



## Memorandum

**Date:** December 12, 2022  
**Project:** Yreka Carnegie Library Rehabilitation Project  
**For:** Juliana Lucchesi, Planning Director, City of Yreka  
**From:** Erinn Silva, Principal Environmental Planner  
**Subject:** Yreka Carnegie Library Rehabilitation Project  
California Environmental Quality Act Categorical Exemption

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### INTRODUCTION

This memorandum is provided as confirmation that the Yreka Carnegie Library Rehabilitation Project is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Article 19, Categorical Exemptions, Section 15331, Historical Resources Restoration/Rehabilitation (Class 31). Class 31 consists of projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. As specified in CEQA Guidelines, Article 19, Categorical Exemptions, Section 15300.2, the exemption is negated by an exception under any of the following circumstances:

- a) **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment, be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b) **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time, is significant.
- c) **Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d) **Scenic Highways.** A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- e) **Hazardous Waste Sites.** A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- f) **Historical Resources.** A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

## PROJECT DESCRIPTION

### *Introduction*

The City of Yreka (City/Yreka), in cooperation with the Siskiyou County Economic Development Council (SCEDC), proposes to rehabilitate the original Yreka Carnegie Library Building, located on the western edge of Yreka's downtown, at 412 West Miner Street (project) (see **Attachment A**, Regional Location and **Attachment B**, Project Location). The Assessor's Parcel Number is 053-352-160 (project area), and the parcel is designated as a Historic District land use in the Yreka General Plan (City of Yreka, 2002). The building would be used as a shared office and public meeting space following rehabilitation to create an adaptive reuse project with new workspaces and a conference venue, serving as a catalyst for community investment. The City and SCEDC were awarded a Community Development Block Grant from the California Department of Housing and Community Development for implementation of the project.

### *Background*

The one-story building was constructed in 1915 and is owned by the City. Construction of the library was originally funded by Andrew Carnegie and operated as the City of Yreka library from 1915 until 1970. The Yreka Carnegie Library was individually listed in the National Register of Historic Places (NRHP) in 1992 as part of the California Carnegie Libraries Multiple Property Listing at the local level of significance under Criteria A<sup>1</sup> and C<sup>2</sup> within the context of "Carnegie Library Development in California and the Architecture it Produced, 1899-1921."

In 1980, the building changed from operating as Yreka's library to Yreka's police department station. The building served as the police station until 2019. Since then, the building has been vacant. The building's exterior remains largely intact and in good to fair condition; however, the building's interior was altered when it was converted into the Yreka Police Department. Alterations included installation of fluorescent light fixtures, carpeting, drop ceilings, partition walls to reconfigure the interior space, and an addition in the rear of the building.

### *Proposed Improvements*

The project would be designed to preserve and restore exterior features and remaining interior spaces that are original, architecturally distinctive, and character-defining. Remaining character-defining features, finishes, and materials on the interior and exterior would be preserved throughout and cleaned and repaired as necessary. Non-character-defining features and spaces would be reconfigured for new commercial and office tenants, and new features, finishes, and materials that are compatible with the building's historic and architectural character will be installed as required. No new additions are proposed to the building. During construction the building would be shored-up to reinforce the structure.

As a historic property on the NRHP, rehabilitation of the building will comply with the Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Rehabilitation pursuant to 36 Code of Federal Regulations 67 (Standards) and the State Historical Building Code (SHBC).

### Exterior Improvements

Rehabilitation would be needed on all four elevations (see **Attachment C**, Exterior Elevations). The proposed exterior rehabilitation of the Yreka Carnegie Library would include removing and replacing all

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<sup>1</sup> The library derives its significance under Criterion A from its association with the history of library development in California.

<sup>2</sup> The library derives its significance under Criterion C for exemplifying a specialized building type resulting from Andrew Carnegie's library philanthropy and popular styles of that era.

non-original windows and doors on the (non-original) rear addition in new openings, and constructing a new exterior balcony and patio on the north elevation and a new Americans with Disabilities Act (ADA)-compliant ramp along the west elevation to accommodate a new accessible entrance to the main lobby area. To create the new ADA-compliant entrance on the west elevation, an original window opening on the west elevation would be reconfigured to fit a new door that would be accessed by the proposed ramp. The existing basement-level door opening on the west elevation would be behind the proposed ADA-compliant ramp, and therefore would be infilled. The project would include improvements to exterior landscaping and parking lot to attract the community, local businesses, and visitors. Removable planters would be added to the existing asphalt to delimit a new patio space under the proposed balcony on the northern elevation. Ground disturbing activities would be limited to the installation of the balcony support posts and construction of the ADA ramp, for a maximum excavation depth of 24 inches. Landscaping and related irrigation improvements would be aboveground.

