic Report prepared by SHN found that the project area was historically leveled via the placement of a significant amount of fill, and the site was heavily used as a log deck and loading area supporting a lumber mill along the old rail line along the southern boundary. The historic landform, prior to filling, was found to be a south-facing low gradient slope above the Jolly Giant Creek drainage. Fill consisting of sand, clays, gravels, and river cobble was placed over most of the site. The fill depth varies from 2 feet at the northern border to over 10 feet at the southern border, with a high concentration of gravels and river cobbles in the upper 2 to 4 feet.

Plant life consists primarily of ruderal species known to first colonize previously disturbed lands and includes upland grasses and shrubs. The majority of the project site is vegetated by non-native weedy grasses and forbs. The north, south and east perimeters of the site, where soils are apparently less compacted, are vegetated by ruderal scrub vegetation. The western portion of the site slopes down to a low point at the southwest corner. This area is dominated by an overstory of Sitka willow, coastal willow and red alder. A dense thicket of elm-leaf blackberry creates an understory to these trees, but also dominates the slope transition up to the main portion of the site (NRM, 2019a).

There are no watercourses on the project site, but a seep (or spring) was identified at the toe of the slope between the project site and the adjacent parcel. This seep causes a perennial wetland. The nearest USGS blueline stream is McDaniel Slough, which lies approximately 1,000 feet to the north and west of the project area. However, Jolly Giant Creek flows underground below Foster Ave, directly along the southern border of the project area. The site drains to the ditch along side the railroad alignment and existing wetlands on the south side of Foster Avenue via storm drains and joins Jolly Giant Creek, which daylights nearby within Shay Park, and then flows south though the City of Arcata in a patchwork of above and below ground reaches before emptying into Humboldt Bay. No National Wetland Inventory Wetland or Deepwater Habitat were identified within the project area (NRM, 2019b).

Regulatory Setting

Wetlands and waters of the U.S. are protected at the federal, state, and local levels. At the state level wetlands and waters are regulated primarily by the California Department of Fish & Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB). The Army Corps of Engineers (ACOE) has jurisdiction over wetlands which meet the three-parameter wetland criteria (hydrology, soils, and vegetation). The ACOE does not regulate wetland buffers, development adjacent to wetlands, or environmentally sensitive habitat areas (ESHAs).

The City of Arcata's General Plan 2020 Resource and Conservation Element strives to protect, maintain and enhance natural ecosystem processes and functions in the region, in order to maintain their natural ecological diversity. A significant part of this goal is recognizing and protecting wetlands as highly productive complex ecosystems that provide vital habitat and cleansing systems. Therefore, the Resource and Conservation Element includes policies that apply to biological resource protection, including RC-1: Natural Biological Diversity/Ecosystem Function and RC-3: Wetlands Management. These policies include:

- RC-1a Maintain Biological and ecological integrity.
- RC-1b Non-native plant and animal species.
- RC-1c Habitat value protection.
- RC-1d Sensitive habitat definition.
- RC-3a Requirement for wetland delineation and study.
- RC-3b Filling of wetlands.
- RC-3j Minimum mitigation requirements for wetland impacts.

In addition to the policies above, the City's Land Use Code would apply to the proposed project (Municipal Code, Title 9, Article 5) including applicable policies on ESHA and Wetland Conservation and Management (§9.59.060) which protect existing wetland areas and maintains a standard of 'no net loss' in area, function, and value. Regulations dictate the preparation of a biological assessment and accompanying impact analysis for all projects that have the potential to impact wetlands, outlining each component of proposed activities and feasible mitigation measures.

Recent Studies

2019 Biological Investigation Report

The discussion and analysis in this initial study section related to wildlife and plant species is primarily based on the Biological Investigation Report prepared by Natural Resources Management Corporation (NRM) in 2019 (Appendix A). The purpose of that Report was to review the project area in sufficient detail to determine potential impacts to wildlife species currently listed or formally proposed for listing as endangered or threatened under the federal Endangered Species Act (ESA) or designated as sensitive

by the California Department of Fish and Wildlife (CDFW); these species are hereinafter referred to as special status species. The Report also reviewed: potential impacts to any plant species that are listed, candidates for listing, or proposed for listing under the ESA, CESA and the California Native Plant Protection Act and or meet the definition of rare or endangered under CEQA, hereinafter referred to as special status plants; and existing or potential impacts to sensitive natural communities. No State or Federally listed species were detected, and no habitat capable of supporting listed species was observed. No sensitive plant species were found within the survey area.

2019 Aquatic Resources Investigation Report

NRM conducted an investigation of aquatic resources and wetland delineation on the project site in early 2019 (Appendix B). The nature of this investigation was a survey of the potential presence of jurisdictional Waters of the United States on the parcel and the potential presence of two-parameter wetlands protected under City of Arcata Land Use Code. A wetland survey undertaken in early 2019 determined the project site contains 0.0267 acres of three-parameter potential ACOE jurisdictional wetlands at the western boundary of the site. This total acreage occurs over two areas, separated by approximately 25 feet. The northern feature is approximately 0.0143 acres in size, and the southern feature is 0.0124 acres (Figure 5). No two-parameter wetlands were identified.

Discussion

a) The Biological Investigation Report prepared by NRM reviewed the project site to determine potential impacts to special status wildlife and plant species (Appendix A).

Wildlife

Prior to initiating field surveys, a query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Data Base (CNDDB 2019) for wildlife species occurrences within a nine-quad topographical map area of the project area was conducted. This provides a comprehensive target species list from which to determine habitat, presence, or sign of species, as well as any known locations for special status species in the general area (Appendix A - Table 1). Preconstruction surveys to determine use of the area by State or Federally listed species, migratory birds, or any other wildlife species were conducted on Thursday, March 21, 2019.

During these surveys, no State or Federally listed species were detected, and no habitat capable of supporting listed species was observed. In addition, this highly disturbed area, immediately adjacent to a current construction site, is proximate to more optimal habitat for migratory songbirds in the Jolly Giant creek watercourse. Non-listed birds were observed moving between the riparian vegetation along Jolly Giant creek and vegetation remaining on the perimeter of the parcel. These birds were exhibiting foraging behavior and none were observed singing, a sign of a territorial or nesting male. A single tree frog was heard calling from the cut berry bramble area, approximately two feet in the parcel from Foster Avenue.

Vegetation and Sensitive Plant Species

The current inventories of the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants of California (CNPS 2019a), and the California Natural Diversity Database (CNDDB) were consulted to determine which special status plant species may occur within the project area and to compile a target species list. A nine-quad query of CNDDB and CNPS Inventory records resulted in 66 listed vascular and nonvascular plant species (Appendix A - Table 3). A site visit to assess the proposed project area for the presence of sensitive plant species and sensitive natural communities was conducted on March 18, 2019. This survey was floristic in nature and

followed the 2018 California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. The timing of the survey was such as to capture appropriate phenology (for positive identification and detection) of target species with potential to occur at the site elevation and within habitat types present. This target list includes Howell's montia, which is known to occur in highly modified habitats which retain surface moisture and low vegetative cover in the spring, but the severity of alteration at this site limits potential for other sensitive species to occur.

No sensitive plant species were found within the survey area. The compacted, gravelly and muddy areas with low vegetative cover did constitute potential habitat for Howell's montia, but not plants were detected. This site, while close to a known Howell's montia population, appears to not have had seeds carried in. The site is highly manipulated and disturbed, and as such it was determined to not constitute potential habitat for any other sensitive plant species. The ruderal herbaceous and scrub community is composed of non-native, invasive and common native species that do not comprise a sensitive community or potential habitat for most sensitive plant species. The ruderal scrub offers little habitat value to wildlife or migratory birds due to lack of consistent cover, high levels of adjacent human activity from surrounding residential areas. As described above, many of the dominant species within the vegetation community types found within the project area are ranked as invasive by Cal-IPC or are otherwise known to be invasive. As this project proposes to remove all existing vegetation for the development of a structure with maintained landscaping, the project would decrease the local populations of these species. Therefore, the project is unlikely to contribute to the propagation or spread of invasive species.

The 2019 NRM Biological Investigation Report, found no occurrences or habitat for any special status plant or animal species. Of the special status animal species, Shay Park and Jolly Giant Creek, which are within the vicinity of the proposed project (more than 500 feet west of the project site) could support foraging and roosting habitat for special status bird, salmonid species, amphibian species; however, none of these species have historically been documented on the subject parcel itself. Therefore, the project is unlikely to have a substantial adverse 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 Depart. of Fish and Wildlife or U.S. Fish and Wildlife Service. A **less than significant impact** would occur.

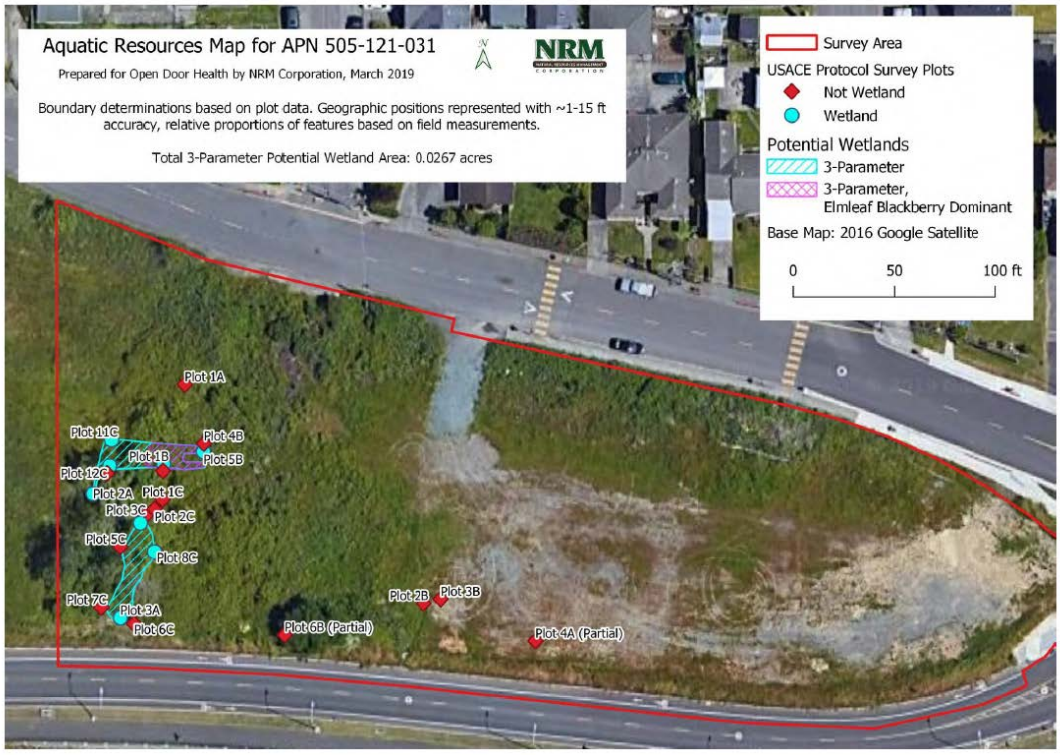
b) The majority of the study area is vegetated by a ruderal community of non-native weedy grasses and forbs, including many Cal-IPC ranked invasive species (NRM, 2019a). The western portion of the study area slopes down to a low point at the southwest corner. This area is dominated by an overstory of what comprises a small patch of North Coast Riparian Scrub including Sitka willow (*Salix sitchensis*), coastal willow (*Salix hookeriana*) and red alder (*Alnus rubra*). This patch, at approximately 0.09 acres, is too small to meet the minimum mapping units size standard (0.25 acres) specified by the Survey of California Vegetation classification and mapping Standards for mapping sensitive natural communities (CDFW 2018a) (NRM, 2019a).

The proposed project footprint will impact 100 percent of the vegetation within the project footprint. The ruderal herbaceous and scrub community is composed of non-native, invasive and common native species that do not comprise a sensitive community or potential habitat for most sensitive plant species. The ruderal scrub offers little habitat value to wildlife or migratory birds due to lack of consistent cover, high levels of adjacent human activity from surrounding residential areas. The patch of North Coast Riparian Scrub vegetation is associated with a potential wetland

feature. However, this vegetation type appears to have formed in a previously disturbed site, as the shrubs and trees are rooted in what appears to be historic fill material. While the assemblage of dominant species may comprise a small inclusion of a provisional sensitive natural community alliance (S3?), potential impacts to this vegetation type will be addressed as part of a wetland mitigation process (see c) below). Therefore, the proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Depart. of Fish and Wildlife or U.S. Fish and Wildlife Service. A **less than significant impact** would occur.

c) As mentioned above, the vegetation in the project vicinity is dominated by disturbance oriented herbaceous communities. The primary source of water on the site is overland drainage from surface runoff. There are no watercourses on the project site, but a seep (or spring) was identified at the toe of the slope near the western boundary of the site. This seep causes a perennial wetland that flows to a ditch along the railroad alignment to wetlands within Shay Park and Jolly Giant Creek. The site was surveyed for the potential presence of both 3-paramenter jurisdictional Waters of the United States on the parcel and 2-parameter wetlands protected under City of Arcata Land Use Code. A primary investigation was conducted in full accordance with the 1987 Corps of Engineers Wetland Delineation Manual and the 2010 Regional Supplement: Western Mountains, Valleys and Coast Region (Version 2.0). A survey of potential two-parameter wetlands was also conducted, including an assessment of the prevalence of wetland indicator vegetation (hydrophytic vegetation) and visual hydrological evidence (such as the presence of surface water or soil saturation).

