ENVIRONMENTAL INITIAL STUDY

INITIAL STUDY CHECKLIST
PROPOSED MITIGATED NEGATIVE DECLARATION
Eureka City Schools
Eureka High School - Albee Stadium Renovation Project

Prepared by:
SHN
1062 G Street, Suite I
Arcata, CA 95521

April 2022

Abbreviations and Acronyms

AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
AHERA	Asbestos Hazard Emergency Response Act
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BMP	best management practices
CAC	Certified Asbestos Consultant
CALFIRE	California Department of Fire and Forestry
CalOSHA	California Division of Occupational Safety and Health
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCE	Community Choice Energy
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish & Wildlife
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbon
cfs	cubic feet per second
CGP	Construction General Permit
CGS	California Geological Survey
CH4	methane
CO	carbon monoxide
CO2	carbon dioxide
CRHR	California Register of Historical Resources
CWA	Clean Water Act
DOC	California Department of Conservation
DOORS	Diesel Off-Road Online Reporting Systems
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
ECS	Eureka City Schools
ECUSD	Eureka City Unified School District
EHS	Eureka High School
EO	Executive Order
EPA	Environmental Protection Agency
EPD	Eureka Police Department
ESA	Environmental Site Assessment
ETS	Eureka Transit Service
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
H_2S	Hydrogen sulfide
HBF	Humboldt Bay Fire
HBMWD	Humboldt Bay Municipal Water District
HFC	hydrofluorocarbon
HP	High-performance Polypropylene
HTA	Humboldt Transit Authority
HWMA	Humboldt Waste Management Authority
IS	Initial Study
JPA	Joint Powers Authority
LBP	Lead-based paint
LCSC	Lead-containing surface coatings
LID	low impact development
LRA	Local Responsibility Area
LRHP	Local Register of Historic Places
LSA	Lake and Streambed Alteration
LUST	leaking underground storage tank
MCAQMD	Mendocino County Air Quality Management District
mi.	miles
MLD	Most Likely Descendant
MMTCO2e	million metric tons of CO2 equivalent
MND	Mitigated Negative Declaration
MS4	Municipal Separate Storm Sewer System
MTCO2e/yr	metric tons of CO2 equivalent per year
N2O	nitrous oxide
NAHC	Native American Heritage Commission
NCAB	North Coast Air Basin
NCRWQCB	North Coast Regional Water Quality Control Board
NCUAQMD	North Coast Unified Air Quality Management District
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO2	nitrogen dioxide
NOA	naturally-occurring asbestos
NOI	Notice of Intent
NOx	nitrous oxides
NRCS	National Resource Conservation Service
NWS	National Weather Service
OHWM	Ordinary High Water Mark
OPR	Governor's Office of Planning & Research
PA	Public Address
PCB	Polychlorinated biphenyls
PE	Physical Education
PF	Public Facility
PFC	perfluorocarbon
PG&E	Pacific Gas & Electric
PM10	Particulate Matter
ppm	parts per million
PRC	Public Resources Code
PVC	poly vinyl chloride
QSD	Qualified SWPPP Developer
R1	Residential Low
R2	Residential Medium
R3	Residential High

Abbreviations and Acronyms (cont'd)

RCEA	Redwood Coast Energy Authority
ROG	reactive organic gases
ROW	right-of-way
SB	Senate Bill
SBR	Styrene butadiene rubber
sf	square feet
SF6	hexafluoride
SFBAAB	San Francisco Bay Area Air Basin
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO2	sulfur dioxide
SR	State Route
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
THPO	Tribal Historic Preservation Officer
US-101	US Highway 101
USACE	United States Army Corp of Engineers
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish & Wildlife Service
USGS	United States Geological Survey
VMT	vehicle miles traveled
VOC	volatile organic compounds
WRA	William Rich & Associates
WWTP	Waste Water Treatment Plant

Eureka City Schools
ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Eureka High School – Albee Stadium Renovation Project

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

Eureka City Schools
2100 J Street
Eureka, California 95501

3. **Contact Person and Phone Number**: Paul Ziegler - Assistant Superintendent, 707-441-2412

4. **Project Location:** The project is located at the Eureka High School (EHS) campus in the City of Eureka, California. The project is located on Assessor's Parcel Numbers (APNs) 005-131-008, 005-132-008, 005-243-003, 005-243-004, 005-246-004, 011-121-001, and 011-131-005, portions of which are currently developed with Albee Stadium, Bud Cloney Field, and various facilities that serve athletic and/or academic functions at EHS. The project is approximately 3 miles east of the Pacific Ocean, at a 90-foot elevation above sea level. The total project area defined by the boundary of the proposed improvements is 9.8 acres. The site is within the U.S. Geological Survey (USGS) Eureka 7.5-minute quadrangle, N.W. ¼, Section 26, Township 5 North, Range 1 West, Humboldt Baseline and Meridian with a center point at latitude 40.7900060° and longitude -124.155321°.

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

Eureka City Schools
2100 J Street
Eureka, California 95501

6. **General Plan Designation:** Public Facility (PF)

7. **Zoning:** Public Facility (PF)

8. **Existing Facilities and Use:** The approximately 9.8-acre project site encompasses two distinct areas of the EHS campus, including areas in and around Albee Stadium and Bud Cloney Field. Albee Stadium and Bud Cloney Field are separated by Del Norte Street, which passes through the project site from east to west. Albee Stadium was built in 1925 and Bud Cloney Field was built sometime after 1970. Since their construction, Albee Stadium and Bud Cloney Field have since been used by both EHS students and community members for athletic and recreational activities with periodic improvements over the years. The existing facilities are in an aging and deteriorated condition. Cooper Creek (also commonly referred to as Cooper Canyon or Cooper Gulch) flows beneath the project site for a total length of 1,500 feet, entering a 30-inch diameter storm drainpipe south of Albee Stadium and daylighting north of Bud Cloney Field. Critical failure of the Cooper Creek storm drainpipe has resulted in sinkholes, posing a significant health and safety hazard and resulting in closures of portions of the project site.

9. **Description of Project:** The Eureka City Schools (ECS) proposes to rehabilitate the failing storm drain system and improve various athletic facilities in support of existing athletic programs.

Albee Stadium

On the south side of Del Norte Street, the project involves replacement of the existing track and field facilities in Albee Stadium, replacing the existing sod football field with a new synthetic turf football field, renovation of the softball field, including a new backstop and dugouts, new retaining walls, concrete flatwork, relocation of freestanding scoreboards, new chain link fencing, metal iron fencing, construction of Americans with Disabilities Act (ADA) accessible paths of travel, and other improvements throughout the project site. Existing stadium lighting will be replaced with a new stadium lighting system. The existing parking lot will be replaced. New power and signal distribution systems will be extended to new and existing buildings. The existing 30-inch diameter concrete storm drainpipe that conveys Cooper Creek beneath the site will be replaced using open trenching methods with a new 42-inch diameter high-performance polypropylene (HP) storm drainpipe that is sized to pass the 100-year storm flow. Existing storm drain laterals will be removed, or pressure grouted in place. The inlet of the storm drainpipe will be improved with a new concrete headwall and rock energy dissipator. Various auxiliary, utility, and stormwater management improvements are also proposed, including the construction of new storm drain piping and bioretention basins to manage and

treat stormwater runoff. The existing fieldhouse will be demolished and reconstructed and two new structures, including a multi-use building (such as concessions, restrooms, etc.) and athletics building (such as team rooms, restrooms, etc.), will be constructed.

Bud Cloney Field

On the north side of Del Norte Street, the project involves renovation of the baseball field, demolition of the Technology Center Building (also known as the Welding Shop), removal of the Portable Agriculture Classrooms and sheds, construction of a new parking lot, and replacement of the sewer, water, electrical, and gas services for the Woodshop Building, greenhouse, and baseball field. The freestanding scoreboard structure and chain link fencing will be replaced. The project will construct ADA accessible paths of travel throughout the project site. The existing 30-inch diameter concrete storm drainpipe that conveys Cooper Creek beneath the site will be replaced using open trenching methods with a new 42-inch diameter high-performance polypropylene (HP) storm drainpipe that is sized to pass the 100-year storm flow. Existing storm drain laterals will be removed, or pressure grouted in place. The outlet of the storm drainpipe will be improved with a new concrete headwall and rock energy dissipator. Various auxiliary, utility, and stormwater management improvements are also proposed, including the construction of new storm drain piping and bioretention basins to manage and treat stormwater runoff. For further detail of the proposed project, see Section 2.2 of the Project Description.

10. **Surrounding Land Uses and Setting:** The project site is centrally located in the City of Eureka. Surrounding land uses include residential development within Low Density Residential (R1), Residential Medium (R2), and Residential High (R3) zoning districts (City of Eureka, 2020a, 2020b). The remnant conifer forested slopes surrounding the project site create varying degrees of separation between the project site and surrounding residential development.

The project site occurs on two distinct areas of the EHS campus, including areas in and around Albee Stadium and Bud Cloney Field. Albee Stadium is bordered by Del Norte Street to the north, and by forested slopes to the east, south, and west. The forested slopes create varying amounts of separation between Albee Stadium and the EHS main campus to the west, and nearby residential development to east and south.

Bud Cloney Field is bordered by Del Norte Street to the south, and by forested slopes to the north, east, and west. Apart from several residences located along Del Norte Street, the forested slopes create separation between Bud Cloney Field and nearby residential development to the east and west. To the north of Bud Cloney Field, Cooper Creek and the surrounding forested slopes form a small, northward-sloping urban forest with extensive wetlands.

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

- Division of the State Architect
- California Department of Fish and Wildlife – Lake and Streambed Alteration (LSA) Agreement
- U.S. Army Corps of Engineers – Section 404 Water Quality Permit
- North Coast Regional Water Quality Control Board – Section 401 Water Quality Certification
- North Coast Regional Water Quality Control Board – Construction General Permit

12. **Tribal Consultation:** ECS requested a list of regional tribes from the Native American Heritage Commission (NAHC). Registered Professional Archaeologist, William Rich, M.A. invited the Wiyot area tribes to coordinate on field survey and archaeological identification efforts at this project location. This outreach was provided by an emailed letter on September 4, 2020 to Tribal Historic Preservation Officers (THPO) Janet Eidsness of the Blue Lake Rancheria, Erika Cooper of the Bear River Band of the Rohnerville Rancheria, and Chairman Ted Hernandez of the Wiyot Tribe. Under Assembly Bill (AB) 52, Eureka City Schools sent notification letters to local Native American tribes on October 19, October 21, and November 5, 2020. Responses were received from the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria requesting that an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation (ECS, 2020a). The requested language is included as Mitigation Measure CR-3 (see Cultural Resources [Section V] and Tribal Cultural Resources [Section XVIII]).

13. **Purpose of this Document:** This document only seeks to analyze the environmental impacts of the construction and operation of the proposed Eureka High School – Albee Stadium Renovation Project and associated expansions (for example, driveway/entrance, parking, drainage, infrastructure, landscaping, etc.).

SECTION 1.0
INTRODUCTION

1.1 Introduction and Regulatory Guidance

This document is an Initial Study (IS) that summarizes the technical studies prepared for the proposed ECS Albee Stadium Renovation Project and provides justification for a Mitigated Negative Declaration (MND). This document has been prepared in accordance with the current California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. The purpose of this document is to evaluate the potential environmental impacts of the proposed Albee Stadium Renovation Project along Del Norte Street in the City of Eureka. Mitigation measures have been proposed to avoid or minimize any significant impacts that were identified.

1.2 Lead Agency

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

1.3 Purpose of the Initial Study

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

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

1.4 Review Process

This IS/MND is being circulated for public and agency review as required by CEQA. Because state agencies will act as responsible or trustee agencies, ECS will circulate the IS/MND to the State Clearinghouse of the Governor's Office of Planning and Research for distribution and a 30-day review period.

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

Paul Ziegler, Assistant Superintendent
Business Services
Eureka City Schools
2100 J Street, Eureka, CA 95501
zieglerp@eurekacityschools.org

SECTION 2.0
PROJECT DESCRIPTION

2.1 Project Location and Setting

Regional Setting

The project site is in the City of Eureka, a coastal city located in central Humboldt County in California's North Coast region. The city contains approximately 16.4 square miles (10,477 acres) of land and water area. Eureka serves as the political seat for the County and is located approximately 275 miles north of San Francisco and 100 miles south of the Oregon border. The U.S. Highway 101 (U.S.-101) is the only major highway connecting Eureka to other destinations in California. Eureka is situated on Humboldt Bay, which holds an important port between San Francisco and Coos Bay, Oregon, and has an extensive urban waterfront devoted to commercial and industrial uses. The climate in Eureka is categorized as cool-summer Mediterranean with mild and rainy winters and cool and dry summers. The region is subject to various natural hazards, including earthquakes, tsunami, and flooding.

Project Location

The project is centrally located in the City of Eureka. Eureka High School (EHS) located at 1915 J Street, Eureka, occupies the entire block bounded by J and N Streets to the west and east, by Buhne Street to the south, and by Cooper Gulch to the north (Figure 1). The proposed project is on a portion of the EHS campus, on portions of APNs 005-131-008, 005-132-008, 005-243-003, 005-243-004, 005-246-004, 011-121-001, and 011-131-005 (Figure 2). The project site is located adjacent to the EHS main campus and includes areas on the north and south side of Del Norte Street. For the purpose of this analysis, the area to the north of Del Norte Street is described as Bud Cloney Field and the area south of Del Norte Street is described as Albee Stadium. As described in greater detail in Section 2.2 (Existing Condition), the project site contains various facilities that serve athletic and/or academic functions at EHS, including the Field House, Portable Agriculture Classrooms, Wood Shop, and Technology Center Building (also known as the Welding Shop). The site is within the U.S. Geological Survey (USGS) Eureka 7.5-minute quadrangle, N.W. ¼, Section 26, Township 5 North, Range 1 West, Humboldt Baseline and Meridian with a center point at latitude 40.7900060° and longitude -124.155321°.

Surrounding Land Uses and Existing Setting

The project site occurs on two distinct areas of the EHS campus, including areas in and around Albee Stadium and Bud Cloney Field. Albee Stadium is bordered by Del Norte Street and Bud Cloney Field to the north and by forested slopes to the east, south, and west. The remnant conifer forested slopes create varying amounts of separation between Albee Stadium and the EHS main campus to the west, and nearby low-density residential development to east and south.

Bud Cloney Field is bordered by Del Norte Street and Albee Stadium to the south, and by forested slopes to the north, east, and west. Apart from several residences located along Del Norte Street, the remnant conifer forested slopes create separation between Bud Cloney Field and nearby low- and medium-density residential development to the east and west. To the north of Bud Cloney Field, Cooper Creek and the surrounding forested slopes form a small, northward-sloping urban forest containing extensive wetlands.

EHS serves grades 9 – 12 and has approximately 1,138 students currently enrolled (California Department of Education [CDE], 2019).

2.2 Existing Conditions

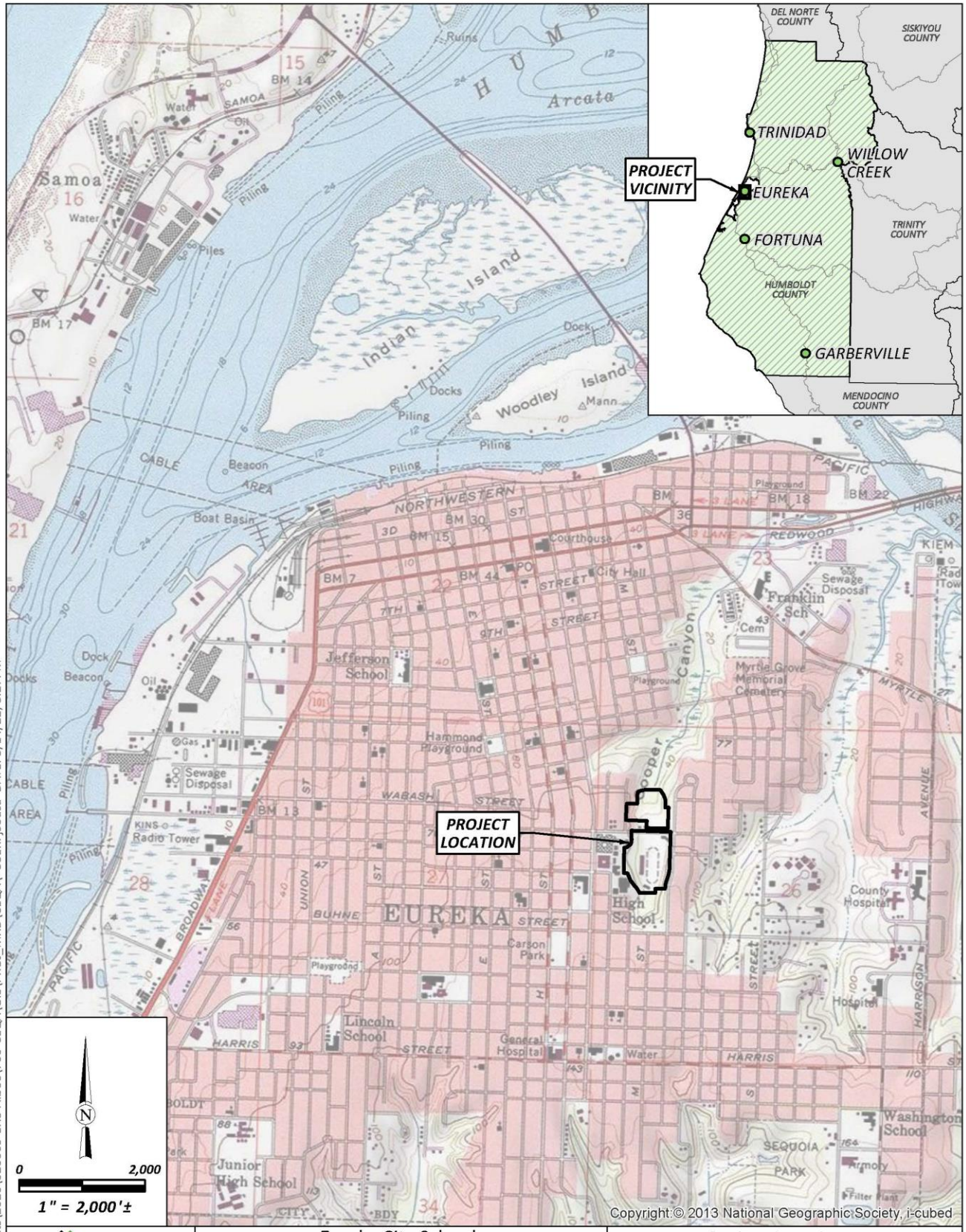
Existing development associated with the project site includes the following (Figure 3):

- **Albee Stadium**
    - Natural turf football field
    - 8-lane running track
    - Spectator bleachers (total capacity 5,200 persons)
    - Natural turf softball field including dugouts
    - Stadium lighting (total of 6 lighting structures)

- Scoreboard
- Press box
- Field house
- Power building
- Pedestrian pathways and access roads
- Standard and ADA parking stalls
- Perimeter fencing and entrance gates
- Retaining walls at various locations
- Miscellaneous Storage Units/Shipping Containers

- **Bud Cloney Field**
  - Technology Center Building (also known as the Welding Shop)
  - Wood Shop
  - Portable Agriculture classrooms
  - Natural turf baseball field including dugouts and batting cages
  - Temporary seating and mobile bleachers
  - Pedestrian pathways and access road
  - Standard and ADA parking stalls
  - Perimeter fencing and entrance gates
  - Interior fencing and entrance gates

Albee Stadium was built in 1925 and Bud Cloney Field was built sometime between 1970 and 1981 (Figures 4 through 7). Since their construction, Albee Stadium and Bud Cloney Field have since been used by both EHS students and community members for athletic and recreational activities with periodic improvements over the years (WRA, 2020). Athletic facilities at the project site are in an aging and deteriorated condition. Furthermore, portions of the project site have become compromised as the result of the critical failure of the underlying storm drain system. Several dangerous sinkholes have developed, resulting in temporary closures to portions of the project site. Additional sinkholes can develop with no warning, which has created an imminent health and safety risk to students, teachers, staff, and visitors to the project site. The primary cause of the sinkholes is the failing storm drain system located up to approximately 14 feet beneath the ground surface. Existing athletic surfaces have become compromised by the failing storm drain system, as well as from historic use and deterioration.



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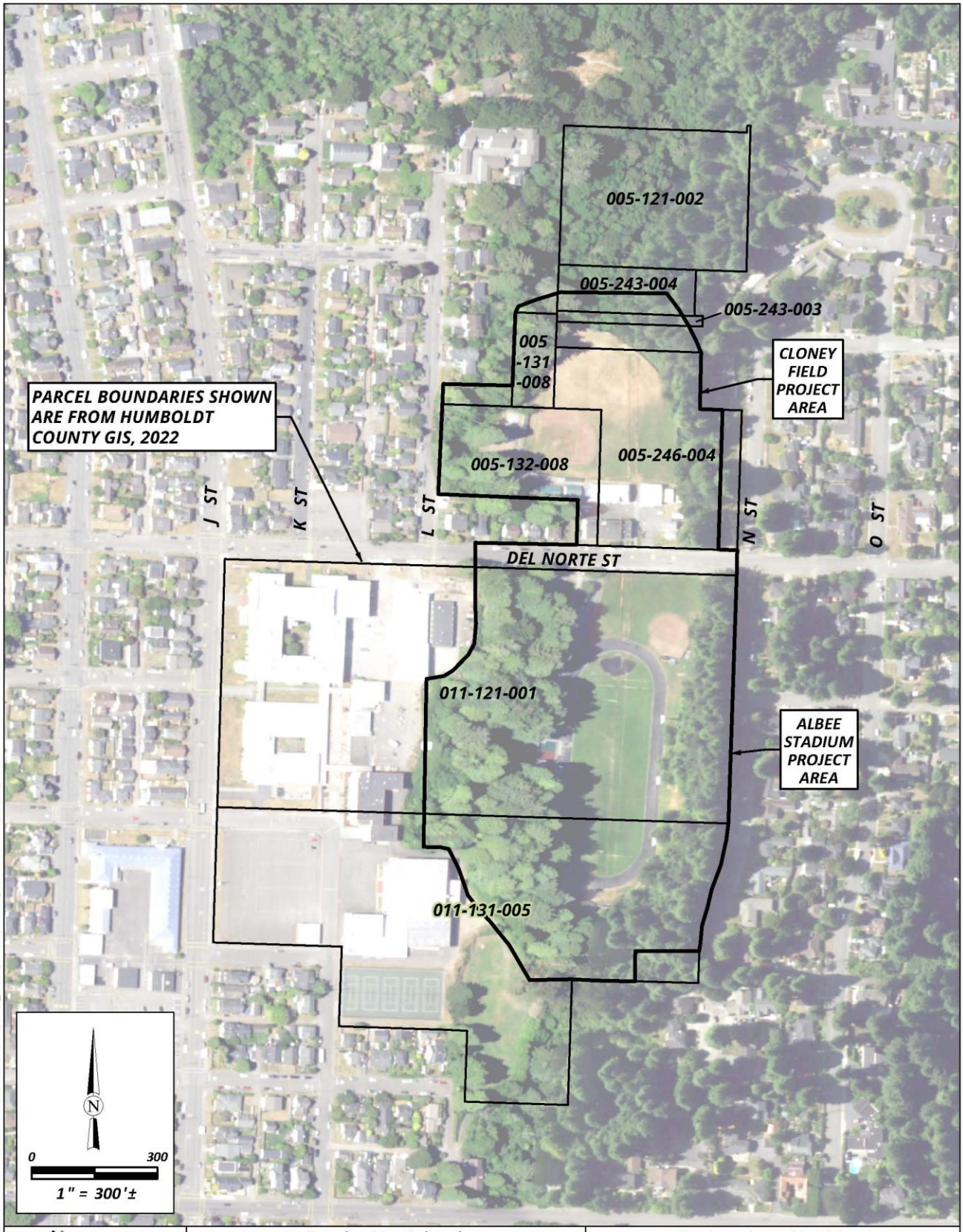
SHN	Eureka City Schools Albee Stadium Renovation Project CEQA Eureka, California	Project Location SHN 020069.700
	March 2022 | CEQA_Fig1_ProjectLocation	Figure 1



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SHN	Eureka City Schools Albee Stadium Renovation Project CEQA Eureka, California	Project Area Site Map SHN 020069.700
	March 2022 | CEQA_Fig2_ProjectAreaSiteMap	Figure 2

Eureka City Schools
Albee Stadium Renovation Project CEQA
Eureka, California

Figure 3
Existing Site Map
March 2022, SHN 020069.150

3

Figure 4. Aerial Photo of Albee Stadium (1946)

Figure 5. Aerial Photo of Albee Stadium (1946)

Figure 6. Aerial Photo of Project Site and Project Vicinity (1946)

Figure 7. Athletic Event at Albee Stadium (Unknown Date)

Facility Operation

The athletic facilities of Albee Stadium (Figures 8 and 9) and Bud Cloney Field (Figures 10 and 11) host EHS sports practices and games during the fall, spring, and summer seasons. Events take place on weekdays and/or weekends. Events at Albee Stadium occur during daylight and nighttime hours, whereas events at Bud Cloney Field only occur during daylight hours. The project site is also host to EHS physical education (PE) classes during normal school hours. Uses related to EHS athletic programs held at the project site are shown in Table 1.

Table 1. Existing EHS Athletic Uses at the Project Site

Facility Use		Typical Location	Last Used
EHS Track and Field	Co-Ed Practice	Albee Stadium	May, 2015
	Co-Ed Meets		
EHS Softball	Women's JV and Varsity Practice	Albee Stadium	May, 2019
	Women's JV and Varsity Games		
EHS Baseball	Men's JV and Varsity Practice	Bud Cloney Field	October, 2019
	Men's JV and Varsity Games		
EHS Football	Men's JV and Varsity Practice	Albee Stadium	November, 2019
	Men's JV and Varsity Games		
EHS Soccer	Women's JV and Varsity Practice	Albee Stadium	November, 2019
	Women's JV and Varsity Games		
	Men's JV and Varsity Practice		
	Men's JV and Varsity Games		
EHS PE	Co-Ed Classes and Activities	Albee Stadium	November, 2019

Figure 8. Albee Stadium (Looking Northeast)

Figure 9. Albee Stadium (Looking Southeast)

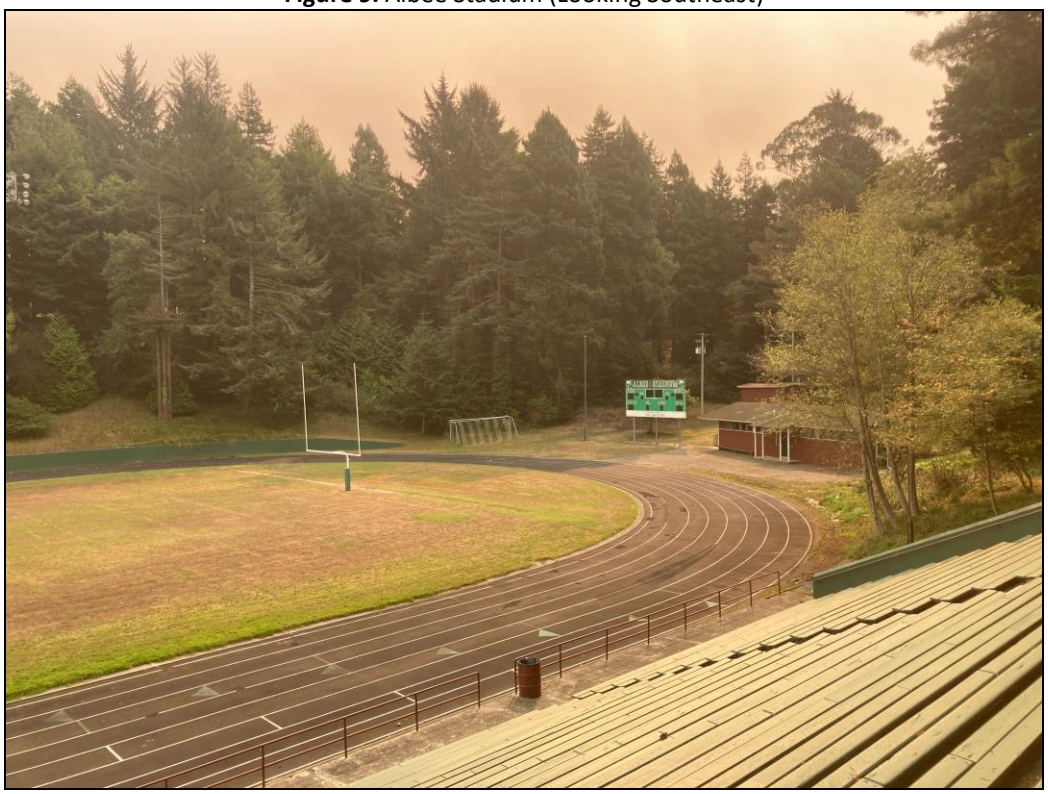


Figure 10. Bud Cloney Field (Looking Northwest)

Figure 11. Bud Cloney Field (Looking South)

ECS also has contracted with several community organizations to host events unaffiliated with EHS athletic or academic programs. These events include club practices and games, middle school/elementary school practices and games, and benefit fundraisers. Public access to the project site for individual community members is available on a contractual basis with EHS.

Table 2. Existing Non-Athletic Uses at the Project Site

Facility Use	Typical Location	Last Used
EHS Graduation	Albee Stadium	June, 2019
Community Events	Albee Stadium	July, 2019
Emergency Assemblage	Albee Stadium	November, 2019
Public Access	Albee Stadium	November, 2019

Over the last several years, the aging and deteriorated condition of the project site has led to a steady decline in EHS affiliated and nonaffiliated events. Moreover, due to the onset of the COVID-19 pandemic in spring 2020, in-person academic and athletic gatherings at EHS have been discontinued at times. As a result, all uses typically held at the project site were temporarily ceased. The most recent date(s) of typical operation and use of the facility is shown in Tables 1 and 2. Because of the relatively recent interruption of use of the facilities due to the storm drainage failures and COVID-19, the CEQA baseline is defined as the normal operation of the subject facilities (such as 2015).

Facility Lighting

Exterior lighting associated with the project site includes stadium lighting, pedestrian-scale lighting, and parking lot lighting. Stadium lighting is mounted to six poles, three occurring on either side of the football field and running track (Figures 12 and 13). Additional sources of outdoor lighting at Albee Stadium include pedestrian-scale lighting located on the exterior of existing structures. Sources of outdoor lighting at Bud Cloney Field include parking lot lighting and pedestrian-scale lighting located on the exterior of existing structures. Use of the site primarily occurs on weekdays and/or weekends during daylight hours; however, stadium lighting at Albee Stadium provides illumination of the football field and running track after dusk, thereby allowing use of the site to occur after daylight hours.

Figure 12. Albee Stadium Lighting (West)

Figure 13. Albee Stadium Lighting (East)

Traffic and Circulation

Albee Stadium is separated from Bud Cloney Field by Del Norte Street, which runs east to west between the two sites (Figures 14 and 15). Del Norte Street has paved pedestrian walkways along the southern and northern edges of the roadway. Street parking is available at several locations along Del Norte Street. A pedestrian cross walk is located midway along Del Norte Street between L and N Streets, providing connection between Albee Stadium and Bud Cloney Field. Del Norte Street contains no bicycle lanes on either side.

Figure 14. Del Norte Street (Looking West)

Figure 15. Del Norte Street (Looking East)

Primary access to Albee Stadium is provided by a paved drive aisle and pedestrian path accessed from the southern edge of Del Norte Street. Existing fencing surrounding Albee Stadium limits access to the site outside of normal school hours and athletic events. Secondary access is provided by additional pathways and drive aisles from the EHS main campus to Albee Stadium located along the western slopes. Entrance gates are located at access points along the perimeter of Albee Stadium.

Access to Bud Cloney Field is provided by a paved drive aisle and pedestrian path accessed from the northern edge of Del Norte Street. Existing fencing surrounding Bud Cloney Field limits access to the site outside of normal school hours and athletic events. An entrance gate is located near the drive aisle from Del Norte Street.

Wetlands and Drainage Features

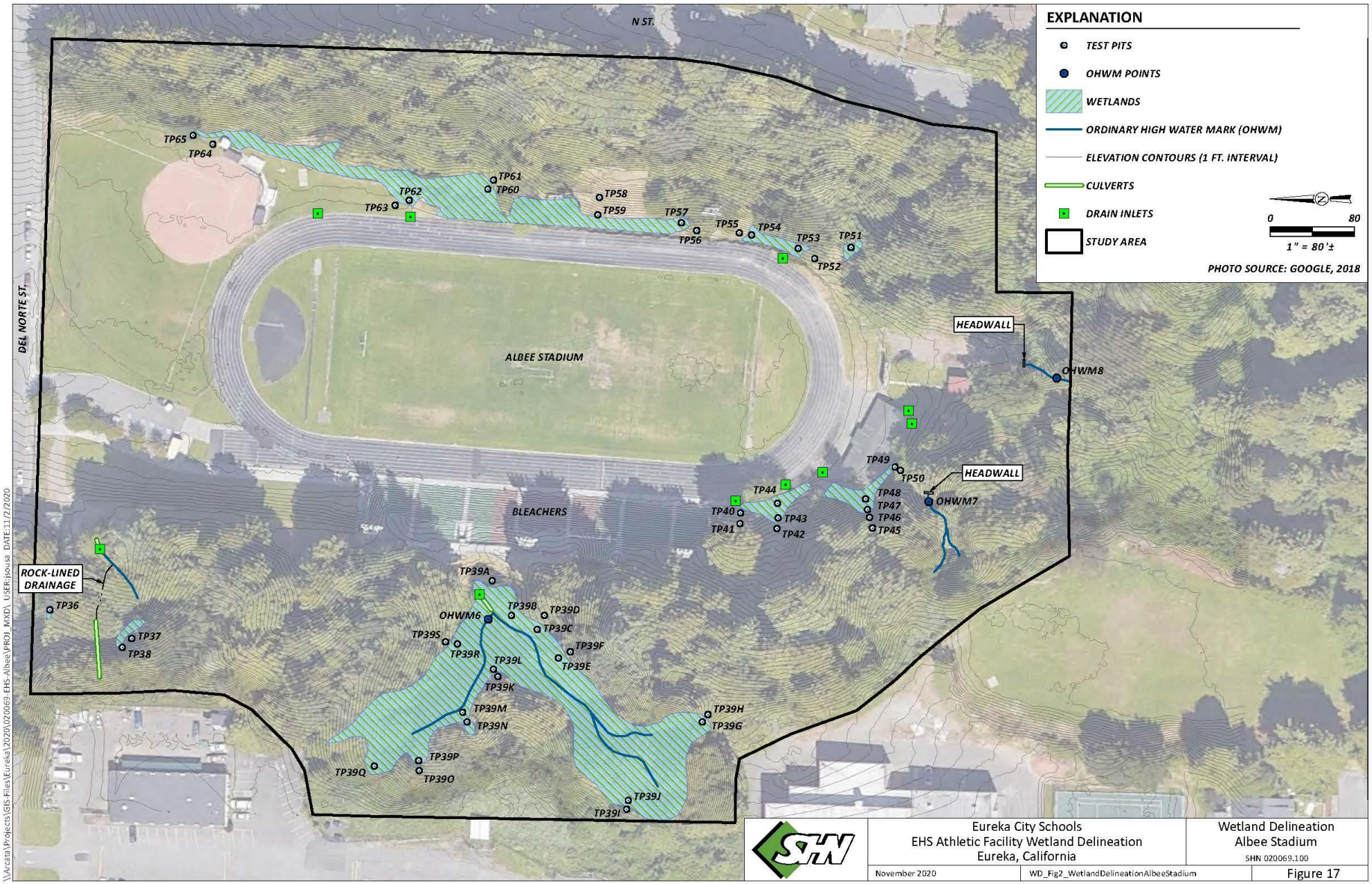
The project site is on historically placed loamy fill and native soil materials within the valley forming Cooper Creek. The project site was filled to the existing grade and installed with an extensive drainage system during the original buildout of Albee Stadium and Bud Cloney Field. Cooper Creek flows beneath the project site for a total length of 1,500 feet, entering a 30-inch diameter concrete storm drainpipe south of Albee Stadium (Figure 16) and daylighting north of Bud Cloney Field. Cooper Creek continues north for approximately 1.3 miles before draining into Eureka Slough and Humboldt Bay. As previously mentioned, the storm drain conveying Cooper Creek beneath the project site has become severely compromised, resulting in several dangerous sinkholes and the temporary closures to portions of the project site.