In addition to the proposed rehabilitation plans, general building maintenance and repairs would occur on all elevations. This would include the following:

- Repair and repaint original cement plaster (south, east, and west elevations);
- Repair and restore original decorative cornice around roof (south, east, and west elevations);
- Repair parapet (all elevations);
- Repair and repaint window and door trim (south, east, and west elevations);
- Repair and repaint existing window sashes (south, east, and west elevations); and
- Repair damaged, cracked, or broken glazing (all elevations).

### Interior Improvements

The proposed interior rehabilitation includes creating new office spaces on the main floor of the original building, and an open-plan work area and conference venue within the rear addition.

Rehabilitation of the main floor of the original building would include lead and asbestos abatement, upgrades to the existing restrooms, and removal of non-original partition walls. Other existing spaces would be converted to new office uses. Non-original features like florescent lighting, drop ceilings, and carpeting will be removed and replaced with a more historically compatible replacements or restored based on documentary evidence, if feasible. Original features like the wood trim and wood wall paneling and shelving would be retained and repaired as needed.

The first floor of the non-original addition would be reconfigured to include a lobby, kitchen, accessible bathroom, and conference room. The second floor would consist of an open floorplan with at least twelve individual workspaces. All existing (non-original) walls, fixtures and finishes within the addition would be removed and replaced.

Substantial structural and system upgrades are also needed to facilitate the building's rehabilitation and will necessitate certain changes to the building. Improvements include electrical work, heating, ventilation, and air conditioning upgrades, and building envelope repair.

## **FINDINGS AND CONCLUSIONS**

### ***a. Location.***

Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment, be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely

mapped, and officially adopted pursuant to law by federal, state, or local agencies. The project is not under a Class 3, 4, 5, 6, or 11 exemption; therefore, this exception would not apply.

**b. Cumulative Impact.**

This exception applies when, although a particular project may not have a significant impact, the cumulative impact of successive projects of the same type in the same place, over time is significant. **Table 1** provides a summary of projects within two miles of the project area that have potential to be constructed at the same time as the project.

**Table 1. Projects Within Two Miles**

Project	Project Description	Project Location in Relation to Project Site	Project Status
State Route 3 Yreka Rehabilitation	This project includes pavement rehabilitation, lighting planters, vegetation and textured sidewalks and crosswalks along State Route 3, also known as Main Street.	This project is located approximately 0.15 mile east of the project area.	The project is anticipated to be completed in 2024.
Flood Hazard Reduction	This project includes lowering and widening the current floodplain, moving and replacing several buildings, and replacing a vehicular bridge across Yreka Creek.	This project is located approximately two miles southwest of the project area.	This project is anticipated to be completed in summer 2023.
Yreka Travel Center and Hotel	This project includes the construction of a convenience store, restaurant, Arco AM/PM gas station, diesel station, a food court with several restaurants, a bar, an exterior patio, laundry, showers, restrooms, and a truck shop.	This project is located approximately 0.75 mile northeast of the project area.	The project construction dates and duration are not known.

Source: (City of Yreka, 2022a; City of Yreka, 2022b; California Department of Transportation, 2022)

There are three projects within two miles of the project area. The State Route 3 Yreka Rehabilitation, Flood Hazard Reduction, and the Yreka Travel Center and Hotel projects could be constructed at the same time as the project. However, the project would have temporary negligible impacts on the environment during construction. In addition, the project would not result in operational impacts on the environment. Therefore, the project would not result in any impacts that are cumulatively considerable, and this exception would not apply.

**c. Significant Effect Due to Unusual Circumstances.**

This exception applies when there is a reasonable possibility that the project would have a significant effect due to unusual circumstances. In this case, there are no unusual circumstances. The project is not located within an area with a substantial slope. Additionally, the project area is not within a landslide hazard area (City of Yreka, 2002). The project is located in the Greenhorn Fault Zone. The Uniform Building Code places the project area in Seismic Zone 3, which is defined as an area of potentially major damage from earthquakes corresponding to intensity VII on the Modified Mercalli Scale (California Department of Conservation, n.d.; City of Yreka, 2002). However, the project includes seismic retrofit, and would reduce risk of injury in an earthquake, compared to existing conditions of the building. In addition, the project is in an area susceptible to 0.2 percent annual chance of flooding, according to the Federal Emergency Management Agency and is susceptible to localized flooding, according to the City’s General Plan (City of Yreka, 2002; Federal Emergency Management Agency, 2012). However, the project does not include any features that would increase risk due to flooding. The project area does not contain sensitive resources such as: scenic resources, special status species or habitat, tribal land, or mineral resources. There is not a reasonable possibility that the activity could have a significant effect due to unusual circumstances on the environment; therefore, this exception would not apply.