Figure 5 Potential Wetland Areas



Source: NRM, 2019. Aquatic Resources Investigation Report: Humboldt County APN 505-121-031.

The 2019 wetland assessment discovered 0.0267 acres, or 1,163 square feet, of potential three-parameter wetland on the western portion of the site. This total acreage occurs over two areas,

separated by approximately 25 feet. The northern feature is approximately 0.0143 acres in size, and the southern feature is 0.0124 acres (Figure 5). The site does not currently contain 2-parameter wetlands that fall under the City of Arcata's local jurisdiction. NRM is in the process of developing a Wetland Mitigation and Monitoring Plan that will conform to ACOE and City of Arcata requirements.

The proposed project will impact 100 percent of the project site and would directly fill the approximately 0.0267 acres (1,163 square feet) of potential 3-parameter, ACOE jurisdictional wetland. There is not sufficient area on-site to mitigate for the wetland loss caused by the project. Open Door will implement mitigation at either the adjacent Shay Park and/or the Arcata High Pond to provide off-site replacement wetlands or invasive species removal/enhancement of existing wetlands. The program will: (1) have a created-to-fill ratio of 2:1 for the permanently impacted wetlands; (2) include a planting plan that compliments the existing native plant species adjacent to the mitigation site; and (3) include monitoring and maintenance for at least 5 years until the created wetland is fully established, including the replanting of any dead or dying plants within the mitigation area. The mitigated wetlands/habitat enhancement would exchange isolated, low quality wetlands with connected, moderate quality, perennial wetlands. Given these conditions, impact to wetlands and riparian habitat would be **less than significant with mitigation incorporated**.

Mitigation BIO-1 – Compensate for Permanent Wetland Impacts

The applicant shall develop and ensure implementation of a wetland mitigation plan that involves creating the affected wetland type or enhancing existing wetlands. The mitigation will provide off-site replacement wetlands or invasive species removal/enhancement of existing wetlands either 1) on City of Arcata property in Shay Park, or 2) adjacent to the Arcata High School pond (Arcata High School District property). The mitigation plan shall be submitted to the City of Arcata Environmental Services Department, the U.S. Army Corps of Engineers (ACOE), and the North Coast Regional Water Quality Control Board and approved by these entities prior to start of work. The program will: (1) have a created-to-fill ratio of 2:1 (or as specified in the mitigation plan prepared for the project) for the permanently impacted wetlands; (2) include a planting plan that compliments the existing native plant species adjacent to the mitigation site; and (3) include monitoring and maintenance for at least 5 years, including the replanting of any dead or dying plants within the mitigation area.

d) The project site is located within an urbanized area of the City and is not part of a known wildlife corridor. The proposed project would not fragment known habitat or interfere with known migration routes or wildlife corridors. Therefore, **no impact** would occur.

e, f) There are no known local, regional, or state habitat conservation plans that apply to this project, with the exception of the City of Arcata's Resource Conservation and Management Element. *Arcata General Plan: 2020 Resource Conservation & Management Element* Policy RC-3a requires a wetland reconnaissance or delineation report for potential wetlands impacts. A wetland delineation was prepared for the proposed project site (Appendix B). General Plan Policy RC-3b stipulates allowances and mitigations for filling a wetland. See discussion above of the project's potential wetland impacts and mitigation measures. Mitigation measure BIO-1 is consistent with applicable General Plan policies, including RC-3j (Minimum mitigation requirements for wetland impacts) and RC-3k (Wetland functional capacity maintenance requirement), and would reduce potential wetland impacts to less than significant. A project compliant with these General Plan

policies and associated Land Use Code requirements (§9.59.060) for filling wetlands is not in conflict with applicable provisions adopted to protect biological resources. As a result, the proposed project would not conflict with applicable Arcata General Plan Policies or other local, regional, or state habitat conservation plans. Therefore, a **less than significant impact** would occur.

Conclusion
Potentially significant biological resource impacts were identified; however, the impacts can be mitigated to a less than significant level.

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

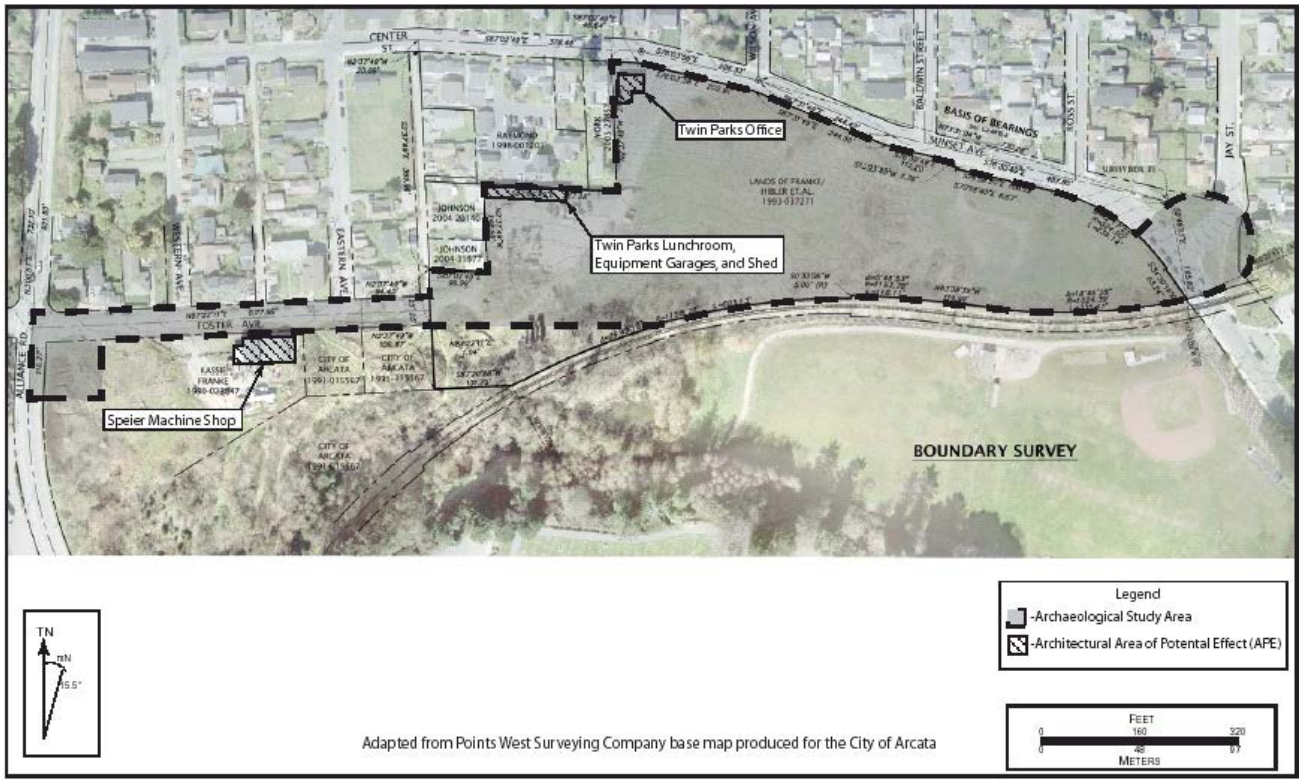
Setting
The project site has previously been used for agricultural and manufacturing uses (first as a farmstead and then as a mill site) and is directly adjacent to a historic railroad. The parcel was included in a Historical Resources Evaluation prepared for the City's Foster Avenue Extension Project, which included an historical study and an archaeological survey to identify, evaluate, and assess cultural resources in the project area (Figure 6). The Historic Property and Survey Report (HPSR) incorporates both the Archaeological Survey Report (ASR) and the Historical Resources Evaluation Report (HRER) (Eidness, Roscoe 2008a, 2008b, 2008c). An additional Cultural Resources Assessment undertaken by Roscoe & Associates in 2010 covered the North Coast Railroad Authority (NCRA) railroad alignment to the south. The discussion and analysis in this Initial Study section is based primarily on these documents.

The project area was the location of a mid-late 19th century farmstead referred to as the Anger-Foster Ranch. The archeological survey did not locate any archaeological evidence of the former farmstead. By the 1950s much of the land within the study area was used for mill operations, including the Speier Mill and the Twin Parks Mill, which occupied most of the project study area and operated from 1947 until 1977. For the Foster Avenue Extension Project, three mill structures were formally recorded and evaluated for historic significance, but none of these structures are located on the proposed project site.

The HRER made the following findings:
- No historic or prehistoric archaeological resources were located or identified as a result of the current study. (See ASR by Eidsness with Roscoe & Associates 2008a)

- There are no historic properties *presently listed* in the National Register or, for the purposes of CEQA, historical resources presently listed in the California Register
- There are no historic properties *previously determined eligible* for the National Register or, for the purposes of CEQA, historical resources presently listed in the California Register.
- There are no resources *previously determined ineligible* for the National Register or for the California Register.
- As a result of the study, the following three located and identified historic architectural resources *are determined ineligible* for the National Register or the California Register (per CEQA Guidelines §15064.5 and per criteria outlined in PRC §5024.1), and *no further study is recommended* to evaluate their National Register or California Register ineligibility.
    1. Twin Parks Office, 1301 Sunset Ave., Arcata, CA
    2. Twin Parks Lunchroom/Equipment Garages & Shed, 1301 Sunset Ave., Arcata, CA
    3. Speier Machine Shop, 1425 Foster Ave., Arcata, CA

Figure 6: Archaeological Study Area and Architectural Area of Potential Effect



Source: Historical Resources Evaluation Report for Proposed Foster Avenue Extension Project (Eidness, Roscoe 2008)

Discussion

a, b) As mentioned above, the project area was the location of a mid-late 19th century farmstead sometime referred to as the Anger-Foster Ranch. The archeological survey did not locate any archaeological evidence of the former farmstead. By the 1950's much of the land within the study area was used for mill operations including the Speier Mill and the Twin Parks Mill, which occupied most of the project study area. For the Foster Avenue Extension Project three mill structures were formally recorded and evaluated for historic significance. None of these are structures are located on the proposed project site and through the HRER it was determined that no further historical or archeological resources were located at the project site. The Archaeological Survey Report found

no previously recorded or newly discovered archaeological resources and no resources were identified or located by the NWIC and Sacred Lands File record searches. In addition, no prehistoric artifacts or sites were located during the field survey or appeared in any of the on-site soil borings. Based on these findings, the proposed project would not cause a substantial adverse change in the significance of a known historical resource pursuant to §15064.5 or to an archaeological resource pursuant to §15064.5. As such, a **less than significant** impact would occur.

c) An archaeological records search at the North West Information Center (NWIC) was conducted as part of the cultural resources investigation by Roscoe & Associates on the Rail with Trail alignment to the south. According to the records search, the trail alignment does not intersect known archaeological sites. However, there are six previously recorded archeological sites within a half mile of the project area. No new archaeological sites were found or identified during the cultural resources study (Roscoe & Associates, 2010), during construction of Foster Avenue, or during development of the adjacent Sunset Terrace Apartments. As there is still potential to uncover human remains or objects of significant culture value, conditions of approval standard to all discretionary approvals are included for any ground disturbing activity that is planned to take place. With implementation of the standard conditions of approval, the proposed project is not expected to disturb any human remains, including those interred outside of dedicated cemeteries. A **less than significant** would occur.

Conclusion
No potentially significant cultural resource impacts were identified; therefore no further analysis or mitigation is required.

ENERGY	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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	

Setting
Humboldt County is geographically isolated and is almost an energy island. The majority of petroleum-based transportation fuels are imported to the county by barge. There is only one pipeline connecting the county to the larger natural gas grid, and only two major connections to the larger electric grid. The electric transmission capacity (approximately 60-70 MW) that connects Humboldt County to the regional grid is less than half of the County's 170 MW peak electrical demand. For this reason Humboldt County generates much of its own electricity, mostly using natural gas and biomass fuels (RCEA, 2013).

The City of Arcata is on the forefront of energy reduction goals in Humboldt County, and adheres to both a Zero Waste Action Plan and a Community Greenhouse Gas Reduction Plan, both of which are used to decrease energy inefficiencies in residential and commercial activities in the City. The Arcata City Council has adopted a new local energy efficiency ordinance in instate more stringent standards than required by state law. The ordinance mainly applies to new residential projects and requires these projects to exceed minimum compliance requirements using energy efficiency measures and/or photovoltaic compliance credits (PVCCs). Local plans that address renewable energy and energy efficiency include:

- Community Greenhouse Gas Reduction Plan (2006)
- Greenhouse Gas Inventory (2010 and 2015)
- Pedestrian and Bicycle Master Plan (2010)
- Zero Waste Action Plan (2017)

Discussion

a-b) The project will consume energy in both construction and operation phases; however, adherence with State and Local plans related to energy consumption (including the Zero Waste Action Plan, Local Greenhouse Gas Reduction Plan) as well as applicant-led energy reduction measures ensure that the project's energy usage is as efficient as possible. The project incorporates energy efficient features including near net-zero energy design.

Energy Consumption During Construction

Construction of the project will include energy intensive activities including the grading, building construction, and paving phases. In order to adhere to the City of Arcata's local plans related to energy efficiency, construction energy usage will be reduced to the greatest extent possible. All construction and demolition projects must reduce, reuse and recycle waste materials and submit both a Waste Management Plan and a Final Report for each project. Reporting is required by the City of Arcata Land Use Guide Article 9.54.050-Construction Materials Recycling, and the California Green Building Code Section 5.408 requires construction waste diversion and waste reduction. Requirements include diversion, recycling or salvaging of at least 50% of non-hazardous construction materials. The project will adhere to these guidelines.

