

CEQA Initial Study

Project Title: Harris Medical Center Project

Project Applicant: Dr. Deepak Stokes **Case No:** GPA-24-0001, ZR-24-0001, ED-24-0001

Project Location: 272 Harris St. Eureka, CA 95503 **APN:** 010-261-012

Current Zoning District: Residential Low (R1)

Current General Plan Designation: Low Density Residential (LDR)

Proposed Zoning District: Henderson Center (HC)

Proposed General Plan Designation: Neighborhood Commercial (NC)

Lead Agency: City of Eureka, 531 “K” Street, Eureka, CA 95501-1165

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Setting: Dr. Deepak Stokes (applicant) is seeking to redevelop a former church site with a mixed-use commercial and residential development. A General Plan Map Amendment and Zoning Reclassification are required to allow the proposed development. The subject parcel (APN 010-261-012) is one legal parcel totaling 1.01 acres. The site is located at 272 Harris Street on the south side of Harris Street between William and D Streets and is the location of the former Apostolic Faith Church.

Existing infrastructure onsite includes a former church building, constructed in approximately 1976, (±5,680 square foot [sq. ft.] footprint; ±13,680 sq. ft. total floor area), accessory garage/storage buildings (±1,430 sq. ft. and ±192 sq. ft.), a large parking lot, and a cell tower.

The existing church building is 41.7 feet in height, and consists of a basement floor, a first floor, and a second floor. The church is built on a significant grade, and thus some of the basement floor “daylights” to be accessible from the ground level. Per the applicant, there have been pre-construction activities associated with an existing foundation repair permit (Permit B21-0265) and investigative testing to obtain a demolition permit for future remodel of the existing building. Pre-construction activities have since ceased until the demolition permit has been obtained from the City of Eureka.

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The existing legally established cell tower and associated adjacent cell tower infrastructure was constructed in 2008 following Eureka Planning Commission approving a Conditional Use Permit (permit number C-08-0005) and Design Review (permit number AA-08-0049). The existing cell tower was legally modified in 2014 (permit number WTF-14-0002) and again in 2023 (permit number WTF-23-0003). The Apostolic Faith Church has been vacant for several years, and, while the church is not in use, the cell tower and associated infrastructure are.

The property does not include streams or wetlands, and is not located in the Coastal Zone or in a mapped floodplain. A small gulch of Martin Slough is located offsite 100 ft to the southwest of the parcel.

Surrounding Land Uses:

The site has a land use designation of Low Density Residential (LDR) and is surrounded by other LDR-designated parcels (*Figure 4*). The site is located just west of Henderson Center where parcels have a land use designation of Neighborhood Commercial (NC). The closest NC-designated parcel is located diagonally across the intersection of Harris and D Streets to the northeast of the site. One block (approximately 330 ft) to the west of the site, parcels along Harris Street are designated Medium Density Residential (MDR).

The block across Harris Street directly to the north of the site, the block across D Street directly to the east of the site, and the block across William Street directly to the west of the site are developed with single-family homes and accessory dwelling units. Directly south of the property is a single-family residence and a vacant lot. The block to the northwest of the site, designated NC, is developed with residences, commercial offices, and retail and service businesses.

Project Description:

Overview:

The Harris Medical Center Project (the “Proposed Project”) involves changing the land use designation and zoning district of a 1.01-acre, former-church site from Low Density Residential/ Residential Low to Neighborhood Commercial/ Henderson Center, and subsequent redevelopment of the site with residential and commercial uses. The site currently contains a vacant church building, accessory garage/storage buildings, a large parking lot, and a cell tower. Proposed development includes converting the existing church building into an urgent care facility, a rural healthcare clinic, a medical spa, and associated office space (with remodeling/demolition as necessary); constructing between eight (8) and twelve (12) new multi-family residential units with up to ten (10) of the residential units contained in two (2) new two-story residential structures and up to two (2) units within the existing church building; constructing ±1,600 sq. ft. of new commercial space for a café; and associated site improvements, including demolition of an existing garage/storage building. The existing cell tower would not be modified, and would continue to operate as is.

More specifically, the Proposed Project involves the following (*Appendix I – Development Plans*):

- A General Plan Map Amendment and Zone Reclassification from LDR/R1 to NC/HC.
- Up to twelve (12) residential units within two new residential buildings totaling ±6,152 sq. ft. and within the existing church building.