**d. Scenic Highways.**

A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. State Route 299, located approximately 0.10 mile east of the project, is eligible for official designation. However, the project would not be visible from State Route 299. Additionally, the project is not within the state or county scenic highways system (California Department of Transportation, 2021). The project area is designated as a Historic District land use (City of Yreka, 2002). Exterior improvements would reflect the building's historic designation and would comply with the City ordinance protecting the scenic value of the Historic District. The project would be designed to preserve the aesthetic value the building possesses as a historic resource. No other scenic resources are within the project area, including trees and rock outcroppings. Therefore, this exception would not apply.

**e. Hazardous Waste Sites.**

This exception applies when a project is located on a site listed as a hazardous waste site under Government Code Section 65962.5. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop a list of hazardous material release sites and update it at least once a year. According to the State Water Resources Control Board GeoTracker database and the California Department of Toxic Substance Control (DTSC) Envirostor database, the project area contains no hazardous material release sites pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control, 2022; State Water Resources Control Board, 2022). In addition, a Phase II Environmental Site Assessment (ESA) was performed to assess the potential presence of contaminants in the soil and groundwater within the project area. No contaminants were identified in the soil. Since hazardous waste sites are not located within the project area, this exception would not apply.

The Phase II ESA prepared for the project identified the following recommendations:

- All asbestos-containing materials containing one percent or more asbestos would be removed by a licensed asbestos abatement contractor registered with the California Division of Occupational Safety and Health (Cal/OSHA).
- Disturbance activities associated with renovation or demolition of asbestos-containing materials containing less than one percent would be performed by licensed contractor registered with Cal/OSHA.
- Contractors would be responsible for informing the landfill of the contractor's intent to dispose of asbestos waste. Some landfills may require additional waste characterization. Contractors would be responsible for segregating and characterizing waste streams prior to disposal.
- Contractors would be notified of the presence of asbestos in their work areas prior to conducting demolition, renovation, or related activities. The notification would include a copy of the Phase II ESA and a list of asbestos removed during subsequent abatement activities. Contractors would be instructed not to disturb asbestos during their work.
- Written notification to USEPA Region 9 would be submitted 10 working days prior to commencement of any demolition activity and for renovation activities involving specific quantities of regulated asbestos containing materials.
- In accordance with Title 8, CCR 341.9, written notification to the nearest Cal/OSHA district office would be submitted at least 24 hours prior to certain asbestos-related work.

- All paints on the site structure would be treated as lead-containing for purposes of determining the applicability of the Cal/OSHA lead standard during maintenance, renovation, or demolition activities.

**f. Historical Resources.**

This exception applies when a project may cause a substantial adverse change in the significance of a historical resource. The project area is designated as a Historic District land use. In addition, the building is listed as a historic property on the NRHP. The building's exterior remains largely intact and in good to fair condition; however, the building's interior was altered when it was converted to the Yreka Police Department.

A Historical Structures Report (HSR) was prepared to identify the most appropriate treatment for rehabilitation of the resource, and to verify that improvements would be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The project would be designed to protect existing historic fabric while allowing for compatible changes. Interior features, finishes, and materials that are not character defining which detract from its historic and architectural significance would be removed. The project would comply with the Standards and the SHBC throughout rehabilitation. These improvements would support the building's historic use as a library. Since the improvements as outlined in the HSR can be made in compliance with the Standards, the project would qualify for Categorical Exemption Class 31 and there would be no adverse change to the resource.

The project would include limited and minimal ground disturbance for the irrigation system, balcony support posts, and ADA ramp. All ground disturbance would be on previously disturbed land and would not be extensive in depth. The General Plan did not identify any areas that have a high likelihood of buried resources (City of Yreka, 2002). Project construction would adhere to Section 7050.5 of the California Health and Safety Code, which requires construction or excavation be stopped in the vicinity of discovered human remains until the City coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the California Native American Heritage Commission. In addition, the project would comply with CEQA Guidelines Section 15064.5 which specify the procedures to be followed in case of the discovery of human remains on non-federal land. Therefore, the project is not expected to result in disturbance of any buried resource. The project would not result in adverse changes in the significance of a historical resource, and this exception would not apply.

## REFERENCES

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**Attachment A Regional Location**



**Attachment B Project Location**

**Attachment C Exterior Elevations**