The steep slopes surrounding Albee Stadium and Bud Cloney Field are dominated by remnant conifer forests. Small channels drain the steep slopes surrounding the project site. Wetland Delineations performed between August 19, 2020 and September 24, 2020 evaluated approximately 21.2 acres of the project site and lands occurring immediately adjacent to the project site. Freshwater forested/shrub wetlands occur intermittently in areas along the margins of the existing athletic fields. These wetlands are classified as Palustrine Forested Broad-leaved Deciduous Seasonally Flooded. Figures 17 and 18 indicate the jurisdictional wetland boundaries and ordinary high-water mark (OHWM) transects within the project site and surrounding slopes (SHN, 2020b).

The total project area defined by the boundary of the proposed improvements is 9.8 acres, consisting of a pre-project impervious surface area of approximately 2.99 acres and a pre-project pervious surface area of approximately 6.81 acres.

Irrigation of the existing natural turf athletic fields typically occurs in the dry season. Irrigation of the athletic fields is generally performed three days per week with 20-minute rotating increments. Water is supplied through existing connections to the City of Eureka public water system.

Figure 16. Cooper Creek Storm Drain Inlet and Headwall


EXPLANATION
TEST PITS
OHWM POINTS
WETLANDS
ORDINARY HIGH WATER MARK (OHWM)
ELEVATION CONTOURS (1 FT. INTERVAL)
CULVERTS
DRAIN INLETS
STUDY AREA
0
80
1" = 80'±
PHOTO SOURCE: GOOGLE, 2018
N ST.
DEL NORTE ST.
ALBEE STADIUM
BLEACHERS
HEADWALL
HEADWALL
ROCK-LINED DRAINAGE
OHWM8
OHWM7
OHWM6
TP65
TP64
TP61
TP60
TP62
TP63
TP58
TP59
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TP39K
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TP39G
TP39P
TP39Q
TP39O
TP39J
TP39I
Eureka City Schools
EHS Athletic Facility Wetland Delineation
Eureka, California
Wetland Delineation
Albee Stadium
SHN 020069.100
November 2020
WD_Fig2_WetlandDelineationAlbeeStadium
Figure 17
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N ST.
L ST.
DEL NORTE ST.
CLONEY FIELD
OUTFALL
OHWM1
OHWM2
OHWM3
OHWM4
OHWM5
TP1
TP2
TP3
TP4
TP5
TP6
TP7
TP8
TP9
TP10
TP11
TP12
TP13
TP14
TP15
TP16
TP17
TP18
TP19
TP20
TP21
TP22
TP23
TP24
TP25
TP26
TP27
TP28
TP29
TP30
TP31
TP32
TP33
TP34
TP35
TP36
EXPLANATION
TEST PITS
OHWM POINTS
WETLANDS
ORDINARY HIGH WATER MARK (OHWM)
ELEVATION CONTOURS (1 FT. INTERVAL)
CULVERTS
DRAIN INLETS
STUDY AREA
0
80
1" = 80'±
PHOTO SOURCE:
USGS NAIP, 2018
\\Arcata\Projects\GIS-Files\Eureka\2020\020069-EHS-Albee\PROJ MXD\ USER:jsousa DATE:11/2/2020
Eureka City Schools
EHS Athletic Facility Wetland Delineation
Eureka, California
Wetland Delineation
Cloney Field
SHN 020069.100
November 2020
WD_Fig3_WetlandDelineationCloneyField
Figure 18

2.3 Proposed Project

As previously discussed, existing facilities at the project site are in an aging and deteriorated condition, in particular the failing drainage system and athletic surfaces. The proposed project will rehabilitate the failing storm drain system and renovate various athletic and educational facilities at Albee Stadium and Bud Cloney Field in support of existing athletic and educational programs (Figures 19-21). The proposed project would be constructed with funding from Measure T, which was passed on March 3, 2020. Although the proposed project is located within the City of Eureka, the project site is located on ECS property under the authority of ECS and the State of California. Public school districts, such as ECS, retain the authority to overrule local zoning and general plan land-use designations if specified procedures are followed pursuant to Government Code sections 53094, 65402(a), and 65403 and Public Resources Code Section 21151.2. Accordingly, ECS adopted Resolution #20-21-014 on September 17, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements (ECS, 2020b). The design of the proposed project will be required to comply with the requirements of the Division of the State Architect (DSA), ECS, and other State entities.

Albee Stadium

On the south side of Del Norte Street, the project involves replacement of the existing track and field facilities in Albee Stadium, replacing the existing sod football field with a new synthetic turf football field, renovation of the softball field, including a new backstop and dugouts, new retaining walls, concrete flatwork, relocation of freestanding scoreboards, new chain link fencing, metal iron fencing, construction of ADA accessible paths of travel and other improvements throughout the project site (Figures 19 and 20). Existing stadium lighting will be replaced with a new stadium lighting system. The existing parking lot will be replaced. New power and signal distribution systems will be extended to new and existing buildings. The existing 30-inch diameter concrete storm drainpipe that conveys Cooper Creek beneath the site will be replaced using open trenching methods with a new 42-inch diameter high-performance polypropylene (HP) storm drainpipe that is sized to pass the 100-year storm flow. Existing storm drain laterals will be removed, or pressure grouted in place. The inlet of the storm drainpipe will be improved with a new concrete headwall and rock energy dissipator. Various auxiliary, utility, and stormwater management improvements are also proposed, including the construction of new storm drain piping and bioretention basins to manage and treat stormwater runoff. The existing fieldhouse will be demolished and reconstructed and two new structures, including a multi-use building (such as concessions, restrooms, etc.) and athletics building (such as team rooms, restrooms, etc.), will be constructed. The press box will be renovated, and a vertical lift will be added on the west side of the press box to provide an accessible path of travel. The bleachers will be improved for accessibility.

Bud Cloney Field

On the north side of Del Norte Street, the project involves renovation of the baseball field, demolition of the Technology Center Building (also known as the Welding Shop), removal of the Portable Agriculture Classrooms and sheds, construction of a new parking lot, and replacement of the sewer, water, electrical, and gas services for the Woodshop Building, greenhouse, and baseball field (Figure 21). The freestanding scoreboard structure and chain link fencing will be replaced. The project will construct ADA accessible paths of travel throughout the project site. The existing 30-inch diameter concrete storm drainpipe that conveys Cooper Creek beneath the site will be replaced using open trenching methods with a new 42-inch diameter high-performance polypropylene (HP) storm drainpipe that is sized to pass the 100-year storm flow. Existing storm drain laterals will be removed, or pressure grouted in place. The outlet of the storm drainpipe will be improved with a new concrete headwall and rock energy dissipator. Various auxiliary, utility, and stormwater management improvements are also proposed, including the construction of new storm drain piping and bioretention basins to manage and treat stormwater runoff.

As described above, the proposed project will replace existing natural turf athletic surfaces at Albee Stadium and Bud Cloney Field with synthetic turf athletic surfaces. The proposed synthetic turf surfaces will utilize virgin materials that have been tested to pass both California and US environmental regulations in terms of chemical and heavy metal tolerances. The proposed turf product would utilize a permeable backing, lead free fibers, and granular infill that will consist of specifically graded sand and a non-styrene butadiene rubber (SBR) infill material (such as, olive pits).

Facility Construction

The total project area defined by the boundary of proposed improvements is 9.8 acres. Construction activities are estimated to last approximately 18 to 24 months, potentially beginning in fall 2022. Construction of the proposed project includes the following activities:

- Mobilization
- Site demolition
- Building demolition
- Underground work

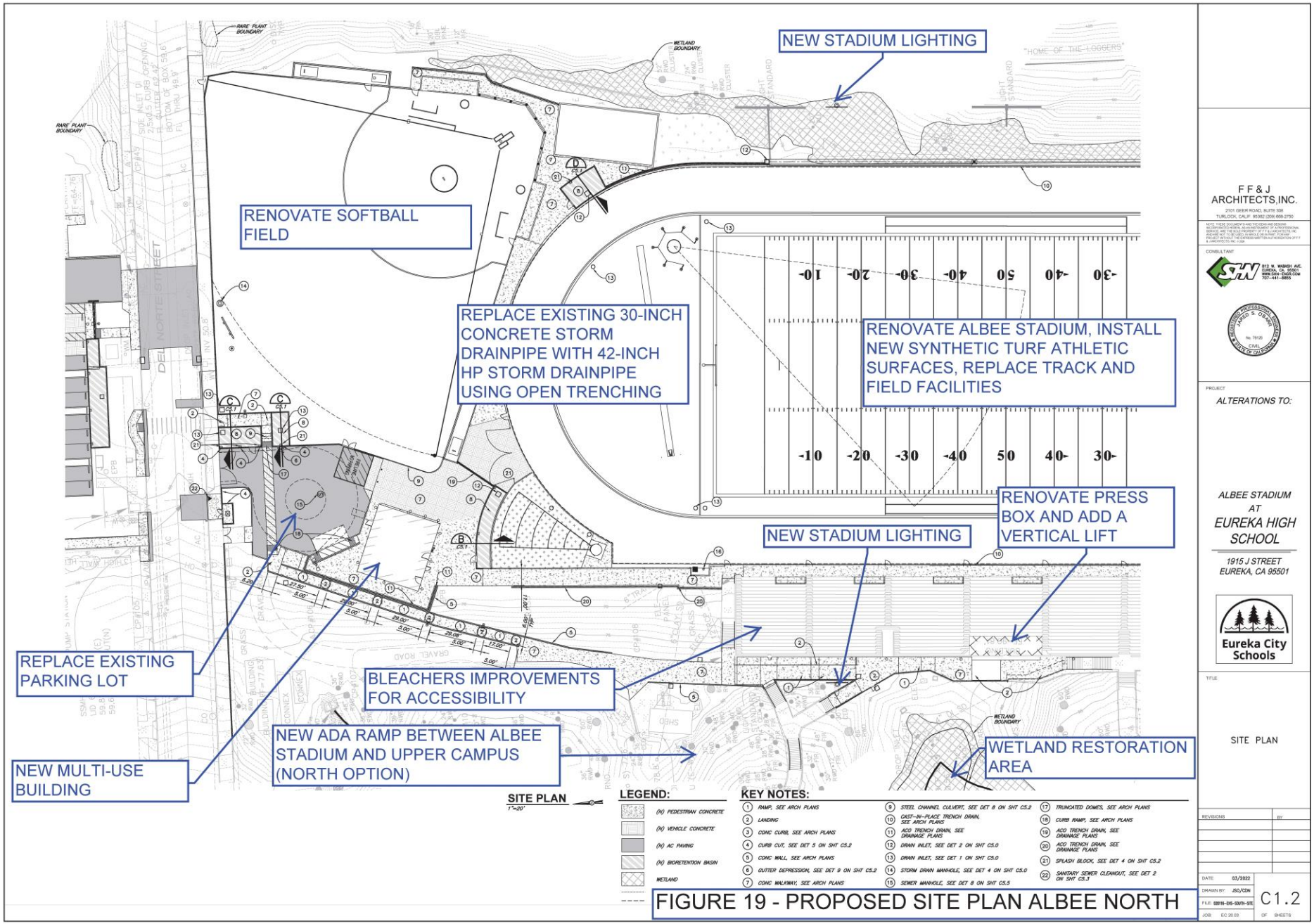


FIGURE 19 - PROPOSED SITE PLAN ALBEE NORTH

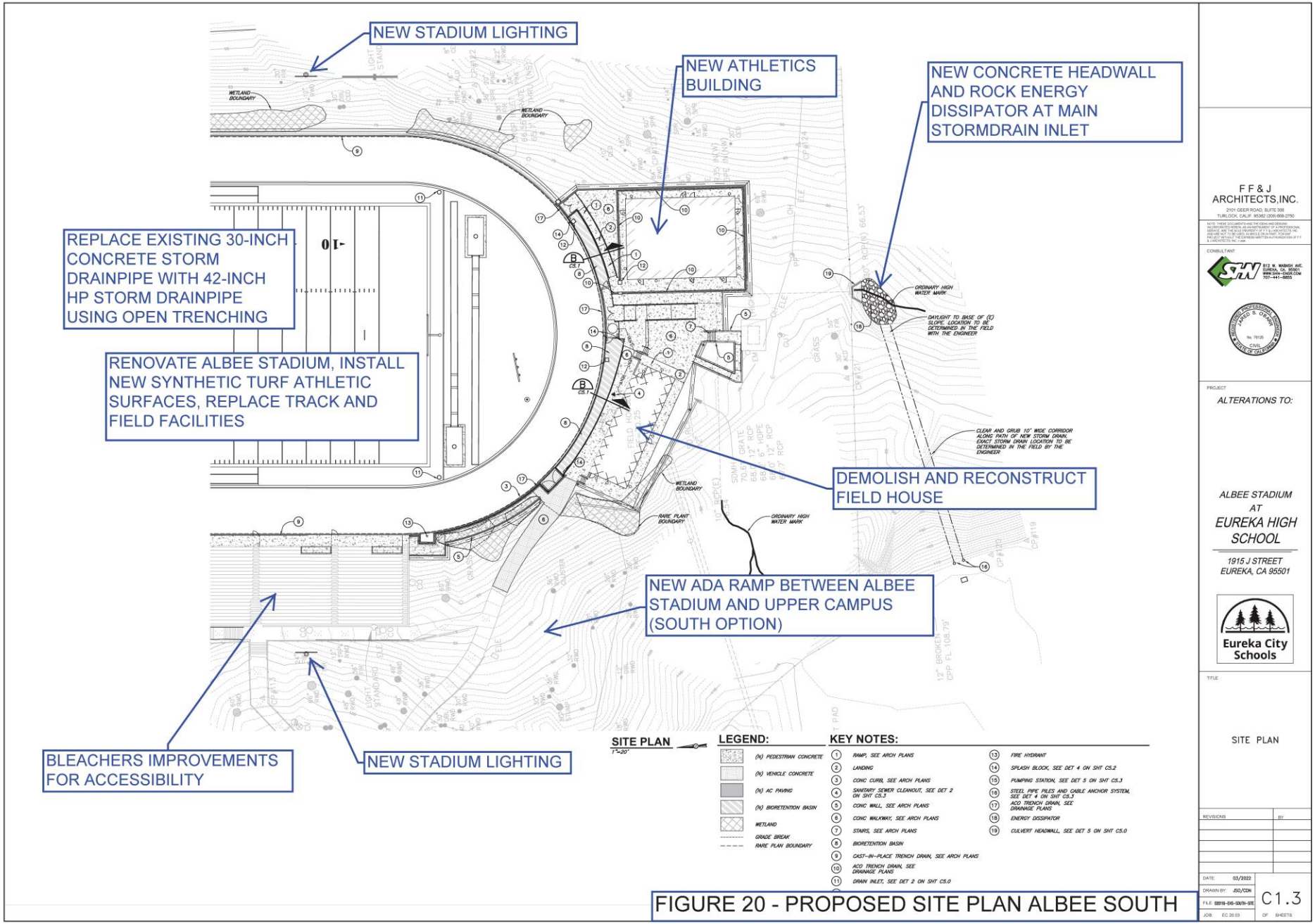


FIGURE 20 - PROPOSED SITE PLAN ALBEE SOUTH

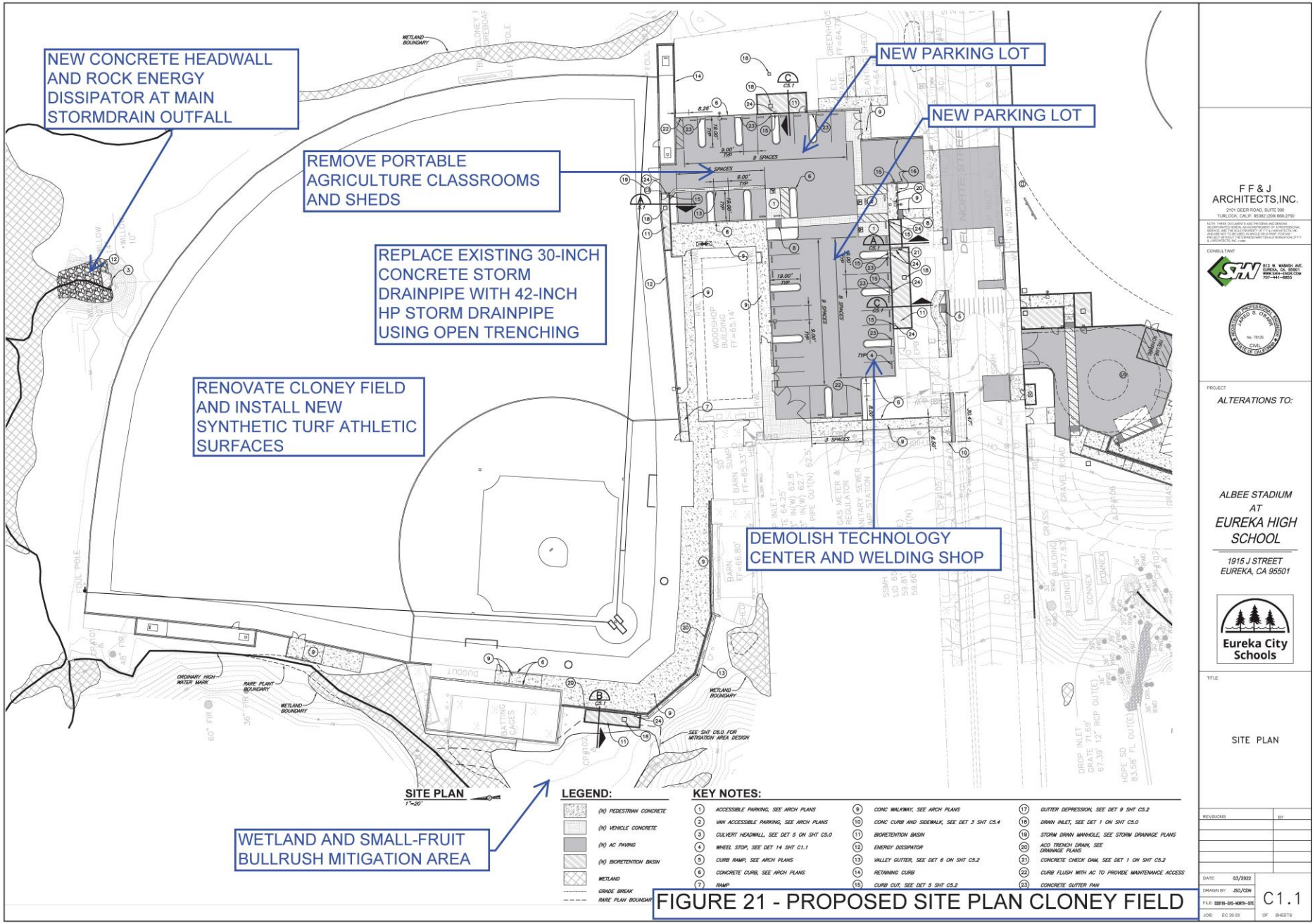


FIGURE 21 - PROPOSED SITE PLAN CLONEY FIELD

- Sub-surface improvements
- Surface improvements
- Retaining walls
- Construction of new buildings
- Alterations to existing structures
- Demobilization

Construction staging will occur onsite and at the EHS main campus within existing developed areas. Construction access would be provided from Del Norte Street. A traffic control plan would be required for the project prior to the start of construction; such plans are typically required to specify access routes, speed limits, flagging, etc. Construction equipment and machinery would include bulldozers, excavators, backhoes, tractors, scrapers, graders, drill rigs, horizontal boring equipment, trenchers, skip loaders, skid steer loaders, dump trucks, bottom dump trailers, compactors, tandem vibratory rollers, pavers, concrete trucks, concrete pumps, concrete finishing equipment, forklifts, boom lifts, cranes, pneumatic rollers, water trucks, street sweepers, pickup trucks, cold planers, winches and pullers, generators, air compressors, air powered construction tools, power saws, hand tools, and other standard construction vehicles and equipment. The proposed project would incorporate best management practices (BMPs) during construction to minimize stormwater runoff in compliance with the State Water Resources Control Board's (SWRCB's) Construction General Permit (CGP).

Facility Operation

Following construction, facility operations will return to normal. Consistent with the CEQA baseline discussed in Section 2.2, Albee Stadium and Bud Cloney Field will continue to host EHS practice and games during the fall, spring, and summer seasons. Events will continue to take place on weekdays and/or weekends. Events at Albee Stadium will continue to occur during daylight and nighttime hours and events at Bud Cloney Field will continue to occur during daylight hours. The two athletic facilities will continue to host EHS physical education classes during normal school hours. ECS may also continue to contract with several community organizations or institutions to host events unaffiliated with EHS athletic or academic programs. Much like the existing use of the site, events may include club practices and games, middle school/elementary school practices and games, and benefit fundraisers. Use of the site by individual community members will continue to be available on a contractual basis. The proposed project would not increase the student capacity at EHS and would not involve any temporary relocation of students during construction activities. In summary, operation of the site will continue as it was upon completion of the proposed project.

Stormwater Drainage

The proposed project will replace 2.21 acres of impervious surface and will create approximately 0.58 acres of new impervious surface, resulting in a total of approximately 2.79 acres of created or replaced impervious surface. As the proposed project is located on Eureka City Unified School District (ECUSD) property under the authority of the State of California, the proposed project is exempt from local development requirements, including Municipal Separate Storm Sewer System (MS4) requirements that are implemented by the City of Eureka. However, the proposed stormwater system is being designed to comply with the requirements of the City of Eureka's MS4 permit and the Humboldt Low Impact Development Stormwater Manual to the greatest extent feasible. To meet these requirements, the proposed project incorporates various site design measures and low impact development (LID) features such as bio-retention basins. In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. This will include the following drainage improvements: 1) raising the finished grade of the athletic fields by approximately one foot; 2) installing a rock/drain layer beneath the football/soccer field within the track and beneath the outfield of the baseball field; and 3) installing a sand channel drainage system at the surface of the football/soccer field and the outfield of the baseball field. These stormwater and drainage improvements will capture runoff from impervious surfaces and sources of stormwater runoff in order to improve drainage on the athletic playing fields, reduce impacts to water quality, and ensure the peak discharge for the 2-year, 24-hour storm will be lower under the post-project condition than it is under the pre-project condition.

Facility Lighting

Exterior lighting associated with the proposed project includes stadium lighting, emergency lighting, pedestrian-scale lighting, and parking lot lighting. The proposed project will replace and reconfigure the existing stadium lighting system at Albee Stadium. Stadium lighting will be mounted on four poles, two on each side of the football field. Emergency lighting will be added from bleachers and buildings to stadium exits or safe dispersal area(s) in the case of power outages or other emergencies. Parking lot lighting will be developed at the expanded parking lot at Bud Cloney Field.

Proposed lighting fixtures would be designed to minimize light spillover onto adjacent properties and streets as well as upward into the night sky. All project lighting would be directed to onsite facilities. Upon completion of the proposed project, EHS events will continue to primarily occur on weekdays and/or weekends during daylight hours, with select events occasionally occurring at Albee Stadium after dusk. Use of the project site will be consistent with the existing use and baseline condition.

Traffic and Circulation

As indicated in Figures 19 through 21 (Proposed Site Plans), the project site will continue to be accessible by Del Norte Street. The proposed project will improve and/or introduce access and parking features in compliance with the requirements of the DSA.

Primary access to Albee Stadium will continue to be provided by a paved drive aisle and pedestrian path accessed from the southern edge of Del Norte Street. Vehicle parking at Albee Stadium will be provided by a slightly expanded parking lot with both ADA and standard parking stalls. Fencing surrounding Albee Stadium will continue to limit access to the site outside of normal school hours and athletic events. Secondary access will continue to be provided by improved pathways and drive aisles from the EHS main campus to Albee Stadium located along the western slopes. Additional paved pedestrian pathways will connect high use areas, such as the parking lot, spectator seating areas, athletic facilities, and proposed structures (e.g. restrooms, snack bar, and team rooms) consistent with ADA requirements. One of two potential ADA-compliant ramp options may also be constructed between the Eureka High main campus and Albee Stadium. The bleachers will be improved for accessibility (Figures 19 and 20).

Access to Bud Cloney Field will be provided by a paved drive aisle and pedestrian path accessed from the northern edge of Del Norte Street. Vehicle parking at Bud Cloney Field will be provided by an expanded parking lot with both ADA and standard parking stalls. Fencing surrounding Bud Cloney Field will continue to limit access to the site outside of normal school hours and athletic events. Paved pedestrian pathways will be constructed from the proposed parking lot to spectator seating areas.

The project facilities will continue to be used by EHS instructors and students who will continue to access the project site by way of the various pedestrian paths that provide access from the EHS main campus.

Wetland, Small Fruit Bulrush Marsh, and Riparian Mitigation

The proposed project is being designed to avoid and minimize impacts to wetlands and other jurisdictional waters to the extent feasible. However, due to the constrained nature of the site and the close proximity of wetlands and OHWMs to the existing athletic and academic facilities that are to be renovated/replaced, a minor amount of wetland fill is anticipated. Approximately 980 sf of wetland is to be temporarily impacted and approximately 1,504 sf is to be permanently filled/removed during construction. Approximately 75 linear feet of OHWM is to be temporarily impacted through the placement of rock slope protection at the inlet and outlet of the main storm drainpipe. The project includes the preparation and implementation of a plan to mitigate and compensate for fill/removal of wetlands and other jurisdictional waters that cannot be avoided during construction. The proposed location for onsite wetland mitigation (creation) would be along the west side of Bud Cloney Field where there is sufficient area to create wetland mitigation at up to a 3:1 ratio for permanent wetland fill impacts. If necessary, there is adequate area for additional wetland mitigation in the form of wetland restoration to the west of the Albee Stadium bleachers (see Section IV – Biological Resources).

The project has been designed to avoid and minimize impacts to small fruit bulrush marsh (a special-status plant community) to the extent feasible, but due to the constrained nature of the site and the close proximity of small fruit bulrush marsh to the existing facilities, minor impacts (fill/removal) are proposed to the west of Bud Cloney Field and at the southwest corner of Albee Stadium. Approximately 488 sf of small fruit bulrush marsh is proposed to be removed. The project includes the preparation and implementation of a plan to mitigate and compensate for removal of small fruit bulrush marsh that cannot be avoided during construction. Because small fruit bulrush marsh is a wetland-dependent vegetation community, the proposed location for onsite small fruit bulrush marsh mitigation would be adjacent to the existing population along the west side of Bud Cloney Field in an area also proposed for compensatory wetland mitigation (see Section IV – Biological Resources). There is adequate room in that location to mitigate impacts to bulrush marsh at a 3:1 ratio.

The project also includes in-place restoration of approximately 6,662 sf of riparian areas temporarily impacted by construction at the intake and outfall of the main stormwater pipe that conveys Cooper Creek beneath the project site.

Existing Building Removal and Reconstruction

At Albee Stadium, the fieldhouse will be demolished and reconstructed in accordance with the Secretary of the Interior Standards for the Treatment of Historic Properties – Reconstruction. Specifically, the following design elements will be incorporated into the reconstruction of the Field House:

1. The roof material will be Composition Luxury grade shingles with a profile which emulates wood shakes in color, texture, and style.

2. Glazing which has been removed or replaced over the years will be replaced with original glazing from the current Jay Willard Gymnasium on the project campus.

3. The horizontal wood elements of the window frames, louvers at the gable ends, and the horizontal wood trim board will be retained. The materials used to replace the existing ship lap siding and plaster will match the scale, texture, and design of the original surface materials. Other wood trim materials found to be in good condition will be restored.

4. The new accessible walkway will run behind the building on its south side, which avoids needing to have a ramping condition around the Field House. New steps will be added on the east and west sides of the building to allow access up to the building from the new finish surface elevations on the north side of the building.

5. The original fenestration, banding, the northeast corner, and front facade accents will be retained. The original front door and side lights on each side will be restored to the original appearance of this building. The door will not be openable, but the appearance will be retained.

The press box will be renovated, including interior improvements, refinishing the exterior walls, replacing the roof, and accessibility improvements such as adding a vertical lift or elevator on the structure's west side.

At Bud Cloney Field, the Technology Center Building (also known as the Welding Shop) will be demolished and the Portable Agriculture Classrooms and sheds will be removed.

SECTION 3.0
ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

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

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

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

_____ Eureka City Schools

Printed name For

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue identifies:

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

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

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

Setting: The project site is located in the City of Eureka on two distinct portions of the EHS campus. The project site contains Albee Stadium, Bud Cloney Field, and various facilities that serve athletic and/or academic functions at EHS (Figures 8 through 15). Albee Stadium was built in 1925 and Bud Cloney Field was built between 1970 and 1981. Since their construction, Albee Stadium and Bud Cloney Field have been used by both EHS students and community members for athletic and recreational activities with periodic improvements over the years (WRA, 2020). The project site can be observed from along Del Norte Street. There are no designated scenic vistas in the project vicinity (City of Eureka, 2018). Additionally, there are no designated state scenic highways in the project vicinity (Caltrans, 2019).

Albee Stadium is bordered by Del Norte Street and Bud Cloney Field to the north and by remnant conifer forested slopes to the east, south, and west. The forested slopes create varying amounts of separation between Albee Stadium and the EHS main campus to the west, and nearby low-density residential development to east and south.

Bud Cloney Field is bordered by Del Norte Street and Albee Stadium to the south, and by forested slopes to the north, east, and west. Apart from several residences located along Del Norte Street, the forested slopes create separation between Bud Cloney Field and nearby low- and medium-density residential development to the east and west. To the north of Bud Cloney Field, Cooper Creek and the surrounding forested slopes form a small, northward-sloping urban forest.

Exterior lighting associated with the proposed project site includes stadium lighting, pedestrian-scale lighting, and parking lot lighting. Existing stadium lighting is mounted to a total of six poles, three located on either side of the football field and running track. Additional existing outdoor lighting at Albee Stadium includes pedestrian-scale lighting located on the exterior of existing structures. Existing outdoor lighting at Bud Cloney Field includes parking lot lighting and pedestrian-scale lighting located on the exterior of existing structures.

Use of the site primarily occurs on weekdays and/or weekends during daylight hours. However, stadium lighting located at Albee Stadium illuminates the football field and running track during events after dusk, thereby allowing use of the site to occur after daylight hours. Adjacent properties developed with private residences are located along Del Norte Street, L Street, and N Street. The forested slopes surrounding Albee Stadium create separation and a visual buffer between the illuminated football field/running track and the majority of nearby residences, effectively reducing potential adverse effects resulting from light spillage onto adjacent properties.

Impact Analysis: Based on a field review with EHS staff, existing information available to the School District, and observations made on the project site and in the vicinity, the following findings can be made:

a) *Have a substantial adverse effect on a scenic vista?* No Impact

Scenic vistas are defined as expansive views of highly valued landscapes from publicly accessible viewpoints. Scenic vistas include views of natural features such as topography, water courses, outcrops, and natural vegetation, as well as man-made scenic structures. The project site can primarily be observed from along Del Norte Street. There are no officially designated scenic vistas in the project vicinity that would be affected by the proposed project (City of Eureka, 2018). Furthermore, the project site is currently developed with outdoor athletics facilities and educational facilities and the proposed project would continue that use.

Based on the information provided above, the proposed project will not have a substantial adverse effect on a scenic vista. Therefore, the proposed project would result in no impact on this resource category.

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

California's Scenic Highway Program was created by the State Legislature in 1963. The project site is located nearly a mile from both U.S. Highway 101 (US-101) and State Route (SR) 255. Neither highway is designated a state scenic highway in Humboldt County and the project would not affect any trees, rock outcroppings, historic buildings, or other identified scenic resources that would be visible from a scenic highway (Caltrans, 2019).

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

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

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The project is located in an urbanized area of the City of Eureka. The project site can primarily be observed from along Del Norte Street. The visual character of the project site is consistent with a high school campus and athletic facility. Due to the aging condition of the existing facilities, the visual quality of the site has degraded over time. During construction activities, the visual character and quality of the project site would reflect that of a typical construction site. Upon completion of construction activities, there would be no substantial change in the overall visual character of the site. Rather, the visual quality of Albee Stadium and Bud Cloney Field would be improved and result in similar overall visual appearance and use. The proposed project is consistent with the Public Facilities zoning designation.