Operational Energy Consumption

Long-term operational energy use associated with the project will include electricity and natural gas consumption (although the proposed project may not use natural gas), energy consumption related to obtaining water, and fuel consumption resulting from operation of vehicles. Existing City standards provide energy reduction measures in the areas of land use, community design, recycling, water, and energy conservation features. The project also aligns with the intent and strategies of the City's Greenhouse Gas Emissions Plan by decreasing water and energy consumption, installing renewable energy apparatus (i.e. likely solar array), improving pedestrian and mass transit infrastructure, and adhering to waste reduction goals.

The project will consolidate two existing Open Door clinics that are currently located in buildings with aging infrastructure that were not designed for medical use. The proposed project lighting will exceed Title 24 standards for watts used and will include occupancy sensors and lighting controls with timers. The "pod"-based floor plan with common areas is designed to consolidate and share space to provide more efficient services. The bus stop installed as part of the project could reduce

vehicle trips to and from the project site. Although the project includes an emergency generator; it will only be used as necessary during power outages.

The project is designed to be near net-zero energy use, which means it is built to minimize net energy and includes energy efficient features and will adhere to state and local energy and waste-reduction policies. As such, the project will not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, potential impacts on energy resources would be **less than significant impact.**

Conclusion
No potentially significant energy impacts were identified; therefore no further analysis or mitigation is required.

GEOLOGY AND SOILS	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i) 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 Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) 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 onsite 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			X	

GEOLOGY AND SOILS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				
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

Northwest California and the Humboldt Bay region are located in a seismically active region dominated by a series of faults including the Little Salmon fault and the Mad River fault zone. These faults are active and capable of generating large magnitude earthquakes. The project site is located within the Mad River fault zone approximately 1,200 feet northeast of the Alquist-Priolo Earthquake Fault Zone for the Fickle Hill fault. A previous study referenced in the Geotechnical Investigation concluded that "the potential for surface rupture associated with the northern trace of the Fickle Hill fault zone is extremely rare" (SHN, 2009b). Additionally, strong seismic shaking is a regional hazard, and is not particular to the project site.

The site is located approximately one mile from Arcata Bay at approximately 45 feet above mean sea level. Subsurface stratigraphy at this site consists of poorly graded sand and silty sand with interbedded fractions of clayey sand overlain by imported fill material including silts, sands, and gravels. The site is built upon deposits identified by McLaughlin et al. (2000) as Holocene/Pleistocene shallow marine terrace interbedded with quaternary alluvium. Quaternary alluvium deposits are described as Holocene/Late Pleistocene "clay, silt, sand, gravel, and boulders deposited in stream beds, alluvial fans, terraces, flood plains and ponds; and soils formed on these deposits" (LACO, 2008a). Fill soil across the site is laterally and vertically heterogeneous and consists of a range of materials including anthropogenic debris in soft clayey silt to dense gravel with sand. Staff has indicated logs and redwood bark layers up to 12 inches thick were observed at the site during the construction of the Foster Avenue Extension project (N. Khatri, personal communication, City of Arcata meeting with Open Door Staff, November 28 2018).

The following Arcata General Plan Public Safety Element policies apply to the proposed project:

- PS-2b Mitigation of ground shaking hazards.
- PS-2c Mitigation of surface rupture and ground shaking hazards
- PS-2d Requirement for and review of "Geotechnical Reports."
- PS-2g Earthquake-resistant building and infrastructure standards.
- PS-3b Grading standards for erosion and sedimentation control.
- PS-3e Geotechnical reports.

A site-specific Geologic Hazard and Geotechnical Investigation Report was prepared for the project site (for a previous property owner) SHN, 2009b. The analysis below is primarily based on this Geotechnical Report which discusses the geologic setting, site conditions, evaluation of potential geologic hazards, field and laboratory testing results, and includes recommendations related to site preparation and grading, foundations, slabs on grade, vehicle pavements, utility trenches, and site drainage.

Discussion

a, i-iv) As discussed above, strong seismic shaking is a known regional hazard, but is not specific to the project site. The site is not located within an Alquist-Priolo Earthquake Fault Zone. There is no evidence of recent active landslides and the potential for slope stability hazard associated with the proposed project is considered negligible.

The geologic report states the following related to liquefaction on the project site: "The low lying swale south of the site has been mapped within a moderate liquefaction hazard zone due to the likely presence of young unconsolidated sediments associated with Jolly Giant Creek. The proposed structures are located outside the influence of these sediments" (SHN, 2009b). The geologic report concludes that liquefaction, co-seismic settlement, and lateral spreading are considered negligible risks for earthquakes of small to moderate magnitude. Risk of damage to the proposed project from larger magnitude earthquakes (7.5 or greater) is within building code criteria and not particular to the project site. Project construction would adhere to the site-specific recommendations contained in the project's geologic report which concluded that the risk of significant post construction static consolidation settlement is low. Soils testing also determined that no high plasticity, potentially expansive soils were observed or anticipated on the project site.

The project site is located outside the nearby area of moderate liquefaction and is not known to be an unstable geologic unit or have unstable soil that would result in landslides, lateral spreading, subsidence, liquefaction or collapse as a result of the proposed project. The subject site is relatively flat and well away from any significant slopes. There is no evidence of recent active landslides and the potential for slope stability hazard associated with the proposed project is considered negligible. As such, the site is not subject to the City's Hillside Development Standards, and the City does not designate the site as a landslide hazard area (City of Arcata General Plan Figure PS-a, Hazards Map).

Project site preparation and construction would adhere to the recommendations in the geologic report which states that there appears to be negligible hazard associated with the risk of slope instability on the project site. The proposed project would be designed and constructed following state and local building codes, engineering best practices, and the recommendations in the geologic report including meeting the most recent California Building Code standards for construction on sites subject to strong ground motion from seismic sources.

Therefore, as addressed above, a **less than significant impact** would occur with regards to exposing people or structures to potential substantial adverse effect involving: the rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; strong-seismic ground shaking; and seismic related ground failure including liquefaction and landslides.

b) Construction activities that would potentially disturb sizeable amounts of soil include removing vegetation, cutting slopes, grading, digging, moving and filling ground material, and moving heavy equipment. Erosion control measures would be implemented on all disturbed areas during project construction and operation. Applicable erosion control measures as defined in the City's Land Use Code and Best Management Practices Manual such as re-vegetation and covering soil stockpiles would be implemented for the duration of the project. Implementing these measures would avoid substantial erosion or topsoil loss. Therefore, the impact would be **less than significant**.

c, d) The project site is not known to be an unstable geologic unit or have unstable soil that would result in landslides, lateral spreading, subsidence, liquefaction or collapse as a result of the proposed project. Project construction would adhere to the site-specific recommendations contained in the project's geologic report which concluded that the risk of significant post construction static consolidation settlement is low if the Design Recommendations are followed. Soils testing also determined that no high plasticity, potentially expansive soils were observed or anticipated on the project site. Therefore, the impact related to landslides, lateral spreading, subsidence, liquefaction, collapse, or expansive soils would be **less than significant**.

e) The proposed project would connect to the City's sanitary sewer system which runs along Sunset Avenue adjacent to the project site. All project related wastewater would be disposed of through this system. Therefore, the use of septic tanks or alternative wastewater disposal systems is not required for the proposed project. **No impact** would occur.

f) As discussed in the "Cultural Resources" section, the Archeological Report prepared by Roscoe and Associates found no sign of archeological/paleontological resources at the project site. There is no evidence of a unique paleontological resource or site nor a unique geologic feature within the project area. Therefore, **no impact** to paleontological/geologic features is anticipated to occur as a result of this project.

Conclusion
No potentially significant geology and soils impacts were identified; therefore no further analysis or mitigation is required.

GREENHOUSE GAS EMISSIONS	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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

Global temperatures are affected by naturally occurring and anthropogenic-generated atmospheric gases such as water vapor, carbon dioxide, methane, and nitrous oxide. Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). Emissions of GHGs from human activities such as electricity production, motor vehicle use, and agriculture, are elevating the concentration of GHGs in the atmosphere and are reported to have led to a trend of unnatural warming of the earth's climate, known as global warming or global climate change, and should be lessened and/or mitigated whenever possible. Other than water vapor, the primary GHGs contributing to global climate change include the following gases:

- Carbon dioxide (CO_2), primarily a byproduct of fuel combustion;
- Nitrous oxide (N_2O), 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 (e.g., 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 (SF6) emissions, which are commonly created by industries such as aluminum production and semiconductor manufacturing.

In 2002, the California legislature declared that global climate change was a matter of increasing concern for the state's public health and environment, and enacted laws requiring the state Air Resources Board (ARB) to control GHG emissions from motor vehicles (Health & Safety Code §32018.5 et seq.). CEQA Guidelines define greenhouse gases to include carbon dioxide (CO_2), nitrous oxide (N_2O), hydrofluorocarbons, perfluorcarbons, and sulfur hexafluoride. The California Global Warming Solutions Act of 2006 (Assembly Bill 32) definitively established the state's climate change policy and set GHG reduction targets (Health & Safety Code §38500 et seq.). The State set its target at reducing greenhouse gases to 1990 levels by 2020.

In 2011, the CEQA Guidelines Section 15064.4 Appendix G was modified to include thresholds of significance for Greenhouse Gases. The project would have potential significant impacts if the project would: generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Due to the nature of the proposed project (centrally-located medical office), GHG impacts are discussed qualitatively herein as allowed by CEQA Guidelines §15064.4(a)2, as GHGs emitted by the Project are not anticipated to significantly increase local area-wide GHG emission rates.

The City of Arcata actively participates in the Cities for Climate Protection (CCP) Campaign and is a member of the California Climate Action Registry. The City developed a Community Greenhouse Gas Reduction Plan (2006) that identified six action areas to change the way we use energy. The Plan includes action strategies in the areas of energy efficiency, renewable energy, sustainable transportation, waste reduction, and carbon sequestration to help achieve this target. In addition, the Plan helps fulfill Policy RE-8 of the City's General Plan calling for energy resources management. Community-wide participation is necessary to achieve the goals and strategies outlined in the plan.

Arcata's greenhouse gas inventory has been updated in the 2010 Greenhouse Gas Emissions Inventory of Government Operations and the 2015 Community Greenhouse Gas Emissions Inventory.

According to the City of Arcata 2010 Community Greenhouse Gas (GHG) Emissions Inventory, total emissions for the City of Arcata in the baseline inventory year (2010) were approximately 198,935 metric tons of CO_2e from local emissions sources and activities. According to the Plan, the areas of transportation fuel consumption and PG&E electricity and natural gas consumption are of particular importance locally.

Discussion

a) The proposed project consolidates two existing health centers into one new facility. GHG emissions associated with project development would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operation emissions associated with health center uses including vehicular traffic, energy and water usage, and solid waste disposal. Generally small infill development projects would not generate substantial GHG emissions that would result in a significant impact. Due to the nature of the proposed project (centrally located, infill project), and proposed project features related to energy efficiency and supporting alternative modes of transportation, the discussion below contains a qualitative analysis of GHG impacts.

The proposed project would be under various stages of construction for one to two years but the construction-related greenhouse gas emissions would be short-term. Therefore, the project construction phase would not significantly increase greenhouse emissions. Due to the project's central location close to Highway 101, downtown Arcata, and adjacent to the City's trail system, and because the proposed project will install a new bus stop, the project supports efforts to reduce greenhouse gas emissions by providing and encouraging alternative modes of transportation. Additionally, the project will provide on-site bike parking, an electric vehicle charging station, and offer incentives to employees for ride-sharing and using transit. The project is also designed to be near net-zero energy, which minimizes GHG emissions related to operational energy use.

Therefore, due to its relatively small size, near-net zero energy project design, other project features, and supporting alternative modes of transportation, the proposed project would not be expected to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment; this impact is considered **less than significant**.

b) In 2006, the California Global Warming Solutions Act (Assembly Bill 32) definitively established the state's climate change policy and set GHG reduction targets (Health & Safety Code §38500 et sec.), including setting a target of reducing GHG emissions to 1990 levels by 2020. AB 32 requires local governments to take an active role in addressing climate change and reducing greenhouse gas (GHG) emissions. Recommendations to reduce residential GHG emissions include promoting energy efficiency in new development and improved coordination of land use and transportation planning on the city, county and regional level, and other measures to reduce automobile use. As mentioned above, the City of Arcata developed a GHG Reduction Plans in 2006. The Plan has several goals and policies that apply to this project, including: encouraging energy efficient buildings; improving bike/ped/transit infrastructure; and promoting "smart growth" policies, which include high density, centrally-located infill projects.

Consistent with AB 32 and the City's GHG Reduction Plan, the proposed project involves infill development, promotes efficient land use, incorporates energy efficiency into its design, and supports alternative modes of transportation. In summary, as a result of the discussion outlined above, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The impact would be **less than significant**.

Conclusion

No potentially significant greenhouse gas emissions impacts were identified; therefore no further analysis or mitigation is required.

HAZARDS AND HAZARDOUS MATERIALS	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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 area?				X

HAZARDS AND HAZARDOUS MATERIALS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
f) Impair implementation of or physically interfere with an adopted 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

Several Phase I Environmental Site Assessments (ESAs) have been completed for the subject property (Winzler & Kelly 1994, SHN 1995, and LACO 2008). Additionally, Phase II ESAs were conducted to characterize the fill soil on the project site (SHN 1995 and LACO 2008). The discussion and analysis in this Initial Study is based on the most recent Phase I and II ESAs. Historical uses of the property include use as agricultural farmland from at least the 1930s through the early 1940s and use as a lumber storage area from Twin Parks Lumber Company mill operations from the mid-1940s to the late 1970s when the facility was closed (LACO 2008).

