

June 2023 | Mitigation Monitoring and Reporting Program

GLEN PAUL SCHOOL MODERNIZATION PROJECT

Humboldt County Office of Education

Prepared for:

Humboldt County Office of Education

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1. Introduction

The Humboldt County Office of Education (HCOE) intends to construct a new single-story building with classrooms, single-story administration facility building, and reconstruct and modernize a multi-use building on the existing Glen Paul School property, located at 2501 Cypress Avenue, Eureka, in Eureka, California.

1.1 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

HCOE is the lead agency for the proposed Glen Paul School Modernization Project (proposed project) and has developed this Mitigation Monitoring and Reporting Program (MMRP) as a vehicle for monitoring mitigation measures outlined in the Glen Paul School Modernization Project Mitigated Negative Declaration (MND), State Clearinghouse No. 2023050012. As the lead agency, HCOE is responsible for implementing the MMRP, which has been prepared in conformance with Section 21081.6 of the California Public Resources Code:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
 - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, and/or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the MND and drafted to meet the requirements of California Public Resources Code, Section 21081.6.

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1.2 PROJECT CHARACTERISTICS

1.2.1 Project Location

The project site is located outside of Eureka City-limits, in an unincorporated area known as Cutten. Located within the City's sphere of influence, Cutten is located approximately 2.5 miles south-southeast of Downtown Eureka and encompasses a total area of 1.3 square miles. The Community of Cutten is located along the northern coast of California in northern Humboldt County approximately 300 miles north of San Francisco and 100 miles south of the Oregon border. The Community of Cutten is approximately 6 miles south of the City of Arcata and approximately 14 miles north of the City of Fortuna. Cutten is located between the inner shoreline of Humboldt Bay and surrounding timber and agricultural lands. The areas closest to Humboldt Bay are at or near sea-level, gaining approximately 200 feet of elevation inland, which characterizes the area as having relatively low and unchanging topography. While the project site is within the City of Eureka's sphere of influence it remains within the jurisdiction of Humboldt County.

The approximately 3-acre project site is northeast of Cypress Avenue. The project site is comprised of two parcels — Assessor Parcel Numbers 017-071-005 and 017-071-006. Regional access to the project site is provided via Interstate (I-) 101. I-101 intersects Eureka from north to south. Local access to the project site is via Walnut Street and Cypress Avenue.

1.2.2 Proposed Improvements

The proposed project involves the construction of a new single-story classroom building, single-story administration facility building, and reconstruction and modernization of a multi-use building on the existing Glen Paul School property. Glen Paul School would continue to serve as HCOE's public special education school designed to meet the special education needs of children and youth from ages 3 to 22 in the Humboldt Community. Currently, the student population is approximately 80 students. school would serve up to approximately 130 students. The anticipated enrollment for fall 2023 is approximately 104 to 130 students.

The newly constructed classroom building would provide four classrooms, two shared offices, and eight restrooms. The newly constructed administration facility building would provide a principal's office, two speech therapist offices, two psychology offices, speech aid office, data clerk office, conference room, staff lounge, work room, IT office, two restrooms, janitor room, and storage and electrical room. These two buildings would be connected as one building with a covered walkway between and encompass approximately 8,456 square feet. The footprint of the multi-use building would not change, and the area demolished and reconstructed would be approximately 9,000 square feet and provide a multi-use room, multi-use therapy room, conference room, principal's office, reception office, speech office, speech therapy room, three offices, two staff restrooms, two dressing rooms, kitchen and pantry, storage room, laundry room, janitor room.

Architecturally and functionally, the classroom building would be designed and constructed as a single-story building (with a height of 18 feet and four inches) that would connect pedestrians with a covered concrete walkway. Primary entrance to the building would be from the northern side of the building, which faces the playground and walkway. Similarly, the administration facility building would be designed and constructed as a

1. Introduction

single-story building (with heights ranging from 12 feet and six inches to 19 feet and 8 inches) that would connect pedestrians with a covered concrete walkway. Primary entrance to the building would be from the southern end of the building, which faces the parking lot and school entrance. The front entrance of the building would be the tallest portion of the building at approximately 19 feet and 8 inches. The multi-use building would be designed and reconstructed as a single-story building (with a height of 18 feet and four inches) that would connect pedestrians with a covered concrete walkway along the perimeter of the building. Primary entrance to the building would remain unchanged and be from the southern end of the building, which faces the parking lot and drop-off loop.