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

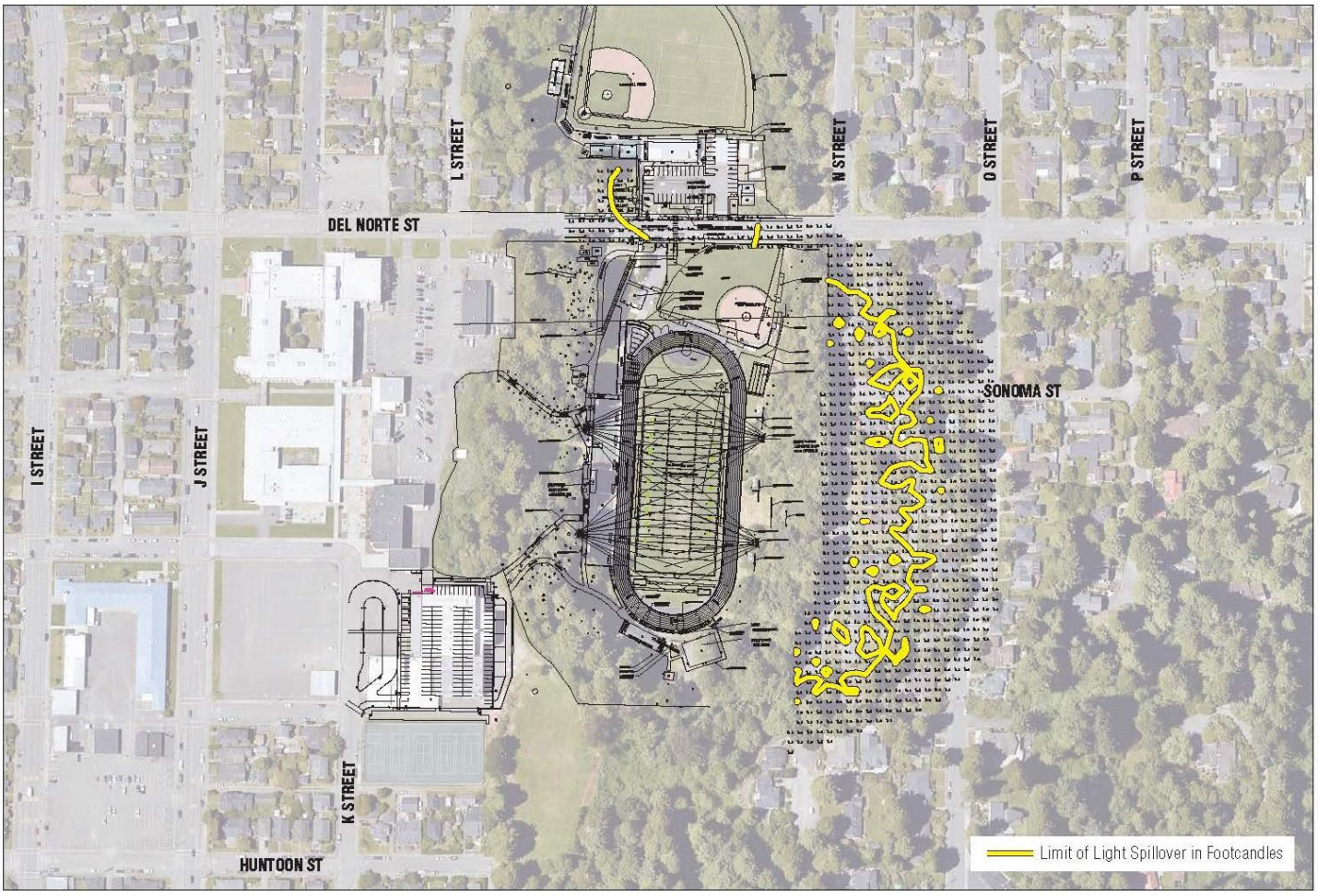
d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?* Less-Than-Significant Impact

Construction
Project construction activities would only occur during daytime hours (From 7:00 a.m. and 7:00 p.m.). As such, construction of the proposed project would not introduce any source of nighttime lighting or glare.

Operation
Exterior lighting associated with the proposed project includes stadium lighting, emergency lighting, pedestrian-scale lighting, and parking lot lighting. Exterior lighting fixtures would be designed to minimize light spillover onto adjacent properties and streets or upward into the night sky. All project lighting would be directed to onsite facilities. Stadium lighting at Albee Stadium would be replaced and reconfigured such that lighting would be mounted on four new poles rather than the existing six poles. A photometric analysis prepared for the proposed project simulated trespass light spillage from proposed stadium lighting and parking lot lighting beyond the school property boundaries (Michael Baker International, 2020). Trees were included in the simulation to include their attenuation effects on the light spillage levels. Light spillage is reported in foot-candle power. A foot-candle is the unit for measuring

the light present on a surface or work plane. One foot-candle is roughly equal to the uniform distribution of light from an ordinary wax candle on a one-square-foot surface, located one foot away from the flame. For this analysis, a significant impact would occur if the proposed project would produce trespass light spillage greater than one foot-candle on any adjacent residential property (City of Eureka, 2018). The limit of all trespass light spillover (including values below one foot-candle) is shown on Figure 22. Although the figure does not show a line that corresponds with the one foot-candle threshold of significance, the results are such that the proposed project would result in trespass light spillage of less than one foot-candle on all adjacent residential properties (Michael Baker International, 2020). Therefore, the reconfigured stadium lighting would not result in a significant impact.

Figure 22. Photometric Diagram



Based on the information provided above, the proposed project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

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

Setting: The project site is located in the City of Eureka on portions of the EHS campus. The project site contains Albee Stadium, Bud Cloney Field, and various facilities that serve athletic and/or academic functions at EHS. Albee Stadium was built in 1925 and Bud Cloney Field was built sometime between 1970 and 1981. Since their construction, Albee Stadium and Bud Cloney Field have since been used by both EHS students and community members for athletic and recreational activities with periodic improvements over the years (WRA, 2020). The project site is underlain with historically-placed loamy fill and native soil materials. As evident from the historical and existing use of the site, the character and condition of the site is not suitable for agricultural or timber production. The site is not subject to a Williamson Act or Timberland Production contract.

Prime Farmland within the City of Eureka or greater Humboldt County region has not been mapped by the California Department of Conservation's Important Farmland Series Mapping and Monitoring Program (DOC, 2020b). However, most of the project site occurs on imported fill material associated with the original buildout of Albee Stadium, Bud Cloney Field, and associated facilities. According to the Natural Resource Conservation Service (NRCS) Web Soil Survey, the underlying soils have United States Department of Agriculture (USDA)-NRCS soil map unit designations of 1) 257—Lepoil-Candymountain complex, 2 to 15 percent slopes and 2) 212—Urban land-Halfbluff-Redsands complex, 0 to 5 percent slopes (NRCS, 2021).

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

a) *Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?* No Impact

Prime Farmland within the City of Eureka or greater Humboldt County region has not been mapped by the California Department of Conservation's Important Farmland Series Mapping and Monitoring Program (DOC, 2020b). The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. As evident from the historical and existing use of the site, the character and condition of the site does not reflect Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

Based on the information provided above, the proposed project will not convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Therefore, the proposed project would result in no impact on this resource category.

b) *Conflict with existing zoning for agricultural use, or a Williamson Act Contract?* No Impact

The project site is not under a current Williamson Act contract and is not zoned for agricultural use. The project site is developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project will not conflict with existing zoning for agricultural use or a Williamson Act Contract. Therefore, the proposed project would result in no impact on this resource category.

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

The project site does not contain forestry or timberland resources and is not zoned for Timberland Production. The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project will not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code (PRC) section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, the proposed project would result in no impact on this resource category.

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

The project site does not contain forest land. The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project will not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the proposed project would result in no impact on this resource category.

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

The project site does not contain farmland or forest land resources. The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the proposed project would result in no impact on this resource category.

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

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

Setting: The project site is located in the City of Eureka on portions of the EHS campus. The project site contains Albee Stadium, Bud Cloney Field, and various facilities that serve athletic and/or academic functions at EHS. Albee Stadium was built in 1925 and Bud Cloney Field was built sometime between 1970 and 1981. Since their construction, Albee Stadium and Bud Cloney Field have since been used by both EHS students and community members for athletic and recreational activities with periodic improvements over the years (WRA, 2020).

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

Sensitive receptors (for example, children, senior citizens, and acutely or chronically ill people) are more susceptible to the effect of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest known potential sensitive receptors to the project site include EHS students in attendance at the EHS main campus, and private residences in the project vicinity along Del Norte Street, L Street, and N Street. The project is directly adjacent to five private residences along Del Norte Street and is within approximately 100 feet of residences along L Street and N Street.

Regulatory Framework: Activities affecting air quality in Humboldt County are subject to the authority of the North Coast Unified Air Quality Management District (NCUAQMD) and the California Air Resources Board (CARB). The NCUAQMD is a regional environmental regulatory agency which has jurisdiction over Humboldt, Del Norte, and Trinity counties in Northern California. The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM10) standard in Humboldt County only (CARB, 2018, 2019a). In 1995, the NCUAQMD prepared a Draft Particulate Matter (PM10) Attainment Plan to identify the primary sources of PM10 in the District and recommend control measures (NCUAQMD, 1995). In the Draft Plan, the largest source of particulate matter is fugitive dust emissions from vehicular traffic on unpaved roads.

Criteria Air Pollutants: Regulated air pollutants are known as criteria air pollutants. Criteria air pollutants are regulated by the NCUAQMD, CARB, and the United States Environmental Protection Agency (USEPA). Exposure to criteria air pollutants can cause myriad adverse health effects in humans. Human health effects of criteria air pollutants are summarized below in Table 3.

Table 3. Summary of Criteria Air Pollutants

Criteria Air Pollutant	Major Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust (CAPCOA, 2011).	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death (CAPCOA, 2011).

Criteria Air Pollutant	Major Sources	Human Health Effects
Nitrogen Dioxide (NO2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel (CAPCOA, 2011).	A respiratory irritant; aggravates lung and heart problems. A precursor to ozone. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere (CAPCOA, 2011).
Ozone (O3)	A colorless or bluish gas (smog) formed by a chemical reaction between reactive organic gases (ROGs) and nitrous oxides (NOx) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills (CAPCOA, 2011).	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield (CAPCOA, 2011).
Particulate Matter (PM10 and PM2.5)	Produced by power plants, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others (CAPCOA, 2011).	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; non-fatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (CAPCOA, 2011).
Sulfur Dioxide (SO2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships (CAPCOA, 2011).	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain (CAPCOA, 2011).
Hydrogen Sulfide (H_2S)	A colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. It is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills. Industrial sources include petrochemical plants, coke oven plants, and kraft paper mills (CARB, 2020b).	Can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting. A few studies suggest that asthmatics may be at increased risk of exacerbation of their asthma symptoms (CARB, 2020b).
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries (CARB, 2020b). Common applications also include Lead Based Paint (LBP) and Lead Containing Surface Coatings (LCSC; CARB, 2020c).	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems (CARB, 2020c).
Sulfate	A sub-fraction of ambient particulate matter. Emissions of sulfur-containing compounds occur primarily from the combustion of petroleum-derived fuels (for example, gasoline and diesel fuel) that contain sulfur. A small amount of sulfate is directly emitted from combustion of sulfur-containing fuels, but most ambient sulfate is formed in the atmosphere (CARB, 2020d).	Much like health effects of PM2.5, sulfate can cause reduced lung function, aggravated asthmatic symptoms, and increased risk of emergency department visits, hospitalizations, and death in people who have chronic heart or lung diseases (CARB, 2020d).

Criteria Air Pollutant	Major Sources	Human Health Effects
Vinyl Chloride	A colorless gas with a mild, sweet odor. Most vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products, thus may be emitted from industrial processes. Vinyl chloride has been detected near landfills, sewage treatment plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents (CARB, 2020e).	Short-term exposure to high levels (10 ppm or above) of vinyl chloride in air causes central nervous system effects, such as dizziness, drowsiness, and headaches. The primary non-cancer health effect of long-term exposure to vinyl chloride through inhalation or oral exposure is liver damage. Inhalation exposure to vinyl chloride has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans (CARB, 2020e).
Visibility Reducing Particles	These particles vary greatly in shape, size, and chemical composition, and come from a variety of natural and manmade sources. Some haze-causing particles are directly emitted to the air such as windblown dust and soot. Others are formed in the air from the chemical transformation of gaseous pollutants (for example, sulfates, nitrates, and organic carbon particles) which are the major constituents of fine PM. These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment (CARB, 2020f).	Haze not only impacts visibility, but some haze-causing pollutants have been linked to serious health problems and environmental damage as well. Exposure to particles up to 2.5 (PM2.5) and 10 microns (PM10) in diameter in the ambient air can contribute to a broad range of adverse health effects, including premature death, hospitalizations, and emergency department visits for worsened heart and lung diseases (CARB, 2020f).

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

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

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

- Lung cancer
- Mesothelioma, a rare form of cancer that is found in the thin lining of the lung, chest and the abdomen and heart
- Asbestosis, a serious progressive, long-term, non-cancer disease of the lungs (USEPA, 2018).

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

Lead: As described in Table 3, exposure to lead can lead to harmful health effects in humans. If LBP and LCSC are chipped or deteriorating, lead particles may become airborne as dust, chips and suspended particles. The disturbance of any materials containing any amount of lead will require compliance with Cal/OSHA Lead Construction Standards (Title 8 CCR 1532.1) for worker protection, and compliance with the California Code of Regulations Title 17, CCR 35000-36100.

Diesel Particulate Matter: CARB has identified diesel particulate matter (DPM) as a toxic air contaminant. Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as DPM. More than 90% of DPM is less than 1 micrometer in diameter, and thus is a subset of particulate matter less than 2.5 microns in diameter (PM2.5). DPM is typically composed of carbon particles and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds (VOCs) and oxides of nitrogen (NOx). The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation. Diesel exhaust can also cause coughing, headaches, light-headedness, and nausea. Due to their extremely small size, these particles can be inhaled and eventually become trapped in the lungs' bronchial and alveolar regions. Because it is part of PM2.5, DPM also contributes to the same non-cancer health effects as PM2.5 exposure (CARB, 2020a).

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

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

The project is located in Humboldt County, which is located in the NCAB and is subject to the jurisdiction of the NCUAQMD. The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM10) standard in Humboldt County only (CARB, 2018, 2019a). Construction of the proposed project includes demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping. These include activities and equipment which may result in the emission of PM10, for which Humboldt County is non-attainment under state ambient air quality standards. As stated previously, the NCUAQMD prepared a Draft Particulate Matter (PM10) Attainment Plan in May 1995. The Draft Plan includes a description of the planning area, an emissions inventory, general attainment goals, and a listing of cost-effective control strategies. The NCUAQMD's Attainment Plan established goals to reduce PM10 emissions and eliminate the number of days in which State standards are exceeded.

Construction

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

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

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

Operation

The Draft Particulate Matter (PM10) Attainment Plan includes three areas of recommended control strategies to achieve attainment status: transportation, land use, and burning. The project aligns with control measures identified in the PM10 Attainment Plan appropriate to this type of project, such as:

Transportation. The project site is located at EHS in the City of Eureka and in the vicinity of residential neighborhoods. The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Because the proposed project seeks to improve existing facilities and infrastructure at the project site, and the proposed use of the site will be consistent with the existing use, transportation patterns in the vicinity of the project site will not be substantially altered or affected by the proposed project (see Section XVII [Transportation]). Moreover, the proposed project will offer bicycle racks to promote the use of bicycles as an alternative to motorized transport. Therefore, the proposed project will not conflict with the PM10 Attainment Plan.

Land Use. The project site is located at EHS in the City of Eureka and in the vicinity of residential neighborhoods. Eureka is the largest population center in Humboldt County. The location of the project site in relation to surrounding residential neighborhoods and the greater Eureka area provides opportunities for people to walk to or use public transportation to the site. The close proximity of the site to existing residential, commercial, employment centers, and motorized/non-motorized transportation corridors will encourage the use of alternative modes of transportation by future residents, which will reduce vehicle miles traveled and the emissions of particulate matter.

Burning. The project proposes the development of an improved athletic facility. The proposed project will utilize structural heating sources other than woodstoves or fireplaces, which will significantly reduce PM10 emissions generated from heating during the long-term operation of the project.

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

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

The project is located in Humboldt County, which is located in the NCAB and is subject to the jurisdiction of the NCUAQMD. The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM10) standard in Humboldt County only (CARB, 2018, 2019a). Construction of the proposed project includes demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping, which include activities and equipment which may result in the emission of PM10, for which Humboldt County is non-attainment under state ambient air quality standards.

In determining whether a project has significant impacts on the environment from criteria air pollutants, the local air district's CEQA thresholds of significance are typically applied to projects in the review process. However, the NCUAQMD has not adopted a numerical threshold for determining the significance of criteria air pollutants from land use projects (NCUAQMD, 2015). For the purpose of assessing air quality impacts of land use projects in CEQA documents, the NCUAQMD recommends the use of thresholds and guidance adopted by other air districts in the State.

The Bay Area Air Quality Management District (BAAQMD) to the south has adopted CEQA significance thresholds and screening criteria for criteria air pollutants. The BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether the land use project could result in potentially significant air quality impacts. If a project falls below the screening criteria, then the project would not result in the generation of criteria air pollutants and/or precursors that exceed the thresholds of significance, and the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. A project would therefore result in a less-than-significant cumulative impact to air quality from criteria air pollutant and precursor emissions (BAAQMD, 2017).

For the purpose of this analysis, use of the BAAQMD screening criteria is a conservative metric due to nature and characteristics of the San Francisco Bay Area Air Basin (SFBAAB) when compared to the NCAB. The SFBAAB is comprised of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara, and parts of Solano and Sonoma counties. The SFBAAB is a geographically expansive and broad metropolitan region comprised of extensive industrial, commercial, and residential development. Past and present development combined with the regions complex transportation patterns have resulted in "non-attainment" status for various criteria air pollutants throughout the SFBAAB. In order to achieve "attainment" status, the BAAQMD rules and regulations regarding the generation of criteria air pollutants and/or precursors are more restrictive than those adopted by the NCUAQMD. Therefore, use of the BAAQMD screening criteria is a conservative metric for the proposed project, which is located in an air basin that is only non-attainment for the State standard for PM10.

BAAQMD screening criteria includes a "city park" category. Much like a city park, the proposed project will function as an outdoor recreational green space, and provide outdoor athletic and recreation opportunities for students, parents, and the community members. Furthermore, the proposed project bears resemblance to a city park by providing public visitation appurtenances and infrastructure, such as restrooms, drive aisles, walkways, and parking spaces. Therefore, for the purpose of this analysis, the proposed project is compared to the BAAQMD screening criteria for a "city park". As shown in Table 4, the proposed project is well below the BAAQMD screening project size for construction and operation of a "city park".

Table 4. BAAQMD Air Quality Screening Criteria

Land Use Type	Construction-Related Screening Size (acres)[1]	Operational-Related Screening Size (acres)[1]	Project Size (acres)
City Park	67	2,613	9.8
1. BAAQMD, 2017			

Furthermore, NCUAQMD's Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity (NCUAQMD, 2015). As previously discussed in subsection a), the standard measures provided in **Mitigation Measure AQ-1** shall be required for controlling dust emissions during construction activities. Therefore, a cumulatively considerable net increase in PM10 will not result from the proposed project.

With the adoption of **Mitigation Measure AQ-1** and based on the information provided above, 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. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

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

As noted in the Air Quality Setting, high concentrations of criteria air pollutants and toxic air contaminants can result in adverse health effects to humans. Some population groups are considered more sensitive to air pollution than others; in particular, children, elderly, and acutely or chronically ill persons, especially those with cardio-respiratory diseases such as asthma and bronchitis. Land uses that generally house more sensitive people include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest known potential sensitive receptors to the project site include EHS students in attendance at the EHS main campus, and private residences in the project vicinity along Del Norte Street, L Street, and N Street. The project is directly adjacent to five private residences along Del Norte Street and is within approximately 100 feet of residences along L Street and N Street.

The NCUAQMD has not adopted guidance for health risk assessments or health risk significance thresholds. However, the NCUAQMD recommends on their website the use of the California Air Pollution Control Officers Association (CAPCOA) guidance document entitled "Health Risk Assessment for Proposed Land Use Projects" to assist lead agencies with the requirements of CEQA when projects may involve exposure to toxic air contaminants (NCUAQMD, 2015). The document primarily focuses on addressing long-term public health risk impacts from and to proposed land use projects. The document does not provide guidance on how risk assessments for construction projects should be addressed in CEQA (CAPCOA, 2009).

Air quality issues occur when sources of air pollutants and sensitive receptors are located near one another. As discussed in the CAPCOA guidance document (2009, Pg. 4), there are basically two types of land use projects that have the potential to cause long-term public health risk impacts:

- Land use projects with toxic emissions that impact receptors. Examples of these types of projects include combustion-related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, and quarry operations.

- Land use projects that will place receptors in the vicinity of existing toxic sources. This would occur when residential, commercial, or institutional developments are proposed to be located in the vicinity of existing toxic emission sources such as stationary sources, high traffic roads, freeways, rail yards, and ports.

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

Construction

Naturally-Occurring Asbestos: The U.S. Geological Survey (USGS, 2011) has published mapping identifying areas that are known to contain naturally occurring asbestos (NOA). The California Department of Conservation (DOC, 2000) has also published mapping of area more likely to contain naturally-occurring asbestos. These mapping sources indicate that there are several locations within Humboldt County that are known to contain NOA. The project site is located along Del Norte Street in the City of Eureka and is not identified as an area that is known to contain or likely to contain NOA. The closest areas containing NOA are located in inland areas of the County over 10 miles east of the project site (USGS, 2011; DOC, 2000). As such, the project site does not contain NOA that could be released during construction activities such as site preparation, grading, and trenching.

Asbestos Containing Materials (ACM): The project proposes the demolition of the existing Technology Center Building (formerly misidentified as the Agriculture Building and currently also known as the Welding Shop) and Portable Agriculture Classrooms near Bud Cloney Field, renovation of the existing Press Booth, and demolition and reconstruction of the Field House near Albee Stadium. The described structures were surveyed for the presence of ACM by a certified Asbestos Building Inspector. Sampling and analysis of the site detected ACM at various locations within the existing Technology Building, Field House, and Press Booth (Brunelle & Clark, 2020a, 2020b, 2020c, and 2020d). The demolition and/or renovation of the existing structures has the potential to expose people to ACM. Therefore, the disturbance, abatement, and demolition of the materials containing asbestos will require compliance with USEPA AHERA, USEPA NESHAP, and Cal/OSHA regulations regarding asbestos in construction. In summary, these regulations require the following procedures:

- Survey by a California State Certified Asbestos Consultant (CAC) of the areas proposed for disturbance for asbestos-containing material.
- Documentation of the asbestos survey results in a signed report from the CAC.
- Notification to the NCUAQMD at least 10 working days prior to any demolition.
- Employing the use of proper work practices outlined in the NESHAP asbestos regulations.
- Complying with CalOSHA worker safety requirements.

All asbestos-containing materials to be removed by renovation or demolition activities must be done by a registered asbestos abatement contractor, as an asbestos abatement project. The construction contractor shall maintain all records of compliance with the NESHAP asbestos regulations and NCUAQMD rules including, but not limited to, the following: 1) evidence of notification to the NCUAQMD; 2) contact information for the asbestos abatement contractor and asbestos consultant; and 3) receipts (or other evidence) of offsite disposal of all asbestos-containing materials. These records shall be made available to the District and NCUAQMD upon request.

The implementation of existing regulatory requirements for the removal and disposal of ACM will reduce potential impacts to a less-than-significant level.

Lead: As described above, the project proposes the demolition and renovation of several existing structures. The described structures were surveyed for the presence of LBP and LCSC by a qualified Lead Inspector/Assessor. Sampling and analysis of the site detected LBP and/or LCSC at various concentrations and locations within portions of the existing Technology Center, Press Booth, Field House, and Portable Agriculture Classrooms (Brunelle & Clark, 2020a, 2020b, 2020c, and 2020d). The demolition and/or renovation of the existing structures has the potential to expose people to LBP and LCSC. Therefore, in compliance with existing law, all project renovation or demolition work that disturbs building components containing any amount of lead is to be conducted as lead-related construction work. Demolition activities associated with the proposed project must comply with Title 17, California Code of Regulations Division 1, Chapter 8 (Lead-Based Paint Regulations), which addresses requirements for the removal of components painted with lead-based paint during site clearing and demolition of existing structures. The construction contractor shall be required to comply with these provisions. The removal of all lead-based paint materials shall be conducted by a certified lead supervisor or certified lead worker, as defined by §35008 and §35009 of the Lead Based Paint Regulations.

The implementation of existing regulatory requirements for the removal and disposal and LBP and LCSC will reduce potential impacts to a less-than-significant level.

Criteria Air Pollutants: Construction of the proposed project includes demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping, which include activities and equipment that may result in the emission of criteria air pollutants (see Table 3). As previously noted, the BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a land use project could result in potentially significant impacts related to criteria air pollutant emissions. Projects below the applicable screening criteria would not exceed thresholds for criteria air pollutants established by the BAAQMD for land-use projects, other than permitted stationary sources. BAAQMD screening criteria include a "city park" category which is compared to the construction of the proposed project for the purpose of this analysis. As discussed in subsection a) and shown in Table 4, the project is proposed to occur on approximately 9.8 acres, which is well below the BAAQMD screening project size of 67 acres for construction of a "city park". Therefore, construction of the proposed project would not expose sensitive receptors to substantial concentrations of criteria air pollutants.

As previously discussed in subsection a), fugitive dust has the potential to be generated during construction from activities including demolition, site preparation, grading, and trenching. Fugitive dust particles can range in size and are often classified as PM10 and/or PM2.5. Fugitive dust generated from construction activity can result in nuisances and localized health impacts (see Table 3). However, construction activities such as demolition, site preparation, grading, and trenching would be transitory, occurring intermittently over the entire construction site over a short timeframe of approximately 18 to 24 months. Moreover, the NCAUQMD Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity. As previously discussed in subsection a), **Mitigation Measure AQ-1** shall be required to reduce impacts from fugitive dust generation during construction activities to less than significant.

Diesel PM. The use of diesel-powered equipment during construction activity would generate DPM, which is a known carcinogen. The majority of heavy diesel equipment used during construction activity would occur during grading of the project site. However, construction activities would be transitory, occurring intermittently over the entire construction site and over a short timeframe of approximately 18 to 24 months. Residents and other sensitive receptors located within the vicinity of the project site would be exposed to construction contaminants only for the duration of construction activity. These brief exposure periods would substantially limit exposure to hazardous emissions.

In addition, any relevant vehicle or equipment use associated with construction of the project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies (such as, exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.

Due to the short duration of construction activity requiring heavy diesel equipment, and in compliance with CARB regulations, construction of the proposed project would not expose sensitive receptors to substantial concentrations of diesel PM.

Operation

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Outdoor athletics facilities and educational facilities are not types of land use that would generally be considered to emit toxic emissions. As noted in the Air Quality Setting, those types of land uses typically include combustion-related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, and quarry operations.

Criteria Air Pollutants. As previously noted, the BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant impacts related to criteria air pollutant emissions. Projects below the applicable screening criteria would not exceed thresholds for criteria air pollutants established by the BAAQMD for land-use projects. BAAQMD screening criteria include a "city park" category which is compared to the operation of the proposed project for the purpose of this analysis. As discussed in subsection a) and shown in Table 4, the project is proposed to occur on approximately 9.8 acres, which is well below the BAAQMD screening project size of 2,613 acres for operation of a "city park". Therefore, operation of the proposed project will not expose nearby sensitive receptors to substantial pollutant concentrations.

With the adoption of **Mitigation Measure AQ-1** and based on the information provided above, the proposed project will not expose sensitive receptors to substantial pollutant concentrations. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Construction
During the construction of the proposed project, odors from construction equipment and hot asphalt may be temporarily evident in the immediate vicinity. These odors would be short-term, relatively minor, and would dissipate rapidly. As such, it is not anticipated that odors from construction of the proposed project would reach an objectionable level that would affect a substantial number of people.

Operation
CARB identifies the sources of the most common odor complaints received by local air districts. Typical sources include facilities such as sewage treatment plants, landfills, recycling facilities, petroleum refineries, and livestock operations (CARB, 2005). The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Operation of the project will not involve any activities or sources that would be a source of objectionable odors that would affect a substantial number of people. The proposed project does not propose any of the land uses identified as typically associated with emissions of objectionable odors.

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

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

Mitigation Measure AQ-1. Fugitive Dust Control Measures: Compliance with these requirements shall be required to minimize dust generation during construction activity.

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

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

Setting: The project site occurs on two distinct areas of the EHS campus, including areas in and around Albee Stadium and Bud Cloney Field. Albee Stadium is bordered by Del Norte Street and Bud Cloney Field to the north and by remnant conifer forested slopes to the east, south, and west. The forested slopes create varying amounts of separation between Albee Stadium and the EHS main campus to the west, and nearby low-density residential development to east and south. Bud Cloney Field is bordered by Del Norte Street and Albee Stadium to the south, and by forested slopes to the north, east, and west. Apart from several residences located along Del Norte Street, the forested slopes create separation between Bud Cloney Field and nearby low- and medium-density residential development to the east and west. To the north of Bud Cloney Field, Cooper Creek and the surrounding forested slopes form a small, northward-sloping urban forest containing extensive wetlands and riparian habitat. The project site is on historically-placed loamy fill and native soil materials within the valley forming Cooper Creek. The project site was filled to existing grade and installed with an extensive drainage system during original buildout of Albee Stadium and Bud Cloney Field. Cooper Creek flows beneath the project site for a total length of 1,500 feet, entering a 30-inch diameter storm drainpipe south of Albee Stadium and daylighting north of Bud Cloney Field. Cooper Creek continues approximately 1.3 miles north before draining into Eureka Slough and Humboldt Bay. Critical failure of the Cooper Creek storm drainpipe has resulted in sinkholes, posing a significant health and safety hazard and resulting in closures of portions of the project site. The project area primarily includes mowed lawn for the football, softball, and baseball fields; however, it also includes portions of the remnant conifer forest, which dominates the steep slopes surrounding the fields and associated facilities. Natural turf surfaces at the site are managed by EHS groundskeepers by conducting mowing, irrigating, fertilizing, sports striping, weeding, and gopher trapping. Non-turf areas within school grounds are managed by EHS groundskeepers by conducting periodic trash removal and weed whacking as needed.

Analysis in this section is based on the Biological Report (SHN, 2020a) and Wetland and Other Waters Delineation Report (SHN, 2020b) that were prepared for this project.

Dominant vegetation in developed/disturbed areas included ruderal species such as English plantain (*Plantago lanceolata*) and allseed (*Polycarpon tetraphyllum* var. *tetraphyllum*), among others. Dominant vegetation in forested areas included coast redwood (*Sequoia sempervirens*), Douglas fir (*Pseudotsuga menziesii*), and Sitka spruce (*Picea sitchensis*) in the canopy, and English ivy (*Hedera helix*), evergreen huckleberry (*Vaccinium ovatum*), and large flower fairy bells (*Prosartes smithii*) in the understory, among others. Dominant

vegetation in open areas included various herbaceous species including sweet vernal grass (*Anthoxanthum odoratum*), creeping bentgrass (*Agrostis stolonifera*), orchard grass (*Dactylis glomerata*), and hairy cat's-ear (*Hypochaeris radicata*), among others. Dominant vegetation in forested wetland areas included skunk cabbage (*Lysichiton americanus*), western lady fern (*Athyrium filix-femina* var. *cyclosorum*), and slough sedge (*Carex obnupta*), among others. Dominant vegetation in wetlands within open areas included small fruit bulrush (*Scirpus microcarpus*), creeping buttercup (*Ranunculus repens*), giant horse tail (*Equisetum telmateia*), common horsetail (*Equisetum arvense*), and montebretia (*Crocosmia* x *crocosmiflora*), among others. Dominant vegetation in riparian woodland associated with Cooper Gulch Canyon to the north of the project area included red alder (*Alnus rubra*), Pacific willow (*Salix lasiandra* var. *lasiandra*), and coast willow (*Salix hookeriana*), among others, as well as a mix of native and non-native species in the understory.

Special-Status Plant Species
Of the 51 special-status botanical species potentially occurring in the Eureka and surrounding quadrangles, 32 are considered to have low or no potential to occur within the project area, and 19 are considered to have a moderate or high potential of occurrence, including one that was observed. Site investigations were conducted during appropriate seasons for detecting species with moderate or higher potential for occurrence. Siskiyou checkerbloom (*Sidalcea malviflora* ssp*. patula*), a 1B.2 special-status botanical species was observed within the study area during the surveys (Figure 23). No additional special-status botanical species were observed, nor is it likely that additional special-status botanical species occur within the project area due to historical and continued disturbance and use and the presence of non-native species.

Special-Status Animal Species
Of the 61 special-status animal species reported from the Eureka and surrounding quadrangles, 54 animal species are considered to have no or a low potential to occur within the study area and seven species have a moderate to high potential of occurrence based on the available habitat, including one that was observed – black-capped chickadee (*Poecile atricapillus*). The seven special-status animal species consist of six bird species and one amphibian species. These are discussed below. No other special-status animal species have moderate or higher potential to occur.

Sensitive Natural Communities
Small fruit bulrush marsh (*Scirpus microcarpus* Herbaceous Alliance) is a sensitive natural community with a rarity rank of G4S2 and exists within several of the wetland areas mapped on site (Figure 23). Riparian woodland associated with Cooper Creek north of Cloney Field is sensitive and is strongly associated with wetland conditions found there. The remnant conifer forest surrounding the athletic facilities does not meet the criteria for a specific special-status vegetation community or alliance but is likely a mix of three natural communities Redwood forest (*Sequoia sempervirens* Forest Alliance), Sitka spruce forest (*Picea sitchensis* Forest Alliance), and Douglas fir forest (*Pseudotsuga menziesii* Forest Alliance).

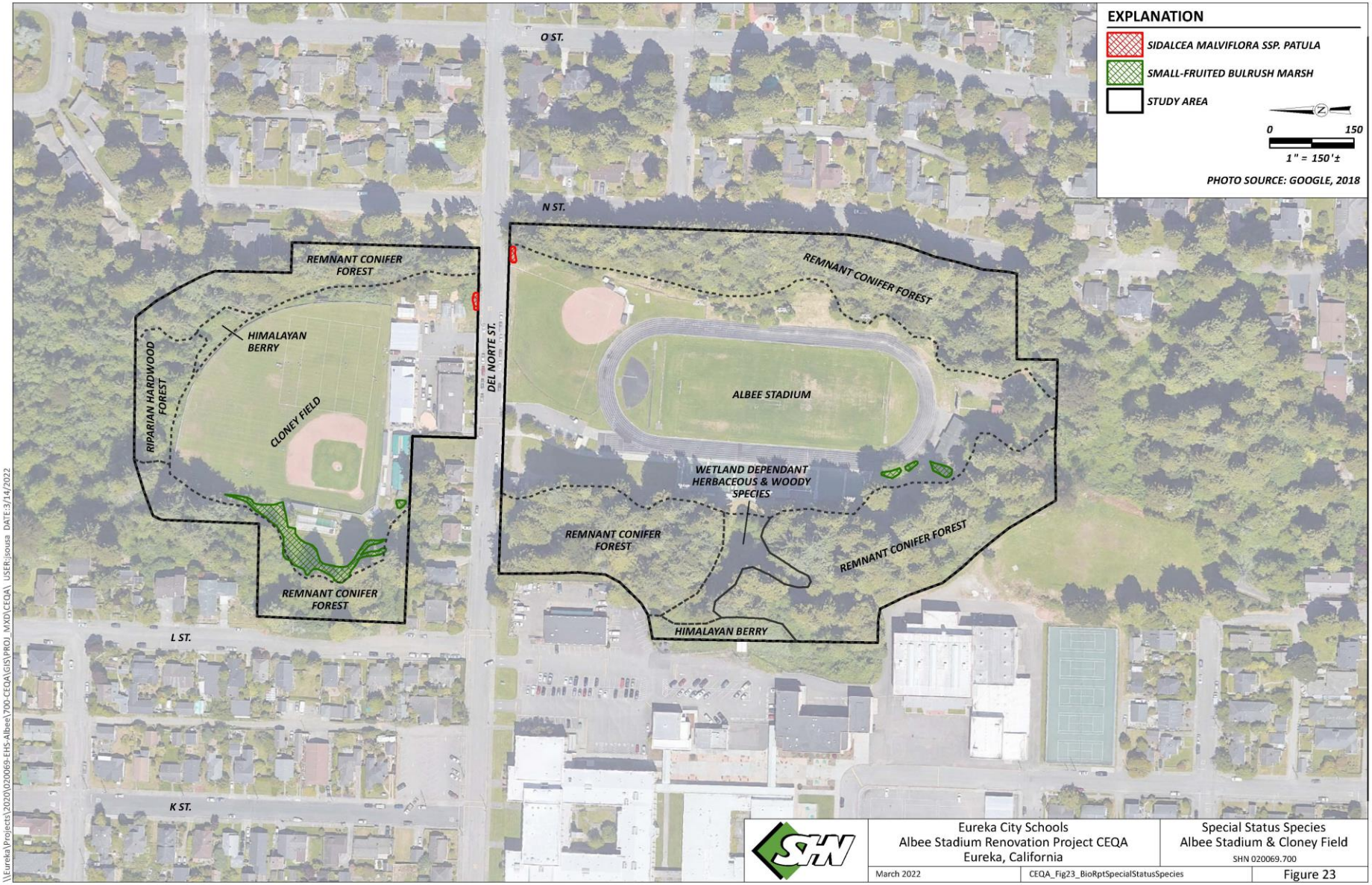
Wetlands and Jurisdictional Drainages
Wetlands occur surrounding the athletic facilities reflecting stormwater catchment and seeps from adjacent slopes. Several small streams occur within the study area with the largest being Cooper Creek, which flows through a culvert under the length of the football and baseball fields. The remaining streams occurring within the study area flow into Cooper Creek. Freshwater forested/shrub wetlands and jurisdictional drainages occur intermittently among the surrounding slopes and along the margins of the existing athletic fields. The wetlands are classified as Palustrine Forested Broad-leaved Deciduous Seasonally Flooded. The ordinary high-water mark (OHWM) features represent the lateral limits of federal jurisdiction over non-tidal water bodies in the absence of adjacent wetlands. Figures 17 and 18 indicate the jurisdictional wetland boundaries and OHWMs delineated within the project site and surrounding slopes.