The Phase I ESA report documents results, conclusions, and recommendations regarding the potential for site impairment by hazardous substances generated, used, or stored on the subject property and immediate site vicinity (LACO 2008). This report includes a records review from multiple sources including by Environmental Data Resources (EDR) and a review of previous ESAs prepared for the project site, site reconnaissance, and interviews.

Results from the Phase I ESA indicated areas with potential hazardous materials release at the site associated with historical lumber storage areas and occasional disposal of used crankcase oil. The Phase II ESA consisted of subsurface investigations to evaluate environmental conditions attributable to hazardous material releases and characterize fill soil (LACO 2008). Sampling methods, summary of soil and groundwater laboratory results, fill characterization, and discussion of findings, conclusions and recommendations are contained in the Phase II ESA and are summarized below.

General Phase I ESA Findings include the following (LACO 2008):

- Current onsite hazardous materials use, storage, or disposal was not identified.
- Evidence of hazardous materials use or disposal was not observed during the site reconnaissance.
- Evidence of underground storage tanks or other subsurface containment structures was not observed onsite or identified in interviews, agency records, or historical records.
- A former Twin Park Mill employee identified isolated areas on the site parcel that were occasionally used to dispose used crankcase oil. A Phase II ESA to assess the affected areas was performed in 1995 (SHN 1995). The results of this investigation indicated low levels (less than 68 parts per million [ppm]) of diesel and motor oil (TPHd and TPHmo). Results of the metals analysis did not indicate concentrations that were above the State of California Title 22 TTLC or significantly high enough (ten times greater than the Title 22 STLC to warrant determination of soluble metal concentrations with the exception of chromium concentrations which were comparable to onsite background sample concentrations. The report indicated that “no further sampling is recommended.”

- The risk of potential hazardous material impacts resulting from offsite sources within is low.

The Phase II ESA collected and evaluated soil and groundwater samples from 13 backhoe pits and three standard penetration test borings at locations based on historical Phase I and Phase II ESAs. Results from this investigation confirm the presence of total petroleum hydrocarbons as diesel (TPHd), total petroleum hydrocarbons as motor oil (TPHmo), and metals in soil identified during the previous investigation (SHN 1995) (LACO 2008). For complete soils and groundwater sampling results see the Phase II ESA report. The Phase II study concludes that the concentration of constituents of concern reported in the soils samples from the site do not likely pose a threat to water quality or human health. In accordance with Phase II recommends, the management of shallow soil impacted with TPHd and TPHmo anticipated to be disturbed during construction and grading activities will be incorporated into the development of the storm water pollution prevention plan. If these soils are removed from the site they will be disposed of at an appropriate location.

Discussion

a, b) Temporary use of oils, diesel, asphalt, paints, and other materials typical of construction activities would occur. The project would not transport, or dispose of hazardous materials, and thus would not create a significant hazard to the public or the environment associated with these materials by creating accident conditions or through routine transport of hazardous goods.

The site has been surveyed for pre-existing hazardous materials from former mill operations. Based on the hazardous materials assessments there is no known or suspected substantial hazardous material contamination on the project site. Records searches, research, laboratory analysis, and field observations indicate that site is free of hazardous levels of the constituents tested. No further assessment or monitoring of groundwater or soils was deemed necessary. Therefore, the proposed project is not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. A **less than significant impact** would occur.

c) The proposed project site is within ¼-mile of Arcata High School and Arcata Elementary School. The proposed use will not emit substantial amounts of hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. No hazardous materials impacts related to construction or operation of the proposed project would be anticipated to affect the schools. Therefore, a **less than significant impact** would occur.

d) Based on the records searches conducted for the project site through the Phase I ESAs the site is not a listed hazardous materials site as defined by Government Code Section 65962.5 and does not create a significant hazard to the public or the environment. Therefore, **no impact** would occur.

e) The proposed project is not located within an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. In addition, the project would not include structures which could potentially represent a hazard to aviation. Thus, the project would not have the potential to result in airport-related safety hazards for people residing or working in the project area. **No impact** would occur.

f) The project would develop a health center on a vacant lot with emergency access from both Foster and Sunset Avenues. Based on the nature and location of the project, no significant

impairment or physical interference with an adopted emergency response plan or emergency evacuation plan would be expected to occur. Therefore, **no impact** would occur.

g) The project site is located in an urban setting within the Arcata Fire Protection District and is not within a State Responsibility Area (SRA) for fire protection, does not occur within an area of steep slopes or forest, and would not result in the intermixing of residences with wildlands. For these reasons, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, and **no impact** would occur.

Conclusion
No potentially significant hazard and hazardous materials impacts were identified; therefore no further analysis or mitigation is required.

HYDROLOGY AND WATER QUALITY	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river or through the addition of impervious surfaces, in a manner which would:			x	
(i) result in substantial erosion or siltation on or offsite;			x	
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			x	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			x	

HYDROLOGY AND WATER QUALITY	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
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 project site is generally flat, with a moderate slope/ depression near the southwestern property corner. Stormwater runoff from the undeveloped project site either infiltrates or flows on the surface downhill to the southwest area of the property. The site drains to Jolly Giant Creek via existing on-site storm drains. Jolly Giant Creek flows underground below Foster Ave., directly along the southern border of the project area. Jolly giant Creek daylights within Shay Park, and then flows south though the City of Arcata in a patchwork of above and below ground reaches before emptying into Humboldt Bay.

The proposed project would remove unconsolidated fill/debris from the site and bring in required structural fill to accommodate the elevation requirements, and if unregulated, environmental effects from construction activities could be significant. However, the following regulations and requirements would be complied with in order to protect water quality:

- City of Arcata Storm Water Management Program (SWMP, 2003);
- City of Arcata Stormwater Best Management Practices (BMP) Manual (part of the City's adopted SWMP, 2003);
- City of Arcata Storm Water Ordinance (Ord. 1319);
- City of Arcata Grading, Erosion and Sediment Control Code (Ord. 1255); and
- Humboldt County LID Manual.

Best Management Practices (BMPs)

To protect water quality, the City applies a number of programs and practices to all new development projects that would directly or indirectly discharge runoff into storm drains, creeks, streams, rivers, the ocean, or other receiving water bodies in the City. These programs and practices provide a framework of appropriate measures and feasible "best management practices" (BMPs) for protecting water quality. The City implements these policies through the Arcata General Plan, Land Use Code, and the City's BMP Manual which includes provisions to minimize potential pollutants entering the waterways and gives guidance for City facilities and activities with identified pollutant sources. A significant portion of Arcata's Best Management Practices (BMPs) manual activities were obtained verbatim from the California Stormwater Quality Task Force's Best Management Practice Handbook and modified to suit the needs of the City of Arcata. These activities have been approved at state level and their implementation is known to reduce environmental impacts. The City of Arcata's BMP Manual Includes a variety of provisions that will reduce or eliminate the project's impact in the environment, including provisions for: paving and grinding operations; erosion control; vehicle and equipment cleaning; non-stormwater discharges; and spill prevention, control and cleanup.

MS4 Permit and Low Impact Development (LID) Requirements

Portions of unincorporated Humboldt County (McKinleyville, the greater Eureka area, and Shelter Cove) and the Cities of Eureka, Arcata, Fortuna, and Trinidad are subject to the State Water Quality Control Board's general permit for municipal separate storm sewer systems (MS4 General Permit). The MS4 permit requirements mandate all stormwater created by impervious surfaces onsite must be detained onsite using Low Impact Development (LID) or other approved measures to ensure no net increase in stormwater runoff. Condition E.12 of the MS4 General Permit requires local agencies, by June 30, 2015, to require that development projects comply with post-construction stormwater requirements based on LID standards. These standards are intended to maintain a site's pre-development runoff characteristics by using design techniques that capture, treat, and infiltrate stormwater on site.

Discussion

a) The methods used to detain and convey stormwater at new developments are regulated at the State and local levels. The State Water Resources Control Board (SWRCB) and North Coast Regional Water Quality Control Boards (NCRWQCB) regulate water quality of surface water and groundwater bodies in the region. The proposed project would adhere to relevant programs and practices applied by the City to protect water quality as discussed above. These programs and practices provide a framework of appropriate measures and feasible procedures for protecting water quality. These policies are implemented through the Arcata General Plan, Land Use Code, the City's BMP Manual, and the County LID Manual that includes provisions to minimize potential pollutants entering the waterways and gives guidance for activities with identified pollutant sources.

Construction activities associated with the proposed project would cause disturbance of soil during excavation work, which could adversely affect water quality. Contaminants from construction vehicles and equipment and sediment from soil erosion could increase the pollutant load in runoff being transported to receiving waters during development. Operation of the proposed project could be a source of various stormwater pollutants associated with development which include pollutants associated with vehicle parking and landscaping, including oil and grease, trash and debris. Such pollutants may also be present in non-stormwater discharges, such as runoff from landscape irrigation. A number of LID site design measures are incorporated into the proposed project to promote the capture, treatment, and infiltration of site stormwater.

All development in the City of Arcata is required to conform to the stormwater regulations in the Municipal Code as well as the City's Statewide MS4 Permit authorized and regulated by the RWQCB. Site development will include Low Impact Development (LID) paving, landscaping and open space features including, but not limited to, grassy swales, rain gardens, etc. These features contribute to increased infiltration and reduced offsite runoff impacts. The project will disturb greater than one acre of impervious surface, which means the project will be considered a hydromodification project. This requires post-project runoff shall not exceed the estimated pre-project flow rate for the 2-year, 24-hour storm. The site's drainage plan has been designed to comply with this requirement. Based on the project's Preliminary Drainage Report (Appendix C), the proposed site plan provides adequate stormwater features to satisfy the requirements of a hydromodification project in accordance with the Humboldt LID Stormwater Manual v2.0.

As the project will comply with all relevant policies and permit procedures, it is not expected the project will violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Because the proposed project would adhere

to the discussed requirements, and because the project would not generate or discharge wastewater or industrial flows to wetlands, creeks, or waters of the U.S., the project would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade water quality. A **less than significant impact** would occur.

b) The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Although the project would cover an existing approximately 1.8 acre pervious site with mostly impervious surfaces, the potential impact to groundwater supplies would not be substantial because (1) the increase in impervious surface would be insignificant compared to the total surface area of the Mad-Redwood groundwater basin (approximately 718,263 acres), (2) there would be no large-scale increase in water demand, and (3) there are no existing or proposed groundwater wells in the immediate project vicinity. For these reasons, the project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the water table. Therefore, **less than significant impact** would occur.

c i) The proposed project would not alter the course of a stream or river and would generally maintain the existing site drainage features and the direction of site runoff. The proposed project would disturb and add impervious surfaces to the much of the site that would affect current on-site drainage patterns. Compliance with construction and operational stormwater requirements (i.e. SWPPP and LID site design measures) would ensure that development of the project would not result in substantial erosion or siltation on- or off-site. A **less than significant impact** would occur.

c ii,iii) The western two-thirds (approximate) of the existing site drains to a drop inlet (DI) in the southwest corner of the site, and the eastern one-third (approximate) of the existing site drains to a DI near the roundabout. According to the Preliminary Drainage Report (Appendix C) the proposed project will increase the peak flow that drains to the southwest DI, and it will decrease the peak flow that drains to the DI near the roundabout. Therefore, a stormwater detention facility will be required in the western drainage area, but a stormwater detention facility will not be required in the eastern drainage area. The ideal location for this will likely be in the southwest corner of the site where there is already a DI, which could be converted into an outflow control structure. The proposed bioretention facility in this area (Bioretention Facility #7) can also serve as a detention basin.

The proposed project would cover much of the site in impervious surfaces. Potential increases in the rate and amount of run-off during storm events would be offset with the proposed drainage plan design features, including onsite retention of runoff from impervious surfaces including roofs and parking areas. The Preliminary Drainage Report states that the project can easily achieve the stormwater retention requirements for the site with the use of adequately sized bioretention facilities. New on-site stormwater drainage facilities including retention would tie into existing stormwater facilities and stormwater would be released into the existing system at specific release rates. The conceptual site plan for the Arcata Community Health Center provides adequate stormwater features to satisfy the requirements of a Hydromodification Project in accordance with the Humboldt LID Stormwater Manual v2.0.

The project is not projected to create significant amounts of pollution that could result in polluted runoff. During project construction, heavy construction equipment would be used and this equipment could deposit contaminates (fuel, oil, etc.) on the ground which could be carried to

surface waters in stormwater runoff. Fuel, oil, paints and other hazardous materials also may be stored on the site during construction and represent a potential spill hazard. However, City of Arcata regulations and requirements referenced in the Setting would be complied with in order to protect water quality and ensure accidents would not present a significant environmental hazard. The project could introduce pollutants into site runoff from grease, oils, dust, and other debris that could accumulate in the parking areas and be carried by rainwater. The proposed stormwater detention facilities would allow for settling and filtration of pollutants prior to entering Jolly Giant Creek. With the integration of standard BMPs and application of required LID practices, the proposed project would not result in substantial additional sources of polluted runoff.

The proposed drainage plan would be designed to accommodate projected site runoff; therefore the capacity of existing and proposed stormwater drainage systems would not be exceeded. As summarized above and described in the project's Preliminary Drainage Report, the proposed drainage facilities are designed to contain and release stormwater so as to not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; and the project would not 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. Therefore, a **less than significant impact** would occur.

d) The project site is not in a hazard zone for seiche, tsunami, or flooding. The "Tsunami Hazard Maps" for Humboldt Bay show the project area as a "no hazard" zone of relative tsunami hazard for an extreme event. "No hazard" areas are in the Upland Zone, which is too high in elevation and/or too far inland to be at risk. Similarly, the site is not in a FEMA flood zone. As such there is negligible risk of release of pollutants due to project inundation. Therefore, no impact would occur.

e) The project will comply with local and state water quality standards as discussed in (a) above. Groundwater considerations are evaluated in (b) above; there is no applicable sustainable groundwater management plan. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, a **less than significant impact** would occur.