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- Proposed new construction includes two (2), two-story residential structures of ±3,128-sq. ft. and ±3,024 sq. ft., respectively, with eight (8) to ten (10) units, and up to two (2) units within the existing church building.
- Proposed new residential structures would be a maximum of 36 feet in height.
- Construction of these new units would require demolition of the existing 1,430-sq. ft. garage building.
- ±1,600 sq. ft. of new commercial space, in a one-story space attached to the northern end of the converted church building, with a maximum height of up to 30 feet.
 - The commercial space would become a café to primarily serve onsite residents, employees, and patrons of the medical and spa services.
- Use of the existing 3-level, ±5,680-sq. ft footprint church, and remodeling/demolition of the existing church, if necessary, for development of an urgent care center, rural health clinic, and medical spa and associated offices.
 - The basement floor will be converted into a rural healthcare clinic (±2,840 sq. ft.) and an urgent care facility (±2,840 sq. ft.), the 1st floor will be converted into a medical spa (±5,680 sq. ft.), and the 2nd floor will be converted into ±2,980 sq. ft. of medical office space and ±2,000 sq. ft. of residential space (±4,980 sq. ft. total). The existing church is just under 42 feet tall, and plans do not include an increase in height.
 - Currently, the 2nd floor is a mezzanine open to the 1st floor below. Current floor area is ±2,320 sq. ft. The proposal to convert the 2nd floor into medical office space and residential units includes the construction of a full 2nd floor, with a resulting floor area of ±4,980 sq. ft. This number is less than the building square footprint because an area of the mezzanine will not be converted into a full floor due to building structure and construction requirements.
 - The existing church building has a current floor area of 13,680 sq. ft., and has a resulting proposed floor area of ±16,340 sq. ft.
- ±684 sq. ft. of new employee breakroom space associated with the urgent care, rural health clinic, and medical spa with a maximum height of 25 feet.
 - A new single-story space for the employee breakroom attached to the southern end of the converted church structure (±684 sq. ft.).

In summary, proposed development includes the following: up to 12 residential units with up to ±6,152 sq. ft. of new residential footprint construction, ±1,600 sq. ft. of new commercial space for a café, conversion/remodel of an existing 3-story, 5,680-sq. ft. footprint church into medical and residential uses, and construction of ±684 sq. ft. of a medical-use adjacent employee breakroom space. A total of ±8,436 sq. ft. of new building footprint construction is proposed.

If the General Plan Map Amendment and Zone Reclassification are approved, the residential, retail, and medical office/clinic uses are principally permitted in the HC zoning district and therefore would not require a Use Permit. Pursuant to Eureka Municipal Code (EMC) §155.412.040, the new structures would require Design Review. A building permit would also be required for the new residential units and for the tenant improvements and change of occupancy associated with the conversion of the church building.

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EMC §155.424.030 (Nonconforming Site Features) requires development projects with a total construction value of \$55,000 or more, as is anticipated for the Proposed Project, to bring certain nonconforming site features into compliance with the existing Zoning Code standards. Existing site features and any changes proposed under the redevelopment plan will be reviewed for compliance with nonconforming site feature regulations, including screening from adjacent residential properties, outdoor lighting, short-term bicycle parking, and waste storage.

Proposed Zoning/Land Use Changes Description:

The proposed HC zoning district is what is applied to the Henderson Center area, which is a commercial hub located to the east of the Proposed Project site, with the closest HC-zoned parcel located directly across the Harris and D Street intersection to the northeast. The EMC defines the HC District as, “*a pedestrian-oriented limited-scale neighborhood shopping district primarily serving residents in nearby neighborhoods. Pedestrian-scale buildings with active street-facing storefronts close to the sidewalk create an active and inviting public realm. Single-family residential homes converted to retail and office uses retain their residential character and buffer nearby residences from higher intensity uses (EMC §155.208.010 [Mixed-Use Zoning Districts]).*”

The corresponding proposed General Plan land use designation is NC, which is described in the 2040 General Plan as, “*Limited-scale convenience retail, restaurants, offices, residential, and personal services, including pedestrian-oriented neighborhood retail. Intended to primarily serve nearby neighborhoods, be compatible with the character and form of adjacent residential uses, support a vibrant pedestrian environment, and promote short neighborhood-based trips. Residential and office uses are primarily allowed only on upper floors and non-street-facing portions of buildings, and only as provided by the applied zoning district.*”