VEHICULAR ACCESS AND CIRCULATION

Vehicular access for the project site would be provided via Cypress Avenue. Parents and students would continue to use the drop-off loop (in front of the existing multi-use building) or the parking spaces along the front entrance and western portion of the school property. The path of travel and access points would remain unchanged from the existing conditions of the school site. However, parking lot configuration would be changed to accommodate the design and layout of the proposed buildings and to allow for safe and efficient vehicular circulation. Parking spaces in the southern portion of the project site and adjacent to the proposed buildings would become parallel parking spaces.

PEDESTRIAN ACCESS AND CIRCULATION

Pedestrian access to the project site would continue to be provided via a public sidewalk along the northern and southern side of Cypress Avenue, which is adjacent to the project site. There are no designated bike lanes or crosswalks near the school property.

STREET NETWORK, BIKE LANES, AND SIDEWALKS

The following paragraphs provide a brief description of the streets that provide access to the school site, the existing bicycle and pedestrian facilities, and the existing transit service in the area.

Street Network, Bike Lanes, and Sidewalks

Cypress Avenue

Cypress Avenue is a two lane east-west street that extends two blocks from Walnut Street to the Glen Paul School and Winship Middle School campuses. It has parking on both sides of the street and a solid white edge line to separate the travel lanes from the parking areas. This parking area can be used as a bike lane when there are no parked vehicles along the street, but it is technically not a bike lane. Cypress Avenue has sidewalks on both sides of the street that terminate west of the Glen Paul School's access driveway. The speed limit on Cypress Avenue is 25 miles per hour.

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Cedar Street

Cedar Street is a two lane north-south street that intersects with Cypress Avenue 475 feet west of the school campus. The intersection of Cypress Avenue and Cedar Street has stop signs on the north and south approaches of Cedar Street. Cedar Street has sidewalks along both sides of the street that have missing segments at some of the properties. There are no bike lanes on Cedar Street and the speed limit is 25 miles per hour.

Walnut Street

Walnut Street is a two lane north-south street that intersects with Cypress Avenue 930 feet west of the school campus. The intersection of Cypress Avenue and Walnut Street is a “T” intersection that has a stop sign on the westbound approach of Cypress Avenue. Walnut Street has sidewalks along both sides of the street and there are no bike lanes. There is a painted yellow school crosswalk across Cypress Avenue at this intersection. The speed limit on Walnut Street is 25 miles per hour and it is also posted as 15 mph when children are present.

Public Transportation

Eureka Transit Service, which is administered through a joint powers authority with the Humboldt Transit Authority, provides bus service in the City of Eureka. The bus route nearest Glen Paul School is the Red Route, which runs along Walnut Street. It has a bus stop at the intersection of Walnut Street and Cypress Avenue.

PARKING

The main parking area for school staff, personnel, and visitors would be in the existing parking lot, near the front entrance, along the western and southern areas of the school site. In the western portion of the project site, there is currently a total of 12 parking spaces. These parking spaces would be reconfigured to include 10 parking spaces, 4 of which would be handicap parking spaces. The 6 existing parking spaces to the west of the project site near the sidewalk would remain unchanged. In the southern portion of the project site near the proposed classroom buildings, there is currently a total of 23 parking spaces, 2 of which are handicap parking spaces. These two handicap parking spaces would provide safe and convenient access as they are situated near the proposed buildings and are easily accessible via a proposed ADA-compliant sidewalk ramp. These parking spaces would be reconfigured to include 6 parallel parking spaces, 2 of which are handicap parking spaces, and 10 new parallel parking spaces immediately to the south and along the existing curb of the parking lot. The 9 existing parking spaces to the south of the project site near the drop-off loop and adjacent to the multi-use building would remain unchanged.

In total, the proposed project would provide parking spaces for up to 41 vehicles and would include standard and handicap parking spaces. Other parking would continue to be provided outside of the project boundaries in the northwestern and eastern portions of the school site.