Conclusion
No potentially significant hydrology and water quality impacts were identified; therefore no further analysis or mitigation is required.

LAND USE AND PLANNING	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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			x	

LAND USE AND PLANNING	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
or mitigating an environmental effect?				

Setting

The site is located north of the Arcata High School lower sports fields (designated Public Facility), south of Sunset Avenue and the Sunset residential neighborhood (designated Residential Low Density), west of the Arcata Skate Park and the Sunset Avenue/ Highway 101 on- and off-ramps, and east of a Residential Medium Density designated parcel currently being developed with 142 one-bedroom residential units.

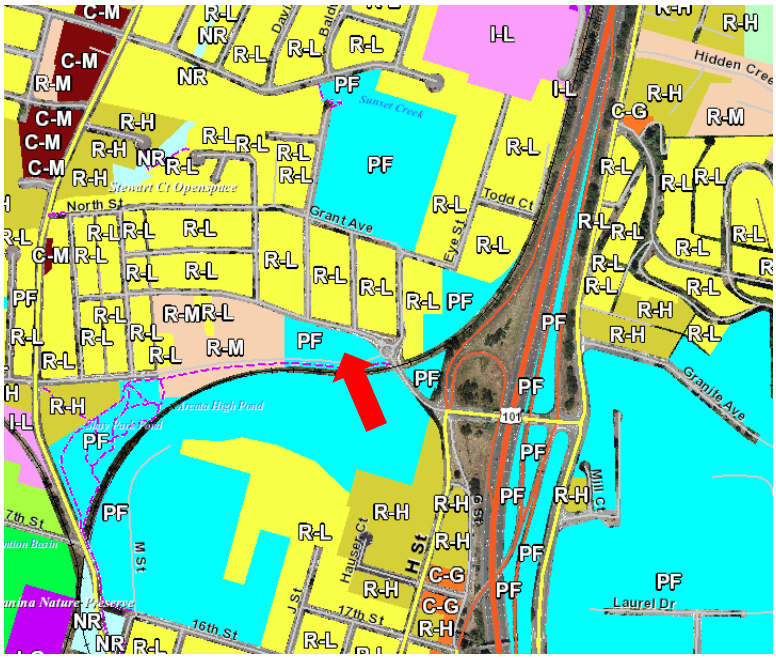
The site is designated by the City of Arcata General Plan as Public Facility (PF) and is zoned Public Facility: Planned Development with a Special Considerations overlay (PF:PD, SPC) which is intended to allow for a "creative approach in the residential development of land resulting in a more efficient, attractive, desirable use of open area; and to permit flexibility in design. The PD-R zone is further intended to best realize the potential of sites characterized by special features of shape, topography, or size" (Zoning Ordinance (Z.O.) Section 408). The site also is regulated by a Special Considerations Combining Zone, which serves to identify areas of the City where certain specific parcels have unique characteristics and/or limitations that require careful consideration when development or a change of use occurs. A Community Health Clinic is conditionally permitted in the PF zone and will require a Minor Use Permit and a "Type B" Planned Development Permit. The "Type B" Permit requires certain findings to be made for the Project to ensure compatibility with the surrounding area and quality of design.

Discussion

a) The proposed project would develop a health center south of Sunset Avenue and the Sunset residential neighborhood. The project site is bound by Sunset Ave to the north, Foster Avenue to the South, the Sunset/Foster Ave. roundabout to the east, and medium density residential development to the west. The existing vacant site is designed for public facility uses. The proposed project would not remove existing streets, would not develop impediments to cross-town vehicular, pedestrian or bicycle movement, and would not otherwise physically divide an established community. Therefore, **no impact** would occur.

b) The site is designated by the City of Arcata General Plan as Public Facility (PF) and is zoned Public Facility: Planned Development with a Special Considerations overlay (PF:PD, SPC). "Doctor's Offices" are listed as conditionally permitted uses in the Public Facility (PF) zone with a Minor Use Permit. Minor Use Permits are designed to guide projects that comply with the intent of the zone but may require greater review by a governing authority. As written in the Arcata Zoning Code, the PF zone is designed for Public Serving Facilities that may be privately owned but institutional in character. All required findings necessary to ensure the project aligns with the intent of the land use plan will be made as a part of the "Type B" Planned Development Permit Process. The PF zone district is consistent with the PF Land Use classification outlined in Arcata's General Plan. Therefore, the proposed project adheres to the intent and accompanying policies of the adopted Land Use Plan and Zoning Code, and the development of a health center at this site will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, including the General Plan, Land Use Plan, Local Coastal Program, and zoning ordinance. **No impact** will occur.

Figure 7 Land Use and Zoning



Source: City of Arcata GIS (https://gis01.cityofarcata.org/web/COA_Parcel_finder/)

Conclusion

No potentially significant land use and planning impacts were identified; therefore no further analysis or mitigation is required.

MINERAL RESOURCES	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
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

The site has no known history of mineral extraction and no mineral extraction is anticipated to take place within any part of the proposed development area. The Phase II analysis determined that there are no known mineral resources present at the project site. Soil makeup primarily consists of clayey sand overlain by imported fill material including silts, sands, and gravels (LACO, 2008).

Discussion

a-b) No mineral resources and no mineral resource extraction currently occurs within the project site. The proposed project would not affect the availability of a known mineral resource that would be of value to the region, nor would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a specific, general plan or other land use plan. Therefore, **no impact** would occur.

Conclusion

No potentially significant mineral resources impacts were identified; therefore no further analysis or mitigation is required.

NOISE	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project result in:				
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 ground borne vibration or ground borne 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 area to excessive noise levels?				X

Setting

The 1.8-acre project site is currently vacant and bounded by Sunset Avenue to the north and east, Foster Avenue to the south, and a residential development currently under construction to the west. Pre-existing noise sources at the project site include traffic on Highway 101; users of the adjacent skate park and Shay Park; Arcata High School students; and vehicle traffic on Foster and Sunset Avenues. The site and vicinity are within the noise environment of Sunset Avenue and HWY 101 located approximately 850’ to the east. According to the Noise Element of the City of Arcata’s General Plan (Figure N-b), the project site and the areas immediately north and south of the project site fall within the 60 dB noise contour of HWY 101 (City of Arcata, 2000). Peak hour allowed exterior DBA (from 7 am to 7 pm) is 75 dBA.

The City of Arcata Noise Ordinance (§9.30.050 of the City's Municipal Code) sets forth the noise regulations applicable within the City. The Ordinance limits construction activities to specific hours (Table 3), sets maximum allowable noise levels at the property lines of sensitive noise receptors and sets maximum allowable transportation noise exposure both within the interiors and the property lines of sensitive noise receptors.

Table 3 City of Arcata – Allowable Hours of Construction	
Day	**Allowable Hours**
Monday through Friday	8:00 a.m. to 7:00 p.m.
Saturday	9:00 a.m. to 7:00 p.m.
Sunday, Holidays	No heavy equipment-related construction activities allowed
Source: City of Arcata Noise Ordinance, §9.30.050(D), Table 3-4.	

Noise-sensitive land uses (or receptors) can be defined as those areas that benefit from a lowered sound level, consistent with areas of primary human activities, such as sleeping or learning. Existing sensitive noise receptors in the vicinity include: residential users across Sunset Avenue approximately 50 feet north of the project site; residential uses along the areas side streets (Jay St., Ross St., Baldwin St., and Wilson St.) as close as 120 feet north and northeast of the project site; a skate park across Sunset approximately 100 feet east of the project site; the Arcata High School playing fields approximately 90 feet south of the project site; and the Arcata High School campus approximately 500 feet south of the project site.

In addition to setting the above noise standards, the Noise Ordinance lists the types of land uses that are considered noise sensitive, including residential uses, transit lodging, hospitals, extended care facilities, theaters, auditoriums, meeting facilities, offices, schools, libraries, museums, playgrounds, and parks, and requires that where intrusive noise has been identified through project review, the review authority shall require that the detrimental effects (sleep interference or the potential for annoyance) be disclosed to neighboring sensitive noise receptors ((§9.30.050(D)(3)).

Discussion

a) The proposed project would result in both a temporary and long-term increase in noise levels in the project vicinity. Short-term noise impacts would come from construction activities and long-term noise impacts would come from day-to-day activities of the health center (e.g. noise from vehicles and/or human activities).

Construction Noise

During the construction phase, earth-moving, compacting and other site preparation activities will likely expose people to or generate noise levels in excess of standards established in the local general plan or noise ordinance or other applicable standard of other agencies; generate groundborne vibration or groundborne noise; the level of vibration or noise would not exceed levels typically associated with residential construction. These activities would be temporary, during the initial stage of construction. Construction activities would temporarily increase ambient noise levels, mainly from heavy equipment and construction-related truck traffic, hydraulic or pneumonic-powered equipment. The temporary use of heavy equipment for earth moving, grading and compaction, paving, and hauling can be expected. The construction phase would increase localized truck trips to transport materials and equipment to and from the site. Construction-related noise would be unavoidable; however, its temporary and intermittent nature

would moderate in terms of its environmental impact. The proposed project would comply with all applicable City policies to abate construction-related noise impacts. General Plan Policy N-5d which requires limiting construction activity to the hours of 8 a.m. and 7 p.m. Monday through Friday, and between 9 a.m. and 7 p.m. on Saturdays, and Policy N-5e which requires that all construction equipment be maintained in good working order and fitted with factory approved mufflers.

The proposed project would not require blasting, jackhammering or the development of deep foundations requiring pile driving during construction, and would not include blasting or heavy percussive activities (such as those associated with some industrial manufacturing activities) during operation; project construction activities and therefore project construction noise would be limited to daytime hours in accordance with the City's Noise Ordinance (§9.30.050(D), Table 3-4), and thus would not occur during the more sensitive evening hours or interfere with sleep; and project construction noise would be short term and temporary. Therefore, short-term construction noise impacts would be less than significant.

Operational Noise

Project operational activities could result in increased on-site noise above levels existing without the project from day-to-day activities of the health center(e.g. noise from vehicles and/or human activities). In the case of a power failure, an additional source of noise will be from the backup generator. However, the generator will be surrounded by a structure to reduce potential impacts and other operational noise increases would be minimal and are not expected to measurably exceed existing background noise levels (e.g. traffic on Highway 101) or accepted noise standards due to the intermittent nature of vehicle trips to and from the site. The proposed project does not involve industrial activities, blasting, or other activities that could create a permanent increase in ambient noise levels

In summary, proposed project construction and operation are not expected to result in generation of 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. A **less than significant** impact would occur.

b) The proposed health center would not require blasting, jackhammering, or the development of deep foundations requiring pile driving during construction and would not include blasting or heavy percussive activities (such as those associated with some industrial manufacturing) during operation. Based upon the types of anticipated construction equipment, and because no blasting or pile driving is needed, ground-borne vibration levels produced during project construction are not expected to have a significant impact at off-site locations. The effects of ground-borne vibration levels, with regard to human annoyance and structural damage, is influenced by various factors including equipment used, ground type, distance between source and receptor, and duration. Pile driving and demolition typically have the most noticeable vibration levels. Heavy equipment use on the project site, such as bulldozers, could create vibration during construction activities; adjacent residences would be exposed to this vibration. However, ground vibrations from construction activities do not often reach the levels that can damage structures, but they can achieve the audible and detectable ranges in buildings very close to the site (FTA, 2006). Since these impacts would be temporary, and during the daytime (not when people are typically sleeping) potential impacts are not expected to result in damage to adjacent residences and are not considered to be excessive. Ground borne noise is not typically an issue for standard

construction practices. Operation of the proposed project would also not be a source of substantial ground borne vibration. Therefore, the proposed project would not produce or expose people to excessive ground-borne vibration/noise levels. A **less than significant** impact would occur.

c) The project site is not located within an airport land use plan area, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip. The closest airports are Murray Field located approximately 6.8 miles to the south, Arcata/Eureka Airport located approximately 7.9 miles to the north, and Eureka Municipal Airport located approximately 12.1 miles to the southwest. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels, and **no impact** would occur.

Conclusion
No potentially significant noise impacts were identified; therefore no further analysis or mitigation is required.

POPULATION AND HOUSING	**Potentially Significant**	**Less Than Significant with Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
a) Induce substantial unplanned population growth in the 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 site is currently vacant but is not zoned for residential development and will not require the demolition of existing housing. The project will consolidate two existing health centers in Arcata and is not anticipated to create a substantial number of new jobs, which may in turn require new housing units to be constructed. There are five housing projects underway in the Central Arcata area in proximity to the project site that could result in close to 1,000 new residents.

Discussion
a-b) No housing is proposed, and the proposed project would not directly or indirectly induce substantial population growth, would not displace existing housing or people, and would not necessitate the construction of replacement housing. **No impact** would occur.

Conclusion
No potentially significant population and housing impacts were identified; therefore no further analysis or mitigation is required.