The requested changes would allow for redevelopment of the site with medical office and clinic uses not allowed under the current low-density residential zoning district/land use designation of the site, and would allow for construction of more residential units than what is currently allowed without subdivision. Table I provides a comparison of the purposes and allowed uses in the current and proposed zoning districts. As shown in Table I, the existing R1 zoning district does allow for residential uses, including two single-family homes on one parcel (attached or detached) in addition to an accessory dwelling unit (ADU) and junior ADU, but does not allow residential development at greater densities, or medical offices and clinics or cafés, which are proposed on the site and are principally allowed under the proposed HC zoning district. Under the current R1 zoning district, the subject parcel would be limited to a total of four dwelling units (two single-family homes, one ADU, and one junior ADU) unless subdivided, while the proposed HC zoning would allow as many dwelling units as could be constructed without exceeding the maximum floor area ratio (FAR) of 2.5. It is important to note that up to 32 residential units could be allowed under the current R1 zoning if a subdivision occurred: given the minimum lot size of 5,000 square feet in the R1 zoning district, this 1.01-acre site could be subdivided into eight (8) R1 parcels, each of which would then be allowed four residential units (for a maximum density with subdivision of 32 dwelling units).

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Table I. Comparison of Existing and Proposed Zoning Districts			
<u>Zoning District</u>	<u>Purpose</u>	<u>Principal Use(s)</u>	<u>Conditional Use(s)</u>
Existing Residential Low (RI)	The RI zoning district contains neighborhoods of single-family homes and accessory dwelling units in a moderately low-density setting, located in proximity to parks, schools and public services.	<ul style="list-style-type: none"> • ADUs • non-medical care housing • single-family home, detached • tiny house on wheels • two single-family homes on one parcel • family day care • vacation rental, proprietor onsite • resource protection/restoration • parks/playgrounds 	<ul style="list-style-type: none"> • medical care housing • day care facility • vacation rental, no proprietor onsite • timber production • civic institutions • government facilities • non-commercial places of assembly • schools • public utility • wireless telecommunication facilities
Proposed Henderson Center (HC)	The HC zoning district is a pedestrian-oriented limited-scale neighborhood shopping district primarily serving residents in nearby neighborhoods. Pedestrian-scale buildings with active street-facing storefronts close to the sidewalk to create an active and inviting public realm. Single-family residential homes converted to retail and office uses retain their residential character and buffer nearby residences from higher intensity uses.	<ul style="list-style-type: none"> • ADUs • non-medical care housing, small • single-family home, attached or detached • micro/shared housing • multi-family dwellings • general indoor/outdoor retail (small) • mobile vendors • restaurant/café/beverage sales • car share facilities • commercial lodging • day care facility • family day care • fitness/dance/health facility (small) • general services • indoor commercial recreation • medical offices and clinics • offices • personal services • artisan manufacturing • civic institutions • colleges/trade schools (upper floor) • instructional services 	<ul style="list-style-type: none"> • medical care housing • non-medical care housing, large • bars • drive-through facility (non-food) • outdoor commercial recreation • parking lot/structure • colleges/trade schools (ground floor) • public utility • wireless telecommunication facilities within 100 feet of a residential zoning district

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		<ul style="list-style-type: none"> • government facilities • non-commercial places of assembly • parks and playgrounds • wireless telecommunication facilities over 100 feet from a residential zoning district 	
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Table 2 provides a comparison of the development standards in the existing RI and proposed HC zoning districts. Table 2 reflects a summary of development standards; exceptions and variations are further described in the EMC. As shown in Table 2, the RI and HC zoning districts have differing development standards with regard to lot area, FAR, maximum units per acre/lot, setbacks, site coverage, and maximum height. In general, the HC zoning district is less restrictive and allows for a wider variety of development onsite.

Zoning District	Min. Lot Area	Maximum FAR	Maximum units per acre	Min. Setbacks	Maximum Site Coverage	Maximum Height
Existing RI	5,000 sq. ft.	1.0	1 dwelling unit / lot ²	10' (front); 4' (side)	60%	35 ft.
Proposed HC	No min.	2.5	No max.	0'; variations further described in Zoning Code	No max.	55 ft.