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

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

The project proposes to rehabilitate the failing storm drain system and renovate various athletic and educational facilities at Albee Stadium and Bud Cloney Field in support of existing athletic and educational programs. Surveys of the site were conducted in preparation of a Biological Report, which addresses special-status biological resources present or potentially occurring within the site, evaluates project-related impacts, and recommends appropriate avoidance and minimization measures (SHN, 2020a). Special-status plant and animal species present within the study area are described below.

Special-Status Plant Species
As noted in the Biological Resources Setting, 19 special-status plant species have moderate to high potential of occurrence on the project site, including one special-status species that was observed, Siskiyou checkerbloom. No additional special-status plant



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species were observed, nor is it likely that additional special-status plant species occur within the project area due to historical and continued disturbance and use and the presence of non-native species (SHN, 2020a).

Siskiyou checkerbloom (*Sidalcea malviflora* ssp. *patula*) is a perennial herb in the Malvaceae family. It is neither state nor federally listed but has a CRPR of 1B.2 and a heritage rank of G5T2/S2. Its elevation range is reported from 5 to 1,255 meters above sea level. Within its range state-wide its blooming period is reported as April through August. This species is reported from broadleaved upland forests, coast prairie, coast scrub, north coast coniferous forests, and riparian habitats, primarily from woodlands and clearings near the coast, often in disturbed areas. Within the nine-quad search, numerous Rarefind occurrences are reported. The nearest is approximately 1.7 miles southwest of the study area, with an observation date in 1944.

The Siskiyou checkerbloom populations observed within the project area occur on both sides of Del Norte Street near the eastern edge of the biological study area (Figure 23). The population on the north side of Del Norte Street was healthy, while the population on the South side of Del Norte Street consisted of only a few individuals. Both populations were in flower during the May 2020 site visit. Annual mowing/weed whacking of the Del Norte Street right-of-way (ROW) likely allows for the persistence of these populations (SHN, 2020a).

The project has been designed to avoid impacting the Siskiyou checkerbloom populations, neither of which is included within the area subject to potential disturbance. The nearest proposed development to the southern population is the proposed retaining wall at the northeast corner of the softball field, which is located approximately 8 feet from the population. The nearest proposed development to the northern population is the proposed parking lot associated with Bud Cloney Field, which is located approximately 20 feet from the population. To ensure the protection of nearby Siskiyou checkerbloom populations during construction, **Mitigation Measure BIO-1** will be implemented. **Mitigation Measure BIO-1** requires the locations of Siskiyou checkerbloom populations within 50 feet of proposed construction to be clearly identified for avoidance in the contract documents (plans and specifications) and that prior to the start of construction, where construction activities occur within 50 feet of the Siskiyou checkerbloom populations, high visibility construction fencing shall be erected to establish a no-disturbance buffer that would be adequate for the protection of the plants, as determined by a qualified biologist. The Siskiyou checkerbloom populations are not anticipated to be impacted during operation of the proposed project because the school's existing and ongoing routine maintenance of these areas, which consists of removing trash and weed whacking each spring will remain unchanged (Ziegler, 2021). Therefore, with the adoption of **Mitigation Measure BIO-1**, there will be a less-than-significant impact on Siskiyou checkerbloom.

Special-Status Bird Species

In support of the Biological Report (SHN, 2020a), reconnaissance-level bird surveys occurred at the project area. During this survey, one special-status bird species was observed – black-capped chickadee (*Poecile atricapillus*). The black-capped chickadee inhabits riparian woodlands in Del Norte and northern Humboldt Counties. It is mainly found in deciduous trees, especially willows and alders, along large or small watercourses. The chickadee excavates its nest cavity in rotten wood, or nests in old woodpecker holes. Suitable habitat exists for this species along the riparian corridors within the study area and it was observed (heard) within the riparian corridor along the western boundary of the project site. Five other special-status bird species have moderate to high potential to occur on the project site, including Cooper's Hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), Vaux's swift (*Chaetura vauxi*), olive-sided flycatcher (*Contopus cooperi*), and Bryant's savannah sparrow (*Passerculus sandwichensis alaudinus*). Considering the managed nature and regular use of the project site, special-status birds are expected to choose less disturbed habitat for nesting and roosting, such as the Cooper Gulch Canyon to the north of the project area. However, potential habitat exists for a small number of special-status birds. In addition, native migratory birds may also be present at the project area. The Biological Report states that all locations with tall grass or a shrub or tree canopy layer within the project area may provide suitable nesting habitat for a diverse assemblage of migratory birds. It recommends that to avoid potential impacts to nesting birds, in accordance with the Migratory Bird Treaty Act, one of the following shall be implemented:

- Conduct vegetation removal and other ground-disturbance activities associated with any construction activities between late August and mid-March, when birds are not typically nesting, or

- If vegetation removal or ground-disturbing activity is to take place during the nesting season (March 15 to August 15 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the United States Fish & Wildlife Service (USFWS) and California Department of Fish & Wildlife (CDFW) and implemented to prevent abandonment of the active nest.

This recommendation has been incorporated as **Mitigation Measure BIO-2**. With the implementation of **Mitigation Measure BIO-2**, potential impacts to special status, migratory, and nesting birds would be less than significant.

Special-Status Amphibian Species

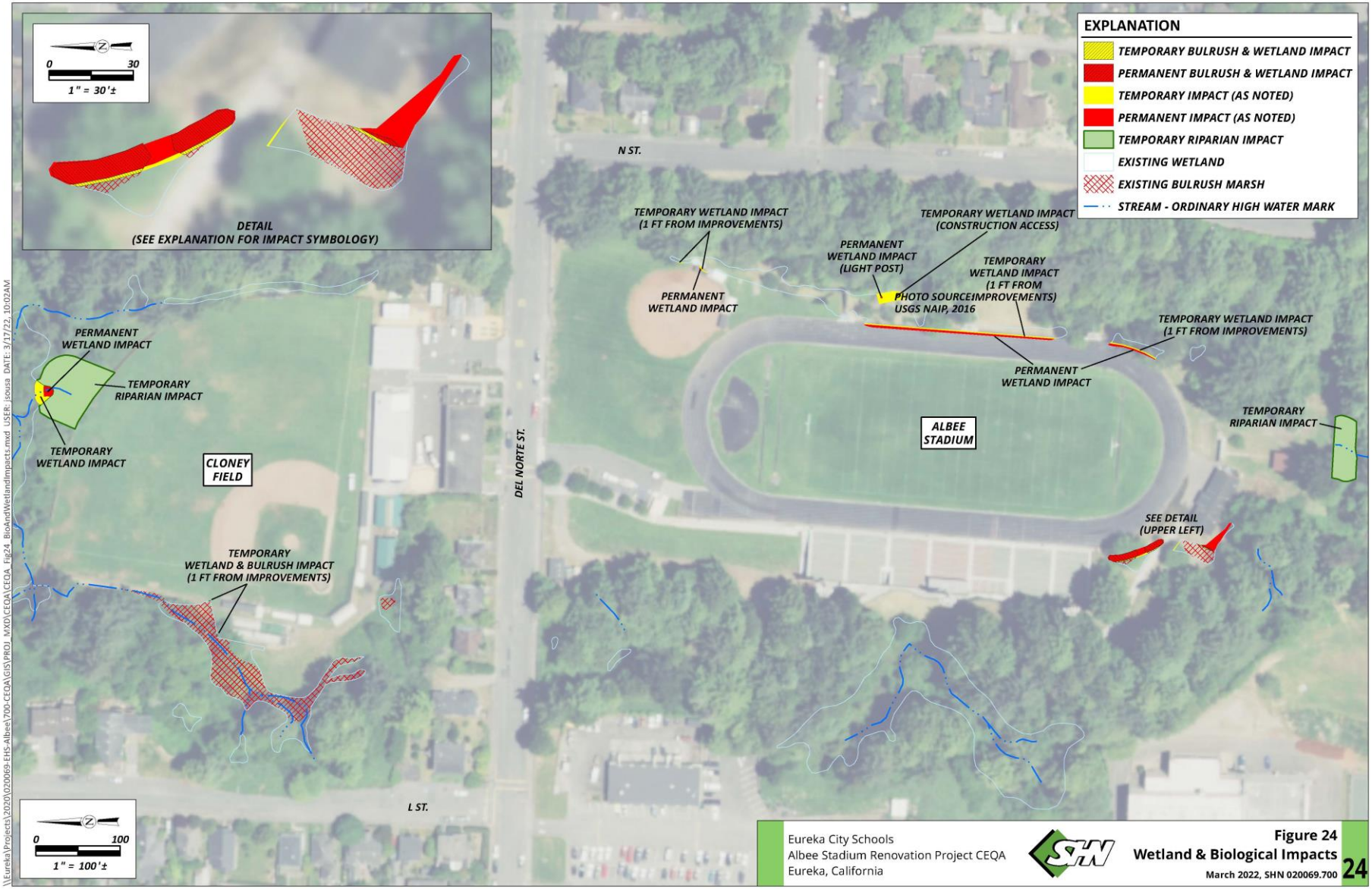
One special-status amphibian species has moderate potential to occur on the project site – northern red-legged frog (*Rana aurora*). Northern red-legged frogs are a State Species of Concern and were evaluated in the Biological Report (SHN, 2020a). They occupy humid forests, woodlands, grasslands, and stream sides in northwestern California, usually near dense riparian cover. They are generally near permanent water but can be found far from water, in damp woods and meadows, during the non-breeding season. Although this species was not detected, suitable habitat exists in several wet locations within the project area, particularly within the active channel of Cooper Creek. The Biological Report recommends that project activities within the active channel of Cooper Creek (including but not limited to storm drainpipe rehabilitation and replacement, rock slope protection, headwall development, or similar ground-disturbing activities) should occur from July 15 through October 31, to minimize potential impacts to aquatic species such as the northern red-legged frog, among others. This recommendation has been incorporated as **Mitigation Measure BIO-3**. With the implementation of **Mitigation Measure BIO-3**, potential impacts to special-status amphibians would be less than significant.

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

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

Mapping of sensitive natural communities including riparian habitat occurred in May through September 2020. Cooper Creek supports an area of riparian hardwood forest immediately north of the Bud Cloney Field (Figure 23). The area is dominated by red alder, pacific willow, and coast willow, with lesser dominance by Sitka spruce and Sitka willow. The assemblage of vegetation does not meet the definition for a specific special-status vegetation community; however, the area represents habitat for a number of botanical and wildlife species as evidenced by largely intact native species dominated understory. This mapped vegetation community also largely coincides with mapped three-parameter wetlands. Construction activities have the potential to indirectly impact the downstream riparian hardwood forest through the discharge of sediment and/or other pollutants during storm drain replacement and construction of the headwall and energy dissipator. Therefore, **Mitigation Measure HWQ-1** (see Section X – Hydrology and Water Quality) will be implemented to manage stormwater and non-stormwater discharges during construction through the preparation and implementation of a stormwater pollution prevention plan (SWPPP). Construction activities are also anticipated to directly impact approximately 6,662 square feet (sf) of riparian habitat at the inlet and outlet of the main storm drainpipe that conveys Cooper Creek beneath the site (Figure 24). This impact is anticipated to be temporary and is associated with temporary equipment access and grading for construction of new concrete headwalls and rock energy dissipator/rock slope protection. Without mitigation, impacts to special-status riparian habitat would represent a significant impact. **Mitigation Measure BIO-4** requires avoidance of impacts to riparian habitat during construction to the greatest extent feasible and protection of riparian areas during construction with protective fencing. **Mitigation Measure BIO-5** requires the preparation and implementation of a plan to restore and mitigate for impacts to riparian habitat that cannot be avoided during construction. With the implementation of **Mitigation Measures HWQ-1, BIO-4**, and **BIO-5**, the impact to special-status riparian habitat would be less than significant.

Small fruit bulrush marsh (*Scirpus microcarpus* Herbaceous Alliance) was observed in several locations within the study area. Small fruit bulrush marshes are ranked G4S2, which means that this vegetation community is secure globally, but is uncommon within the state of California. Within the project vicinity the largest, most intact example occurs west of Bud Cloney Field; however smaller occurrences are mapped west and northwest of the Albee Stadium track near the Field House (Figure 23). All examples of this vegetation community within the project vicinity are within areas mapped as three-parameter wetlands and display high levels of cover by native vegetation. The Biological Report recommends avoidance of small fruit bulrush marsh. The project has been designed to avoid and minimize impacts to small fruit bulrush marsh to the extent feasible, but due to the constrained nature of the site and the close proximity of small fruit bulrush marsh to the existing facilities, minor impacts (fill/removal) are proposed to the west of Bud Cloney Field and at the southwest corner of Albee Stadium (Figure 24). Approximately 488 sf of small fruit bulrush marsh is proposed to be removed. Without mitigation, this would represent a significant impact. **Mitigation Measure BIO-6** requires the establishment and maintenance of appropriate buffers to avoid and protect small fruit bullrush marsh during construction**. Mitigation Measure BIO-7** requires the preparation and implementation of a plan to mitigate and compensate for removal of small fruit bulrush marsh that cannot be avoided during construction. The proposed location for onsite small fruit


EXPLANATION
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PERMANENT BULRUSH & WETLAND IMPACT
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Eureka City Schools
Albee Stadium Renovation Project CEQA
Eureka, California
Figure 24
Wetland & Biological Impacts
March 2022, SHN 020069.700
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bulrush marsh mitigation would be adjacent to the existing population along the west side of Bud Cloney Field in an area also proposed for compensatory wetland mitigation (Figure 25). With the incorporation of **Mitigation Measures BIO-6** and **BIO-7**, potential impacts to small fruit bulrush marsh would be less than significant.

The majority of the study area surrounding the athletic facilities is dominated by remnant conifer forest best described as north coast conifer forest (Figure 23). Three tree species are dominant within the forest with coast redwood displaying the highest cover, followed by Sitka spruce and Douglas fir. Lesser dominants included western red cedar (*Thuja plicata*), western hemlock (*Tsuga heterophylla*), and grand fir (*Abies grandis*). The dominance by coast redwood, Sitka spruce, and Douglas fir do not meet the criteria for a specific special-status vegetation community or alliance but is likely a mix of three natural communities (Redwood forest (*Sequoia sempervirens* Forest Alliance), Sitka spruce forest (*Picea sitchensis* Forest Alliance), and Douglas fir forest (*Pseudotsuga menziesii* Forest Alliance). The mixed conifer forest surrounding the athletic facilities is habitat for a number of botanical and wildlife species that otherwise would not survive in the suburban surroundings (SHN, 2020a). Construction of the project's two potential ADA-compliant ramp options between the Eureka High main campus and Albee Stadium would involve removal of a number of mature trees. If the north ADA ramp option is selected (Figure 19), construction would involve removal of up to 15 redwoods (diameter at breast height [DBH] 24 to 60 inches), 1 Sitka spruce (DBH 36 inches), 1 red alder (DBH 20 inches), and 1 western red cedar (DBH 24 inches). If the south ADA ramp option is selected (Figure 20), construction would involve removal of up to 9 redwoods (DBH 12 to 61 inches) and 1 Douglas fir (DBH 36 inches). One or the other ADA ramp options may be constructed as a result of the project, but not both. It is also possible that neither ADA ramp option will be constructed if ECS can obtain a hardship exemption from the Division of the State Architect (DSA). The trees to potentially be removed do not meet the criteria for a specific special-status vegetation community or alliance, and thus their removal would not constitute a potentially significant impact under CEQA; however, their removal would reduce the habitat for a number of botanical and wildlife species. Therefore, to further reduce the project's potential for adverse biological impacts, **Mitigation Measure BIO-8** will be implemented, requiring that for each mature tree removed for ADA ramp construction, replacement trees will be planted at a 3:1 ratio. Replacement trees shall be of the same species as the trees to be removed and shall be planted in the vicinity of the area opened up by ADA ramp construction. With the incorporation of **Mitigation Measures BIO-8**, potential impacts from tree removal would be less than significant.

With the incorporation of **Mitigation Measures HWQ-1, BIO-4, BIO-5, BIO-6**, **BIO-7**, and **BIO-8**, and based on the information provided above, the proposed project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local of regional plans, policies, regulations, or by CDFW or USFWS. Therefore, the proposed project will have a less-than-significant impact with mitigation incorporated on this resource category.

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

As described in the Biological Resources Setting and the Wetland and Other Waters Delineation Report (SHN, 2020b), freshwater forested/shrub wetlands meeting the definition of three-parameter wetlands occur intermittently among the surrounding slopes and along the margins of the existing athletic fields. These federally protected wetlands are classified as Palustrine Forested Broad-leaved Deciduous Seasonally Flooded. Small channels drain the steep slopes surrounding the project site. The OHWM features associated with the small channels represent the lateral limits of federal jurisdiction over non-tidal water bodies in the absence of adjacent wetlands. Figures 17 and 18 indicate the jurisdictional wetland boundaries and OHWMs delineated within the project site and surrounding slopes.

Construction activities have the potential to indirectly impact downstream wetland habitat and OHWM through the discharge of sediment and/or other pollutants. Therefore, **Mitigation Measure HWQ-1** (see Section X – Hydrology and Water Quality) will be implemented to manage stormwater and non-stormwater discharges during construction through the preparation and implementation of a stormwater pollution prevention plan (SWPPP).

The proposed project is being designed to avoid and minimize impacts to wetlands and other jurisdictional waters to the extent feasible. However, due to the constrained nature of the site and the close proximity of wetlands and OHWMs to the existing athletic and academic facilities that are to be renovated/replaced, a minor amount of wetland fill is anticipated. Approximately 980 sf of wetland is to be temporarily impacted and approximately 1,504 sf is to be permanently filled/removed during construction (Figure 24). Approximately 75 linear feet of OHWM is to be temporarily impacted through the placement of rock slope protection at the inlet and outlet of the main storm drainpipe (Figure 24). Without mitigation, the impacts to wetlands would represent a significant impact. **Mitigation Measure BIO-9** requires the establishment and maintenance of appropriate buffers to avoid and protect wetlands and other jurisdictional waters during construction. **Mitigation Measure BIO-10** requires the preparation and implementation of a plan to mitigate and compensate for fill/removal of wetlands and other jurisdictional waters that cannot be avoided during construction. The proposed location for onsite wetland mitigation (creation) would be along the west side of Bud

Cloney Field (Figure 21) where there is sufficient area to create wetland mitigation at up to a 3:1 ratio for permanent wetland fill impacts. To mitigate for temporary wetland impacts, there is adequate area for additional wetland mitigation in the form of wetland restoration to the west of the Albee Stadium bleachers (Figure 19). With the incorporation of **Mitigation Measures HWQ-1, BIO-9**, and **BIO-10** and based on the information provided above, the proposed project will not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, the proposed project will have a less-than-significant impact with mitigation incorporated on this resource category.

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

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Wildlife movement corridors within the vicinity of the project consist of Cooper Creek and its associated riparian corridor upstream and downstream of the proposed project. Cooper Creek flows beneath the project site for a total length of 1,500 feet, entering a 30-inch diameter storm drainpipe south of Albee Stadium and daylighting north of Bud Cloney Field. Cooper Creek continues north for approximately 1.3 miles north before draining into Eureka Slough and Humboldt Bay. The Biological Report identified no special-status fish species as having a moderate or high potential to occur at the project site due to a lack of surface water connectivity.

The proposed project will be developed within the footprint of Albee Stadium, Bud Cloney Field, and the other existing facilities. Heavy vegetation cover along the western, eastern, and northern boundaries of the project site provides an adequate wildlife movement corridor around the project area. Therefore, the proposed project will not encroach on wildlife movement corridors, and the movement of wildlife species in the project area will continue to occur similar to the baseline condition.

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

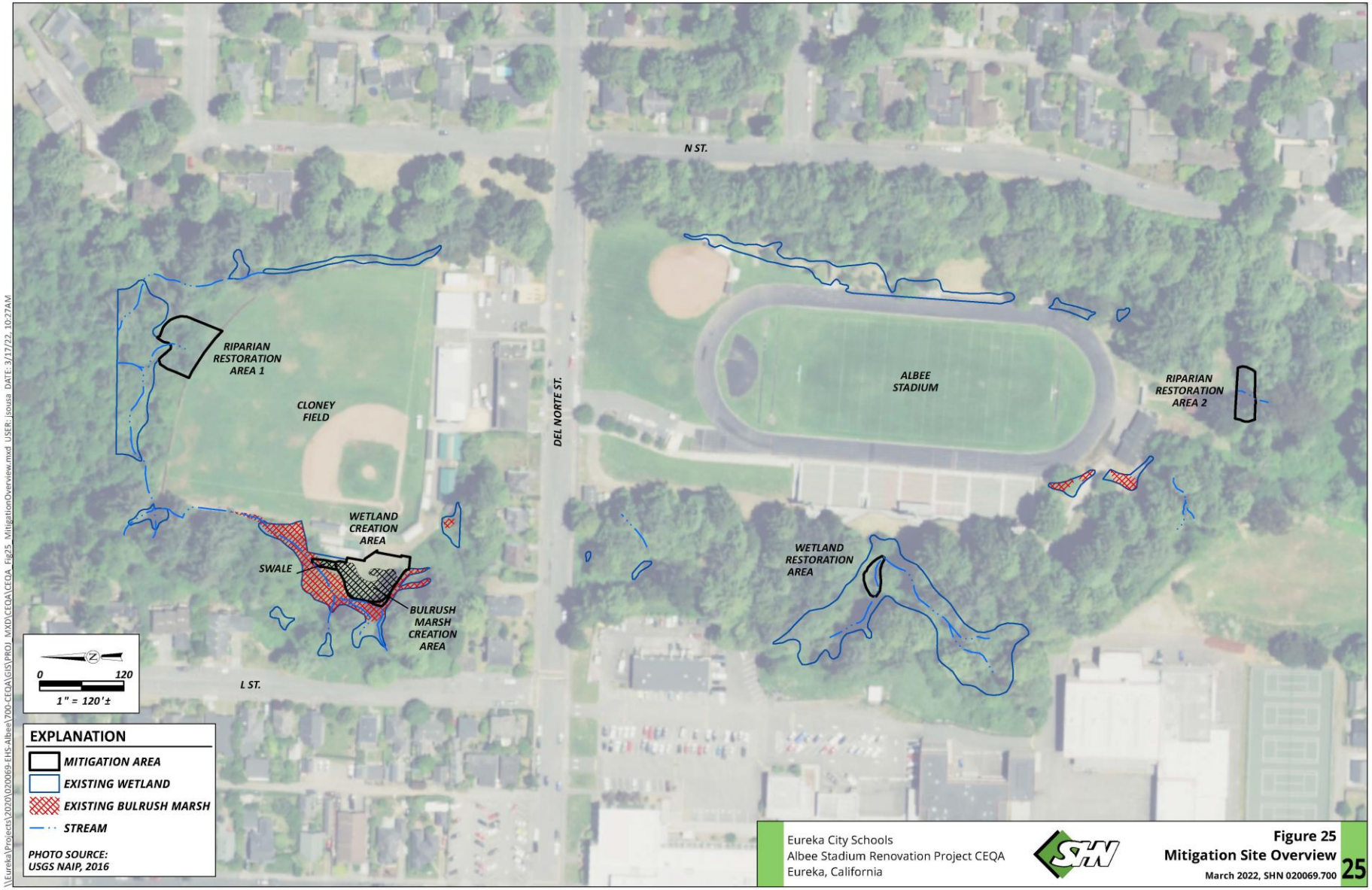
e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?* Less-Than-Significant Impact

The project proposes renovation and replacement of athletic and educational facilities at EHS in the City of Eureka. Although the proposed project is located within the City of Eureka, the project site is located on ECS property under the authority of ECS and the State of California. Public school districts, such as ECS, retain the authority to overrule local zoning and general plan land-use designations if specified procedures are followed pursuant to Government Code sections 53094, 65402(a), and 65403 and Public Resources Code Section 21151.2. Accordingly, ECS adopted Resolution #20-21-014 on September 17, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements (ECS, 2020b). However, the proposed project will be required to comply with the existing regulatory requirements of State and federal agencies including the United States Army Corp of Engineers (USACE), North Coast Regional Water Quality Control Board (NCRWQCB), and CDFW. To comply with these regulations, the project has been designed and mitigated to comply with the existing regulatory requirements related to the protection of wetlands, riparian areas, water quality, and sensitive plant and animal species.

Based on the information provided above, the proposed project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the proposed project will have a less-than-significant impact on this resource category.

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

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


N ST.
DEL NORTE ST.
RIPARIAN RESTORATION AREA 1
CLONEY FIELD
ALBEE STADIUM
RIPARIAN RESTORATION AREA 2
WETLAND CREATION AREA
SWALE
BULRUSH MARSH CREATION AREA
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120
1" = 120'±
EXPLANATION
MITIGATION AREA
EXISTING WETLAND
EXISTING BULRUSH MARSH
STREAM
PHOTO SOURCE: USGS NAIP, 2016
\\Eureka\Projects\2020\020069-EHS-Albee\700-CEQA\GIS\PROJ_MXD\CEQA_Fig25_MitigationOverview.mxd USER: jsousa DATE: 3/17/22, 10:27AM
Eureka City Schools
Albee Stadium Renovation Project CEQA
Eureka, California
Figure 25
Mitigation Site Overview
March 2022, SHN 020069.700
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Mitigation Measures: In order for the proposed project to result in a less-than-significant impact to *Biological Resources*, the following mitigation measures will be implemented:

Mitigation Measure BIO-1. Protect Siskiyou Checkerbloom: To avoid potential impacts to Siskiyou checkerbloom (*Sidalcea malviflora* ssp. *patula*) the following shall be implemented:

- Locations of Siskiyou checkerbloom populations within 50 feet of proposed construction shall be clearly identified for avoidance in the contract documents (plans and specifications); and
- Prior to the start of construction, where construction activities occur within 50 feet of the Siskiyou checkerbloom populations, high visibility construction fencing shall be erected to establish a no-disturbance buffer that would be adequate for the protection of the plants, as determined by a qualified biologist.

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

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

Mitigation Measure BIO-3. Seasonal Limitation on Work in Active Channel: Project activities within the active channel of Cooper Creek (including but not limited to storm drainpipe rehabilitation and replacement, rock slope protection, headwall development, or similar ground-disturbing activities) shall occur from July 15 through October 31, to minimize potential impacts to aquatic species such as the northern red-legged frog, among others.

Mitigation Measure BIO-4. Protect Riparian Habitat: ECS shall avoid impacts to riparian habitat during construction to the greatest extent feasible. Riparian habitat adjacent to the project site that will not be impacted by the project shall be protected during construction with protective fencing. Protective fencing shall be installed prior to construction and a biological monitor shall supervise the installation of the fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.

Mitigation Measure BIO-5. Mitigate for Riparian Habitat Impacts: ECS shall avoid impacts to riparian habitat to the extent feasible. Where impacts to riparian habitat cannot be avoided, impacts to riparian habitat shall be quantified during construction and habitat shall be restored following construction. Riparian habitat shall be restored within the impact footprint at a 1:1 ratio for temporary impacts and elsewhere onsite at up to a 3:1 ratio for permanent impacts. ECS shall restore the affected areas by planting native flora, primarily trees, to re-establish functional riparian woodland. In addition, removal of concrete and metal debris from the active stream channel and invasive species management will be part of the mitigation effort. A Mitigation Monitoring Plan shall be prepared in coordination with NCRWQCB and CDFW. The Plan shall be acceptable to the regulatory agencies with jurisdiction over riparian areas and shall include the following elements: proposed mitigation ratios; description and size of the restoration area; site preparation and design; plant species; planting design and techniques; maintenance activities; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The Plan shall be implemented by ECS. ECS shall also compensate for impacts to riparian areas by obtaining required permits from the NCRWQCB and CDFW, which shall be received prior to the start of any construction activity subject to these permits. ECS shall ensure that any additional measures outlined in the permits are implemented.

Mitigation Measure BIO-6. Protect Small Fruit Bullrush Marsh: ECS shall implement the following mitigation measures to avoid and protect small fruit bulrush marsh (*Scirpus microcarpus* Herbaceous Alliance):

- Prior to the start of construction, a qualified biologist will develop and distribute educational materials to construction crews at a "tail-gate" meeting identifying small fruit bulrush marsh within the project area. This will include (but is not limited to) hard copy information about small fruit bulrush marsh identification and defining protective buffer flagging or fencing to explain where the buffers are placed and what they are intended to protect.

- Except where direct removal of small fruit bulrush marsh is proposed, establish and maintain appropriate buffers as determined by a qualified biologist for the duration of construction. Small fruit bulrush marsh shall be demarcated with high visibility fencing to avoid ground disturbance.

Mitigation Measure BIO-7. Mitigate for Impacts to Small Fruit Bullrush Marsh: ECS shall prepare and implement a Mitigation Monitoring Plan to identify and compensate for removal of small fruit bulrush marsh (*Scirpus microcarpus* Herbaceous Alliance) that cannot be avoided during construction. The Plan will include the following components, must adequately replace habitat, and be approved by the California Department of Fish & Wildlife (CDFW):

- Identify, map, and quantify the impacted small fruit bulrush marsh.
- Determine the appropriate replacement or restoration to impact ratio.
- Identify suitable location(s) for creating replacement habitat (including wetland areas created pursuant to Mitigation Measure BIO-10) or restoring a site that previously had the equivalent small fruit bulrush marsh community.
- Determine success criteria against which the replacement/restoration site would be judged to successfully have replaced or restored the small fruit bulrush marsh.
- Determine appropriate ongoing monitoring for the small fruit bulrush marsh mitigation. Monitoring shall include the timing and frequency of inspections, and documentation of inspections, until it is determined that the success criteria has been met.
- If during monitoring it is found that the replacement and/or restoration is not succeeding, ECS shall consult with CDFW to determine appropriate corrective actions.

Mitigation Measure BIO-8. Mitigate for Tree Removals: If mature trees are to be removed for construction of one of the two ADA ramp options between the Eureka High main campus and Albee Stadium, replacement trees shall be planted at a 3:1 ratio. Replacement trees shall be of the same species as the trees to be removed and shall be planted in the vicinity of the area opened up by ADA ramp construction.

Mitigation Measure BIO-9. Protect Wetlands: Excluding wetlands (and other jurisdictional waters as delineated by ordinary high water mark) that will be filled or must be worked in during project construction, ECS shall protect wetlands and other jurisdictional waters during construction. Prior to the start of construction, where construction activities occur within close proximity (50 feet) to delineated wetlands and other jurisdictional waters, high visibility construction fencing shall be erected to establish a no-disturbance buffer that would be adequate for the protection of the wetlands and other jurisdictional waters, as determined by a qualified biologist. The fencing shall be checked weekly by a biological monitor to ensure its continued correct placement and stability.

Mitigation Measure BIO-10. Mitigate for Wetland Impacts: ECS shall avoid the fill of wetlands (and other jurisdictional waters as delineated by ordinary high water mark) to the extent feasible. Where fill of wetlands and other jurisdictional waters cannot be avoided, ECS shall compensate for the loss so there is no net loss of wetlands. ECS shall compensate for impacts to identified wetlands and other jurisdictional waters through restoration, rehabilitation, and/or creation of wetland at a ratio of no less than 1:1. A Mitigation Monitoring Plan shall be prepared in coordination with NCRWQCB, USACE, and CDFW. Compensation for wetlands shall occur so there is no net loss of wetland habitat at ratios to be determined in consultation with NCRWQCB, USACE, and CDFW. The Plan shall be acceptable to the regulatory agencies with jurisdiction over wetlands and waters and shall include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The Plan shall be implemented by ECS. ECS shall also compensate for impacts to wetlands and other waters by obtaining required permits from the USACE, NCRWQCB, and CDFW which shall be received prior to the start of any construction activity subject to these permits. ECS shall ensure that any additional measures outlined in the permits are implemented.

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

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

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

Setting: A Historical Resources Investigation was completed for the proposed project by William Rich and Associates (WRA). The purpose of this investigation was to document whether significant archaeological or historic period-built environment cultural resources, defined as an Historical Resource or Tribal Cultural Resource in the CEQA Guidelines Title 14 California Code of Regulations (CCR) Section 15064.5(a), are present within the proposed project area. This was completed by performing research of existing information, outreach to Wiyot area tribes and local historical societies, an archaeological field survey, and an evaluation of the historical buildings and structures in the project area (WRA, 2020).

The project site is located in the City of Eureka, which is located within the indigenous territory of the Wiyot people. At the time that Euro-Americans first settled in this region, the Wiyot Tribe held the coastal lands surrounding Humboldt Bay. They were divided into three principal groups, the Patawat, who lived in the villages on the lower Mad River, the Wiki on Humboldt Bay, and the Wiyot along the lower Eel River. It is the name of the Eel River division, which is now used exclusively in accounts pertaining to the entire group. Several Wiyot villages and archaeological sites were mapped along the shore of the bay around a century ago, north and west of the project area; however, none of these sites occur within one-half mile of the proposed undertaking. There are no known Wiyot sites, places of importance, or other cultural resources in the project area (WRA, 2020).