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

Setting
Emergency response and evacuation in the area is the responsibility of the Arcata Police Department located at 736 F Street, and the Arcata Fire District located at 631 9th Street and 3235 Janes Road. These provide critical emergency response services and serve as the community's primary response agencies under the City's Emergency Response Plan. Both the APD and AFD are part of the multiagency Standardized Emergency Management System emergency response network. In addition, a California Highway Patrol (CHP) office is located at 255 East Samoa Boulevard and regularly provides back-up services to APD within city limits and serves as the primary emergency responders along the Highway 101 corridor. The Humboldt County Sheriff's Office also serves the Highway 101 Corridor and HSU Police offer partner law enforcement services as well. The Project will consolidate two existing health clinic locations in Arcata and is therefore not anticipated to create new users in need of public services.

The project site is less than 500 ft from Arcata High School and less than ½ mile from Arcata Elementary School. No new residential units would be created as a result of the project, hence no new students are expected as a result of the project. The Arcata Skate Park is directly east of the project site and the City's Shay Park southwest of the site.

Discussion
a, b) The proposed project would develop a new health center that will consolidate two existing clinics. It is not anticipated the Project will lead to new users or significantly altered travel patterns. The project would not result in significant adverse effects on service ratios for the police or fire departments or lead to significantly delayed response times. Therefore, there will be **no impact** to fire and police services.

c) The project site is located in the Arcata Elementary School District and the Northern Humboldt Union High School District. The proposed project would develop a new health center and will not increase the number of students within a designated service area, and would not result in significant adverse effects on school district service ratios or school facilities. Therefore, **no impact** to schools would occur.

d) The proposed project would not contribute to any substantial physical deterioration of City parks as there would be little if any net increase in demand for park and recreational facilities. The project would not require the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Therefore, **no impact** would occur.

e) No other public facilities or public services apply to the project. Therefore, **no impact** would occur.

Conclusion
No potentially significant public services impacts were identified; therefore no further analysis or mitigation is required.

RECREATION	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
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
The City of Arcata provides park and recreational facilities in the close vicinity of the project site, including Shay Park, Larson Park, and the City of Arcata Skate Park. The development is also adjacent to the City's Rail with Trail, a Class I non-motorized trail linking Sunset Avenue south to Samoa Blvd; and continuing through the Arcata Marsh complex to the Humboldt Bay Trail. The City is currently planning for the next section of multi-use trail in Arcata, which will connect the Sunset Avenue/Larson Park area to Valley West, West End Road, Aldergrove Industrial Park, and to the future Annie and Mary Trail. Additionally, the Arcata High School lower fields are south of the project site.

Discussion
a, b) The Project will not create a significant number of new users and will provide onsite outdoor spaces for staff and patients. Open Door employees and patients may use adjacent City park and recreation facilities as a result of the project, but this is not expected to result substantial additional use of such facilities. The proposed project would not add residents to the surrounding area, and park use by staff/patients would be for short time periods (i.e. lunch breaks etc.) and

would not substantially increase use of these facilities that would cause substantial physical deterioration and it would not require the construction or expansion of other recreational facilities that could result in adverse physical effects. Therefore, **a less than significant impact** would occur.

Conclusion

No potentially significant recreation impacts were identified; therefore no further analysis or mitigation is required.

TRANSPORTATION	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
Would the project:				
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 or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?			X	

Physical Setting

The project site is located directly north of Foster Avenue and south of Sunset Avenue, approximately 600 feet west of the Highway 101/ Sunset Avenue interchange (southbound ramps at G/H Streets). In 2014 the Foster Avenue extension project was completed creating a new arterial roadway directly south of the project site. The extension project was a designated prioritized planning project in the City's Transportation Element (2000), to function as a new major arterial road to extend Foster Avenue east of Alliance Road to connect with Sunset Avenue near the Highway 101 interchange to create an east-west facility between Spear Avenue and 14th Street. This roadway extension was intended to provide a direct arterial connection from Alliance Road to Highway 101 that bypassed the Sunset residential neighborhood, and to improve and facilitate bus routing. Foster Avenue is now a 20' wide arterial with 4' and 6' bike lanes on either side of the travel lanes. The Arcata Rail with Trail, a 10' wide Class I separated multi-use path, is located immediately adjacent to the south side of Foster Avenue and provides a separated non-motorized link from Sunset Avenue to Samoa Blvd, through to the Arcata Marsh & Wildlife Sanctuary to the south, and linking to the Humboldt Bay Trail. The City is currently planning for the next section of multi-use trail in Arcata, which will connect the Sunset Avenue/Larson Park area to Valley West, West End Road, Aldergrove Industrial Park, and to the future Annie and Mary Trail.

The project site is one of six current proposed development sites within a three-quarter mile radius of one another (development on two of these sites -Sunset Terrace and Twin Peaks- has been approved and is currently underway) (Figure 8). All five other projects are single- or multi-family residential developments. The potential impacts to Level of Service (LOS) as a result of these six projects at 12 intersections are considered both individually and cumulatively in the *Central Arcata Areawide Traffic Impact Study* (W-Trans, 2017). This traffic study also considered access for pedestrian, bicyclists, and transit. In addition, Vehicle miles traveled (VMT) modeling for the proposed projects was also conducted

for the six projects in a *Technical Memorandum on VMT Procedure and Computations* (W&S Solutions, LLC, 2016).

Figure 8 Central Arcata Areawide Traffic Study – Projects and Intersections

Source: W-Trans, 2017. Central Arcata Areawide Traffic Study.

Regulatory Setting

In January 2019, the Governor's Office of Planning and Research released comprehensive updates to the CEQA Guidelines, including updates to the Transportation Section, including changing the title of the section from "Transportation and Traffic" to simply "Transportation", and adding a new section regarding determining the significance of a project's transportation impacts (CEQA Guidelines Section 15064.3). A lead agency may elect to be governed by the provisions of this section immediately; however, they apply statewide July 1, 2020. The updated guidelines exhibit a clear intent to prioritize infill projects and shift away from congestion-based Level of Service (LOS) standards to Vehicle Miles Traveled (VMT), which more efficiently analyzes a project's energy usage and overall environmental impact. Using VMT also ensures that infill projects, which may cause traffic congestion but also decrease energy inefficiencies, are not penalized.

CEQA Guidelines Section 15064.3. Determining the Significance of Transportation Impacts.

(a) Purpose. This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) (regarding

roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.

The City of Arcata's General Plan Transportation Element (2000) contains the goal of creating and maintaining an internal street system consistent with Arcata's small-town, nonmetropolitan character and which maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays (Policy T-4). Additionally, the Transportation Element includes specific policies that encourage infill, redevelopment, and reuse of underutilized property at higher densities with the objective of reducing the percentage of automobile trips and reducing annual vehicle miles traveled through land use and development patterns that encourage walking, bicycling and transit use (Policy T-2). The City has no adopted minimum standard for intersection LOS.

City of Arcata General Plan: Transportation Element (2000)

Policy T-1 Balanced Transportation System with Choice of Modes
Objective: Create and maintain a balanced transportation system with choice of bus transit, bicycle, and pedestrian as well as private automobile modes. Reduce the percentage of trips that are made by automobile and provide the opportunity and facilities to divert trips from automobiles to other modes.

T-1a Investment in alternative modes. In order to provide a realistic and cost-effective balance between travel modes, the City shall emphasize investment in alternative modes (bikeways, etc.) as a priority over increasing vehicular capacities of streets.

Policy T-2 Travel Demand Management
Objective: Reduce the percentage of automobiles and reduce the annual vehicle-miles of travel.

T-2a Land use development patterns. The City encourages and supports travel demand management efforts. The City shall promote land use and development patterns that encourage walking, bicycling and transit use. In recognition of the link between land use and transportation, the land use plan shall discourage low density, homogenous land-use patterns that foster automobile travel and are impractical to serve with transit. Land use planning shall emphasize high density and mixed land use patterns which translate into higher transit and pedestrian travel in the downtown and neighborhood commercial areas. Infill, redevelopment, and reuse of underutilized property at higher densities shall be encouraged prior to outward expansion of City boundaries…

Policy T-4 Streets and Highways Plan and Policy
Objectives: Plan an internal street system consistent with Arcata's small-town, nonmetropolitan character and which: 1) efficiently utilizes existing facilities and reduces need for investment in new or expanded street and highway facilities or capacities; 2) improves connectivity of streets to provide for direct routes between origins and destinations; 3) has a high quality of regular maintenance and repair; and 4) maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays.

Discussion

a) The proposed project would develop an existing vacant site with a community health center that consolidates and replaces two existing health facilities. The consolidation is expected to increase overall transportation efficiencies including a reduction in the total number of staff and

efficiencies from deliveries going to one location instead of multiple, which will reduce congestion and the need for parking downtown. Primary vehicular site access would be off Foster Avenue to reduce through traffic on Sunset Avenue; a service vehicle (i.e. delivery and garbage) and limited staff parking area would be accessed off Sunset Avenue near Baldwin Street (see Figure 2, Site Plan). Although the project would result in an increase in the total number of trips going to and from the proposed site, a majority of these trips are currently going to the two near-by existing health centers and would be directed to the project site instead, which is closer to the Hwy 101 interchange. Therefore, despite the proposed project adding occupy-able facility space to the city inventory overall total trips within the City as a result of the project are not expected to substantially change.

The project provides pedestrian facilities and will develop on-site sidewalks connecting to existing sidewalks along Sunset and Foster Avenues. A path is also proposed along the western project boundary that would connect the Sunset residential neighborhood through the project site to Foster Avenue, where existing crosswalks connect to the City's existing multi-use trail and Shay Park. This will provide a shorter route and allow neighborhood residents to access existing trail facilities without having to navigate the Sunset/Foster roundabout. In addition, the project includes travel demand management techniques as a means of reducing total number of vehicles driving to and from the project site. The project includes incentives to encourage the use of alternative transportation options including: contributing to the installation of an off-site west bound bus stop at the Arcata Skate Park; Open Door will encourage employees to carpool and may provide priority parking for those that do; bus passes may be provided or subsidized for employees; on-site bike parking will be provided; and space may be provided for a Zagster bike share location (similar to those in other locations in Arcata). Additionally, the project will contribute funding into a City-held account towards future intersection improvements at Foster/Alliance and Sunset/ LK Wood as identified in the *Central Arcata Areawide Traffic Impact Study* (W-Trans, 2017).

According to the Central Arcata Areawide Traffic Study (Traffic Study) the proposed project could generate an average of 1,084 daily trips; 72 trips would be expected during the morning peak hour and 107 during the evening peak hour (W-Trans, 2017). These projections were based on standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 9th Edition, 2012. The proposed project was treated as a "Medical-Dental Office" based on rates for ITE LU#720. These vehicle trips have the potential to impact several nearby intersections, both a stand-alone project and as one of a larger series of projects currently underway in the area. Although the City does not have adopted LOS thresholds, an operational threshold of LOS C was identified as being the desired minimum to be used for Traffic Study analysis purposes, with this threshold to be applied to the operation of the intersection as whole and not that of any one movement or approach. The potential impacts are discussed in detail in the Traffic Study referenced above and summarized below.

Existing Conditions

Under existing conditions, all but one of the study intersections are operating acceptably at LOS C or better during both peak periods evaluated. Sunset Avenue/LK Wood Boulevard is currently operating at LOS E during the p.m. peak period, which is below the threshold applied though still considered acceptable for this location because potential improvements identified as being feasible to improve vehicular operation would have a negative impact on pedestrian and bicycle access.

Future Conditions Without Projects

Future traffic volumes were developed using an assumed growth rate of 1.5 percent per year to a horizon year of 2036, or 20 years out. No changes to the infrastructure or transportation system were assumed for this scenario. Under the estimated Future volumes, three of the study intersections are expected to operate below LOS C during one or both peak periods. Sunset Avenue/LK Wood Boulevard, which was identified as operating unacceptably during the p.m. peak hour under current traffic volumes, would experience increased delay, and Sunset Avenue/US 101 North Ramps is expected to deteriorate to LOS D overall during this time period. The intersection of Foster Avenue/Alliance Road is expected to operate unacceptably during both peak periods and 11th Street/K Street during the p.m. peak hour with the increased volumes. Since the two intersections at LK Wood Boulevard/Sunset Avenue and Sunset Avenue/US 101 North Ramps are in close proximity, it is recommended that long-term any improvements to one of the intersections include the other. In addition to the roundabout on Sunset Avenue at US 101 North and LK Wood Boulevard, additional capacity will be needed at Foster Avenue/Alliance Road. To achieve LOS C operation, a roundabout would be needed at this location as well. There is limited right-of-way available at this intersection, so use of a mini-roundabout could be used. Finally, under the projected future volumes, the intersection at 11th Street/K Street would need increased vehicular capacity to operate at LOS C. However, because no feasible modifications were identified that would improve vehicular operation without deteriorating conditions for pedestrians and bicycles, no improvements are recommended, nor are they needed under the criteria applied in the Traffic Study.

Proposed Project

For the purposes of the proposed project, the intersection with the most significant potential traffic impact is Alliance Road and Foster Avenue, which is currently a four-way stop. Five of the seven study intersections would continue operating acceptably upon the addition of traffic from the proposed project. Sunset Avenue/LK Wood Boulevard is considered as operating acceptably, as discussed above. The project could result in deterioration of operation during the p.m. peak hour at Foster Avenue/ Alliance Road (Figure 9). The Traffic Study recommends re-striping in the short-term to provide left-turn and through/right turn lanes southbound and a right-turn lane and left/through lane on the northbound approach; this restriping was already completed as part of another project.