Per the development standards of the HC zoning district, with a maximum FAR of 2.5, a maximum building height of 55 feet, and a minimum building height of two stories, buildout of the 1.01-acre (43,996 sq. ft.) site would allow for the development of one or more two- to five-story buildings with a combined total of 109,990-sq. ft. of floor area. The existing church building is just under 42 feet tall and meets the HC building setbacks.

All proposed development would be designed to follow the development standards of the proposed HC zoning designation with regard to building setbacks, building heights, and maximum FAR. The floor areas of each existing/proposed structure are as follows:

- New residential buildings (±6,152-sq. ft. footprint total, 2 stories): ±12,304 sq. ft.
- New commercial space attached to converted church building (±1,600-sq. ft. footprint, 1 story): ±1,600 sq. ft.

¹ Based on EMC § 155.204.030 DEVELOPMENT STANDARDS Tables 204-2 and 208-2.

² Senate Bill 9 (SB9) allows for parcels in single-family residential zone districts to increase their density to one single-family residence, one additional single-family residence (attached or detached), one ADU and one junior ADU.

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- Existing/remodeled church building for medical and residential uses (5,680 sq. ft. footprint, 3 stories): ±16,340 sq. ft.
- New employee break room space attached to converted church building (±684-sq. ft. footprint, 1 story): ±684 sq. ft.

The total floor area of the remodeled/proposed structures would be ±30,928 sq. ft. for a FAR of 0.70, which is less than the maximum FAR of 2.5 in the proposed HC zoning district. Future site redevelopment as a result of the Zoning Reclassification and General Plan Map Amendment would allow a higher FAR, up to 2.5.

There are dozens of potential uses of the site that could result from changing the zoning district from RI to HC (see Table 1). Principally permitted uses in existing structures or other types of projects that do not trigger discretionary permits would not require additional review under CEQA. Conditional uses would require additional review under CEQA, as well as any new construction not anticipated by this CEQA document that triggers Design Review. However, future discretionary projects may qualify for the CEQA Class 32 categorical exemption (CEQA Guidelines §15332) and thus may not trigger the need for a subsequent environmental document because the Proposed Project site is located within city limits, is less than 5 acres in size, is substantially surrounded by urban uses, has no value as habitat for special-status species, and can be served by all required utilities and public services. To meet the Class 32 exemption, future discretionary projects at the site would have to be consistent with the applicable General Plan land use designation and policies and Zoning Code district and regulations and would have to avoid significant effects relating to traffic, noise, air quality and water quality.

Uses that would be principally permitted at this site under the HC zoning district that are currently not allowed in the RI zoning district include the following: multi-family dwellings, single-family attached homes (townhomes), micro-shared housing, general indoor/outdoor retail (small), mobile vendors, restaurant/café/beverage sales, car share facilities, commercial lodging, fitness/dance/health facility (small), general services, indoor commercial recreation, medical offices and clinics, offices, personal services, artisan manufacturing, and instructional services. Uses that would be principally permitted at this site under the HC zone change that are currently conditionally permitted under the RI zone include the following: day care facility, civic institutions, colleges/trade schools (upper floor), government facilities, and non-commercial places of assembly. It is important to note that wireless telecommunication facilities (WTFs) within 100 ft of a residential zoning district, as is the case with this site, require a Conditional Use Permit, which the existing WTF obtained in 2008 (permit number C-08-0005).

Proposed Development Details:

Under the Proposed Project, eight (8) to twelve (12) residential units are proposed in two new townhouse-style structures on the east and west sides of the property, with four (4) to six (6) units in each of the two structures, and/or up to two (2) units within the existing church building. Construction of the residential units would require demolition of the existing 1,430 garage building located on the southwest area of the property. The new residential structures would be two stories and would have a footprint of ±6,152 sq. ft. in total (currently proposed at ±3,128 sq. ft. and ±3,024 sq. ft., respectively). For analysis purposes, the maximum of 12 residential units are estimated to house 28.2 (rounding to 29) residents, based on the average household size of

2.35 for the City of Eureka, per the City's 2019-2027 Housing Element Technical Appendix (2022).