ECS requested a list of regional tribes from the Native American Heritage Commission (NAHC). Registered Professional Archaeologist, William Rich, M.A. invited the Wiyot area tribes to coordinate on field survey and archaeological identification efforts at this project location. This outreach was provided by an emailed letter on September 4, 2020 to Tribal Historic Preservation Officers (THPO) Janet Eidsness of the Blue Lake Rancheria, Erika Cooper of the Bear River Band of the Rohnerville Rancheria, and Chairman Ted Hernandez of the Wiyot Tribe. Under Assembly Bill (AB) 52, Eureka City Schools sent notification letters to these same local Native American tribes on October 19, October 21, and November 5, 2020. Responses were received from the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria requesting that an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation (ECS, 2020a).

In 1850, members of the Mendocino Company landed on the shore of Humboldt Bay and began to lay claim to the region that had long been Wiyot territory. Streets, mills, and buildings were built as development in the region expanded, forming what today is the City of Eureka. The project site is located on what is now portions of the EHS campus. The project site contains Albee Stadium, Bud Cloney Field, and various facilities that serve EHS, including the Field House at Albee Stadium, and the Portable Agriculture Classrooms and Technology Center (formerly misidentified as the Agriculture Building and currently also known as the Welding Shop) near Bud Cloney Field. The project area includes land that was cleared, in-filled, and developed between the 1910s and the 1950s for the construction of EHS facilities. This area was described early as being densely forested prior to being cleared in the late 19th century (WRA, 2020).

Albee Stadium was built in 1925 and has since been used by both EHS students and community members for athletic and recreational activities with periodic improvements over the years. The Albee Stadium Field House was constructed in the 1950s, resembling International Style of design. This simple gabled building contains modest International Style design elements, including the ribbon windows set flush with outer walls; fenestration lacking in decorative detailing; smooth stuccoed outer walls; cantilevered roof sections lacking ground support, and the asymmetrical façade. These elements of the Field House retain requisite integrity to convey the structure's architectural significance (WRA, 2020).

Bud Cloney Field was built over the deeper part of Cooper Creek (also referred to as Cooper Canyon or Cooper Gulch) sometime between 1970 and 1981. It has been used as a baseball diamond since that time, both by EHS students and community members. Adjacent to Bud Cloney Field are Agriculture Buildings, which consist of two adjoining portable classroom trailers, which were installed in 2006, having replaced the original agriculture building which was built in 1952 and torn down in the 1970s. As this building is an entirely modern construction, it does not meet the age criteria or other criteria requisite for inclusion on state or local registers, nor would it be considered a historical resource. Near Bud Cloney Field and the Agriculture Building sits the Technology Center (formerly misidentified as the Agriculture Building and currently also known as the Welding Shop), which was built in 1950, after the land north of Del Norte Street was cleared and filled. Between 1988 and 1990, the Welding Shop was added onto the east side of the Technology Center building. The Technology Center building, containing a classroom, auto garage, and welding shop is an example of International Style, recognized as a significant architectural theme for the campus, sharing several design features with the Willard Gymnasium on the EHS main campus and the Field House at Albee Stadium. The building has been closed to student use since 2017 due to unsafe and hazardous conditions resulting from structural foundation failure (WRA, 2020).

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

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

During the Historical Resources Investigation prepared for the proposed project, two buildings within the project area were recognized as being more than 50 years of age. These are the Technology Center (1950) near Bud Cloney Field and the Field House (1950) at Albee Stadium. The Field House and the Technology Center both appeared to retain integrity as modest examples of the International Style. The Field House, Technology Center, and Albee Stadium appeared eligible for the California Register of Historical Resources (CRHR) and the City of Eureka Local Register of Historic Places (LRHP). These structures contribute to the significance of the EHS campus. Other facilities and areas within the project footprint, such as the Portable Agriculture Classrooms and Bud Cloney Field, do not meet the age threshold for consideration as historical resources or meet criteria for inclusion in federal, state, or local registers (WRA, 2020). Therefore, the following discussion focuses on the Field House, Technology Center, and Albee Stadium.

Field House

As described above, the Historical Resources Investigation concluded that the Field House is eligible for the CRHR and LRHP. At the time the Historical Resources Investigation was prepared, the Field House was proposed for replacement of exterior finish, doors, and windows to meet Title 24 energy and Americans with Disability Act (ADA) accessibility requirements. New concrete landings, ramps, and steps were to be added on each end of the building to meet ADA accessibility requirements. The building size was not to be increased.

In preparation for the proposed modifications to this building, WRA recommended that the project utilize the Secretary of the Interior's Standards for the Treatment of Historic Properties. The Secretary of the Interior's Standards were developed to promote consistent preservation practices. The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. The Standards are neither technical nor prescriptive, but are intended to promote responsible preservation practices that help protect cultural resources. In the Standards, there are four ways that a historic property may be treated; they include Preservation, Rehabilitation, Restoration, and Reconstruction.

According to the Historical Resources Investigation, the most appropriate standard to use for reviewing this proposed remodeling of the Field House was Rehabilitation. Rehabilitation emphasizes the retention and repair of historic materials, but also acknowledges time moves forward and properties change, and allows additions so long as the essential historic character on the parcel remains. Contemporary or non-historic materials may be used in the construction where the same materials would be impractical. Rehabilitation focuses more on how people continue to use and adapt properties according to changing needs than on historical interpretation.

The Historical Resources Investigation for the proposed project utilized the ten Standards of Rehabilitation to analyze the appropriateness of the Secretary of the Interior's Standards for the Treatment of Historic Properties, concluding that Rehabilitation

of the Field House would adequately reduce impacts to less-than-significant. Additionally, ECS coordinated with Historic Preservation Consultant Jill Macdonald and incorporated her recommendations (Macdonald, 2021a) into the proposed alterations to the Field House (FF&J, 2021). Jill Macdonald reviewed the updated Field House rehabilitation plans and concurred with the proposed modifications (Macdonald, 2021b).

However, since the preparation of the above referenced Historic Resources Investigation, the California Division of the State Architect (DSA) reviewed the plans to rehabilitate the Field House, and further assessed the structural modifications necessary to bring the building up to a code acceptable to schools. DSA's review process is done with the goal of requiring school districts to demolish older buildings and reconstruct them to meet the most current building code requirements. Based on DSA's review of the proposed Field House improvements, and the structural modifications, DSA is now requiring, along with the proposed new interior improvements for the building, the cost to rehabilitate the Field House is over the 50% replacement value of the building. Therefore, current State Building Code requires the Field House building to meet all current building codes, which DSA says cannot be met with the current building. Based upon its review of the Geotechnical and Geohazard Report (SHN, 2021a), DSA determined that the soil under the Field House is unstable and would need to be remediated to eliminate the potential of liquefaction. The anticipated costs involved to make all of the structural modifications make the potential of rehabilitation of the Field House cost prohibitive (Macdonald, 2022).

With rehabilitation of the Field House no longer being feasible, ECS is committed to reconstruction of the building using the Secretary of the Interior Standards for the Treatment of Historic Properties – Reconstruction. This involves reconstructing the building to match the original footprint and exterior appearance, and salvaging and reusing the original windows, doors, frames, and other distinguishing features in order for the building to exemplify its historical architectural style. Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historical location.

The following are the Secretary of the Interior Standards for Reconstruction (NPS-USDI, 2022):

> The Standards will be applied, taking into consideration the economic and technical feasibility of each project.
>
> 1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.
> 2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts that are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
> 3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
> 4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
> 5. A reconstruction will be clearly identified as a contemporary re-creation.
> 6. Designs that were never executed historically will not be constructed.

Jill MacDonald provided a letter stating that because the original plans for the Field House exist, and because of the adequate photographic documentation of the structure in its original form, it is feasible that an accurate reconstruction of the Field House can be attained (Macdonald, 2022). She specified that all of the original materials that can be saved must be incorporated into the reconstruction. Although the interior of the building will have modern upgrades, the exterior must mimic the original facades. She specified that the comments in her letter dated March 25, 2021 (Macdonald, 2021a) are still relevant and need to be incorporated into the final design. She concluded that reconstruction of the Field House is an opportunity to honor the historic context of the campus setting at Eureka Senior High School, and that the Field House reconstruction will be an exemplary example of the benefits of sound preservation practice based on the economic unfeasibility of any other preservation treatment (Macdonald, 2022).

Therefore, reconstruction of the Field House meeting the Secretary of Interior's Standards for the Treatment of Historic Properties – Reconstruction has been included as **Mitigation Measure CR-1.** With the inclusion of the **Mitigation Measure CR-1**, which includes the specific design recommendations provided by Jill Macdonald, the reconstruction of the Field House would not adversely affect the ability of the structure to convey its historical architectural style, either individually or as a contributor to a potential Eureka High School historic district.

To further mitigate any adverse impact to the Field House posed by its proposed demolition and reconstruction, the structure was photographed and documented during preparation of the Historical Resources Investigation. This has been incorporated as **Mitigation Measure CR-2.** In fulfillment of the requirements of this measure, the Historical Resources Investigation included completed California Department of Parks and Recreation (DPR) 523-series historical resources inventory forms for the Field House. Therefore, with the inclusion of the **Mitigation Measures CR-1** (to be completed as part of the project) and **CR-2** (already completed), the demolition of the Field House would result in a less-than-significant impact to a historical resource pursuant to Section 15064.5.

Technology Center

As previously noted, the Historical Resources Investigation concluded that the Technology Center is eligible for listing in the CRHR and LRHP. However, the investigation notes that the proposed demolition of the Technology Center now appears unavoidable given the subgrade failure and subsequent impacts to the building foundation system (WRA, 2020). Due to the Technology Center's eligibility for the CRHR and LRHP, WRA recommended the structure be photographed and documented to mitigate any adverse impact to the structure posed by the proposed demolition of the building. This recommendation has been incorporated as **Mitigation Measure CR-2.** In fulfillment of the requirements of this measure, the Historical Resources Investigation included completed California Department of Parks and Recreation (DPR) 523-series historical resources inventory forms for the Technology Center, and it concluded that the DPR 523 record forms and the historical documentation contained in the Historical Resources Investigation shall serve to mitigate any significant impact to these resources posed by the project. Therefore, with the inclusion of **Mitigation Measure CR-2** (already completed), the demolition of the Technology Center building would result in a less-than-significant impact to the significance of a historical resource pursuant to Section 15064.5.

Albee Stadium

As previously noted, the Historical Resources Investigation concluded that the Albee Stadium is eligible for listing in the CRHR and LRHP. Albee Stadium's eligibility is associated with the historical development of the City of Eureka and its contribution to regional history. However, the proposed project, which seeks to improve stadium lighting, athletic facilities, support structures, and access routes, is not expected to adversely affect the ability of these structures to convey their historical significance, either individually or as contributors to a potential Eureka High School historic district. These improvements are functional modifications which will provide utility to Albee Stadium without detracting from its historical significance. The intended changes to Albee Stadium are relatively minimal and the overall design, massing, scale, and context of the property will not be altered as a result of the proposed project. These small changes could, in fact, allow for the viability of this local landmark, by allowing new and continued uses for older historic spaces (WRA, 2020). Therefore, the proposed improvements to Albee Stadium would result in a less-than-significant impact to the significance of a historical resource pursuant to Section 15064.5.

Based on the information provided above, with the inclusion of **Mitigation Measures CR-1** and **CR-2**, it has been determined that the proposed project will not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

The project site includes land that was cleared, in-filled, and developed between the 1910s and the 1950s for the construction of EHS facilities. This area was described as being densely forested prior to being cleared in the late 19th century. The Historical Resources Investigation prepared for the proposed project documents that no Native American archaeological sites, features, or other cultural resources were identified during the investigation, nor have any been identified in the adjacent vicinity during past survey efforts. This does not, however, preclude the potential for these types of resources to be present at this location, due to the proximity to a perennial watercourse in Cooper Creek that drains directly to Humboldt Bay where associated Wiyot sites are known to occur. The location, being situated in the upper canyon of a small stream flowing into Humboldt Bay, could contain archaeological deposits wherever intact soils are present, including along the eastern and western margins of the project area, where imported fill is more shallow or where intact landforms are present.

ECS requested a list of regional tribes from the Native American Heritage Commission (NAHC). Registered Professional Archaeologist, William Rich, M.A. invited the Wiyot area tribes to coordinate on field survey and archaeological identification efforts at this project location. This outreach was provided by an emailed letter on September 4, 2020 to Tribal Historic Preservation Officers (THPO) Janet Eidsness of the Blue Lake Rancheria, Erika Cooper of the Bear River Band of the Rohnerville Rancheria, and Chairman Ted Hernandez of the Wiyot Tribe. Under Assembly Bill (AB) 52, Eureka City Schools sent notification letters to these same local Native American tribes on October 19, October 21, and November 5, 2020. Responses were received from the Wiyot Tribe,

Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria requesting that an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation (ECS, 2020a).

Although the Historical Resources Investigation suggests that it would be relatively unlikely, because of prior disturbances, to encounter intact buried archaeological materials at this location during implementation of the proposed project, Tribal representatives requested an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation. Therefore, implementation of an Inadvertent Discovery Protocol shall be required as **Mitigation Measure CR-3**. The Historical Resources Investigation concludes that with implementation of **Mitigation Measure CR-3**, the proposed project would not result in a substantial adverse change to archaeological resources (WRA, 2020).

With the implementation of **Mitigation Measure CR-3,** the proposed project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Due to the past disturbance of the site, the presence of human remains is unlikely. However, there is a possibility that human remains and historic burial sites could exist in the area and may be uncovered during project development. An Inadvertent Discovery Protocol for human remains is included in **Mitigation Measure CR-4**. As such, if human remains are discovered during project construction, work will stop at the discovery location and **Mitigation Measure CR-4** will be implemented immediately.

With the implementation of **Mitigation Measure CR-4**, it has been determined that the proposed project will not disturb any human remains, including those interred outside of formal cemeteries. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Mitigation Measure CR-1. Field House Reconstruction: The Field House shall be reconstructed according to the Secretary of the Interior's Standards for the Treatment of Historic Properties – Reconstruction. Specifically, the following design elements will be incorporated into the reconstruction of the Field House:

1. The roof material will be Composition Luxury grade shingles with a profile which emulates wood shakes in color, texture, and style.

2. Glazing which has been removed or replaced over the years will be replaced with original glazing from the current Jay Willard Gymnasium on the project campus.

3. The horizontal wood elements of the window frames, louvers at the gable ends, and the horizontal wood trim board will be retained. The materials used to replace the existing ship lap siding and plaster will match the scale, texture, and design of the original surface materials. Other wood trim materials found to be in good condition will be restored.

4. The new accessible walkway will run behind the building on its south side, which avoids needing to have a ramping condition around the Field House. New steps will be added on the east and west sides of the building to allow access up to the building from the new finish surface elevations on the north side of the building.

5. The original fenestration, banding, the northeast corner, and front facade accents will be retained. The original front door and side lights on each side will be restored to the original appearance of this building. The door will not be openable, but the appearance will be retained.

Mitigation Measure CR-2. Technology Center and Field House Documentation: Prior to their demolition, the Technology Center and the Field House shall be subject to the historical documentation called for and completed in the Historical Resources Investigation, including photographs of the structure and completion of California Department of Parks and Recreation (DPR) 523-series historical resources inventory forms.

Mitigation Measure CR-3. Inadvertent Discovery Protocol for Archaeological Resources: If archaeological finds dating to the prehistoric and/or historic periods are encountered during construction activities, the contractor foreman shall cease all work in the immediate area and within a 50-foot buffer of the discovery location and immediately notify the Eureka City Schools (ECS). A qualified professional archaeologist shall be retained by ECS to conduct a rapid response examination of the find, assess its potential significance, and recommend a treatment plan to recover important information where significant impacts cannot be avoided. A professional experienced in historic era archaeology shall be required to evaluate and treat historic period (Euro American) finds. In cases where Native American archaeological constituents are inadvertently discovered, the Tribal Historic Preservation Officers (THPOs) for the tribes listed in Section 5.2 will be consulted by the ECS about the discovery's significance and development and implementation of a culturally sensitive treatment plan to be carried out by the consulting archaeologist and tribal representatives as appropriate.

Prehistoric archaeological discoveries may include obsidian or chert flakes and flaked-stone tools; locally darkened ashy midden soils; groundstone artifacts such as mortars and pestles; shellfish and faunal food refuse; shell beads and ornaments; and intact human burials or skeletal remains. If human remains are found, California Health and Safety Code 7050.5 requires that the County Coroner be contacted immediately at 707-445-7242. If the Coroner determines the remains to be Native American, the Native American Heritage Commission will then be contacted by the Coroner to identify the Most Likely Descendant (MLD), who shall recommend to the property owner the appropriate treatment of the remains pursuant to PRC 5097.98. Violators shall be prosecuted in accordance with PRC Section 5097.99.

Examples of potentially significant historic archaeological finds include but are not limited to: mortared bricks or rock alignments (possible building foundations); redwood boards or lined sump pits (in-place structural remains), or concentrations of refuse (old bottles, ceramics, metal objects, etc.) that may have been discarded into a pit feature (privy or well).

Mitigation Measure CR-4. Inadvertent Discovery Protocol for Human Remains: If previously unidentified evidence of human burial or human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5), the Humboldt County Coroner must be informed and consulted, per State law. If the coroner determines the remains to be Native American, he or she shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent. The most likely descendent will be given an opportunity to make recommendations for means of treatment of the human remains and any associated grave goods. When the commission is unable to identify a descendant or the descendants identified fail to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. Work in the area shall not continue until the human remains are dealt with according to the recommendations of the County Coroner, Native American Heritage Commission, and/or the most likely descendent have been implemented.

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

Setting: The project site is located in the City of Eureka on portions of the EHS campus, including Albee Stadium and Bud Cloney Field. In Humboldt County, energy is used as a transportation fuel and as electrical and heat energy in homes, businesses, industries, and agriculture.

EHS is enrolled with Redwood Coast Energy Authority (RCEA) for the purchase of electrical energy, which is distributed and delivered through the existing Pacific Gas & Electric (PG&E) electrical grid. RCEA administers Humboldt County's Community Choice Energy (CCE) program. The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce greenhouse gas emissions, and reinvest in local energy infrastructure. The CCE program currently procures approximately 47% of its power from renewable and carbon-free sources, which is approximately 8% greater than the renewable sources provided by the PG&E Base Plan (RCEA, 2019; PG&E, 2019).

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

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

Construction

During construction of the proposed project, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker and delivery truck travel to and from the project site, and to operate generators to provide temporary power for electronic equipment. Construction activities will include demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping.

There are no unusual project characteristics that would need construction equipment or practices that would be less energy efficient than at comparable construction sites in the region or state. Construction activity would be temporary and fuel consumption associated with construction activities would cease once construction is completed. Furthermore, various equipment would be supplied by onsite generators, and would not require permanent connections to or otherwise burden local utilities. Due to the temporary nature of construction activities, the fuel and energy needed during construction would not be considered a wasteful or inefficient use of energy. Therefore, it is expected that construction energy consumption associated with the project would be comparable to other similar construction projects, and would therefore not be inefficient, wasteful, or unnecessary.

Operation

The proposed project will involve the continued operation of athletic and educational facilities, which will occur on an intermittent basis and do not have the potential to result in a significant increase in energy use. During operation of the proposed project, energy from the RCEA CCE program would be used for facility lighting, scoreboard, and public address (PA) system operation, restroom and concessions appliances, and irrigation. The CCE program procures approximately 47% of its power from renewable sources (RCEA, 2019). Operational energy use will also be in the form of fuel consumption for facility maintenance and operation of motor vehicles traveling to and from the facility for practice and athletic events. Fuel consumption will occur on an intermittent basis and is not anticipated to result in significant energy use above the existing baseline condition.

New and renovated structures proposed by the project are required to comply with Title 24 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations), which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building

insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. It has generally been the presumption throughout the State of California that compliance with Title 24 (as well as compliance with the federal and state regulations) ensures that projects will not result in the inefficient, wasteful, and unnecessary consumption of energy.

Based on the information provided above, the proposed project will not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project proposes improvements to Albee Stadium and Bud Cloney Field. This is not a type of project that would have the potential to conflict with or obstruct state or local plans for renewable energy or energy efficiency. Instead, the project will be consistent with plans for renewable energy or energy efficiency since it will receive electricity from a CCE program with a power mix containing 47% renewable energy sources, and will be required to comply with the Title 24 Building Energy Efficiency Standards.

Based on the information provided above, the proposed project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

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

Setting: A Geologic Hazard and Geotechnical Investigation Report was completed for the proposed project (SHN, 2021a). The primary purpose of this investigation was to assess site subsurface conditions and to develop geotechnical recommendations in support of the design and construction of the proposed project. The investigation included: a) field exploration and laboratory testing program; and b) an engineering analysis to develop geotechnical recommendations, including grading and foundation recommendations for the planned construction. A letter providing Supplemental Geotechnical Recommendations for small pole structures and smaller height retaining walls was also completed (SHN, 2021b). A Geologic Hazard and Geotechnical Report prepared for a previous project on the EHS campus also provides geologic setting information (SHN, 2018).

The project site is located in the City of Eureka on portions of the EHS campus, including Albee Stadium and Bud Cloney Field. Eureka is located within the Coast Ranges Geomorphic Province of California, which is characterized by subparallel north- to northwest-trending mountain ranges and intermountain and coastal alluvial valleys and plains. Topography in the province is controlled by the predominant geological structural trends within the Coast Range that generally consist of northwest trending synclines, anticlines, and faulted blocks.

The City of Eureka is located at the southern end of the Cascadia Subduction Zone, which is a tectonically active region with high seismic activity. Historic seismicity and paleoseismic studies in the area suggest sources of damaging earthquakes in the Eureka region can come from the Gorda Plate (a fragment of the Juan de Fuca plate); the Mendocino fault; the Mendocino Triple Junction; the northern end of the San Andreas fault; faults within the North American Plate (including the Little Salmon fault and the Mad River fault zone); and offshore faults from the Cascadia Subduction Zone in general (City of Eureka, 2018).

Due to the dynamic crustal deformation near the Mendocino Triple Junction, there is a high level of seismicity in the north coast region of California, which is the most seismically active region in the continental United States. However, no known active fault crosses the EHS campus. The nearest known active fault is the Little Salmon fault, which is mapped approximately 5 miles to the southwest of EHS. The nearest fault within the Mad River fault zone, the Fickle Hill fault, is nearly 7 miles to the north of EHS. The risk of surface fault rupture at the EHS campus is negligible (SHN, 2018).

The center of project site is relatively flat and developed with the existing athletic fields and ancillary facilities. Elevations rise steeply on the east and west sides of the project site, shaping the site into a gulch that drains to the north. The topography of the project site and surroundings is attributed to the geomorphic effects of Cooper Creek (also commonly referred to as Cooper Canyon or Cooper Gulch). The eastern slope of the valley is a smooth continuous valley wall slope of moderate gradient through the entire project area. Although areas of substantial seepage are present, there are no well-established watercourses on the eastern slope. The western slope of valley is characterized by a drainage canyon consisting of several small springs and wetlands. Groundwater was encountered at the project site between 10 to 20 feet below the site's surface. However, groundwater levels were closer to the ground surface towards the valley margins. Existing drainage facilities are extensive, and some are more effective than others (SHN, 2021a).

Subsurface investigations of the project site indicate that the site is underlain by artificial fill, Holocene age alluvium and colluvium, late Pleistocene age marine terrace deposits, a distinct "pre-terrace" mud, and Hookton formation sediments. Fill soils encountered during the investigation are relatively thin at the upstream (southern) end of Albee Stadium, and thicken toward the downstream (northern) end of the project area north of Del Norte Street, consistent with the natural gradient of the valley. Fill soils are thickest in the center of the valley, and thinner toward the valley margins (SHN, 2021a).

The majority of the project site is in an area characterized as relatively stable, and the surrounding slopes are characterized as having low instability (Humboldt County, 2020b). There is no mapping or geomorphic evidence to suggest landslide potential along the valley walls surrounding the project site. However, the Geologic Hazard and Geotechnical Investigation indicated that areas of the project site have a moderate to high likelihood of liquefying during the design earthquake. It inferred that areas of more significant liquefaction (and settlement) are possible along the valley axis, where uncontrolled fills are thickest, but these areas will support only parking and athletic fields, which are suitably low exposure improvements (SHN, 2021a).

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

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

Seismically-induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. The magnitude and nature of fault rupture can vary for different faults or even along different strands of the same fault. Surface rupture can damage or collapse buildings, cause severe damage to roads and pavement structures, and cause failure of overhead as well as underground utilities. Although the project site resides in region of high seismic activity, the project site, however, does not lie in a fault rupture zone, as delineated by the Alquist-Priolo Earthquake Fault Zoning Map (DOC, 2020a).

Based on the information provided above, it has been determined the proposed project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake, fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Therefore, the proposed project would result in a less-than-significant impact.

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

As noted in the Geology and Soils Setting, there is a high level of seismicity in the north coast region of California, which is the most seismically-active region in the continental United States. The entire northern California region is subject to the potential for moderate to strong seismic shaking due to local or distant seismic sources. Seismic shaking has the potential to be generated by faults many miles from the project vicinity. As discussed under subsection a.i), no known active faults traverse the project site.

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. While the proposed project includes the construction and renovation of structures, no structures

that would allow long-term habitation (for example, residences, hospitals, etc.) are proposed by the project. The site will primarily be used for outdoor athletic activities with intermittent use of the structures.

Regional and site-specific conditions of the project site were examined by SHN in preparation of a Geologic Hazard and Geotechnical Investigation. The investigation provides recommendations relating to the design and construction of the proposed project. Based on the results and recommendations of the investigation, the project site is determined to be suitable for construction of the proposed project, provided all site-specific recommendations are incorporated into the project design and construction. Therefore, adherence to the recommendations of the Geologic Hazard and Geotechnical Investigation (SHN,2021a; and subsequent recommendations such as the Supplemental Geotechnical Recommendations; SHN, 2021b) shall be required as **Mitigation Measure GEO-1** to minimize potential risks from strong seismic ground shaking.

With the implementation of **Mitigation Measure GEO-1** and based on the information provided above, it has been determined the proposed project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

As noted in the Geology and Soils Setting, there is a high level of seismicity in the north coast region of California, which is the most seismically active region in the continental United States. The entire northern California region is subject to the potential for moderate to strong seismic shaking due to local or distant seismic sources. According to the Humboldt County GIS system, the majority of the project site is in an area characterized as relatively stable, with the potential for liquefaction. The surrounding slopes are characterized as having low instability (Humboldt County, 2020b).

Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion and are converted to a fluid state as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations.

Design and construction of the project would incorporate appropriate engineering practices to ensure seismic stability as required by the California Building Code (CBC). In addition, the proposed project shall adhere to the recommendations of the Geologic Hazard and Geotechnical Investigation (SHN, 2021a; and subsequent recommendations such as the Supplemental Geotechnical Recommendations; SHN, 2021b) relating to the design and construction of the proposed project. This requirement has been included as **Mitigation Measure GEO-1** to minimize potential risks from seismic hazards.

With the implementation of **Mitigation Measure GEO-1** and based on the information provided above, it has been determined the proposed project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Slope failures, commonly referred to as landslides, include many phenomena that involve the downslope displacement and movement of material, either triggered by static (such as, gravity) or dynamic (such as, earthquake) forces. Earthquake motions can induce significant horizontal and vertical dynamic stresses in slopes that can trigger failure. Earthquake-induced landslides can occur in areas with steep slopes that are susceptible to strong ground motion during an earthquake. The youthful and steep topography of the coast range is known for its potential for landslides.

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Elevations are primarily flat within the center of the project site, with elevations rising immediately to the east and west of the project site. According to the Humboldt County GIS system, the majority of the project site is in an area characterized as relatively stable. The surrounding slopes are characterized as having low instability (Humboldt County, 2020b). Furthermore, there is no mapping or geomorphic evidence to suggest landslide potential along the valley wall slopes adjacent to the project site (SHN, 2021a). The majority of surface and subsurface disturbances associated with construction of the proposed project will occur within the footprint of the existing athletic fields where the site is flat.

Based on the information provided above, it has been determined the proposed project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, the proposed project would result in a less-than-significant impact.

b) *Result in substantial soil erosion or the loss of topsoil?* Less Than Significant with Mitigation Incorporated

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Elevations are primarily flat within the center of the project site, with elevations rising steeply immediately to the east and west of the project site. The greatest potential for soil erosion would occur during the construction phase of the proposed project, which would include grading, excavation, trenching, and other ground-disturbing activities that have the potential to result in soil erosion. The majority of surface and subsurface disturbances associated with construction of the proposed project will occur within the footprint of the existing athletic fields.

Protective and avoidance measures shall be implemented during construction of the proposed project pursuant to the requirements of the SWRCB CGP. The SWRCB CGP will require the preparation of a Construction SWPPP, which documents the stormwater dynamics at the site, the BMPs and water quality protection measures that are to be used, and the frequency of inspections. In conjunction with the requirement to prepare a SWPPP, **Mitigation Measure HWQ-1** has been incorporated to provide additional water quality protection during construction through the implementation of appropriate BMPs (see Section X – Hydrology and Water Quality). Adherence to the SWRCB regulatory requirements shall ensure construction of the proposed project will not result in substantial soil erosion or the loss of topsoil.

Additionally, because construction activities will involve work in jurisdictional waters including the replacement of the main storm drainpipe containing Cooper Creek, the proposed project will require a Clean Water Act (CWA) Section 404 Permit from the U.S. Army Corps of Engineers (USACE), a Section 401 Certification from the North Coast Regional Water Quality Control Board (NCRWQCB), and a Lake and Streambed Alteration (LSA) Agreement from CDFW, and will need to comply with all permit conditions. Permit conditions will include measures and protocols to minimize soil erosion and the loss of topsoil. Therefore, the risk of soil erosion during construction of the proposed project is minimal.

With the implementation of **Mitigation Measure HWQ-1** and based on the information provided above, it has been determined the proposed project will not result in substantial soil erosion or the loss of topsoil. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated.

c) *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?* Less-Than-Significant with Mitigation Incorporated

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Elevations are primarily flat within the center of the project site, with elevations rising immediately to the east and west of the project site. According to the Humboldt County GIS system, the majority of the project site is in an area characterized as relatively stable, with the potential for liquefaction. The surrounding slopes are characterized as having low instability (Humboldt County, 2020b). There are no documented on- or offsite landslide hazard areas identified within the project site or the immediate vicinity.

Design and construction of the project would incorporate appropriate engineering practices to ensure seismic stability as required by the CBC. In addition, the proposed project shall adhere to the recommendations of the Geologic Hazard and Geotechnical Investigation (SHN,2021a; and subsequent recommendations such as the Supplemental Geotechnical Recommendations; SHN, 2021b) relating to the design and construction of the proposed project. This requirement has been included as **Mitigation Measure GEO-1** to minimize potential risks from geologic hazards, including in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.

With the implementation of **Mitigation Measure GEO-1** and based on the information provided above, it has been determined the proposed project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Expansive soils are those that undergo a change in volume when exposed to fluctuations in moisture, causing shrinking when dry and swelling when moist. Such change in volume can distort structural elements and damage structures. Typically, soils with high clay contents are most susceptible to these processes.

The Geologic Hazard and Geotechnical Investigation prepared for the project indicates the site is underlain by artificial fill, Holocene age alluvium and colluvium, late Pleistocene age marine terrace deposits, and distinct "pre-terrace" mud, and Hookton formation sediments (SHN, 2021a). The recommendations for design and construction of the proposed project are detailed in the Geologic Hazard and Geotechnical Investigation (SHN,2021a; and subsequent recommendations such as the Supplemental Geotechnical Recommendations; SHN, 2021b) and have been included as **Mitigation Measure GEO-1**.

With the implementation of **Mitigation Measure GEO-1** and based on the information provided above, it has been determined the proposed project will not create substantial direct or indirect risks to life or property by being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994). Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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?* No Impact

EHS is served by an existing sewer system. The proposed project would not involve the use of septic tanks or any other alternative wastewater disposal systems. As such, the proposed project will not 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. Therefore, the proposed project would have no impact on this resource category.

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

Paleontological resources are classified as nonrenewable scientific resources, such as vertebrate, invertebrate, and plant fossils. The project site has already been substantially disturbed and is currently developed with athletic facilities. There are no known unique paleontological resources or unique geological features on or near the site. Regional uplifting and other seismic activity in the area have limited the potential for discovery of paleontological resources.

However, ground-disturbing activities associated with construction of the proposed project have the potential to result in the accidental damage of previously undiscovered paleontological resources if such exist at the project site. As such, if a paleontological discovery is made during construction, the contractor shall immediately cease all work activities in the vicinity (within approximately 100 feet) of the discovery and shall immediately contact the ECS. A qualified paleontologist shall be retained to observe all subsequent grading and excavation activities in the area of the find and shall salvage fossils as necessary. The paleontologist shall establish procedures for paleontological resource surveillance and shall establish, in cooperation with the project developer, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of fossils. If major paleontological resources are discovered that require temporarily halting or redirecting of grading, the paleontologist shall report such findings to the ECS. The paleontologist shall determine appropriate actions, in cooperation with the ECS, that ensure proper exploration and/or salvage. Excavated finds shall first be offered to a state-designated repository such as the Museum of Paleontology, University of California, Berkeley, or the California Academy of Sciences. Otherwise, the finds shall be offered to the ECS for purposes of public education and interpretive displays. The paleontologist shall submit a follow-up report to the ECS that shall include the period of inspection, an analysis of the fossils found, and the present repository of fossils. To prevent potential impacts to unknown paleontological resources at the project site, the Inadvertent Discovery Protocol described above has been included as **Mitigation Measure GEO-2**.

With the implementation of **Mitigation Measure GEO-2** and based on the information provided above, it has been determined the proposed project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Mitigation Measure GEO-1. Adherence to Geologic Hazard and Geotechnical Investigation Recommendations: Adherence to all project specific recommendations in the SHN Geologic Hazard and Geotechnical Investigation (SHN,2021a; and subsequent recommendations such as the Supplemental Geotechnical Recommendations; SHN, 2021b) shall be required during design and

construction of the proposed project. Project specific recommendations pertain to topics such as Seismic Design Parameters, Site Preparation and Grading, Buildings Q and R, Storm Drainage System Rehabilitation, Albee Stadium Track and Field, Synthetic Turf Football Field, Running Track Replacement, Engineered Fills, Excavations, Cut and Fill Slopes, Wet Weather Subgrade Protection, Surface and Subsurface Drainage Control, Utility Trench Backfill, Foundations, Concrete Slabs-on-Grade, Retaining Walls, and Asphalt and Concrete Pavements.