Four of the seven study intersections are expected to operate acceptably upon adding proposed project trips to anticipated future volumes. Sunset Avenue/LK Wood Boulevard, Sunset Avenue/US 101 North Ramps, and Foster Avenue/Alliance Road would operate at a service level below LOS C in their current configurations. The future plus project operating conditions are summarized in Figure 10 below. According to the Traffic Study, the trips generated by the proposed project could be accommodated while maintaining acceptable operation with the following proposed improvements: proportional share fees should be paid to fund both roundabout projects (Foster Avenue/Alliance Road and Sunset Avenue/US 101 North -LK Wood Boulevard). The Open Door's proportional shares were calculated in the Traffic Study as 9.2% of installation cost for the Foster Avenue/Alliance Road Intersection and 3.5% of installation cost for the Sunset Avenue/US 101 North Ramps and LK Wood Boulevard intersections.

Figure 9 Existing Plus Project Peak Hour Intersection Level of Service

Table 11 – Existing plus Open Door Health Center Peak Hour Intersection Levels of Service

Study Intersection *Approach*	AM Peak Delay	AM Peak LOS	PM Peak Delay	PM Peak LOS
1. St. Louis Rd/US 101 Overpass	3.4	A	5.4	A
Northbound St. Louis Rd Approach	*9.8*	*A*	*9.6*	*A*
Westbound Overpass Approach	*9.0*	*A*	*9.2*	*A*
2. LK Wood Blvd/US 101 Overpass	3.2	A	2.5	A
Southbound LK Wood Approach	*11.4*	*B*	*11.7*	*B*
3. Sunset Ave/LK Wood Blvd	13.3	B	**35.9**	E
4. Sunset Ave/US 101 N Ramps	6.0	A	10.0	B
Northbound US 101 N Off-ramp Approach	*27.5*	*D*	*31.0*	*D*
5. Sunset Ave/US 101 S Ramps-G/H Streets	14.4	B	11.5	B
6. Sunset Ave/Foster Ave-Jay St	5.2	A	4.6	B
7. Foster Ave/Alliance Rd	19.1	C	**26.7**	**D**
Restripe Alliance Road Approaches	13.8	B	17.6	C

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics;* **Bold** text = operation below desired threshold; Shaded cells = conditions with recommended improvements

Finding – Five of the seven study intersections would continue operating acceptably upon the addition of traffic from the Open Door Health project. Sunset Avenue/LK Wood Boulevard is considered as operating acceptably, as discussed previously. The project results in deterioration of operation during the p.m. peak hour at Foster Avenue/ Alliance Road to LOS D.

Recommendation – As shown in Figure 9, Foster Avenue/Alliance Road should be restriped to provide left-turn and through/right-turn lanes southbound and a right-turn lane and left-turn/through lane on the northbound approach as part of the project, if not already completed as part of another project.

Source: W-Trans, 2017. Central Arcata Areawide Traffic Study.

Figure 10 Future Plus Project Peak Hour Intersection Level of Service

Table 20 – Future plus Open Door Health Center Peak Hour Intersection Levels of Service

Study Intersection *Approach*	AM Peak Delay	AM Peak LOS	PM Peak Delay	PM Peak LOS
1. St. Louis Rd/US 101 Overpass	3.5	A	5.6	A
Northbound St. Louis Rd Approach	*10.1*	*B*	*9.9*	*A*
Westbound Overpass Approach	*9.1*	*A*	*9.4*	*A*
2. LK Wood Blvd/US 101 Overpass	3.5	A	2.8	A
Southbound LK Wood Approach	*12.7*	*B*	*13.1*	*B*
3. Sunset Ave/LK Wood Blvd	17.2	C	**88.7**	**F**
Roundabout – Intersections 3 and 4	10.7	B	20.6	C
4. Sunset Ave/US 101 N Ramps	12.7	C	**33.3**	**D**
Northbound US 101 N Off-ramp Approach	*62.6*	*F*	*110.8*	*F*
5. Sunset Ave/US 101 S Ramps-G/H Streets	20.5	C	13.1	B
6. Sunset Ave/Foster Ave-Jay St	5.9	A	5.4	A
7. Foster Ave/Alliance Rd	**40.9**	**E**	**74.2**	**F**
Roundabout	8.7	A	9.3	A

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics;* ** = delay greater than 120 seconds; **Bold** text = operation below desired threshold; Shaded cells = conditions with recommended improvements

Findings – Four of the seven study intersections would continue operating acceptably upon adding traffic from the Open Door Health project to future volumes. Trips generated by the Open Door Health project could be accommodated while maintaining acceptable operation with these proposed improvements.

Recommendation – Proportional share fees should be paid by the Open Door Health applicant to fund both roundabout projects. The Open Door Health project's proportional shares are 3.5 percent for the Sunset Avenue/US 101 North Ramps and LK Wood Boulevard intersections and 9.2 percent for Foster Avenue/Alliance Road.

Source: W-Trans, 2017. Central Arcata Areawide Traffic Study.

Cumulative Considerations

Upon adding traffic for the six projects to the future volumes, and with recommendations previously identified as being needed to accommodate future volumes without any of the six projects, three of the study locations are still projected to operate below LOS C. With the roundabouts previously indicated as being needed between Sunset Avenue/LK Wood Boulevard and Sunset Avenue/US 101 North Ramps, these intersections would operate acceptably during the a.m. peak hour, but at LOS D during the p.m. peak hour. The intersection of 11th Street/K Street, which is expected to operate at LOS F without the project, would experience further increases in delay with project traffic added; because any improvements that could feasibly be made at this location would result in negative impacts on pedestrian and bicycle access, the lower service level was deemed acceptable.

It is noted that the assumed 1.5 percent growth per year used to project the future volumes should be considered conservative. Additionally, the project-generated trips were added to the future volumes; this is also conservative since the projected growth would typically include the growth associated with the proposed projects. A review of volumes at the proposed Sunset Avenue/US 101 North-LK Wood Boulevard roundabout indicates that, in order for operation to deteriorate below LOS C for the proposed roundabout, approximately 1,500 new residential units would need to be constructed that use the interchange for primary access (W-Trans, 2017).

The Traffic Study recommendation related to future traffic plus all six projects is that while it is anticipated that the proposed roundabout at Sunset Avenue/US 101 North-LK Wood Boulevard will be adequate to accommodate all future growth in the City of Arcata, the City should monitor growth, and use 1,500 new residential units as a trigger indicating the need to evaluate operation and determine if further capacity enhancements are needed. As an alternative, the City could elect to use LOS D operation as the acceptable threshold for this location.

The improvements recommended for “without project” conditions are adequate to achieve acceptable operation upon the addition of all six projects to Future volumes, with one exception as noted below, and the proportional share that each project should contribute to help pay for these improvements was calculated and is noted in the Traffic Study. The exception is Sunset Avenue/US 101 North ramps-LK Wood Boulevard, which is projected to operate at LOS D during the p.m. peak hour with all projects added to future volumes. The Traffic Study notes that the intersection of Sunset Avenue/LK Wood Boulevard is owned and operated by Humboldt State University. “It is understood from the University that their emphasis is placed on pedestrian and bicycle access and safety, with operation for vehicular traffic given a lesser priority. Improvements at this intersection were therefore considered for operation of LOS D or lower, though lower service levels were deemed acceptable if improvements necessary to achieve a higher service level would negatively impact pedestrian and/or bicycle access” (W-Trans, 2017).

Conclusion

The City’s General Plan Transportation Element (2000) contains the goal of creating and maintaining “an internal street system consistent with Arcata’s small-town, nonmetropolitan character and which maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays” (Policy T-4 Streets and Highways Plan and Policy). This suggests short periods of congestion are not contrary to the goal of the overall circulation system and General Plan policies. Although traffic congestion will fall below LOS

C with this project in addition to the six other nearby projects at certain intersections, since the City does not have adopted LOS thresholds, the project would not conflict with this or other programs, plans, ordinances or policies addressing the circulation system. Additionally, the General Plan includes specific policies that encourage infill, redevelopment, and reuse of underutilized property at higher densities with the objective of reducing the percentage of automobile trips and reducing annual vehicle miles traveled through land use and development patterns that encourage walking, bicycling and transit use (Policy T-2 Travel Demand Management). The proposed project contains features in support of Policy T-2 as described above. The Traffic Study also notes that due to the conservative nature of the Study, it is likely the calculated volumes will not be achieved, and capacity improvements should be limited to what can reasonably be expected to be needed. Excess capacity is undesirable in that it generally results in higher travel speeds and comes at the expense of pedestrians and cyclists.

The project includes travel demand management techniques as a means of reducing total number of vehicles driving to and from the project site. The project includes incentives to encourage the use of alternative transportation options including: the installation of an off-site west bound bus stop at the Arcata Skate Park; Open Door will encourage employees to carpool and may provide priority parking for those that do; bus passes may be provided or subsidized for employees, on-site bike parking will be provided; and space may be provided for a Zagster bike share location (similar to those in other locations in Arcata). The project also provides pedestrian facilities and will develop on-site sidewalks connecting to existing sidewalks along Sunset and Foster Avenues. A path is also proposed along the western project boundary that would connect the Sunset residential neighborhood through the project site, to Foster Avenue, where existing crosswalks connect to the City's existing multi-use trail and Shay Park. This will provide a shorter route and allow neighborhood residents to access existing trail facilities without having to navigate the Sunset/Foster roundabout.

Although the City has identified the improvements needed to mitigate the identified traffic impacts and the project will pay the recommended traffic impact fee, the City has not adopted a formal traffic mitigation program to implement the mitigation prior to the project being developed and operational. As a result, the proposed project could result in peak hour traffic delays that exceed the City's operational thresholds for certain intersections and a **potentially significant impact** could occur.

b) Vehicle miles traveled (VMT) modeling for the proposed project was conducted in a *Technical Memorandum on VMT Procedure and Computations* (W&S Solutions, LLC, 2016). This Technical Memorandum considered all six projects in the 2017 W-Trans Traffic Study discussed above. For the proposed project, VMT per employee in 2010 and 2040 were calculated. Fifteen percent below average 2010 VMT was used as the CEQA threshold. The modeling concluded that "all project sites generate average VMT less than the CEQA thresholds for both AM and PM; therefore, these projects are of no significant impact" as shown in the Figure below.

Figure 11 CEQA Significance Criterion vs. 2010 and 2040 VMT

			AM			PM		
		Area	2010 Avg VMT	2040 Avg VMT	CEQA Threshold	2010 Avg VMT	2040 Avg VMT	CEQA Threshold
	Area	Regional	7.71	8.44		7.31	8.02	
Without Project	1	The Village Apt	5.30	5.71	6.55	4.72	5.11	6.22
	2	Canyon Creek Apt	5.30	5.71	6.55	4.72	5.11	6.22
	3	Open Door Com Health Ctr	4.88	5.00	6.55	4.62	4.68	6.22
	4	Sunset Terrace Apt	4.88	5.00	6.55	4.62	4.68	6.22
	5	Twin Park Apt	4.88	5.00	6.55	4.62	4.68	6.22
	6	CreekSide	5.05	5.16	6.55	5.06	5.10	6.22
	Ave. VMT		5.13	5.41	6.55	4.70	4.93	6.22
With Project	1	The Village Apt		5.60	6.55		5.08	6.22
	2	Canyon Creek Apt		5.67	6.55		5.10	6.22
	3	Open Door Com Health Ctr		5.19	6.55		4.67	6.22
	4	Sunset Terrace Apt		4.96	6.55		4.69	6.22
	5	Twin Park Apt		4.99	6.55		4.69	6.22
	6	CreekSide		5.17	6.55		5.05	6.22
	Ave. VMT			5.35	6.55		4.91	6.22
Note. 1 CEQA Threshold = 2010 Avg VMT*0.85								

Source: W & S Solutions, LLC, 2016.

Minor temporary changes in traffic volumes or patterns would also result from construction of the project. Project construction would require deliveries of equipment and materials to the site, as well as daily commute trips by construction employees. Potential transportation system impacts during the construction phase of the proposed project include the potential to disrupt traffic flows on area roadways through the addition of construction vehicles turning in and out of the project site and sharing the roadway with normal vehicle traffic. These impacts would be short-term during construction activity and are considered less than significant.

The proposed project will consolidate two existing health center locations, which will increase efficiency of deliveries, patients, and workers. The new site is also in closer proximity to the Highway 101 exit than either of the two existing Arcata Open Door Clinic locations. Additionally, the project would contribute towards installation of a new bus stop less than 500 feet from the project site along an existing transit route. Based on Figure 9 above, both 2010 and 2040 VMT would be less than the CEQA threshold for the proposed project and result in no significant impact. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b). A **less than significant impact** would occur.

c) The proposed project would utilize existing City Streets and would complete the sidewalk on the north side of Foster Avenue, along the southern property boundary and on Sunset Avenue along the northern property boundary. The proposed primary parking area ingress/egresses onto Foster Avenue would be designed to City standards and provide sufficient visibility so as not to substantially increase hazards. A secondary exit is also proposed on Foster to allow for an on-site patient drop-off area. Because all site access driveways will be designed to city visibility standards, the design features would avoid any substantial increase in hazards and the proposed project would not introduce incompatible uses. Therefore, a **less than significant impact** would occur.

d) The proposed project would develop a new community health center that will not restrict access or use of Foster or Sunset Avenues. Primary site access will be from Foster Avenue, with a delivery and staff parking area off Sunset Avenue. Emergency access to the project site is considered adequate and the project's location and design would not adversely affect the fire or police

department's ability to efficiently respond to emergencies. Therefore, a **less than significant impact would occur**.

Conclusion
There are potentially significant impacts to transportation associated with project implementation; therefore, transportation issues will be further analyzed in the EIR.