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PROJECT PHASING AND CONSTRUCTION

Project development is anticipated to be completed in one phase, including the following activities: site preparation, grading and excavation, trenching for site utilities, construction of the new school buildings, reconstruction and modernization of the existing multi-use building, paving, and painting. Overall construction is estimated to take approximately 12 months, extending from June 2024 to June 2025. The project would require approximately 1,500 cubic yards (cy) of cut and approximately 50 cy of fill. In total, this would result in approximately 1,500 cy of soil to be exported and 50 cy of soil that would remain onsite. Based on the proposed construction timeline, it is anticipated that the new campus would be operational for the 2025-2026 school year, which commences in August 2025.

1.3 ENVIRONMENTAL IMPACTS

1.3.1 Impacts Considered Less Than Significant

The MND and supporting Initial Study identified various thresholds from the CEQA Guidelines in a number of environmental categories that would not be significantly impacted by the proposed project and therefore did not require mitigation. Impacts to the following environmental resources were found to be less than significant:

- | | |
|---------------------------------------|-----------------------------------|
| 1. Aesthetics | 10. Noise |
| 2. Agriculture and Forestry Resources | 11. Population and Housing |
| 3. Air Quality | 12. Public Services |
| 4. Energy | 13. Recreation |
| 5. Geology and Soils | 14. Transportation |
| 6. Greenhouse Gas Emissions | 15. Tribal Cultural Resources |
| 7. Hazards and Hazardous Materials | 16. Utilities and Service Systems |
| 8. Land Use and Planning | 17. Wildfire |
| 9. Mineral Resources | |

1.3.2 Potentially Significant Adverse Impacts That Can Be Mitigated, Avoided, or Substantially Lessened

Air Quality, Biological Resources, and Cultural Resources were identified as having potentially significant impacts that could be reduced, avoided, or substantially lessened through implementation of mitigation measures. No significant and unavoidable impacts were identified.

1. Introduction

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2. Mitigation Monitoring Process

2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall MMRP management is the responsibility of HCOE. HCOE's technical consultants (CEQA consultant, archaeologist, paleontologist, etc.) may perform related monitoring tasks under the direction of the environmental monitor (if they are contracted by HCOE).

2.2 HUMBOLDT COUNTY OFFICE OF EDUCATION

HCOE is the designated lead agency for the MMRP and has the overall responsibility for the review of all monitoring reports, enforcement actions, and document disposition. HCOE will rely on information provided by individual monitors (e.g., CEQA consultant, archaeologist, paleontologist), presuming it to be accurate and up to date, and will field check mitigation measure status, as required.

2.3 MITIGATION MONITORING TEAM

The mitigation monitoring team, including the construction manager and technical advisors, is responsible for monitoring implementation/compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work is field monitoring and compliance report preparation. Implementation disputes are brought to HCOE's Director of Special Education and/or their designee.

2.3.1 Monitoring Team

The following summarizes key positions in the MMRP and their functions:

1. **Construction Manager:** Responsible for coordination of mitigation monitoring team; technical consultants; report preparation; and implementing the monitoring program, including overall program administration, document/report clearinghouse, and first phase of dispute resolution.
2. **Technical Advisors:** Responsible for monitoring in their areas of expertise (CEQA, archaeology, paleontology). Report directly to the monitoring program manager.

2.3.2 Recognized Experts

Recognized experts are required on the monitoring team to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts will assess compliance with required mitigation measures, and recognized experts from responsible agencies will consult with the construction manager regarding disputes.

2. Mitigation Monitoring Process

2.4 ARBITRATION RESOLUTION

If a mitigation monitor is of the opinion that a mitigation measure has not been implemented or has not been implemented correctly, the problem will be brought before the construction manager for resolution. The decision of the construction manager is final unless appealed to HCOE's Director of Special Education and/or their designee. The construction manager will have the authority to issue stop work orders until the dispute is resolved.

2.5 ENFORCEMENT

Agencies may enforce conditions of approval through their existing police power using stop work orders; fines; infraction citations; or in some cases, notice of violation for tax purposes.

3. Mitigation Monitoring Requirements

3.1 PRE-MONITORING MEETING

A pre-monitoring meeting will be scheduled to review mitigation measures, implementation requirements, schedule conformance, and monitoring team responsibilities. Team rules will be established, the entire mitigation monitoring program presented, and any misunderstandings resolved.