The existing church building, proposed for conversion to medical and residential facilities, has a daylight basement and two stories. The daylight basement means that the basement floor has windows partially below ground-level and partially above ground-level, due to the slope of the site. The basement floor is intended to be converted into a rural healthcare clinic ($\pm 2,840$ sq. ft.) and urgent care facility ($\pm 2,840$ sq. ft.). The first floor is proposed to be converted into a medical spa ($\pm 5,680$ sq. ft.). The second floor is currently a mezzanine and is proposed to be reinforced and converted into associated office space ($\pm 2,980$) and residential units ($\pm 2,000$ sq. ft.). The proposed change of use would require mechanical, electrical, and accessibility upgrades to bring the building up to California Building Code (CBC) standards. In addition, interior and external improvements would occur to support the 2nd story remodel and proposed build-out.

Remodeling and construction of the existing church building is anticipated to take between nine (9) and 12 months, and construction of the new residential and commercial buildings are anticipated to take between six (6) and 12 months. In total, construction of the full proposed build-out would occur over one (1) to two (2) years.

Operations of the medical uses within the remodeled church building are further described as follows:

Urgent Care: The urgent care center would occupy approximately $\pm 2,840$ sq. ft. of the basement floor. Access to the urgent care center would be from a basement entrance on the western side of the building. The urgent care center would provide medical services, including primary care, urgent wound care, illness treatment, and laboratory services. The urgent care center would be separated from the rural health clinic through internal building modifications and would operate separately and independently. The center would operate between 8 A.M. to 8 P.M., seven days per week, and the applicant anticipates that approximately 25 patients would visit the urgent care center per day. Approximately five (5) full-time employees would be required to operate the center. Appointments and walk-in patients would be accepted.

Rural Health Clinic: The rural health clinic would occupy approximately $\pm 2,840$ sq. ft. of the basement floor. Access to the urgent care center would be from a basement entrance on the eastern side of the building. The rural health clinic would provide women's health services and primary care medical services, and the clinic would also provide patrons with access to housing and employment resources, training, and information. The hours of operation would be 8 A.M. to 5 P.M., Monday through Friday, and the applicant anticipates up to 30 patients helped or seen per day (more likely to be an average of 20 patients on a daily basis). Six (6) full-time employees would be needed to operate the clinic. An appointment would be required to visit the clinic; walk-ins would not be accepted.

Medical Spa: The medical spa would operate on the first floor of the building (approximately 5,680sq. ft.). Medical spa services would include aesthetic procedures and injections, laser treatment, massage, and esthetician services. Approximately four (4)

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employees would be required to staff the medical spa, year-round. The hours of operation would be Monday through Saturday, 8 A.M. to 7 P.M. An appointment would be required to visit the medical spa; walk-ins would not be accepted. The applicant anticipates that the spa would treat approximately 24 patients per day. Access to the medical spa would be from the eastern, first floor entrance.

Offices: Offices related to all building operations would be located on the constructed/remodeled second floor of the building (approximately 2,980 sq. ft.). Offices would not be generally open to the public. The office space would be used for record-keeping, storage, and general office activities for medical activities. No additional employees other than those already described would be needed for the general office activities.

Commercial Space: The commercial space would be operated as a café, functioning to serve employees and patients of the urgent care facility, the rural health center, and the medical spa. Offsite customers would also be welcome. Two (2) to four (4) employees are expected to operate the café. The café would operate from 8. a.m. to 5 p.m. on weekdays and Saturdays.

The onsite cell tower would not be impacted by the Proposed Project; it would continue operation as allowed under permit number WTF-23-0003.

Access and Proximity to Public Transportation

The site is located at 272 Harris Street, on the south side of Harris Street between William and D Streets in Eureka. Harris Street, a paved, one-way (east bound) two-lane street, is functionally classified as a Major Arterial Street, per the City's 2040 General Plan. Per the General Plan, Major Arterial Streets are those designed as high-capacity roadways that "connect regional facilities and accommodate regional, intra-city, and sub-regional travel" (pg. 136). A Major Arterial street reflects a roadway that serves significant traffic volumes. This section of Harris Street (between Albee Street and Union Street) has approximately 10,810 average daily trips, with peak traffic occurring in the morning at 11:00 a.m. and peak traffic occurring in the afternoon at 4:00 p.m.