TRIBAL CULTURAL RESOURCES	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
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, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
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, the Lead Agency shall consider the significance of the resource to a California Native American Tribe.			X	

Setting
Wiyot occupation of the Humboldt Bay region preceded Euroamerican history from "time immemorial." One might speculate about Wiyot association with this land. Jolly Giant Creek and Janes Creek drain into McDaniel Slough, which empties into Humboldt (Arcata) Bay. Being tributaries of the bay, they were likely salmonid streams supporting coastal cutthroat trout, steelhead and coho salmon, all of which were utilized by Wiyot people (Eidness & Roscoe, 2008a).

The project parcel was included in a Historical Resources Evaluation Report (HRER) prepared for the City's Foster Avenue Extension Project, which included an historical study and an archaeological survey to identify, evaluate, and assess cultural resources in the project area. An additional Cultural Resources Assessment undertaken by Roscoe & Associates in 2010 covered the North Coast Railroad Authority (NCRA) railroad alignment to the south. The discussion and analysis in this Initial Study section is based primarily on these documents.

Discussion

a, b) As discussed in the *Cultural Resources* section of this document, the archaeological surveys undertaken at the site by Eidsness and Roscoe from 2008-10 found no previously recorded or newly discovered archaeological resources. No prehistoric artifacts or sites were located during the field surveys or appeared in any of the on-site soil borings. In addition, no resources were identified or located by the NCIC and Sacred Lands File record searches and no tribal cultural resources were identified during construction of Foster Ave. or adjacent site development.

The survey undertaken by Roscoe and Associates determined that the site and surrounding area is not known to house significant tribal cultural resources of any kind that are either: 1) listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in PRC section 5020.1(k); or 2) determined by a lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in PRC section 5024.1(c), and considering the significance of the resource to a California Native American tribe. Hence, the proposed project is not expected to cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, impacts would be **less than significant**.

Conclusion

No potentially significant tribal cultural resource impacts were identified; therefore no further analysis or mitigation is required unless issues come to light during the AB 52 consultation process.

UTILITIES AND SERVICE SYSTEMS	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water 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 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 inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			x	

UTILITIES AND SERVICE SYSTEMS	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
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

The project site will be served by the City of Arcata water, sewer, and stormwater systems. Both sanitary sewer and water main are located in Sunset Avenue, north of the project site. There are two existing onsite drop inlets that connect to the City's stormwater system. Electric power and natural gas are provided by PG&E; telecommunications are provided by AT&T and Suddenlink. A preliminary utility evaluation was conducted for the proposed project to determine if existing infrastructure has the capacity to meet the demands of the proposed development (SHN, 2019). The utility evaluation considered existing water, sewer, gas, electric, data, and broadband cable services in the vicinity of the proposed project and included coordination with the City of Arcata, the Pacific Gas and Electric Company (PG&E), AT&T, and Suddenlink Communications (Suddenlink). A summary of the utility evaluation results is provided in the discussion and analysis below.

The City's primary water source is water purchased from Humboldt Bay Municipal Water District (HBMWD) and delivered to the Alliance Transfer Station. The City-owned Heindon Well is available as an auxiliary domestic water source. Water is delivered through 86.9 miles of water distribution mains and storage tanks located through an area encompassing approximately ten square miles (City of Arcata, 2018). The City of Arcata owns and operates the wastewater collection, treatment, and disposal facilities that collect and treat wastewater. The Arcata Wastewater Treatment Plant has primary treatment facilities (i.e., headworks, grit removal, primary clarifier, and digester); a series of oxidation ponds and treatment marshes to provide secondary treatment; followed by polishing marshes at the Arcata Marsh and Wildlife Sanctuary (AMWS) (City of Arcata, 2018).

Solid waste within the City of Arcata is currently collected by Recology Arcata, which provides waste and recycling bins and provides for the special hauling of building materials and recyclables. Recology Arcata delivers the solid waste to the Humboldt Waste Management Authority (HWMA) Solid Waste Transfer Station in Eureka where waste is sorted and recyclables and hazardous materials are removed.

Discussion

a) The proposed health center is a relatively small-scale medical office use on an infill site that has been planned for development and considered through city-wide future demand evaluations for public utilities including the potential demand for water and sewer service relating to the project site. As a result, incremental increases in water and wastewater generated by the project have been accounted for by the City in its system planning. The project would not result in the need for the construction of new water or wastewater treatment facilities, or the expansion of existing such facilities. In addition, projects are required to pay a sewer and water connection fee in order

to offset the impact that new development puts on the City's water delivery and wastewater treatment infrastructure.

As discussed in the Hydrology and Water Quality section of this document, on-site stormwater detention facilities will be designed and constructed in compliance with MS4 Permit requirements through the RWQCB. No new or expanded off-site stormwater drainage facilities would be required as a result of the proposed project. The project site is an infill site adjacent to existing electrical power, natural gas, and telecommunication facilities. Additionally, the project is designed to be near net-zero energy, and therefore is not expected to require or result in the construction or expansion of such facilities. Based on the utility evaluation prepared for the proposed project, the existing infrastructure in the vicinity of the project site appears to have adequate capacity to support the proposed development without significant modifications (SHN, 2019). Therefore, the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. A **less than significant impact** would occur.

b) The project would create a small incremental increase in demand for domestic water service from the City of Arcata, which purchases water from the HBMWD. The City's Urban Water Management Plan 2015 was updated in 2018 and specifically identifies the proposed project as a likely development project.

According to the City's Urban Water Management Plan, Arcata has a peak rate allocation of 3.25 MGD from HBMWD. In 2015, the City utilized 658 MG, or 55 percent of its allocation. In 2040, when projected demand is anticipated to be nearly 890 MG the City will be utilizing less than 75 percent of its peak rate allocation. In addition, studies at Heindon Groundwater Well indicate that the City can safely withdrawal 0.5 MGD from the groundwater basin (City of Arcata, 2018).

The data shows that the HBMWD has more than enough water supply to meet demand during normal, dry, and multiple dry years. Likewise, the Service Area anticipates having its entire peak rate allocation available during multiple dry years since there are no projected shortfalls in the supply available to HBMWD (City of Arcata, 2018). Therefore, the City has sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. A **less than significant impact** would occur.

c) The project would create a small incremental increase in demand for wastewater treatment/ disposal service from the City. The health center will have no water pre-treatment needs, as the center will not have x-ray, dental, or other uses that would require pre-treatment. The City's wastewater treatment plant is currently undergoing a facilities plan update to determine present capacity and ability to serve the City's treatment needs. This work informs the City's ability to comply with its National Pollution Discharge Elimination System permit issued by the North Coast Regional Water Control Board (NCRWQCB).

There is planned wastewater treatment capacity for 20,000 people and actual capacity for slightly more. Current potential and planned development projects may yield a slightly higher population, depending on household characteristics. All of this development is within the margins of planning for the facilities; however, the facilities must be improved to meet the demand of both current and future population. The City has plans to improve the treatment

plant and water service capacity. The primary method for paying for these improvements from the ratepayers comes from the capacity charge portion of the capital connection fees and monthly rates for service (City of Arcata, 2017).

The proposed project would not interfere with the WWTP complying with RWQCB regulations because: (1) the project would create only a small incremental increase in wastewater requiring treatment and disposal, (2) the wastewater generated would be mostly typical domestic wastewater associated with office facilities rather than industrial wastewater and the health center does not plan to have any water pre-treatment needs; and (3) the project would pay applicable connection fees and monthly service charges. Therefore, the proposed project would not result in a determination that there is not enough capacity to process the wastewater generated by the project in addition to existing commitments. A **less than significant impact** would occur.

d, e) The proposed project would generate solid waste during both construction and operation. Construction solid waste would include the one-time temporary generation of construction waste associated with site development. Project operation is anticipated to be served by two, three-yard dumpsters collected by Recology.

The City of Arcata has a universal curbside solid waste and recycling collection program to meet State waste reduction mandates, provide convenient service, reduce illegal disposal and public health hazards, and assist the City in moving towards the goal of zero waste. The program requires that all property owners and multifamily and business property owners subscribe to one of the service levels for garbage and recycling collection. Recology Arcata is responsible for local garbage and recycling collection in the City and delivery to Humboldt Waste Management Authority (HWMA) Hawthorne Street Waste Transfer Station, where waste is sorted and recyclables and hazardous materials are removed.

The HWMA is the joint powers authority for waste disposal in Humboldt County. The HWMA ships solid waste from its Hawthorne Street facility in Eureka, to State licensed landfills located outside Humboldt County. Currently, the majority of Humboldt County's solid waste is transferred to one of three out-of-area landfills for disposal: east to the Anderson Landfill in Shasta County, north to the Dry Creek Landfill in Jackson County, Oregon, or south to Potrero Hills Landfill in Suisun City. Together, these three landfills have sufficient permitted capacity to accommodate the County's waste disposal needs for at least the next 20 years (Humboldt County, 2017). The Humboldt Waste Management Authority waste transfer facility was designed to accommodate the county's current and anticipated future needs for solid waste disposal. The increases in solid waste generated by the proposed project would represent a negligible impact to the HWMA transfer station, which is currently operating below capacity.

The project-generated solid waste would represent a less than significant impact on the local transfer station and landfill as both have excess capacity. In addition, the proposed project will comply with City recycling and waste stream reduction requirements, including the City's Zero Waste Plan, to minimize waste going to the landfill. Therefore, the proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste and would not 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. A **less than significant impact** would occur.

Conclusion
No potentially significant utilities and service system impacts were identified; therefore no further analysis or mitigation is required.

WILDFIRE	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**No Impact**
If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:				
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, pollutants from a wildfire or the uncontrolled spread of 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 change?			X	

Setting
Wildland fire protection in California is the responsibility of either the State, local government, or the federal government. A State Responsibility Area (SRA) is a legal term defining the area where the State has financial responsibility for wildland fire protection. Incorporated cities and areas of federal ownership are not included. The prevention and suppression of fires in all areas that are not SRAs are primarily the responsibility of local or federal agencies. Local Responsibility Areas (LRAs) include incorporated cities, cultivated agriculture lands, and portions of the desert. Local responsibility area fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government.

The project area falls into an LRA as does the majority of the Humboldt Bay Region and is served by Arcata Fire District. The boundary of the closest SRA is approximately one mile away at the eastern Arcata City limit boundary (Arcata Parcel Finder, 2018). According to 2007 CalFire "Fire Hazard Severity

Zones" maps, the project area falls into the "LRA Unzoned" category, which is the designation of the majority of the low-elevation coastal-adjacent land along Humboldt Bay including the Arcata Bottoms, Fay Slough, and the Eel River Delta.

Discussion

a-d) The project site is in a LRA currently served by the Arcata Fire District. The closest SRA is approximately one mile east of the project area. The project area is not in a designated area of severe fire hazard due to its environmental conditions and a general lack of significant naturally occurring combustible organic material. According to 2007 CalFire "Fire Hazard Severity Zones" maps, the project area falls into the "LRA Unzoned" category. As this project is not located in or near a state responsibility area or a very high fire hazard severity zone, a **less than significant** impact would occur.

Conclusion

No potentially significant wildfire impacts were identified; therefore no further analysis or mitigation is required.

MANDATORY FINDINGS OF SIGNIFICANCE	**Potentially Significant**	**Less Than Significant With Mitigation**	**Less Than Significant**	**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 with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	X			
c) Does the project have environmental effects which will cause substantial			X	

MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant	Less Than Significant With Mitigation	Less Than Significant	No Impact
adverse effects on human beings, either directly or indirectly?				

Discussion
Certain mandatory findings of significance must be made to comply with CEQA Guidelines §15065. The proposed project has been analyzed, and it has been determined that it would not:

- Substantially degrade environmental quality;
- Substantially reduce fish or wildlife habitat;
- Cause a fish or wildlife population to fall below self-sustaining levels;
- Threaten to eliminate a plant or animal community;
- Reduce the numbers or range of a rare, threatened, or endangered species;
- Eliminate important examples of the major periods of California history or pre-history;
- Achieve short term goals to the disadvantage of long term goals;
- Have environmental effects that will directly or indirectly cause substantial adverse effects on human beings; or

The project has been evaluated in this initial study and determined to have no potentially significant unmitigated impacts, except for potential transportation impacts which will be further analyzed in an EIR.

a) The proposed project has the potential to adversely affect a small amount of wetlands, but does not threaten self-sustaining levels or endangered plants or animals. The potential impacts to biological resources would be less than significant with mitigation measures described in this document. See the Biological Resources Section for a specific discussion of biological resources supporting this finding. Potential impacts to historic and cultural resources would be less than significant. See the Cultural Resources Section for a specific discussion of historic resources supporting this finding. With the mitigation measures described in this document, the Project would not 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, 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. See Biological Resources and Cultural Resources Sections for specific discussions supporting this finding. As such, no element of this project would cause substantial environmental degradation, and potential environmental impacts as a result of this project would be **less than significant with mitigation**.

b) An analysis of cumulative impacts considers potential project impacts combined with incremental effects of other approved, proposed or reasonably foreseeable similar projects in the vicinity. Many of the items reviewed as part of this initial study would result in no impact or were considered to have less than significant impacts, and where appropriate, references were made to the Arcata General Plan and specific studies prepared for the proposed project. The project's individual impacts would not add appreciably to existing or foreseeable future significant cumulative impacts, such as biological resources, stormwater runoff, water supply, or air quality degradation. However, the project could result in potentially significant transportation impacts. There are five known

current residential project proposals in the project vicinity and potential cumulative impacts are considered in this Initial Study and will be further analyzed in the EIR.

c) 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. The proposed project has been designed to be consistent with General Plan policies and zoning requirements. Based on the analysis in this document, construction and operation of the proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. As such, potential impacts would be **less than significant**.

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