Mitigation Measure GEO-2. **Inadvertent Discovery Protocol – Paleontological Resources:** If a paleontological discovery is made during construction, the contractor shall immediately cease all work activities in the vicinity (within approximately 100 feet) of the discovery and a qualified paleontologist shall be retained to observe all subsequent grading and excavation activities in the area of the find and shall salvage fossils as necessary. The paleontologist shall establish procedures for paleontological resource surveillance and shall establish, in cooperation with the project developer, procedures for temporarily halting or redirecting work to permit sampling, identification, and evaluation of fossils. If major paleontological resources are discovered that require temporarily halting or redirecting of grading, the paleontologist shall report such findings to the ECS. The paleontologist shall determine appropriate actions, in cooperation with the ECS, that ensure proper exploration and/or salvage. Excavated finds shall first be offered to a state-designated repository such as the Museum of Paleontology, University of California, Berkeley, or the California Academy of Sciences. Otherwise, the finds shall be offered to the ECS for purposes of public education and interpretive displays. The paleontologist shall submit a follow-up report to the ECS that shall include the period of inspection, an analysis of the fossils found, and the present repository of fossils.

Also, the following mitigation measure has been required in the Hydrology and Water Quality section of this document, so that when implemented, the proposed project will have a less significant impact:

Mitigation Measure HWQ-1 (Best Management Practices): See Hydrology and Water Quality (Section X)

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

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

- Carbon dioxide (CO2), primarily a byproduct of fossil fuel combustion in stationary and mobile sources;
- Nitrous oxide (N2O), a byproduct of fuel combustion and also associated with agricultural operations such as the fertilization of crops;
- Methane (CH4), commonly created by off-gassing from agricultural practices (for example, livestock), wastewater treatment, and landfill operations;
- Chlorofluorocarbons (CFCs), which were used as refrigerants, propellants, and cleaning solvents, although their production has been mostly prohibited by international treaty;
- Hydrofluorocarbons (HFCs), which are now widely used as a substitute for chlorofluorocarbons in refrigeration and cooling; and
- Perfluorocarbons (PFCs) and sulfur hexafluoride (SF6) emissions, which are commonly created by industries such as aluminum production and semiconductor manufacturing.

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

California passed Assembly Bill 32 (Global Warming Solutions Act) in 2006, mandating a reduction in GHG emissions and Senate Bill 97 in 2007, evaluating and addressing GHG emissions under CEQA. On April 13, 2009, the Governor's Office of Planning and Research (OPR) submitted to the Secretary for Natural Resources its proposed amendments to the state CEQA Guidelines for GHG emissions, as required by Senate Bill 97 (Chapter 185, 2007) and they became effective March 18, 2010. As a result of these revisions to the CEQA Guidelines, lead agencies are obligated to determine whether a project's GHG emissions significantly affect the environment and to impose feasible mitigation to eliminate or substantially lessen any such significant effects. A lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is "less-than-significant" or, in the case of cumulative impacts, less than cumulatively considerable (Sacramento Metropolitan Air Quality Management District [SMAQMD], 2018).

The Global Warming Solutions Act (AB 32) also directed CARB to develop the Climate Change Scoping Plan (Scoping Plan), which outlines a set of actions to achieve the AB 32 goal of reducing GHG emissions to 1990 levels by 2020, and to maintain such reductions thereafter. CARB approved the Scoping Plan in 2008 and first updated it in May 2014. The second update in November 2017 also address the actions necessary to achieve the further GHG emissions reduction goal of reducing GHG emissions to 40 percent below 1990 levels by 2030, as described in Senate Bill 32 (SB 32). In addition, the 2017 Scoping Plan looks forward to the reduction goal of reducing emissions 80 percent under 1990 levels by 2050, as described in Executive Order S-3-05 (EO-S-3-05; CARB, 2017).

In 2018, the State had already met the AB 32 goal of reducing emissions to 1990 levels by 2020 approximately four years early (CARB, 2019b). As stated in the Executive Summary of the 2019 Edition of the California Greenhouse Gas Emissions Inventory: 2000-2017:

"The inventory for 2017 shows that California's GHG emissions continue to decrease. In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO2 equivalent (MMTCO2e), 5 MMTCO2e lower than 2016 levels and 7 MMTCO2e below the 2020 GHG Limit of 431 MMTCO2e."

The ECS has not adopted quantitative thresholds for determining the significance of GHG emissions, nor has ECS adopted a qualified plan, policy, or regulation to reduce emissions that qualifies for tiering in CEQA documents (per State CEQA Guidelines Section 15183.5(a)).

The project site is located in the NCAB and is under the jurisdiction of the NCUAQMD. The NCUAQMD has also not adopted quantitative thresholds for determining the significance of GHG emissions, nor has the NCUAQMD adopted a qualified plan, policy, or regulation to reduce emissions that qualifies for tiering in CEQA documents (per State CEQA Guidelines Section 15183.5(a); NCUAQMD, 2015). In the absence of quantitative thresholds or a Climate Action Plan from ECS, City of Eureka, or NCUAQMD, thresholds and guidance adopted by other air districts in the State are used for the purposes of this analysis.

In the NCAB, the closest air district to the proposed project that has adopted GHG significance thresholds is the Mendocino County Air Quality Management District (MCAQMD). MCAQMD has adopted an operational emissions threshold of 1,100 metric tons of CO2e per year (MTCO2e/yr; MCAQMD, 2010). This threshold is also recommended for use by the BAAQMD and the SMAQMD. The SMAQMD also recommends use of this threshold for analyzing GHG emissions from construction activity. This threshold was developed to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32, SB 32, the Scoping Plan, and Executive Orders (SMAQMD, 2018). As such, this threshold has been adopted for use in the NCAB and is one of the most used thresholds in the State for analyzing the potential impacts of construction and operational GHG emissions. For the reasons noted above, the threshold of 1,100 MTCO2e/yr is used to evaluate the proposed project's construction and operational GHG emissions. If the threshold is exceeded, then the project would have a cumulatively considerable contribution to a significant cumulative environmental impact and would conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions.

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

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

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The majority of the proposed project will occur within the footprint of the existing athletic fields, buildings, and other previously developed areas. The proposed project would generate both direct and indirect GHG emissions. Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Indirect GHG emissions include emissions from energy consumption, solid waste, and water demand. Project construction activities would result in a temporary increase in GHG emissions, including exhaust emissions from on-road haul trucks, worker commute vehicles, and off-road heavy-duty equipment. Because the proposed project is consistent with the existing use of the site, GHG emissions resulting from energy consumption, solid waste, water demand, and mobile (vehicle) sources are not expected to significantly increase as a result of project operation.

The BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether operation of a project could result in potentially significant impacts related to GHG emissions. Projects below the applicable screening criteria would not exceed the threshold of 1,100 MTCO2e/yr adopted by the BAAQMD, SMAQMD, and MCAQMD. The BAAQMD screening criteria includes a "city park" category (BAAQMD, 2017). Much like a city park, the proposed project will function as an outdoor recreational space, and provide outdoor athletic and recreation opportunities for students, parents, and community members. Furthermore, the proposed project bears resemblance to a city park by providing public visitation appurtenances and infrastructure, such as restrooms, drive aisles, parking spaces, and walkways. Therefore, for the purpose of this analysis, the proposed project is compared to the BAAQMD operational screening criteria for a "city park." As shown in Table 5, the proposed project is well below the BAAQMD screening project size for operation of a "city park." Due to the fact that the proposed project is well below the operational screening criteria size (600 acres), it is conservatively estimated that GHG emissions from construction activity would also be well below the 1,100 MTCO2e/yr threshold. Therefore, construction and operation of the proposed project would not generate GHG emissions that would result in a cumulatively considerable contribution to a significant cumulative environmental impact.

Table 5. BAAQMD GHG Emissions Screening Criteria

Land Use Type	Operational Screening Size	Project Size
City Park	600 acres	9.8 acres
Source: BAAQMD, 2017		

Based on the information provided above, it has been determined that the proposed project will not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project would generate both direct and indirect GHG emissions. Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Indirect GHG emissions include emissions from energy consumption, solid waste, and water demand.

A GHG impact would be significant if GHG emissions from the proposed project would conflict with an applicable plan, policy, or regulation for the purpose of reducing GHG emissions. As noted in the Greenhouse Gas Emissions Setting, a Climate Action Plan has not been adopted by ECS or City of Eureka. For the proposed project, it is analyzed whether the emissions obstruct compliance with the GHG emission reduction goals in Assembly Bill (AB 32), Senate Bill 32 (SB 32), and Executive Order S-3-05 (EO S-3-05). As stated in the Greenhouse Gas Emissions Setting, to the extent that the proposed project does not exceed the threshold of significance of 1,100 $MTCO_2e$/yr, it would not result in a conflict with GHG reduction plans.

The proposed project is subject to myriad state regulations applicable to project design, construction, and operation that would reduce GHG emissions, increase energy efficiency, and provide compliance with the CARB Climate Change Scoping Plan (CARB, 2017). The State of California has the most comprehensive GHG regulatory requirements in the United States, with laws and regulations requiring reductions that affect project emissions. Legal mandates to reduce GHG emissions from vehicles, for example, reduce project-related vehicular emissions. Legal mandates to reduce GHG emissions from the energy production sector that will serve the proposed project would also reduce project-related GHG emissions from electricity consumption. Legal mandates to reduce per capita water consumption and impose waste management standards to reduce methane and other GHGs from solid wastes are all examples of mandates that reduce GHGs.

As discussed above, GHG emissions from construction and operation of the proposed project would be well below the threshold of significance adopted by the BAAQMD, SMAQMD, and MCAQMD (1,100 MTCO2e/yr) for determining the significance of GHG emissions. This threshold was developed to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32, SB 32, the Scoping Plan, and Executive Orders (SMAQMD, 2018). In addition, the project will be consistent with plans for reducing GHG emissions since it will receive electricity from a Community Choice Energy program with a power mix containing 47% renewable energy sources, and will be required to comply with the Title 24 Building Energy Efficiency Standards.

Based on the information provided above, it has been determined the proposed project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

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

Setting: The project site is located in the City of Eureka on portions of the EHS campus, including Albee Stadium and Bud Cloney Field. EHS has used Albee Stadium since before 1946 and Bud Cloney field since before 1983. The athletic field surfaces are managed by EHS groundskeepers by conducting regular mowing, irrigating, sports striping, weeding, fertilizing, and gopher trapping. EHS groundskeepers clean and maintain existing structures, equipment, and restrooms with use of commercially available paints, solvents, and cleaning products. These products are used in adherence to warning labels and storage recommendations from the individual manufacturers.

Hazards are those physical safety factors that can cause injury or death, and while by themselves in isolation may not pose a significant safety hazard to the public, when combined with development of projects, they can exacerbate hazardous conditions. Hazardous materials are typically chemicals or processes that are used or generated by a project that could pose harm to people, either working at the site or in adjacent areas. Many of these chemicals can cause hazardous conditions to occur should they be improperly disposed of or accidentally spilled as part of project development or operations. Hazardous materials are also those listed as hazardous pursuant to Government Code Section 65962.5.

The California Department of Toxic Substances Control (DTSC) maintains a list of hazardous substances and contaminated sites around the State as part of its Envirostor database. According to DTSC, the project site is not identified as containing hazardous materials contamination or the storage of hazardous materials (DTSC, 2020). The SWRCB maintains a list of leaking underground storage tank (LUST) sites and other cleanup sites around the State as part of its GeoTracker database. According to the SWRCB, the project site is not identified as a LUST site or other cleanup site (SWRCB, 2020a).

A Phase I Environmental Site Assessment (ESA) was completed for the proposed project (SHN, 2021c). It encountered no evidence of past land uses that may have generated or caused the release of regulated or hazardous materials, and identified no recognized environmental conditions associated with the project site. No potential or confirmed state or federal Superfund site is located on, or immediately adjacent to, the project site. In its discussion of onsite soil conditions, the Phase I ESA cited the 2018 and 2021 SHN geotechnical reports (SHN, 2018; SHN, 2021a) which concluded the following:

Albee Stadium and adjacent facilities north of Del Norte Street were created by filling the bottom of Cooper Gulch. Based on historic photography, this appears to have been completed in phases, with the development of Albee Stadium pre-dating the development of facilities north of Del Norte Street.

During our investigation, fill soils were limited to flat-lying areas within the project area; significant fill soils were not encountered on the valley wall slopes surrounding Cooper Gulch in the areas under consideration herein.

Fill soils encountered during the investigation are relatively thin at the upstream (southern) end of Albee Stadium, and thicken toward the downstream (northern) end of the project area north of Del Norte Street, consistent with the natural gradient of the valley. At the southern end of Albee Stadium, where the storm drain inlet is visible just below grade, fill thickness was observed on the order of approximately 6 feet (boring B-05-20). To the north, borings advanced near the storm drain alignment along the valley axis (B-03-20, B-07-20, B-08-20, from south to north), encountered fill thicknesses of 10, 16, and 21 feet, respectively. As would be expected, fill soils are thickest in the center of Cooper Gulch, and thin toward the valley margins.

Fill soils observed during the subsurface investigation are highly variable, consisting of mostly silty and clayey sands within Albee Stadium. North of Del Norte Street, near the downstream end of the storm drain (this is the outfield of the existing baseball field), fill soils include large quantities of poorly graded sand, which was imported to the site. The fill soils throughout the project area were generally loose, with standard penetration test blow counts typically less than 10. It is assumed that all the fill soils in the project area were placed without engineering control (that is not placed with verified compaction). It was also noted, both wood and charcoal within the fill soils, both of which are undesirable and suggest placement of random soils without appropriate screening or control (SHN, 2021c).

Although the Phase I ESA encountered no evidence of past land uses that may have generated or caused the release of regulated or hazardous materials and identified no recognized environmental conditions associated with the project site, it identified the presence of fill materials, and potential asbestos-containing materials and/or lead based paints in building materials as Business Environmental Risks for the site. The Phase I ESA conservatively recommended characterization of soil and groundwater quality prior to site construction if excavated fill materials will not be reused on the site as a best management practice to evaluate the need for worker protection and potential disposal options for excavated soil and groundwater (SHN, 2021c).

Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. Sensitive receptors (for example, children, senior citizens, and acutely or chronically ill people) are more susceptible to the effect of air pollution than the general population. The nearest known potential sensitive receptors to the project site include EHS students in attendance at the EHS main campus, and private residences in the project vicinity along Del Norte Street, L Street, and N Street. The project is directly adjacent to five private residences along Del Norte Street and is within approximately 100 feet of residences along L Street and N Street.

The Humboldt County Public Works Department operates six county airports. Airports nearest the project site include the Samoa Field (approximately 3.0 miles), Murray Field (approximately 2.1 mi.), the California Redwood Coast-Humboldt County Airport (approximately 12.7 mi.), and the Kneeland Airport (approximately 12.9 mi.). The proposed project site and surrounding area are characterized by features typical of an urban landscape.

Humboldt Bay Fire (HBF) provides fire protection services to the City of Eureka. HBF is a full service fire department which provides emergency response and non-emergency public safety services from five fire stations located in and around Eureka. The nearest fire station is Humboldt Bay Fire Station 4 at Myrtle Avenue and Cousins Street, approximately 0.7 miles from the project.

Eureka and its surrounding area are also subject to potential fire hazards. The California Department of Forestry and Fire Protection (CALFIRE) maps identify fire hazard severity zones (FHSZ) in state (SRA) and local (LRA) responsibility areas for fire protection. The project site is in an LRA, and regional LRA fire severity maps designate some areas within the City limits as moderate FHSZ, specifically the forested slopes forming Cooper Creek (also commonly referred to as Cooper Canyon or Cooper Gulch) north of the Bud Cloney Field are identified as a moderate FHSZ. As a result of this mapping, portions of Bud Cloney Field are also identified as a moderate FHSZ (CALFIRE, 2007; Humboldt County, 2020a).

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

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

The project proposes improvements to existing sports field facilities and associated educational facilities. The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project.

Construction

Construction of the project would require the temporary use and transport of paints, fuels, oils, solvents, and other chemicals used during construction activities. Improper use and transportation of hazardous materials could result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. These activities are controlled by state and federal regulations. Throughout the transport, use, or disposal of potentially hazardous materials, the contractor is required to employ standard cleanup and safety procedures to minimize the potential for public exposure from accidental releases of such substances into the environment. Additionally, construction activities at the project site would require implementation of a SWPPP that would incorporate BMPs for construction, including site housekeeping practices, hazardous material storage, inspections, maintenance, worker training in pollution prevention measures, and secondary containment of releases to prevent pollutants from being carried offsite via runoff. These measures will reduce the risk of transporting, using, and disposing of hazardous construction materials.

Operation

During the operation of the proposed project, maintenance, cleaning, and landscaping products may be stored and used at the project site that contain toxic substances (for example, paints, solvents, pesticides, fertilizers, and cleaning products). However, the use of these products is part of the baseline conditions, as they are periodically used during the existing operation of the site. These products are typically low in concentration and used in small quantities that would not pose a significant risk to humans or the environment during transport and use at the project site. Furthermore, these products will be used in adherence to warning labels and storage recommendations from the individual manufacturers.

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

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

The project proposes improvements to existing sports field facilities and associated educational facilities. The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project.

Construction

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

Operation

As previously noted, the proposed project would not change the type of ongoing operations at the site. Operation of the proposed project will require the storage and use of maintenance, cleaning, and landscaping products that contain toxic substances (for example, paints, solvents, pesticides, fertilizers, and cleaning products). However, the use of these products is part of the baseline conditions, as they are periodically used during the existing operation of the site. These products are typically low in concentration and used in small quantities that would not pose a significant risk to humans or the environment during use at the project site. Furthermore, these products will be used in adherence to warning labels and storage recommendations from the individual manufacturers to reduce the risk of upset and accident conditions. With appropriate storage, handling, and application practices, it is unlikely that any hazardous materials used during operation of the project would be released in a manner that would create a significant hazard to the public or the environment.

Based on the information provided above, it has been determined that the proposed project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* Less Than Significant with Mitigation Incorporated

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. This is not a type of land use that generally would emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. The only school within one-quarter mile of the project site is EHS itself (where the proposed project is located).

Construction

Although the Phase I ESA encountered no evidence of past land uses that may have generated or caused the release of regulated or hazardous materials and identified no recognized environmental conditions associated with the project site, it identified the presence of fill materials, and potential asbestos-containing materials and/or lead-based paints in building materials as business environmental risks for the site. The Phase I ESA conservatively recommended characterization of soil and groundwater quality prior to site construction if excavated fill materials will not be reused on the site as a best management practice to evaluate the need for worker protection and potential disposal options for excavated soil and groundwater (SHN, 2021c). Therefore, **Mitigation Measure HM-1** is incorporated, which requires that if excavated material is to be taken offsite rather than reused onsite, ECS must stockpile it onsite and test for petroleum hydrocarbons, semi-volatile organic compounds, and CAM 17 metals. If excavated material is found to have contamination, it must be disposed of in accordance with applicable regulations.

As discussed in Section III (Air Quality), asbestos-containing materials and lead-based materials are present within the existing structures at the site proposed for demolition. The demolition of these structure shall comply with federal and state regulations for the removal, handling, and disposal of asbestos-containing and lead-based materials. Compliance with existing regulatory requirements will reduce the risks associated with demolishing structures containing these materials to less-than-significant levels and would not pose a substantial risk to schools within one-quarter mile of the project site.

As discussed in Section III (Air Quality), a short-term increase in fugitive dust emissions is anticipated during the project construction phase. To reduce impacts to less-than-significant, several dust control measures will be required during construction of the proposed project as outlined in **Mitigation Measure AQ-1**. With the implementation of these dust control measures, fugitive dust emissions would not significantly impact schools within one-quarter mile of the project site.

Operation

As previously noted, the proposed project would not change the type of ongoing operations at the site. Operation of the proposed project will require the storage and use of maintenance, cleaning, and landscaping products that contain toxic substances (for example, paints, solvents, pesticides, fertilizers, and cleaning products). These products are typically low in concentration and used in small quantities that would not pose a significant risk to humans or the environment during use at the project site. Furthermore, these products will be used in adherence to warning labels and storage recommendations from the individual manufacturers. With appropriate storage, handling, and application practices, it is unlikely that any hazardous materials used during operation of the project would pose a substantial risk to schools within one-quarter mile of the project site.

With the adoption of **Mitigation Measure HM-1** and **Mitigation Measure AQ-1** and based on the information provided above, it has been determined the proposed project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

The State's Hazardous Waste and Substances Sites List (Cortese List, Government Code Section 65962.5) identifies sites with leaking underground fuel tanks, hazardous waste facilities subject to corrective actions, solid waste disposal facilities from which there is a known migration of hazardous waste, and other sites where environmental releases have occurred. According to review of the information available on the SWRCB Geotracker and the DTSC Envirostor websites, the project site is not identified as containing hazardous materials contamination or the storage of hazardous materials (DTSC, 2020) and is not identified as containing a leaking underground storage tank site or another cleanup site (SWRCB, 2020a). There are no other known sites containing hazardous materials contamination in the project area that would have the potential to impact the project site.

A Phase I Environmental Site Assessment was completed for the proposed project (SHN, 2021c). It encountered no evidence of past land uses that may have generated or caused the release of regulated or hazardous materials and identified no recognized environmental conditions associated with the project site. No potential or confirmed state or federal Superfund site is located on, or immediately adjacent to, the project site. The Phase I ESA conservatively recommended characterization of soil and groundwater quality prior to site construction if excavated fill materials will not be reused on the site as a best management practice to evaluate the need for worker protection and potential disposal options for excavated soil and groundwater (SHN, 2021c). Therefore, **Mitigation Measure HM-1** is incorporated, which requires that if excavated material is to be taken offsite rather than reused onsite, ECS must stockpile it onsite and test for petroleum hydrocarbons, semi-volatile organic compounds, and CAM 17 metals. If excavated material is found to have contamination, it must be disposed of in accordance with applicable regulations.

With the incorporation of **Mitigation Measure HM-1**, the project will not create a significant hazard to the public or the environment. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Public Airports nearest the project site include the Samoa Field (approximately 3.0 miles[mi.]), Murray Field (approximately 2.1 mi.), the California Redwood Coast-Humboldt County Airport (approximately 12.7 mi.), and the Kneeland Airport (approximately 12.9 mi.).

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

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

The project proposes improvement of existing EHS athletic and educational facilities in the City of Eureka. The proposed project is not of the nature to substantially impact emergency response or evacuation. Similar to the existing condition, access to the proposed project would occur through drive aisles from Del Norte Street. The proposed drive aisles and parking facilities will be designed to meet emergency access standards and accommodate the onsite maneuvering of emergency vehicles. Emergency responders would have adequate access to reach the site in case of an emergency. Furthermore, emergency lighting will be added from bleachers and buildings to stadium exits or safe dispersal area in the case of power outages or other emergencies. Proposed emergency lighting will promote simultaneous emergency evacuation and emergency response. As such, the proposed project will provide improved emergency access to the project site compared to existing conditions.

Based on the information provided above, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project area is characteristic of an urban environment, with residential neighborhoods, roadways, public facilities, and parks in the vicinity of the project site. The forested slopes north of Bud Cloney Field are identified as medium FHSZ (CALFIRE, 2007; Humboldt County, 2020a). The risk of wildfire in the immediate vicinity of the project site is limited. The proposed project is consistent with the existing use of the site and would not result in increased risk from wildland fires. The proposed project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

Mitigation Measures: In order for the proposed project to result in a less-than-significant impact to *Hazards and Hazardous Materials,* the following mitigation measure will be implemented:

Mitigation Measure HM-1. Stockpile and Test Excavated Materials Before Transport Offsite: If excavated material is to be taken offsite rather than reused onsite, ECS must first stockpile it onsite and test for petroleum hydrocarbons, semi-volatile

organic compounds, and CAM 17 metals. If excavated material is found to have contamination, it must be disposed of in accordance with applicable regulations.

Also, the following mitigation measure has been required in the Air Quality section of this document, so that when implemented, the proposed project will have a less significant impact:

Mitigation Measure AQ-1 (Fugitive Dust Control Measures): See Air Quality (Section III)

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

Setting: The project is located in the City of Eureka on portions of the EHS campus, including Albee Stadium and Bud Cloney Field. EHS has used Albee Stadium since before 1946 and Bud Cloney Field since before 1983. The project site is approximately three miles east of the Pacific Ocean (Figure 1).

The project site is located in the Eureka Plain (110.00) in the North Coast Region. More specifically, the project site is located in the watershed of Cooper Creek (also commonly referred to as Cooper Canyon or Cooper Gulch), tributary to Eureka Slough and Humboldt Bay. The North Coast Regional Water Quality Control Board (NCRWQCB) adopts and implements the Water Quality Control Plan (Basin Plan) for the North Coast Region, which identifies beneficial uses and recognizes water quality impairments unique to the region. Although Cooper Creek is not recognized as an impaired water body, Humboldt Bay (downstream of the project site) is listed as an impaired waterbody due to concentrations of Dioxin Toxic Equivalents and PCBs (Polychlorinated biphenyls; SWRCB, 2017, 2020b). Typical sources of Dioxin Toxic Equivalents to a given water body include industrial point sources, waste storage/storage tank leaks (above ground), and other unknown sources (SWRCB, 2017). Sources of PCBs in Humboldt Bay are unknown, however, according to the United States Environmental Protection Agency (USEPA), PCBs can still be released into the environment from:

- Poorly maintained hazardous waste sites that contain PCBs
- Illegal or improper dumping of PCB wastes
- Leaks or releases from electrical transformers containing PCBs

- Disposal of PCB-containing consumer products into municipal or other landfills not designed to handle hazardous waste

- Burning some wastes in municipal and industrial incinerators (USEPA, 2020).

Cooper Creek flows beneath the project site for a total length of 1,500 feet, entering a 30-inch diameter storm drainpipe south of Albee Stadium and daylighting north of Bud Cloney Field. Elevations gradually rise to the south of Albee Stadium at the inlet of the Cooper Creek culvert and decline steeply north of Bud Cloney Field at the outlet of the Cooper Creek culvert. To the east and west of Albee Stadium, elevations rise steeply shaping the stadium into a valley-like feature. The slopes surrounding Albee Stadium and Bud Cloney Field are dominated by remnant conifer forests. Small channels drain the slopes surrounding the project site. The athletic fields and surrounding slopes flow towards drainage ditches and/or drainage inlets, which ultimately drain to Cooper Creek. As discussed in Section IV (Biological Resources), the site also contains wetlands, which primarily occur along the margins of the existing athletic fields and among the surrounding slopes. All runoff from the project site drains into Cooper Gulch.

Portions of the project site have become compromised as the result of the critical failure of the underlying storm drain system. Several dangerous sinkholes have developed, resulting in temporary closures to portions of the project site. Additional sinkholes can develop with no warning, which has created an imminent health and safety risk to students, teachers, staff and visitors to the project site. The primary cause of the sinkholes is the failing storm drain system located up to approximately 14 feet beneath the ground surface.

The project site is located in the Eureka Plain Groundwater Basin (Basin No. 1-009). The approximately 37,400-acre groundwater basin is bounded by the Little Salmon Fault to the south, Humboldt Bay and Arcata Bay to the west and northwest, and by Wildcat series deposits to the east (DWR, 2004). The DWR has ranked the Eureka Plain Groundwater Basin as "Very Low" priority because of the condition of the basin and the minimal risk of overdraft and other impacts (DWR, 2020).

Flood zones are geographic areas that the Federal Emergency Management Agency (FEMA) has defined according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM). Each flood zone reflects the anticipated type of flooding in the area. According to FIRM Panel 06023C0845G, areas downstream of the Cooper Creek culvert underlying the project site are located in an area of minimal flood hazard, (Zone X; FEMA, 2017).

Water service (for example, drinking fountains, restrooms, irrigation etc.) is provided to the project site by the City of Eureka, which receives water from the Humboldt Bay Municipal Water District (HBMWD). HBMWD maintains and operates a series of ranney wells that withdraw groundwater from below the bed of the Mad River.

A Draft Stormwater Control Plan for Regulated Projects was prepared for this project (SHN, 2021d). It addresses project stormwater mitigation requirements consistent with the Phase II Small Municipal Separate Storm Sewer System (MS4) Program requirements, including stormwater mitigation for the 85th percentile design storm and hydromodification requirements. The total project area defined by the boundary of proposed improvements to the site is 9.8 acres. The pre-project site has an impervious surface area of approximately 130,442 square feet (sf; 2.99 acres), and a pervious surface area of approximately 296,552 sf (6.81 acres). The post-project site will have an impervious surface area of approximately 155,709 sf (3.57 acres), and a pervious surface area of approximately 271,285 sf (6.23 acres). The project will replace approximately 2.21 acres of impervious surface and will create approximately 0.58 acres of new impervious surface, resulting in a total of approximately 2.79 acres of created or replaced impervious surface. A total of approximately 0.78 acres of existing impervious surface will remain as-is. Because the project will create or replace more than 1 acre of impervious surfaces, hydromodification management is required, which requires that the post-project runoff shall not exceed the pre-project runoff flow rate for the 2-year, 24-hour duration storm. The NCRWQCB has indicated that the approach used in the Draft Stormwater Control Plan is robust and conservative in implementing post-project pollution control measures and that NCRWQCB approves of the proposed strategy and measures (Thompson, 2021).

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

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

The surface water features on the project site include small channels along steep slopes surrounding the project site, wetland features along the margins of the project site and along the surrounding slopes, and Cooper Creek which passes beneath the project site in a 30-inch diameter culvert.

Construction

Construction of the proposed project will require demolition, site preparation, grading, athletic surface and building construction, alterations to existing structures, open trenching storm drainpipe replacement, retaining walls, paving, architectural coating, and

landscaping. Due to the constrained nature of the site and the need to rehabilitate the failing stormwater drainage system, the project proposes ground-disturbing activities within and directly adjacent to surface water features such as wetlands and drainage channels along the margins of the project site as well as excavation and replacement of the main storm drainpipe containing Cooper Creek that runs beneath the project site. Proposed construction activities have the potential to result in water quality pollutants such as silt, debris, chemicals, paints, and other solvents. The release of such pollutants would adversely affect water quality. In addition, stormwater discharge may include debris, particulate, and petroleum hydrocarbons as a result of improper storage of construction materials, improper disposal of construction wastes, discharges resulting from construction dewatering activities, and spilled petroleum products. As such, short-term water quality impacts have the potential to occur during construction of the proposed project in the absence of any protective and avoidance measures.

Because construction activities will involve work in jurisdictional waters including the replacement of the main storm drainpipe containing Cooper Creek, the proposed project will require a Clean Water Act (CWA) Section 404 Permit from the U.S. Army Corps of Engineers (USACE), a Section 401 Certification from the NCRWQCB, and a Lake and Streambed Alteration (LSA) Agreement from CDFW and will need to comply with all permit conditions. Permit conditions will include measures and protocols to minimize the degradation of surface water and groundwater quality.

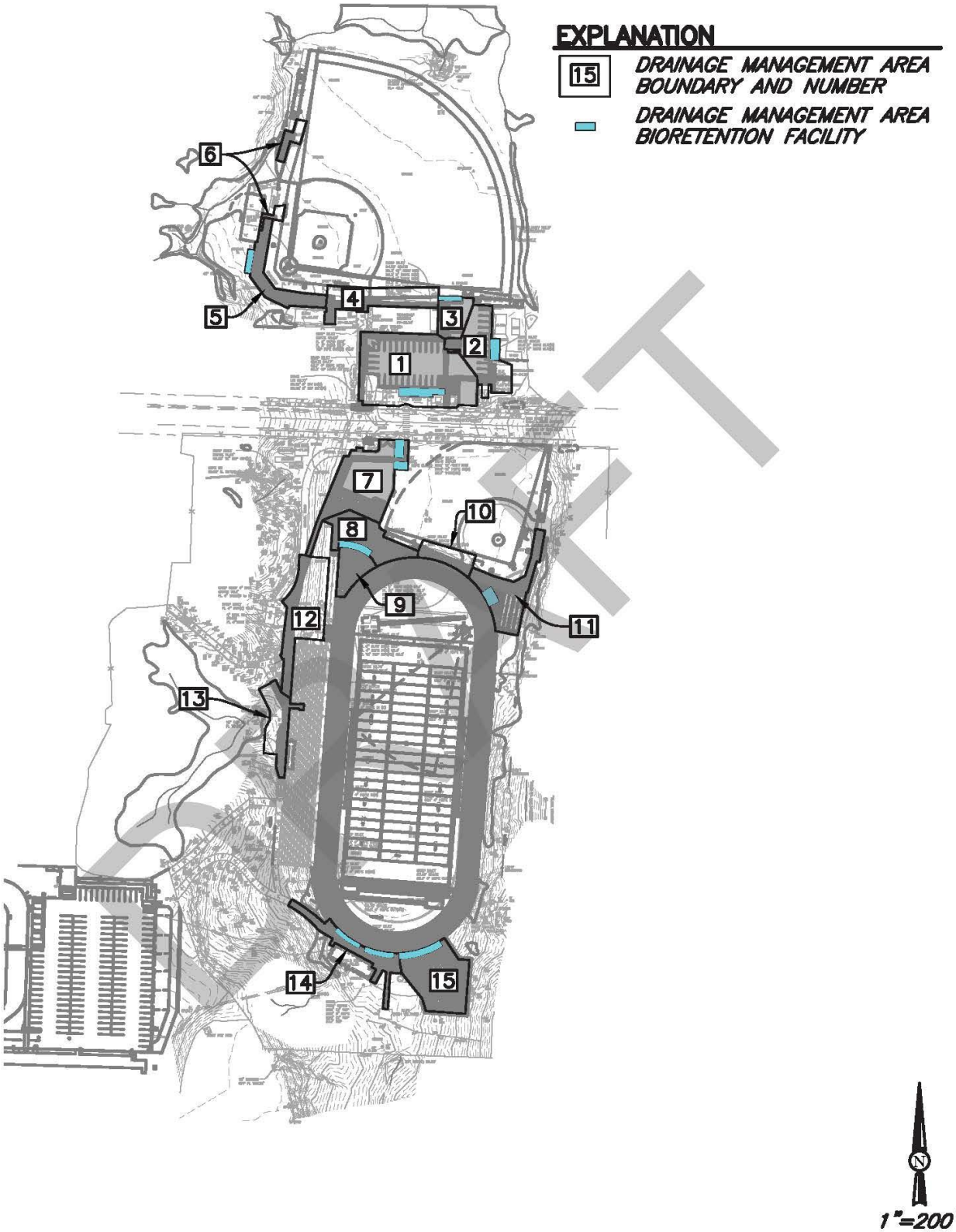
Because the project will involve more than one acre of ground disturbance, EHS will need to obtain coverage under State Water Resources Control Board Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, as amended by Order No. 2012-0006. In compliance with the NPDES requirements, a Notice of Intent (NOI) would be prepared and submitted to the NCRWQCB, providing notification and intent to comply with the State of California Construction General Permit (CGP). In addition, a Construction SWPPP would be prepared for pollution prevention and control prior to initiating site construction activities. The Construction SWPPP would identify and specify the use of appropriate BMPs for control of pollutants in stormwater runoff during construction-related activities, and would be designed to address water erosion control, sediment control, offsite tracking control, wind erosion control, non-stormwater management control, and waste management and materials pollution control. A sampling and monitoring program would be included in the Construction SWPPP that meets the requirements of the NCRWQCB to ensure the BMPs are effective. A Qualified SWPPP Practitioner would oversee implementation of the SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance. In conjunction with the requirement to prepare a SWPPP, **Mitigation Measure HWQ-1** has been incorporated to provide additional water quality protection during construction through the implementation of appropriate BMPs.