3.2 CATEGORIZED MITIGATION MEASURES/TABLE

Project-specific mitigation measures have been categorized in Table 3-1, *Mitigation Monitoring Requirements*. The table identifies the environmental impact, specific mitigation measures, schedule, and responsible monitor. The mitigation table will serve as the basis for scheduling the implementation of and compliance with all mitigation measures.

3.3 FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (e.g., hard hat, glasses) shall be worn at all times in construction areas. Injuries shall be immediately reported to the mitigation monitoring team.

3.4 COORDINATION WITH CONTRACTORS

The construction manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
AIR QUALITY				
<p>AQ-1 The construction contractor(s) shall, at minimum, use equipment that meets the United States Environmental Protection Agency's (EPA) Tier 4 (Interim) emissions standards for off-road diesel-powered construction equipment used during the building demolition and debris haul, site preparation and soil haul, and grading overlapping construction activities with more than 50 horsepower, unless it can be demonstrated to HCOE that such equipment is not available. Where equipment is not available, the next available engine Tier (e.g., US EPA Tier 3 equipment) shall be used. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 4 emissions standards for a similarly sized engine, as defined by the California Air Resources Board's regulations.</p> <p>Prior to construction, the project engineer shall ensure that all plans clearly show the requirement for EPA Tier 4 emissions standards for construction equipment over 50 horsepower for the grading activities stated above. During construction, the construction contractor shall maintain a list of all operating equipment associated with grading in use on the site for verification by HCOE. The construction equipment list shall state the makes, models, and equipment identification numbers and the number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.</p>	Project Engineer/Construction Contractor	Prior to and during construction	Humboldt County Office of Education	
BIOLOGICAL RESOURCES				
<p>BIO-1 Conduct a pre-construction nesting raptor and bird survey of all suitable habitat on the project site within 14 days of the commencement ground disturbance (e.g., tree/vegetation removal, mass grading) during the nesting season (February 1 – August 31). Where accessible, surveys should be conducted within 300 feet of the project site for nesting raptors, and 100 feet of the project site for other nesting birds.</p>	Qualified biologist	Prior to construction	Humboldt County Office of Education	

3. Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>BIO-2 If active nests are found, a no-disturbance buffer around the nest shall be established. The buffer distance shall be established by a qualified biologist, in consultation with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. Once the young are independent of the nest, no further measures are necessary.</p>	<p>Qualified biologist</p>	<p>Prior to construction</p>	<p>Humboldt County Office of Education</p>	
CULTURAL RESOURCES				
<p>CUL-1 Prior to ground disturbance by project site clearance and grading, HCOE shall retain a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, to be on-call during all project ground disturbance activities.</p> <p>If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:</p> <ul style="list-style-type: none"> ▪ If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required. ▪ If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the CEQA lead agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not eligible for the NRHP or CRHR; or 2) that the treatment measures have been completed to their satisfaction. ▪ If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from 	<p>Professional archaeologist</p>	<p>During any ground-disturbing construction activities</p>	<p>Humboldt County Office of Education</p>	

3. Mitigation Monitoring Requirements

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>disturbance (AB 2641). The archaeologist shall notify the Humboldt County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission (NAHC), which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If HCOE does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, HCOE must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.</p>				

4. Mitigation Monitoring Reports

Mitigation monitoring reports are required to document compliance with the Mitigation Monitoring Program and to dispute arbitration enforcement resolution. Specific reports include:

- Field Check Report
- Implementation Compliance Report
- Arbitration/Enforcement Report

4.1 FIELD CHECK REPORT

Field check reports are required to record in-field compliance and conditions.

4.2 IMPLEMENTATION COMPLIANCE REPORT

The Implementation Compliance Report is prepared to document the implementation of mitigation measures, based on the information in Table 3-1. The report summarizes implementation compliance, including mitigation measures, date completed, and monitor's signature.

4.3 ARBITRATION/ENFORCEMENT REPORT

The Arbitration/Enforcement Report is prepared to document the outcome of arbitration review and becomes a portion of the Implementation Compliance Report.

4. Mitigation Monitoring Reports

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5. Community Involvement

Monitoring reports are public documents and are available for review by the general public. Discrepancies in monitoring reports can be taken to HCOE's Director of Special Education and/or their designee by the general public.

5. Community Involvement

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6. Report Preparation

6.1 LIST OF PREPARERS

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