The nearest bus stop to the Proposed Project is at the intersection of Harris Street and Lowell Street, located approximately 400 feet west of the Proposed Project site. The Eureka Transit Authority Gold, Red, Green, and Rainbow routes serve the Harris Street and Lowell Street transit stop. In addition to the Harris & Lowell bus stop, the F Street and Harris Street bus stop is located approximately 660 feet east of the Proposed Project site. The Eureka Transit Authority Gold, Purple, Red, Green, and Rainbow bus routes all serve the F Street and Harris Street transit stop. Both nearby transit stops are operated by the Eureka Transit Service. Harris Street is also an existing Class II Bikeway, which provides a restricted right-of-way for cyclists. Existing, designated buffered bike lanes are provided along H and I Street in Eureka, located 4 blocks from the Proposed Project site. In addition, approximately 5-foot wide sidewalks provide an accessible path of travel for pedestrians on the north, east, and west sides of the Proposed Project site.

Tables 3 through 5 display estimates of daily vehicle traffic trips associated with the proposed medical, residential, and commercial site uses.

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<u>Description</u>	<u>Number of Employees</u>	<u>Number of Patients</u>	<u>Projected Daily Trips³</u>	<u>Operating Days</u>	<u>Adjusted Average Daily Trips⁴</u>
Urgent Care	5	25	60	Monday – Sunday	60
Rural Health Clinic	6	30	72	Monday - Friday	51
Medical Spa	4	24	56	Monday - Saturday	48
Totals	15	79	188		159

<u>Description</u>	<u>Maximum Number of Units</u>	<u>Number of Trips per Unit⁵</u>	<u>Average Daily Trips</u>
8 – 12 Residential units	12	4	48

<u>Description</u>	<u>Number of Employees</u>	<u>Number of off-site Patrons⁶</u>	<u>Projected Average Daily Trips</u>
Café	4	10	28

As shown in Tables 3 through 5, combined uses of the Proposed Project would yield a maximum of 235 trips per day. Due to the proximity to the major transit stop, trip estimates are conservative as it is expected that some employees, residents, and patients would use public transit.

Harris Street peak hours of traffic are at 11 a.m. and 4 p.m., based on City of Eureka traffic count data. Based on proposed operating hours of the urgent care facility, the rural health clinic, and the medical spa, employees would arrive prior to the 8 a.m. start time, and would leave after the 8 p.m., 5 p.m., or 7 p.m. closing time, respectively. A shift change for the urgent care facility would occur midday, around 2 p.m. None of these times are at peak traffic times. Projected patient trips would occur evenly throughout the day, with approximately 79 per day or about 7 to 10 trips per hour, based on the facility operating times. Therefore, it can be expected that up to 10 trips would occur during a given peak traffic hour for medical patients. Approximately four (4) residential trips are anticipated per residential vehicle per day, with two (2) trips typically occurring in the morning (8 a.m. to 9 a.m.) and in the evening (5 p.m. to 6 p.m.), resulting in approximately 12 peak hour residential trips. Based on café operating hours (8 a.m. to 5 p.m.), employees would arrive and leave the site before and after peak hours. Projected vehicular patron

³ Assuming two (2) trips per employee and two (2) trips per patient, per day.

⁴ Daily trips adjusted based on Operating Days.

⁵ Assuming one (1) car per unit based on proposed provided parking.

⁶ The café would primarily serve employees and patrons of the onsite facilities, but offsite customers would be welcome. It is assumed that offsite customers would be a mix of foot, public transit, and vehicular transit. Ten (10) offsite patrons in vehicles are assumed per day. Assuming two (2) trips each patron and employees.

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trips would occur evenly throughout the day, with approximately 1-2 trips per hour. Using a conservative estimate of five (5) vehicular patron trips per hour, to account for a peak hour rush, approximately five (5) trips during peak hour traffic could be expected. In total, the Proposed Project would result in 27 peak hour traffic trips (Table 6). This does not account for medical patients utilizing public transit or bicycle transportation, and is thus considered a conservative estimate.