Operation

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project would not involve the use of septic systems or alternative wastewater disposal systems.

The project will replace approximately 2.21 acres of impervious surface and will create approximately 0.58 acres of new impervious surface, resulting in a total of approximately 2.79 acres of created or replaced impervious surface. A total of approximately 0.78 acres of existing impervious surface will remain as-is. The increase in development and impervious surfaces as a result of the proposed project, and the associated increase in stormwater runoff, has the potential to increase the presence of sediment and urban pollutants in stormwater runoff. Stormwater that comes into contact with driveways, parking lots, and roadways is the primary pollutant source in runoff. Gasoline, grease, oil, and their constituents such as benzene and toluene, are commonly released through auto emissions, spills, leaks, gasoline tanks, oil pans, and crankcases. Lead, zinc, pyrene and other metals and hydrocarbons are components of asphalt and tires, which degrade over time and release their constituents to stormwater. Brake linings and clutch facings may wear, releasing copper and possibly asbestos. Landscaped areas may contribute hydrocarbons and pesticides, such as herbicides, insecticides, and fungicides, to stormwater runoff. Landscaping fertilizer contains nutrients, particularly nitrogen, potassium, and phosphorous. The unpaved landscaped areas may also be a source of sediment and organic debris in stormwater. Weathering of buildings over time releases building material constituents. Heavy metals, particularly copper, lead, zinc, and chromium are released from flashings, shingles, gutters and downspouts, galvanized pipes, and metal plating. Paints and other wood preservatives may also contain hydrocarbons.

Because the project will create more than 5,000 sf of impervious surface, it is classified as a "Regulated Project" according to the Phase II MS4 Program, Section E.12.c(ii). Given that the project will result in an increase of less than 50% of the previously existing impervious area (this project will increase impervious area by approximately 19%), stormwater runoff from new and/or replaced impervious surfaces must be mitigated according to Section E.12.c.II.a of Phase II Small MS4 Program. The Draft Stormwater Control Plan for Regulated Projects (SHN, 2021d) provides recommendations to achieve stormwater mitigation for the 85th percentile design storm. Accordingly, the project will use bioretention facilities and disconnected impervious areas to reduce runoff throughout the site. Eleven bioretention basins are proposed throughout the site (Figure 26) to manage and treat stormwater runoff from new or replaced impervious surface areas. Impervious area disconnection is also proposed such that runoff from disconnected impervious



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SHN	Eureka City Schools Albee Stadium at Eureka High School Eureka, California	Drainage Management Areas and Bioretention Facilities SHN 020116
	February 2021	020116-FULL-SITE-SW-MIT-FIG	Figure 26

areas is designed to flow across vegetated areas before being received by the site's storm drain system. The bioretention facilities and impervious area disconnections will minimize adverse impacts to water quality from stormwater runoff potentially containing various pollutants. The NCRWQCB has indicated that the approach used in the Draft Stormwater Control Plan is robust and conservative in implementing post-project pollution control measures and that NCRWQCB approves of the proposed strategy and measures (Thompson, 2021). In addition, the project proposes to replace and rehabilitate the failed elements of the existing drainage system underlying the existing facilities, which is anticipated to improve the water quality of stormwater runoff from the site relative to existing failing drainage system conditions.

The Draft Stormwater Control Plan for Regulated Projects found that due to the unique drainage configuration of a track and due to the fact that the track is located at a relatively low elevation on the site, it is not feasible to direct runoff from the track into a bioretention basin or other vegetated stormwater mitigation features. In discussions with the NCRWQCB regarding the challenges associated with treating runoff from the track surface, and noting that runoff from the track surface is unlikely to contain contaminants, NCRWQCB personnel stated that they are willing to consider alternative design measures as a substitute for providing treatment for runoff from the track surface. The alternative design measure that was mentioned by the NCRWQCB as a possible substitute is the use of a natural infill material for the synthetic turf fields rather than the styrene-butadiene rubber (SBR) infill that is commonly used as an infill material for synthetic turf fields (SHN, 2021d). Therefore, EHS has committed to using a natural infill material for its synthetic fields (such as, olive pits). **Mitigation Measure HWQ-2** has been incorporated to ensure that synthetic turf surfaces will not violate a water quality standard or substantially degrade water quality. It requires that new or replaced synthetic turf surfaces shall utilize virgin materials that have been tested to pass both California and U.S. environmental regulations in terms of chemical and heavy metal tolerances. Synthetic turf surfaces shall utilize a permeable backing, lead-free fibers, and granular infill that will consist of specifically graded sand and a non-SBR infill material (such as, olive pits).

Because the bleachers at the site are existing, runoff from the bleachers will not require treatment. A trench drain will be installed along the base of the bleachers (between the bleacher walkway and the new track surface). This trench drain will receive runoff from the existing bleachers and will convey this runoff to the site storm drain system. The NCRWQCB has requested that the trench drain be fitted with grates with small enough openings to help prevent trash from entering the storm drain system. The most commonly available "heel safe" trench drain grates can have openings as small as 0.25 inches (SHN, 2021d). **Mitigation Measure HWQ-3** has been incorporated to ensure that the trench drains along the base of the bleachers will be fitted with these "heel safe" grates in order to help prevent trash from entering the storm drain system.

Because the project creates or replaces more than one acre of impervious surfaces, hydromodification management is required by Section E.12.f(i) of the Phase II MS4 Program which requires that the post-project runoff shall not exceed the pre-project runoff flow rate for the 2-year, 24-hour duration storm. The peak discharge for the 2-year, 24-hour storm will be lower under the post-project condition than it is under the pre-project condition. The infiltration rate of the soil media in the bioretention facilities will reduce the post-development peak runoff rate and help to mitigate the impacts of the increased impervious surface created by the project. The post-development peak flow of 1.80 cubic feet per second (cfs) is less than the pre-development peak flow of 1.86 cfs, meeting the hydromodification requirements for the project (SHN, 2021d).

With the implementation of **Mitigation Measures HWQ-1, HWQ-2,** and **HWQ-3,** and based on the information provided above, it has been determined the proposed project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?* No Impact

The project site is currently developed as outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. As noted above, the proposed project will result in the creation of approximately 0.58 acres of new impervious surfaces and includes new site design measures and LID features such as bioretention facilities and impervious area disconnections (SHN, 2021d). In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. These stormwater and drainage improvements will result in improved infiltration capacity and have the potential to improve groundwater recharge at the site.

The project site has existing connection to the water distribution system operated by the City of Eureka. The City is one of several Public Water Systems that obtains water from a regional wholesale water provider (HBMWD), and water supplied to customers in the City consists entirely of water supplied by HBMWD. HBMWD maintains and operates a series of ranney wells that withdraw

groundwater from below the bed of the Mad River. Water use at the project site includes the irrigation system, fire protection, and drinking water, restroom, and housekeeping appliances. During operation of the proposed project, water will continue to be supplied by City of Eureka. No groundwater well is proposed.

The proposed project is located in the Eureka Plain Groundwater Basin and the HBMWD water source is located in the Mad River Groundwater Basin. The California Department of Water Resources (DWR) has ranked both basins as "Very Low" priority groundwater basins because of the condition of the basins and the minimal risk of overdraft and other impacts indicating that neither groundwater basin is at risk of overdraft. As such, the proposed project will not interfere with the implementation of a sustainable groundwater management plan (DWR, 2020). Therefore, the proposed project is not of the nature to substantially decrease groundwater supplies or interfere with groundwater recharge.

Based on the information provided above, it has been determined the proposed project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, the proposed project would have no impact on this resource category.

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

Construction

As noted in the Setting, the project site and surrounding slopes include several wetland areas and surface water drainage features. Construction of the proposed project has the potential to result in erosion and discharge of sediment to nearby drainage features. However, protective and avoidance measures shall be implemented during construction of the proposed project pursuant to the requirements of the SWRCB CGP. The SWRCB CGP will require the preparation of a Construction SWPPP, which documents the stormwater dynamics at the site, the BMPs and water quality protection measures that are to be used, and the frequency of inspections. In conjunction with the requirement to prepare a SWPPP, **Mitigation Measure HWQ-1** has been incorporated to provide additional water quality protection during construction through the implementation of appropriate BMPs. Adherence to the SWRCB regulatory requirements shall ensure construction of the proposed project will not result in substantial erosion or siltation on- or offsite.

Additionally, because construction activities will involve work in jurisdictional waters including the replacement of the main storm drainpipe containing Cooper Creek, the proposed project will require a CWA Section 404 Permit from the USACE, a Section 401 Certification from the NCRWQCB, and an LSA Agreement from CDFW, and will need to comply with all permit conditions. Permit conditions will include measures and protocols to minimize the erosion or siltation on- or offsite.

Operation

The project does not propose to alter the course of existing surface water features. However, as previously noted, the proposed project will result in approximately 0.58 acres of new impervious surfaces, which has the potential to result in increased stormwater runoff that leads to on- or offsite erosion and siltation. As discussed in the Draft Stormwater Control Plan for Regulated Projects (SHN, 2021d), the proposed stormwater system will be designed consistent with the requirements of the City of Eureka MS4 Permit to manage post-construction stormwater runoff through new site design measures and LID features such as bioretention basins and impervious area disconnections. These stormwater and drainage improvements will reduce the volume and rate of runoff, provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions, and minimize substantial erosion or siltation on- or offsite.

With the implementation of **Mitigation Measure HWQ-1,** in compliance with the requirements of the USACE, NCRWQCB, and CDFW, and based on the information provided above, it has been determined the proposed project will not substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or offsite. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

As noted in the Setting, the project site and surrounding slopes include several wetland areas and surface water drainage features. The project does not propose to significantly alter the course of existing surface water features. However, as previously noted, the proposed project will result in approximately 0.58 acres of new impervious surfaces, which has the potential to increase the rate or

amount of stormwater runoff and result in flooding on- or offsite. During operation of the proposed project, increased volume and speed of runoff could cause runoff to reach downstream areas sooner and coincide more closely with the peak of runoff from lower areas; the effect, along with that of higher runoff, could be increased flood flows.

As discussed in the Draft Stormwater Control Plan for Regulated Projects (SHN, 2021d), the proposed stormwater system will be designed consistent with the requirements of the City of Eureka MS4 Permit to manage post-construction stormwater runoff through new site design measures and LID features such as bioretention basins and impervious area disconnections. These stormwater and drainage improvements will reduce the volume and rate of runoff, provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions, and minimize substantial erosion or siltation on- or offsite. As concluded in the Draft Stormwater Control Plan for Regulated Projects (SHN, 2021d), the peak discharge for the 2-year, 24-hour storm will be lower under the post-project condition (1.80 cfs) than it is under the pre-project condition (1.86 cfs). As such, the additional impervious surface proposed by the project would not result in flooding on- or offsite.

Based on the information provided above, it has been determined the proposed project will not substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c.iii) *Substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;* Less Than Significant with Mitigation Incorporated

As noted above, the project does not propose to alter the course of existing surface water features. However, as previously noted, the proposed project will result in approximately 0.58 acres of new impervious surfaces, which has the potential to result in increased stormwater runoff and on- or offsite erosion and siltation. As discussed in the Draft Stormwater Control Plan for Regulated Projects (SHN, 2021d), the proposed stormwater system will be designed consistent with the requirements of the City of Eureka MS4 Permit to manage post-construction stormwater runoff through new site design measures and LID features such as bioretention basins and impervious area disconnections. These stormwater and drainage improvements will reduce the volume and rate of runoff, provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions, and minimize substantial erosion or siltation on- or offsite. As concluded in the Draft Stormwater Control Plan for Regulated Projects (SHN, 2021d), the peak discharge for the 2-year, 24-hour storm will be lower under the post-project condition (1.80 cfs) than it is under the pre-project condition (1.86 cfs). In addition, **Mitigation Measures HWQ-1, HWQ-2,** and **HWQ-3** have been incorporated to protect water quality during construction and operation. As such, the additional impervious surface proposed by 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.

With the implementation of **Mitigation Measures HWQ-1, HWQ-2,** and **HWQ-3** and based on the information provided above, it has been determined the proposed project will not substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

According to FIRM Panel 06023C0845G, none of the project is within a designated special flood hazard area. An area including the north end of Bud Cloney Field and northward within Cooper Creek is located in an area of minimal flood hazard, (Zone X; FEMA, 2017). The project would improve the outlet of the main storm drainpipe that conveys Cooper Creek beneath the site by constructing a new concrete headwall and rock slope protection; but these improvements would not impede or redirect flood flows. Therefore, the potential for the proposed project to impede or redirect flood flows is negligible. Although the project would result in approximately 0.58 acres of new impervious surfaces, stormwater and drainage improvements are proposed by the project that would ensure that post-construction stormwater runoff will be less than pre-construction runoff. Furthermore, as noted above, the project does not propose to alter the course of existing surface water features.

Based on the information provided above, it has been determined the proposed project will not substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff which would Impede or redirect flood flows. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?* No Impact

According to FIRM Panel 06023C0845G, none of the project is within a designated special flood hazard area. An area including the north end of Bud Cloney Field and northward within Cooper Creek is located in an area of minimal flood hazard, (Zone X; FEMA, 2017). FEMA defines Zone X as an area subject to inundation by the 0.2 percent annual chance (or 500-year) flood event. Therefore, the project site is not located within a 100-year flood hazard area. Furthermore, the project is located outside of the mapped tsunami inundation zone (CalEMA, 2009).

Based on the information provided above, it has been determined the proposed project will not be located in a flood hazard, tsunami, or seiche zone, and will not risk release of pollutants due to project inundation. Therefore, the proposed project would have no impact on this resource category.

e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?* Less-Than-Significant Impact

Water Quality Control Plan

The project site is located in the Eureka Plain in the North Coast Region. More specifically, the project site is located in the Cooper Creek watershed, tributary to Eureka Slough and Humboldt Bay. NCRWQCB adopts and implements the Water Quality Control Plan (Basin Plan) for the North Coast Region which identifies beneficial uses and recognizes water quality problems unique to the region.

Construction of the proposed project requires grading, earthmoving, and stockpiling activities. Due to the extent of these activities (greater than one acre of ground disturbance), construction of the proposed project will require compliance with the SWRCB CGP. Compliance with the CGP will require development and implementation of a SWPPP that would incorporate current BMPs for construction, including site housekeeping practices, erosion control, hazardous material storage, inspections, maintenance, worker training in pollution prevention measures, and secondary containment of releases to prevent pollutants from being carried offsite via runoff. In conjunction with the requirement to prepare a SWPPP, **Mitigation Measure HWQ-1** has been incorporated to provide additional water quality protection during construction through the implementation of appropriate BMPs. Adherence to the SWRCB regulatory requirements shall ensure construction of the proposed project will not obstruct implementation of the Basin Plan.

Additionally, because construction activities will involve work in jurisdictional waters including the replacement of the main storm drainpipe containing Cooper Creek, the proposed project will require a CWA Section 404 Permit from the USACE, a Section 401 Certification from the NCRWQCB, and an LSA Agreement from CDFW, and will need to comply with all permit conditions. Permit conditions will include measures and protocols to minimize the erosion or siltation on- or offsite and ensure the project is consistent with the Basin Plan.

As described in the Setting, Cooper Creek is a tributary to Humboldt Bay, which is listed as an impaired water body for Dioxin Toxic Equivalents and PCBs. The project does not propose the construction or operation sources that will contribute to the water quality impairment of Humboldt Bay from Dioxin Toxic Equivalents and PCBs. Moreover, as previously mentioned, the proposed project includes stormwater and drainage improvements that will reduce the potential for miscellaneous pollutants from entering Cooper Creek and Humboldt Bay, and provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions.

Sustainable Groundwater Management Plan

The project site has existing connection to the water distribution system operated by the City of Eureka. The City is one of several Public Water Systems that obtains water from a regional wholesale water provider, the HBMWD, and water supplied to customers in the City consists entirely of water supplied by HBMWD. HBMWD maintains and operates a series of ranney wells that withdraw groundwater from below the bed of the Mad River. Water use at the project site includes the irrigation system, fire protection, and drinking water, restroom, and housekeeping appliances. During operation of the proposed project, water will continue to be supplied by City of Eureka. No groundwater well is proposed.

The proposed project is located in the Eureka Plain Groundwater Basin and the HBMWD water source is located in the Mad River Groundwater Basin. The DWR has ranked both basins as “Very Low” priority groundwater basins because of the condition

of the basins and the minimal risk of overdraft and other impacts indicating that neither groundwater basin is at risk of overdraft. Therefore, the proposed project will not interfere with the implementation of a sustainable groundwater management plan.

Based on the information provided above, it has been determined that the proposed project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

Mitigation Measure HWQ-1. Best Management Practices: The following Best Management Practices shall be implemented to protect water quality during construction to avoid impacts to water quality:

- All contractors that would be performing demolition, construction, grading, storm drainpipe rehabilitation/replacement, or other work that could cause increased water pollution conditions at the site (such as, non-stormwater discharges or dispersal of soils) shall receive training regarding the environmental sensitivity of the site and the need to minimize impacts. Contractors shall also be trained on implementation of stormwater and non-stormwater BMPs for protection of water quality;

- Contractors shall implement appropriate BMPs during construction as determined by a Qualified SWPPP Developer;

- Contractors shall be responsible for minimizing erosion and preventing the transport of sediment to sensitive areas;

- Sufficient erosion control supplies shall be maintained on site at all times, available for prompt use in areas susceptible to erosion during rain events;

- Disturbance of existing vegetation shall be minimized to only that necessary to complete the work;

- Contractors shall make adequate preparations, including training and providing equipment, to contain oil and/or other hazardous materials spills;

- Dewatering and water diversion operations, if needed, shall be conducted where needed from the work location and stored or disposed of appropriately, in accordance with the SWPPP and agency permit conditions;

- Contractors shall ensure that the site is prepared with BMPs prior to the onset of any storm predicted to receive 0.5 inches or more of rain over 24 hours; and

- All erosion and sediment control measures shall be maintained in accordance with their respective BMP fact sheet until disturbed areas are stabilized.

Mitigation Measure HWQ-2. Synthetic Turf Surfaces: New or replaced synthetic turf surfaces shall utilize virgin materials that have been tested to pass both California and U.S. environmental regulations in terms of chemical and heavy metal tolerances. Synthetic turf surfaces shall utilize a permeable backing, lead free fibers, and granular infill that will consist of specifically graded sand and a non-styrene-butadiene rubber (non-SBR) infill material (such as, olive pits).

Mitigation Measure HWQ-3. Heel Safe Trench Drain Grates: Trench drains along the base of the bleachers shall be fitted with "heel safe" grates to help prevent trash from entering the storm drain system.

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

Setting: The project site is located in the City of Eureka on portions of the EHS campus, including Albee Stadium and Bud Cloney Field. EHS has used Albee Stadium since before 1946 and Bud Cloney Field since before 1983. EHS is a part of the ECUSD. EHS serves grades 9 – 12 and has approximately 1,138 students currently enrolled (CDE, 2019).

The project site contains existing athletic and educational facilities and is designated and zoned Public Facility (PF) by the City of Eureka. The project site is centrally located in the City of Eureka. Surrounding land uses include residential development within Low Density Residential (R1), Residential Medium (R2), and Residential High (R3) zoning districts. The remnant conifer forested slopes surrounding the project site create varying degrees of separation between the project site and surrounding residential development.

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

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

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project would improve an existing athletic facility that is an integral part of the local community. The proposed improvements would occur within the existing footprint of EHS athletic, academic, and ancillary facilities.

Based on the information provided above, it has been determined that the proposed project will not physically divide an established community. Therefore, the proposed project would have no impact on this resource category.

b) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* Less Than Significant Impact with Mitigation Incorporated

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The project site is designated and zoned PF by the City of Eureka, which is consistent with the existing and proposed use of the site. The proposed project is located on ECS property under the authority of the State of California. Per Government Code Section 53094, the ECS adopted Resolution No. 20-21-014 on September 17, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements. However, the proposed project will be required to comply with the existing regulatory requirements of State and federal agencies. As discussed throughout this document, the project has been designed and mitigated to comply with State and federal regulatory requirements. In all instances where potentially significant impacts have been identified, mitigation is provided to reduce each impact to less-than-significant levels. This was necessary in the following sections of the document:

- Air Quality (Section III)
- Biological Resources (Section IV)
- Cultural Resources (Section V)
- Geology and Soils (Section VII)
- Hazards and Hazardous Materials (Section IX)
- Hydrology and Water Quality (Section X)

- Noise (Section XIII)
- Tribal Cultural Resources (XVIII)

As designed and mitigated, the proposed project would not conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project.

With the implementation of mitigation measures included in other sections of this document and based on the information provided above, it has been determined that the proposed project will not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed project would have a less-than-significant impact with mitigation incorporated.

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Protect Siskiyou Checkerbloom)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Seasonal Limitation on Work in Active Channel)

Mitigation Measure BIO-4 (Protect Riparian Habitat)

Mitigation Measure BIO-5 (Mitigate for Riparian Habitat Impacts)

Mitigation Measure BIO-6 (Protect Small Fruit Bullrush Marsh)

Mitigation Measure BIO-7 (Mitigate for Impacts to Small Fruit Bullrush Marsh)

Mitigation Measure BIO-8 (Mitigate for Tree Removals)

Mitigation Measure BIO-9 (Protect Wetlands)

Mitigation Measure BIO-10 (Mitigate for Wetland Impacts)

Mitigation Measure CR-1 (Field House Reconstruction)

Mitigation Measure CR-2 (Technology Center and Field House Documentation)

Mitigation Measure CR-3 (Inadvertent Discovery Protocol for Archaeological Resources)

Mitigation Measure CR-4 (Inadvertent Discovery Protocol for Human Remains)

Mitigation Measure GEO-1 (Adherence to Geologic Hazard and Geotechnical Investigation Recommendations)

Mitigation Measure GEO-2 (Inadvertent Discovery Protocol for Paleontological Resources)

Mitigation Measure HM-1 (Stockpile and Test Excavated Material Before Transport Offsite)

Mitigation Measure HWQ-1 (Best Management Practices)

Mitigation Measure HWQ-2 (Synthetic Turf Surfaces)

Mitigation Measure HWQ-3 (Heel Safe Trench Drain Grates)

Mitigation Measure NO-1 (Construction Noise Limitations)

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

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

Mineral resources in the vicinity of the City of Eureka are primarily aggregate deposits found along the Eel River and Mad River (outside the project area). Areas along the Eel River and Mad River are currently used for aggregate resource extraction (gravel). Other than instream aggregate, no locally important mineral resources have been identified in the vicinity of the project site.

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

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

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. There are no known deposits of commercially viable mineral or aggregate on the project site.

For these reasons, it has been determined that the proposed project would not 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. Therefore, the proposed project would result in no impact on this resource category.

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

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. There are no known deposits of commercially viable mineral or aggregate on the project site.

For the reasons discussed above, it has been determined that the proposed project would not 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. Therefore, the proposed project would result in no impact on this resource category.

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

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

Setting: Noise impacts are those that exceed noise standards developed to provide reasonable control of noise to residences, parks, open spaces, and other specific designated sites. Noise can be generated by a number of sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations.

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. It is estimated that EHS has used Albee Stadium since before 1946 and Bud Cloney Field since before 1983 for a range of athletic events. However, athletic facilities at the project site are in an aging and deteriorated condition and portions of project site have become compromised as the result of a critical failure of the underlying storm drain system (such as sinkholes, etc.). As discussed under Section 2.2 (Existing Conditions), over the last several years, the aging and deteriorated condition of the project site has led to a steady decline in EHS-affiliated and nonaffiliated events. Moreover, due to the onset of the COVID-19 pandemic in spring 2020, in-person academic and athletic gatherings at EHS have been discontinued at times. As a result, all uses typically held at the project site were temporarily ceased. The most recent date(s) of typical operation and use of the facility is shown in Tables 1 and 2 (Section 2.2). Because of the relatively recent interruption of use of the facilities due to the storm drainage failures and COVID-19, the CEQA baseline is defined as the normal operation of the subject facilities. Existing operational noise generated from the project site includes, but is not limited to spectator cheering, live and/or pre-recorded music, announcers/commentators, and referee whistling. The noise occurs intermittently and is limited to athletic events and other events hosted at the project site.

In the vicinity of the proposed project, noise-generating sources are varied and consist of vehicle traffic along Del Norte Street and the surrounding street systems, and typical residential activity throughout the urban environment. Additionally, day to day activities at the EHS main campus are noise-generating sources (such as students, bells/alarms, intercom, etc.). Regional airports are not a source of substantial noise levels affecting the project site.

Residential uses, schools, hospitals, churches, and libraries are typically considered sensitive noise receptors as these are locations where people sleep or expect low noise levels. The nearest known potential sensitive receptors to the project site include EHS students in attendance at the EHS main campus and private residences in the project vicinity along Del Norte Street, L Street, and N Street. The project is directly adjacent to five private residences along Del Norte Street and is within approximately 100 feet of residences along L Street and N Street. To the east and west of Albee Stadium, elevations rise steeply, shaping the stadium into a valley-like feature. The slopes surrounding Albee Stadium and Bud Cloney Field are occupied by a stand of conifers that form a vegetative buffer of varying width and density between the project site and surrounding land uses. The topography and vegetative buffer may provide some sound attenuation from the project site to nearby sensitive receptors.

The City of Eureka has adopted noise standards, which are included in the General Plan and Land Use Code. The proposed project is located on ECS property under the authority of the State of California. Per Government Code Section 53094, the ECS adopted Resolution No. 20-21-014 on September 17, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements (ECS, 2020b).

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

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

As noted in the Noise Setting, the proposed project is located on ECS property under the authority of the State of California. Per Government Code Section 53094, the ECS adopted Resolution No. 20-21-014 on September 17, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements (ECS, 2020b).

Construction

The project proposes improvement of the existing EHS athletic facilities and associated educational facilities in the City of Eureka. Construction equipment and machinery would include bulldozers, excavators, backhoes, tractors, scrapers, graders, drill rigs, horizontal boring equipment, trenchers, skip loaders, skid steer loaders, dump trucks, bottom dump trailers, compactors, tandem vibratory rollers, pavers, concrete trucks, concrete pumps, concrete finishing equipment, forklifts, boom lifts, cranes, pneumatic rollers, water trucks, street sweepers, pickup trucks, cold planers, winches and pullers, generators, air compressors, air powered construction tools, power saws, hand tools and other standard construction vehicles and equipment. No pile driving or blasting is proposed. Construction of the proposed project would result in a temporary increase in ambient noise levels and may result in nuisance noise impacts to adjacent residential uses. Nuisance noise impacts typically occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), when noise-generating sources are adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

Construction activities would be transitory (occurring intermittently over the construction period) and temporary (occurring over a timeframe of approximately 18 to 24 months). However, to reduce potential nuisance noise impacts during construction, construction activities will not occur during noise-sensitive times of the day (such as, early morning or nighttime) or on more sensitive days (such as, Sundays and recognized union holidays). In addition, it will also be required for all stationary equipment and construction equipment to be maintained in good working order and fitted with manufacturer-approved muffler systems. These requirements for construction activity have been included as **Mitigation Measure NO-1** for the proposed project and require the following: 1) Construction activities will be limited to the hours between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturdays; 2) Construction activity will not occur on Sunday or recognized union holidays; and 3) All stationary and construction equipment will be maintained in good working order and fitted with manufacturer-approved muffler systems. Specifically, recognized union holidays shall be defined according to the 2022 Calendar for Northern California Master Agreements (United Contractors, 2021) and subsequent year calendars. With the implementation of **Mitigation Measure NO-1**, impacts to nearby sensitive receptors from construction activities will be less-than-significant.

Operation

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. No new noise generating sources are proposed. The proposed project would serve the existing student population and would provide the same uses that have occurred at the project site. Consequently, the proposed project would not result in a significant change in noise at the project site and operational noise would not result in a substantial permanent increase in ambient noise levels compared to the CEQA baseline.

With the adoption of **Mitigation Measure NO-1** and based on the information provided above, it has been determined that the proposed project will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated.

b) *Generation of excessive groundborne vibration or groundborne noise levels?* Less Than Significant with Mitigation Incorporated

The proposed project's construction activity has the potential to result in minor groundborne vibration and noise. The closest land uses potentially impacted by groundborne vibration and noise are the residences located approximately 50 feet away from Bud Cloney Field along Del Norte Street. Ground vibrations from construction activities do not often reach the levels that can damage structures. Pile-driving and blasting generate the highest levels of vibration; however, neither of these activities will occur during construction of the proposed project. As discussed under subsection a), construction activity must comply with the requirements in **Mitigation Measure NO-1**, which place limitations on the days and hours of construction activity, to ensure that nearby land uses are not disturbed by early morning or nighttime construction activity. In addition to reducing construction noise levels, compliance with these requirements also minimizes the potential impacts of vibration on persons adjacent to the project site. Construction activities will occur for a short duration and during daytime hours and will not result in groundborne noise levels that are excessive.

With the implementation of **Mitigation Measure NO-1** and for the reasons discussed above, it has been determined that the proposed project will not result in the generation of excessive groundborne vibration or groundborne noise levels. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated.

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

The project site is not located within the vicinity of a private airstrip, within an airport land use plan, or within two miles of a public airport or public use airport. Due to the distance from the project site, regional airports are not a source of excessive noise levels affecting the project site. As such, the proposed project would not expose people residing or working in the project site to excessive noise levels. Therefore, the proposed project would result in no impact on this resource category.

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

Mitigation Measure NO-1. Construction Noise Limitations: The following measures will be implemented during construction activities to reduce noise levels:

- Construction activities shall be restricted to the hours between 7:00 a.m. and 7:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 5:00 p.m. on Saturdays.
- Construction activity will not occur on Sundays or recognized union holidays.
- All stationary and construction equipment will be maintained in good working order and fitted with factory-approved muffler systems.

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

Setting: The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka on the EHS campus, which is a part of the ECUSD. According to estimates from the California Department of Finance, the City of Eureka had an estimated population of 26,699 as of January 2020 (DOF, 2020). The project site consists of two existing athletic fields that support various EHS athletic programs. EHS serves grades 9 – 12 and has approximately 1,138 students currently enrolled (CDE, 2019).

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

a) *Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?* No Impact

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. Rather than proposing new housing, businesses, or infrastructure that would have the potential to induce substantial population growth, the project proposes improvement of existing athletic and educational facilities. The proposed project would not substantially alter existing uses on the project site and would not induce growth in the student population. For these reasons, it has been determined that the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, the proposed project would result in no impact on this resource category.

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

The project site is currently developed with outdoor athletics facilities and educational facilities and does not contain existing housing. As such, the proposed project would not displace people or housing. For these reasons, it has been determined that the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the proposed project would result in no impact on this resource category.

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

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

Setting: The project site is located in the City of Eureka, which has fire and police protection, schools, parks, and other public facilities and services.

Law Enforcement
The Eureka Police Department (EPD) provides law enforcement for residents living within the City of Eureka. EPD is headquartered in downtown Eureka and has two Service Areas, each of which are managed by a Police Captain. Service Area 1 consists of the south and west portions of Eureka, and Service Area 2 consists of the north and east sections of Eureka (City of Eureka, 2018). The nearest police station is at 6th and C Streets, approximately 0.9 miles from the project.

Fire Protection
Humboldt Bay Fire (HBF) provides fire protection services to the City of Eureka. HBF is a full-service department which provides emergency response and non-emergency public safety services from five fire stations located in and around Eureka. HBF was founded in 2011 through a Joint Powers Authority (JPA), which consolidated the former Eureka Fire Department with the Humboldt Fire District to provide service to the City of Eureka and Greater Eureka area (City of Eureka, 2018). The nearest fire station is Humboldt Bay Fire Station 4 at Myrtle Avenue and Cousins Street, approximately 0.7 miles from the project.

Schools
ECS is the largest school district in the City of Eureka, operating several elementary schools, two middle schools, and a high school (such as, EHS) on which the project site is located. EHS serves grades 9 – 12 and has approximately 1,138 students currently enrolled (CDE, 2019).

Parks
The City of Eureka maintains a network of parks and recreation facilities distributed throughout the City that provide many recreational and educational opportunities. The project site is not adjacent to or in immediate proximity to City parks and recreational facilities. However, parks and recreational facilities nearest the project site include Carson Park and Playground, Eureka Dog Park, Ryan Building (Youth Center), and Hammond Park and Playground (City of Eureka, 2018).

Other Public Facilities
Other public facilities in the City of Eureka include library services. Library services in the City of Eureka include the Eureka Main Library, which is considered the main branch of the eleven branches of the Humboldt County Library System which operates throughout the County (City of Eureka, 2018).

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

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection*? Less-Than-Significant Impact

Fire protection services are currently provided to the project site by the HBF. The project proposes improvement of the existing outdoor athletics facilities and educational facilities at EHS in the City of Eureka. While the proposed project may require fire protection response in the case of an emergency, the type and intensity of land use will not change and the proposed project will not significantly increase the demand for fire protection services to the extent that new or physically altered facilities would be required.

Based on the information provided above, it has been determined that the proposed project does not require new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection*? Less-Than-Significant Impact

Police protection services are currently provided to the project site by the EPD. The project proposes improvement of existing outdoor athletics facilities and educational facilities at EHS in the City of Eureka. While the proposed project may require police protection and response in the case of an emergency, the type and intensity of land use will not change and the proposed project will not significantly increase the demand for police protection services to the extent that new or physically altered facilities would be required.

Based on the information provided above, it has been determined that the proposed project would not require new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools*? Less Than Significant with Mitigation Incorporated

The project proposes improvement of outdoor athletics facilities and educational facilities at EHS in the City of Eureka. The proposed project is not of the nature to increase student enrollment at EHS or have other impacts on existing academic-related operations at EHS that would require new or physically altered school facilities in order to maintain acceptable performance objectives.

The proposed improvements to the EHS athletic and educational facilities would result in physical impacts to the surface and subsurface of the project site. These impacts are considered to be part of the project's construction phase and are evaluated in other sections of this document including, Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Hazards and Hazardous Materials (Section IX), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (XVIII). In instances where significant impacts have been identified, mitigation measures are included to reduce these impacts to less-than-significant levels. No additional mitigation measures beyond those already identified would be required.

With the implementation of mitigation measures included in other sections of this document and for these reasons discussed above, it has been determined that the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. It has also been determined that the proposed project would not require new or physically altered governmental facilities, other than those proposed by the project, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks*? Less Than Significant with Mitigation Incorporated

The project proposes improvement of the existing EHS athletic facility in the City of Eureka. The proposed project is not of the nature to increase student enrollment at EHS or cause other growth-inducing impacts that would require new or physically altered park facilities in order to maintain acceptable performance objectives.

The proposed improvements to the EHS athletic facilities would result in physical impacts to the surface and subsurface of the project site. These impacts are considered to be part of the project's construction phase and are evaluated in other sections of this document including, Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Hazards and Hazardous Materials (Section IX), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (XVIII). In instances where significant impacts have been identified, mitigation measures are included to reduce these impacts to less-than-significant levels. No additional mitigation measures beyond those already identified would be required.

With the implementation of mitigation measures included in other sections of this document and for these reasons discussed above, it has been determined that the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. It has also been determined that the proposed project would not require new or physically altered governmental facilities, other than those proposed by the project, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

The project proposes improvement of the existing EHS athletic facility in the City of Eureka. The proposed project is not of the nature to increase student enrollment at EHS or cause other growth-inducing impacts that would require new or physically altered public facilities in order to maintain acceptable performance objectives.

For these reasons, it has been determined that the proposed project would not require new or physically altered governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. Therefore, the proposed project would have no impact on this resource category.

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Protect Siskiyou Checkerbloom)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Seasonal Limitation on Work in Active Channel)

Mitigation Measure BIO-4 (Protect Riparian Habitat)

Mitigation Measure BIO-5 (Mitigate for Riparian Habitat Impacts)

Mitigation Measure BIO-6 (Protect Small Fruit Bullrush Marsh)

Mitigation Measure BIO-7 (Mitigate for Impacts to Small Fruit Bullrush Marsh)

Mitigation Measure BIO-8 (Mitigate for Tree Removals)

Mitigation Measure BIO-9 (Protect Wetlands)

Mitigation Measure BIO-10 (Mitigate for Wetland Impacts)

Mitigation Measure CR-1 (Field House Reconstruction)

Mitigation Measure CR-2 (Technology Center and Field House Documentation)

Mitigation Measure CR-3 (Inadvertent Discovery Protocol for Archaeological Resources)

Mitigation Measure CR-4 (Inadvertent Discovery Protocol for Human Remains)

Mitigation Measure GEO-1 (Adherence to Geologic Hazard and Geotechnical Investigation Recommendations)

Mitigation Measure GEO-2 (Inadvertent Discovery Protocol for Paleontological Resources)

Mitigation Measure HM-1 (Stockpile and Test Excavated Material Before Transport Offsite)

Mitigation Measure HWQ-1 (Best Management Practices)

Mitigation Measure HWQ-2 (Synthetic Turf Surfaces)

Mitigation Measure HWQ-3 (Heel Safe Trench Drain Grates)

Mitigation Measure NO-1 (Construction Noise Limitations)

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

Setting: The project site is located in the City of Eureka. The City of Eureka maintains a network of parks and other recreational facilities distributed throughout the City. Eureka's parks have varied facilities and offer many recreational and educational opportunities. The project site is not adjacent to or in immediate proximity to City parks and recreational facilities. However, parks and recreational facilities nearest the project site include Carson Park and Playground, Eureka Dog Park, Ryan Building (Youth Center), and Hammond Park and Playground (City of Eureka, 2018).

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

a) *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?* Less-Than-Significant Impact

The project proposes improvement of the existing EHS athletic facilities. The proposed project is not of the nature to increase student enrollment at EHS or cause other growth-inducing impacts that would increase the use of existing parks or other recreational facilities such that physical deterioration of these facilities would occur or be accelerated.

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

b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which will have an adverse physical effect on the environment?* Less-Than-Significant Impact with Mitigation Incorporated

The project proposes improvement of the existing EHS athletic facilities. The proposed improvements to the EHS athletic facilities would result in physical impacts to the surface and subsurface of the project site. These impacts are considered to be part of the project's construction phase and are evaluated in other sections of this document including, but not limited to, Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Hazards and Hazardous Materials (Section IX), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (XVIII). In instances where significant impacts have been identified, mitigation measures are included to reduce these impacts to less-than-significant levels. No additional mitigation measures beyond those already identified would be required.

With the implementation of mitigation measures included in other sections of this document and for these reasons discussed above, it has been determined that the proposed project would not result in adverse physical effects on the environment from the construction or expansion of recreational facilities. Therefore, the proposed project would have a less-than-significant impact with mitigation incorporated on this resource category.

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Protect Siskiyou Checkerbloom)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Seasonal Limitation on Work in Active Channel)

Mitigation Measure BIO-4 (Protect Riparian Habitat)

Mitigation Measure BIO-5 (Mitigate for Riparian Habitat Impacts)

Mitigation Measure BIO-6 (Protect Small Fruit Bullrush Marsh)

Mitigation Measure BIO-7 (Mitigate for Impacts to Small Fruit Bullrush Marsh)

Mitigation Measure BIO-8 (Mitigate for Tree Removals)

Mitigation Measure BIO-9 (Protect Wetlands)

Mitigation Measure BIO-10 (Mitigate for Wetland Impacts)

Mitigation Measure CR-1 (Field House Reconstruction)

Mitigation Measure CR-2 (Technology Center and Field House Documentation)

Mitigation Measure CR-3 (Inadvertent Discovery Protocol for Archaeological Resources)

Mitigation Measure CR-4 (Inadvertent Discovery Protocol for Human Remains)

Mitigation Measure GEO-1 (Adherence to Geologic Hazard and Geotechnical Investigation Recommendations)

Mitigation Measure GEO-2 (Inadvertent Discovery Protocol for Paleontological Resources)

Mitigation Measure HM-1 (Stockpile and Test Excavated Material Before Transport Offsite)

Mitigation Measure HWQ-1 (Best Management Practices)

Mitigation Measure HWQ-2 (Synthetic Turf Surfaces)

Mitigation Measure HWQ-3 (Heel Safe Trench Drain Grates)

Mitigation Measure NO-1 (Construction Noise Limitations)

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

Setting: The project site is currently developed with outdoor athletics facilities and educational facilities at EHS in the City of Eureka. The project sites includes two distinct areas of EHS, including Albee Stadium and Bud Cloney Field. Del Norte Street bisects the project site, separating Albee Stadium from Bud Cloney Field. The City of Eureka has identified Del Norte Street as a "Major Collector," which includes "*Two lane medium-speed, medium volume roadways that connect arterials to local streets and accommodate intra-city travel. Provide access within and between neighborhoods"* (City of Eureka, 2018).

It is estimated that EHS has used Albee Stadium since before 1946 and Bud Cloney Field since before 1983 for a range of athletic events. However, athletic facilities at the project site are in an aging and deteriorated condition and portions of the project site have become compromised as the result of a critical failure of the underlying storm drain system (such as sinkholes, etc.). Hazardous conditions at the project site have made the existing athletic facilities unsuitable to host athletic events, and since 2019, events that were typically held at the project site have been temporarily relocated to offsite locations. Offsite athletic events resulted in the temporary diversion of student, parent, and spectator from EHS to offsite locations. For the purpose of this analysis, the CEQA baseline predates 2019 and includes EHS athletic events held at the project site. The discussion and analysis below includes information related to the CEQA baseline and typical use of the project site.

Parking Facilities

Paved driveways from Del Norte Street provide vehicular access to Albee Stadium and Bud Cloney Field. Vehicular access is limited by perimeter fencing and associated gates at driveway entrances to Albee Stadium and Bud Cloney Field. Existing parking facilities at the project site are limited and include ADA and faculty/maintenance crew parking. During typical athletic events, parking typically occurs along Del Norte Street, at the EHS main campus, and/or throughout adjacent neighborhood roadways. Parking facilities at the EHS main campus are accessed by way of Del Norte Street and K Street, and provide parking spaces for staff, students, and visitors.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a network of sidewalks, crosswalks, and curb ramps provide access for pedestrians in the vicinity of the proposed project. Most notably, Del Norte Street is developed with sidewalks on both sides of the roadway From the C Street (west) to Gates Street (east). Pedestrian-scale street lighting is intermittently provided along Del Norte Street.

Pedestrian access to Albee Stadium and Bud Cloney Field is limited by perimeter fencing and associated entry gates. However, when entry gates are opened, Albee Stadium can be accessed by pedestrian pathways from Del Norte Street and the EHS main campus. Similarly, Bud Cloney Field can be accessed by pedestrian pathways from Del Norte Street. Additionally, internal pedestrian pathways provide access between high use areas, such as bathrooms, spectator seating, etc. The aforementioned pedestrian facilities between EHS main campus and the project site are frequently utilized by EHS students (such as, spectators and athletes) to access the site after normal school hours.

Bicycle Facilities

The project site contains bicycle racks at multiple locations for secure bicycle parking. In the project area, Class II Bikeways (Bicycle Lanes) are located along J Street, west of the project site and adjacent to the EHS main campus. The City of Eureka General Plan provides the following definition for Class II bikeways: *" Provides a restricted right-of way and is designated for the use of bicycles with a striped lane on a street or highway. Vehicle and pedestrian cross-flow are permitted"* (City of Eureka, 2018). The Class II Bikeways along J Street provide north-south connections.

Transit Systems
ECS offers a limited number of bus routes within established busing zones for enrolled students. Additional public transit opportunities are available through Humboldt Transit Authority (HTA), a joint powers authority between Humboldt County and the cities of Arcata, Eureka, Fortuna, Rio Dell and Trinidad. Included is the Eureka Transit Service (ETS), which provides fixed bus route systems within and around the City of Eureka, operating several routes in a circular pattern. The nearest ETS bus stop to the project site is located at I and Del Norte Street. For those who are unable to use a fixed route bus system due to a physical or mental disability, City of Eureka Dial-A-Ride, or paratransit, is available through certification.

Transportation Plans and Policies
The ECS has not developed any transportation plans or policies that are applicable to the proposed project. The City of Eureka General Plan contains policies related to the performance of the circulation system for vehicular and non-vehicular modes of transportation. The proposed project is located on ECS property under the authority of the State of California. Per Government Code Section 53094, the ECS adopted Resolution #20-21-014 on September 17, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements.

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

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

The project proposes improvement of an existing EHS athletic facility in the City of Eureka. As noted in the Transportation Setting, the proposed project is located on ECS property under the authority of the State of California. Per Government Code Section 53094, the ECS determined the proposed project is exempt from local regulations, ordinances, and requirements.

Vehicular Facilities
The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. The proposed project includes the improvement of internal pedestrian facilities and the expansion of vehicle parking facilities at Bud Cloney Field. The expanded parking facilities would be accessed from Del Norte Street similar to existing drive aisles and parking facilities that serve the site. Operation of the proposed project would not increase the student population or result in any new uses that would generate new or increased vehicle trips. Therefore, the proposed project would not significantly increase congestion on Del Norte Street in a manner that would conflict with the local or regional roadway system.

Pedestrian Facilities
The project proposes to install and maintain internal pedestrian facilities between onsite locations, Del Norte Street, and the EHS main campus. These pedestrian facilities would improve connectivity throughout the project site and immediate vicinity. Therefore, impacts to pedestrian facilities from the proposed project would be less than significant.

Bicycle Facilities
The proposed project will replace or otherwise provide bicycle racks at the project site for secure bicycle parking. The proposed project will not otherwise impact bicycle facilities in the project vicinity. Therefore, impacts to bicycle facilities from the proposed project would be less than significant.

Transit Facilities
The nearest ETS bus stop to the project site is located at I and Del Norte Street. For those who are unable to use a fixed route bus system due to a physical or mental disability, City of Eureka Dial-A-Ride, or paratransit, is available through certification. The project proposes to remedy hazardous conditions at the project site in order to allow use of the site to continue in a manner consistent with the CEQA baseline. The proposed project is served by transit facilities but would not be responsible for a significant number of new transit trips. Therefore, impacts to transit facilities from the proposed project would be less than significant.

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

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

Vehicle miles traveled (VMT) represents the total number of daily miles driven by persons traveling to and from a defined geographic area. Many factors affect VMT, including the average distance residents commute to land use projects. CEQA Guidelines Section 15064.3, subdivision (b) indicates that land use projects would have a significant impact if the project resulted in VMT exceeding an applicable threshold of significance. It further notes that if existing models or methods are not available to estimate the vehicle miles traveled for the project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. VMT guidelines have not been adopted by any jurisdiction in Humboldt County and, therefore, a qualitative analysis is appropriate.

The project site is currently developed with outdoor athletics facilities and educational facilities and would continue to function as such under the proposed project. Hazardous conditions at the project site have temporarily relocated athletic events to various offsite locations. The project proposes to remedy hazardous conditions at the project site in order to allow use of the site to continue in a manner consistent with the CEQA baseline. Therefore, the proposed project would not result in a substantial change of use at the site that would increase VMT.

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

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

The project proposes improvement of existing EHS athletic and educational facilities in the City of Eureka. No offsite improvements are proposed or required to implement the proposed project. The project would not change roadway geometry that could increase hazards related to design features. Additionally, the proposed project would not change the existing land use of the site, as the site is currently developed to support EHS athletic and educational programs. Therefore, construction and operation of the proposed project would not result in use of vehicles or equipment, such as farm equipment or tractors, that would be incompatible with existing land uses in the surrounding area.

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

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

The project proposes improvement of existing EHS athletic and educational facilities in the City of Eureka. The proposed project is not of the nature to substantially impact emergency access. Similar to the existing conditions, access to the proposed project would occur through drive aisles from Del Norte Street. The proposed drive aisles and parking facilities will be designed to meet emergency access standards and accommodate the onsite maneuvering of emergency vehicles. Emergency responders would have adequate access to reach the site in case of an emergency. Furthermore, emergency lighting will be added from bleachers and buildings to stadium exits or safe dispersal area in the case of power outages or other emergencies. Proposed emergency lighting will promote simultaneous emergency evacuation and emergency response.

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

Mitigation Measures: No mitigation measures require implementation for the project to result in a less-than-significant impact to Transportation.

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

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

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

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

A Historical Resources Investigation was completed for the proposed project by William Rich and Associates (WRA). The purpose of this investigation was to document whether significant archaeological or historic period-built environment cultural resources, defined as an Historical Resource or Tribal Cultural Resource in the CEQA Guidelines Title 14 California Code of Regulations (CCR) Section 15064.5(a), are present within the proposed project area. This was completed by performing research of existing information, outreach to Wiyot area tribes and local historical societies, an archaeological field survey, and an evaluation of the historical buildings and structures in the project area (WRA, 2020).

The project site is located in the City of Eureka, which is located within the indigenous territory of the Wiyot people. At the time that Euro-Americans first settled in this region, the Wiyot Tribe held the coastal lands surrounding Humboldt Bay. They were divided into three principal groups, the Patawat, who lived in the villages on the lower Mad River, the Wiki on Humboldt Bay, and the Wiyot along the lower Eel River. It is the name of the Eel River division, which is now used exclusively in accounts pertaining to the entire group (WRA, 2020).

Wiyot stone tool technology included flaked stone knives, projectile points, and other tools made from obsidian, basalt and silicates. Groundstone tools included club heads, pipes, and charms, and mortars with a shallow grinding basin and long cylindrical pestles used for grinding acorns. Steatite was much used for making ornaments, toys, and bowls. Beads manufactured from bone, shell, and steatite were used for ornamentation. Wood and bone were used for a variety of tools and weapons, bows, arrow shafts and points, hide preparation tools, fishhooks, pipes, musical instruments, food serving utensils, gaming pieces, hairpins, awls, and punches. Dugout canoes and paddles were routinely made with redwood (WRA, 2020).

Several Wiyot villages and archaeological sites were mapped along the shore of the bay around a century ago, north and west of the project area. The closest known Wiyot habitation sites to the project site occupied the edge of the intertidal zone near the small sloughs now known as First Slough and Target North Slough, about a mile northeast of the project site. However, none of these sites occur within one-half mile of the proposed undertaking. There are no known Wiyot sites, places of importance, or other cultural resources in the project area (WRA, 2020).

ECS requested a list of regional tribes from the Native American Heritage Commission (NAHC). Registered Professional Archaeologist, William Rich, M.A. invited the Wiyot area tribes to coordinate on field survey and archaeological identification efforts at this project location. This outreach was provided by an emailed letter on September 4, 2020 to Tribal Historic Preservation Officers (THPO) Janet Eidsness of the Blue Lake Rancheria, Erika Cooper of the Bear River Band of the Rohnerville Rancheria, and Chairman Ted Hernandez of the Wiyot Tribe. Under Assembly Bill (AB) 52, Eureka City Schools sent notification letters to these same local Native American tribes on October 19, October 21, and November 5, 2020. Responses were received from the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria requesting that an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation (ECS, 2020a).

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

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

The project site includes land that was cleared, in-filled, and developed between the 1910s and the 1950s for the construction of EHS facilities. This area was described as being densely forested prior to being cleared in the late 19th century. The Historical Resources Investigation prepared for the proposed project concludes that no Native American archaeological sites, features, or other cultural resources were identified during the investigation, nor have any been identified in the adjacent vicinity during past survey efforts. This does not, however, preclude the potential for these types of resources to be present at this location, due to the proximity to a perennial watercourse in Cooper Creek that drains directly to Humboldt Bay where associated Wiyot sites are known to occur. The location, being situated in the upper canyon of a small stream flowing into Humboldt Bay, could contain archaeological deposits wherever intact soils are present, including along the eastern and western margins of the project area, where imported fill is more shallow or where intact landforms are present.

ECS requested a list of regional tribes from the NAHC. Registered Professional Archaeologist, William Rich, M.A. invited the Wiyot area tribes to coordinate on field survey and archaeological identification efforts at this project location. This outreach was provided by an emailed letter on September 4, 2020 THPO Janet Eidsness of the Blue Lake Rancheria, Erika Cooper of the Bear River Band of the Rohnerville Rancheria, and Chairman Ted Hernandez of the Wiyot Tribe. Under AB 52, Eureka City Schools sent notification letters to these same local Native American tribes on October 19, October 21, and November 5, 2020. Responses were received from the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria requesting that an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation (ECS, 2020a).

Although the Historical Resources Investigation suggests that it would be relatively unlikely, because of prior disturbances, to encounter intact buried archaeological materials at this location during implementation of the proposed project, Tribal representatives requested an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation. Therefore, implementation of an Inadvertent Discovery Protocol shall be required as **Mitigation Measure CR-3** (see Cultural Resources [Section V]). The Historical Resources Investigation concludes that with implementation of **Mitigation Measure CR-3**, the proposed project would not result in a substantial adverse change to archaeological resources (WRA, 2020).

With the implementation of **Mitigation Measure CR-3**, it has been determined that the proposed project will not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of*

the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.? Less Than Significant with Mitigation Incorporated

As discussed under subsection a), an Historical Resources Investigation was prepared for the proposed project by WRA and pursuant to AB 52 notification letters regarding tribal consultation were sent to the Wiyot Tribe, Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, Karuk Tribe, and Trinidad Rancheria. Tribal representatives requested an Inadvertent Discovery Protocol be implemented in the instance that Native American or historic period archaeological materials are inadvertently unearthed during project implementation. For all other construction activities, implementation of an Inadvertent Discovery Protocol shall be required as **Mitigation Measure CR-3** (see Cultural Resources [Section V]). The Historical Resources Investigation concludes that with implementation of **Mitigation Measure CR-3**, the proposed project would not result in a substantial adverse change to archaeological resources (WRA, 2020).

With the implementation of **Mitigation Measure CR-3,** the proposed project will not cause a substantial adverse change in the significance of a tribal cultural resource that is that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Mitigation Measure CR-3 (Inadvertent Discovery Protocol) – See Cultural Resources (Section V)

XIX. UTILITIES AND SERVICE SYSTEMS: *Would the project:*	Potentially Significant Impact	Less-Than-Significant with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or 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 or reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Setting: The project site is located at the EHS campus in the City of Eureka. The project proposes improvement of existing stormwater infrastructure and athletic and educational facilities at Albee Stadium and Bud Cloney Field at the EHS campus in the City of Eureka.

Electricity

The project site has existing connections to the electrical grid in the project area, which is maintained and operated by PG&E. However, the District is enrolled in the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program. The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce GHG emissions, and reinvest in local energy infrastructure. The electricity continues to be distributed and delivered through the existing PG&E electrical grid. The CCE program currently procures approximately 47% of its power from renewable and carbon-free sources (RCEA, 2019).

Wastewater

The project site has existing connection to the wastewater collection and treatment system owned and operated by the City of Eureka. All of the wastewater from the City (excluding stormwater runoff) is collected and treated at the Elk River Wastewater Treatment Plant (WWTP) to secondary treatment standards.

Water

The project site has existing connection to the water distribution system operated by the City of Eureka. The City is one of several Public Water Systems that obtains water from a regional wholesale water provider, the Humboldt Bay Municipal Water District (HBMWD), and water supplied to customers in the City consists entirely of water supplied by HBMWD. HBMWD maintains and operates a series of ranney wells that withdraw groundwater from below the bed of the Mad River. HBMWD disinfects the water via chlorination before distributing by pipeline to the City's water treatment complex in Eureka. Water use at the project site includes the irrigation system, fire protection, and drinking water, restroom, and housekeeping appliances.

Stormwater

An existing 30-inch diameter concrete storm drain mainline runs below the entire project site, beginning south of the track, and ending north of the baseball field. This storm drain line conveys the flows in Cooper Gulch under the site. All runoff from the project site drains into Cooper Gulch.

Solid Waste

The project site has existing solid waste collection receptacles. However, there are no existing recycling receptacles to allow separation of recyclable and nonrecyclable materials. Solid waste services are provided by Recology Humboldt County; the sole provider of solid waste collection and removal services for residents living in the City of Eureka, as well as those living in the unincorporated communities adjacent to the City. Humboldt Waste Management Authority (HWMA) is a Joint Powers Authority that provides solid waste processing

and disposal for Eureka, as well as other cities and unincorporated communities throughout Humboldt County. Solid waste is transported to the HWMA Solid Waste Transfer Station in Eureka. Large recyclable materials (scrap metal, wood, and concrete) and hazardous materials (washers, dryers, televisions, tires, etc.) are pulled from the waste stream at the Eureka facility, and the remaining solid waste is shipped to the Dry Creek Landfill in Medford, Oregon and the Anderson Landfill in Anderson, California. There are also recycling drop off centers at Humboldt Sanitation in McKinleyville, Eel River Resource Recovery in Samoa, and HWMA in Eureka.

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

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

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. The proposed improvements include utility infrastructure improvements such as a new stadium lighting system, new power and signal distribution systems for new and existing buildings, stormwater drainage improvements, and new bioretention basins to manage and treat stormwater runoff.

These utility infrastructure improvements would result in physical impacts to the surface and subsurface of the project site. These impacts are considered to be part of the project's construction phase and are evaluated in other sections of this document including, but not limited to, Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Hazards and Hazardous Materials (Section IX), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (XVIII). In instances where significant impacts have been identified, mitigation measures are included to reduce these impacts to less-than-significant levels. No additional mitigation measures beyond those already identified would be required.

With the implementation of mitigation measures included in other sections of this document and based on the information provided above, it has been determined that the proposed project would not result in significant environmental effects from the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. Existing water use at the project site includes an irrigation system, fire protection, and drinking water, restroom, and housekeeping appliances. Water will continue to be supplied by the City of Eureka from its source, HBMWD. Because the proposed project will not substantially alter the existing use of the site, proposed water use is assumed to be consistent with the existing water use. Additionally, water use will likely be reduced due to replacing some natural sod turf surfaces with synthetic turf surfaces. Moreover, HBMWD is not experiencing any water shortage, and has sufficient water supply to carry it through multiple future drought years (HBMWD, 2016).

Based on the information provided above, it has been determined that the proposed project would have sufficient water supplies available to serve the project and/or reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

c) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?* Less-Than-Significant Impact

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. Since the proposed project will not substantially alter the existing use of the site, proposed wastewater generation rates are assumed to be consistent with the existing wastewater generation rates.

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

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

The project site is currently developed with outdoor athletics facilities and educational facilities in the City of Eureka and would continue to function as such under the proposed project. The proposed improvements would generate solid waste during both construction and operation.

Construction

Waste generated from construction activities may include substandard soil/surface materials from grading, materials and spoils from demolition (such as fencing, building materials, etc.), and excess construction materials. Disposal of waste materials generated during construction activities will be required to comply with applicable federal, state, and local regulations. Solid waste generated by construction of the project would be similar to other comparable construction projects in the region or state. There are no unusual project characteristics that would result in the generation of solid wastes in excess of state or local standards or in excess of the capacity of local infrastructure. Due to the temporary nature of the proposed construction activity, it would not have the potential to impair attainment of solid waste reduction goals.

Operation

During operation of the proposed project, solid waste and recyclables would be generated primarily during sporting events at the proposed athletic facility. Solid waste and recyclables generated by the proposed project would continue to be integrated into the EHS and City of Eureka solid waste stream and are not anticipated to generate significant amounts of solid waste above the existing baseline condition. Since the proposed project will not substantially alter the existing use of the site, proposed solid waste generation rates are assumed to be consistent with the existing solid waste generation rates. As such, the proposed project would not result in a significant increase in solid waste generation within the City. Moreover, the proposed project will develop recycling receptacles at the project site, where none currently exist.

Transfer stations and landfills that currently serve Humboldt County have adequate permitted capacity to accommodate the project's solid waste disposal needs. Furthermore, with the project's conformance to applicable federal, state, and local solid waste reduction and recycling measures, the project is not anticipated to impair the attainment of solid waste reduction goals.

Based on the information provided above, it has been determined that the proposed project will 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. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

Recology Humboldt County collects solid waste and recyclables generated at EHS facilities. During operation of the proposed project, the project site would generate solid waste and recyclables, which would continue to be integrated into the EHS and City of Eureka solid waste stream. As discussed under subsection d), the proposed project would not result in a significant increase in solid waste generation within the City. Moreover, the proposed project will develop recycling receptacles at the project site, where none currently exist.

Based on the information provided above, it has been determined that the proposed project will comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Protect Siskiyou Checkerbloom)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Seasonal Limitation on Work in Active Channel)

Mitigation Measure BIO-4 (Protect Riparian Habitat)

Mitigation Measure BIO-5 (Mitigate for Riparian Habitat Impacts)

Mitigation Measure BIO-6 (Protect Small Fruit Bullrush Marsh)

Mitigation Measure BIO-7 (Mitigate for Impacts to Small Fruit Bullrush Marsh)

Mitigation Measure BIO-8 (Mitigate for Tree Removals)

Mitigation Measure BIO-9 (Protect Wetlands)

Mitigation Measure BIO-10 (Mitigate for Wetland Impacts)

Mitigation Measure CR-1 (Field House Reconstruction)

Mitigation Measure CR-2 (Technology Center and Field House Documentation)

Mitigation Measure CR-3 (Inadvertent Discovery Protocol for Archaeological Resources)

Mitigation Measure CR-4 (Inadvertent Discovery Protocol for Human Remains)

Mitigation Measure GEO-1 (Adherence to Geologic Hazard and Geotechnical Investigation Recommendations)

Mitigation Measure GEO-2 (Inadvertent Discovery Protocol for Paleontological Resources)

Mitigation Measure HM-1 (Stockpile and Test Excavated Material Before Transport Offsite)

Mitigation Measure HWQ-1 (Best Management Practices)

Mitigation Measure HWQ-2 (Synthetic Turf Surfaces)

Mitigation Measure HWQ-3 (Heel Safe Trench Drain Grates)

Mitigation Measure NO-1 (Construction Noise Limitations)

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

Setting: The project site is currently developed with outdoor athletics fields, educational facilities, and ancillary facilities at Eureka High School (EHS) in the City of Eureka. The project site includes two distinct areas of EHS, including Albee Stadium and Bud Cloney Field. As described in Section 1 (Project Description), primary access to the project site is provided by Del Norte Street. Del Norte Street passes through the project site separating Albee Stadium from Bud Cloney Field. Paved drive aisles from Del Norte Street provide vehicular access to the two sites. The center of project site is relatively flat and developed with the existing outdoor athletics fields, educational facilities, and ancillary facilities. Elevations rise steeply on the east and west sides of the project site, shaping the site into a gulch that drains to the north. The slopes surrounding the project site are dominated by remnant conifer forests. Small channels drain the slopes surrounding the project site. The athletic fields and surrounding slopes flow towards drainage ditches and/or drainage inlets, which ultimately drain to Cooper Creek (also commonly referred to as Cooper Canyon or Cooper Gulch). As discussed in Section IV (Biological Resources), the site also contains wetlands, which primarily occur along the margins of the existing athletic fields and among the surrounding slopes. The topography of the project site and surroundings is attributed to the geomorphic effects of Cooper Creek.

Eureka and its surrounding area are subject to potential fire hazards. The California Department of Forestry and Fire Protection (CALFIRE) maps identify fire hazard severity zones (FHSZ) in state (SRA) and local (LRA) responsibility areas for fire protection. The project site is in an LRA, and regional LRA fire severity maps designate some areas within the City limits as moderate FHSZ, specifically the forested slopes forming Cooper Creek north of the Bud Cloney Field are identified as a moderate FHSZ. As a result of this mapping, portions of Bud Cloney Field are also identified as a moderate FHSZ (CALFIRE, 2007; Humboldt County, 2020a). Fire prevention, fire protection, and emergency medical services are provided by Humboldt Bay Fire (HBF). HBF is a full-service department which provides emergency response and non-emergency public safety services from five fire stations located in and around Eureka. HBF was founded in 2011 through a Joint Powers Authority, which consolidated the former Eureka Fire Department with the Humboldt Fire District to provide service to the City of Eureka and Greater Eureka area (City of Eureka, 2018).

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

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

The project proposes improvement of the existing athletic fields and ancillary facilities at Albee Stadium and Bud Cloney Field. Primary access to the project site is provided by paved drive aisles from Del Norte Street. The project proposes to expand onsite parking facilities at the project site. The proposed parking facilities will be designed to meet emergency access standards and accommodate the onsite maneuvering of emergency vehicles. As such, the proposed project will provide improved emergency access to the project site compared to existing conditions. Furthermore, the project site is not located in a very high FHSZ where the risk of emergency response and evacuation due to wildfire is extreme.

Based on the information provided above, it has been determined that the proposed project will not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project proposes improvement of the existing athletic fields and ancillary facilities at Albee Stadium and Bud Cloney Field. The forested slopes north of Bud Cloney Field are identified as medium FHSZ (CALFIRE, 2007; Humboldt County, 2020a). The project site does not exhibit topography, vegetation patterns, or other factors (for example, fuels, aspect, etc.) that would expose people or structures to a significant risk of wildland fires. Furthermore, the proposed project is not of the nature to exacerbate wildfire risks, nor is the project site located in a very high FHSZ where the risk of emergency response and evacuation due to wildfire is extreme.

Based on the information provided above, it has been determined that the proposed project will not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project proposes improvement of the existing athletic fields and ancillary facilities at Albee Stadium and Bud Cloney Field. The project site is within the vicinity of existing water, wastewater, stormwater, electrical, and telecommunication facilities available to service the project. The proposed project would require several access and utility improvements. However, due to the location of the proposed project, the installation or maintenance of these improvements is not of the nature to exacerbate fire risk.

Based on the information provided above, it has been determined that the proposed project will not exacerbate fire risk or result in temporary or ongoing impacts to the environment from the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities). Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project proposes improvement of the existing athletic fields and ancillary facilities at Albee Stadium and Bud Cloney Field. The center of the project site is relatively flat. Slopes surrounding the project site rise steeply on the northern, eastern, and southern sides of the site, shaping the project site into a valley. The slopes surrounding the project site are dominated by remnant conifer forests. Small channels drain the slopes surrounding the project site. The athletic fields and surrounding slopes flow towards drainage ditches and/or drainage inlets, which ultimately drain to Cooper.

The project area is characteristic of an urban environment, with residential neighborhoods, roadways, public facilities, and parks in the vicinity of the project site. The forested slopes north of Bud Cloney Field are identified as medium FHSZ (CALFIRE, 2007; Humboldt County, 2020a). The risk of wildfire in the immediate vicinity of the project site is limited. The proposed project is consistent with the existing use of the site and is not located in an area that would expose people or structures to downslope or downstream flooding or landslides resulting from post-fire slope instability, runoff, or drainage changes.

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

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

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

Discussion: Based on the analysis undertaken as part of this Initial Study – Mitigated Negative Declaration, the following findings can be made:

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

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

Mitigation:

All Mitigation Measures discussed is this document shall apply.

b) *Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection the effects of past projects, the effects of other current projects, and the effects of probable future projects)?* Less Than Significant with Mitigation Incorporated

As discussed throughout this document, the project would not increase the number of sporting and other events held by EHS at the project site but would allow the return of such events which have been limited or suspended due to the deteriorated and unsafe conditions of the project site. As such, most potential impacts from operation of the proposed project are part of the existing baseline condition. The mitigation measures required for the proposed project are primarily to mitigate the impacts of construction activity. Implementation of the proposed project has the potential to result in impacts to the environment that are individually limited, but are not cumulatively considerable, including impacts to air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and tribal cultural resources. In most instances where the project has the potential to result in individually limited significant impacts to the environment (including the resources listed above), mitigation measures have been imposed to reduce the potential effects to less-than-significant levels. In other instances, the project design and compliance with existing laws and regulations would reduce impacts of the project to less-than-significant levels. Therefore, based on the discussion and findings in this document, there is no evidence to suggest that the proposed project would have impacts that are cumulatively considerable.

Mitigation:

All Mitigation Measures discussed is this document shall apply.

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

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

Mitigation Measures: Same as the following Mitigation Measures related to construction and operation of the proposed project:

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Protect Siskiyou Checkerbloom)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Seasonal Limitation on Work in Active Channel)

Mitigation Measure BIO-4 (Protect Riparian Habitat)

Mitigation Measure BIO-5 (Mitigate for Riparian Habitat Impacts)

Mitigation Measure BIO-6 (Protect Small Fruit Bullrush Marsh)

Mitigation Measure BIO-7 (Mitigate for Impacts to Small Fruit Bullrush Marsh)

Mitigation Measure BIO-8 (Mitigate for Tree Removals)

Mitigation Measure BIO-9 (Protect Wetlands)

Mitigation Measure BIO-10 (Mitigate for Wetland Impacts)

Mitigation Measure CR-1 (Field House Reconstruction)

Mitigation Measure CR-2 (Technology Center and Field House Documentation)

Mitigation Measure CR-3 (Inadvertent Discovery Protocol for Archaeological Resources)

Mitigation Measure CR-4 (Inadvertent Discovery Protocol for Human Remains)

Mitigation Measure GEO-1 (Adherence to Geologic Hazard and Geotechnical Investigation Recommendations)

Mitigation Measure GEO-2 (Inadvertent Discovery Protocol for Paleontological Resources)

Mitigation Measure HM-1 (Stockpile and Test Excavated Material Before Transport Offsite)

Mitigation Measure HWQ-1 (Best Management Practices)

Mitigation Measure HWQ-2 (Synthetic Turf Surfaces)

Mitigation Measure HWQ-3 (Heel Safe Trench Drain Grates)

Mitigation Measure NO-1 (Construction Noise Limitations)

References

The following documents were used in preparation of this Initial Study. The reference documents are available from Eureka City School upon request. Please contact the District's Assistant Superintendent by e-mail at zieglerp@eurekacityschools.org.

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