Table 6: Estimated Peak Hour Traffic from Proposed Project		
<u>Use Type</u>	<u>Description</u>	<u>Total Estimated Peak Hour Daily Trips</u>
Medical	15 Employee Trips	0
Medical	79 Patient Trips	10
Residential	12 Residents with Vehicles	12
Commercial	Employees	0
Commercial	Patrons	5
Total		27

Parking

The site currently contains 41 parking spaces. As the site is currently vacant, none of the parking spaces are being occupied. A total of 36 parking spaces are proposed onsite to serve the medical and residential uses. Pursuant to EMC §155.324.030 (Table 324-1: Required Vehicle Parking Spaces) the site would be required to provide one (1) parking space per 500 square feet for the commercial uses and one (1) space per residential unit (Urgent Care and Rural Health [$\pm 5,680$ sf/500 sq. ft. = 12 parking spaces], Medical Spa [$\pm 5,680$ sf/500 sq. ft. = 12 parking spaces], Offices [$\pm 2,980$ sf/500 sq. ft. = 6 parking spaces], Commercial Space [$\pm 1,600/500$ sf = 4 parking spaces], and multi-family residential [12 units = 12 parking spaces]). Without parking exemptions, a total of 46 parking spaces would be required (as shown in Tables 2 and 3 on Sheet C1 of the Development Plans [Appendix 1]). However, per EMC §155.324.040, parking spaces can be reduced by 30% for projects within 600 feet of a bus stop. As described above, the nearest bus stop to the Proposed Project is approximately 400 feet from the site. Therefore, the City’s exemptions allow a reduction of 14 parking spaces, leaving 32 spaces required. The 36 parking spaces proposed are in excess of City requirements. At least two (2) of the 36 parking spaces proposed would be for Electric Vehicle charging, and at least four (4) of the 36 parking spaces proposed would be ADA-compliant, per California Building Code accessibility regulations.

Regardless of the City’s parking requirements or eligible reductions, California Government Code §65863.2 [added by AB 2097 (2021-2022)] prohibits a public agency from imposing or enforcing any minimum automobile parking requirements on a residential, commercial, or other development project if the project is located within one-half mile of a major transit stop as defined in §21155 of the Public Resources Code (PRC). PRC §21155 defines a major transit stop in part to include stops identified as major transit stops in the applicable regional transportation plan. On January 18, 2024, the Humboldt County Association of Governments (HCAOG) amended the applicable regional transportation plan, VROOM 2022-2042, to include seven identified major transit stops, including the transit stop at the corner of F Street and Harris Street, approximately 660 feet from the Proposed Project site. As a result, the City is preempted by State Law from imposing any parking requirement on the Proposed Project.

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In addition, the Proposed Project proposes 16 bicycle parking spaces. Pursuant to EMC §155.324.070 (Table 324-3: Required Bicycle Parking Spaces), multi-family use types require one (1) short-term bicycle parking space per six (6) residential units and one (1) long-term bicycle parking space per three (3) residential units for long term spaces. With 12 units proposed, two (2) short-term bicycle parking spaces and four (4) long-term bicycle parking spaces would be required. In addition, one (1) short-term bicycle parking space is required per every 1,000 sq. ft. of all other uses. With ±15,940 sq. ft. of other uses proposed (excluding the proposed break room), 16 short-term bicycle parking spaces would be required, bringing the total to 22 bicycle parking spaces. However, EMC §155.324.070 Table 324-3 states that “in no case will more than 15 bicycle spaces be required for any single use or development project”. Therefore, a maximum of 15 bicycle parking spaces would be required for the Proposed Project. Per Table 5 on Sheet C2 of the Development Plans (*Appendix 1*) the Proposed Project includes 16 bicycle parking spaces, in excess of the required 15 spaces.

Power:

PG&E currently provides electricity and natural gas to the site, and would continue to do so moving forward. New residential buildings would be required to have rooftop-mounted solar panels, which would also provide onsite power. No permanent onsite generators are currently proposed. In the event of a power outage, the applicant would bring a mobile generator onsite to preserve medical equipment.

Water, Wastewater, Waste, and Stormwater:

The site is connected to existing City of Eureka water and wastewater services and stormwater drainage infrastructure. The site is located within the district of the Humboldt Bay Waste Management Authority (HBWMA), which provides waste removal services for the site.

Scope of Initial Study

This Initial Study seeks to directly analyze impacts of the proposed land use designation and zoning district changes and the proposed site development (i.e., the new residential buildings, the proposed conversion of the church to medical facilities, the new employee break-room space, and the new commercial space), which comprise the “Proposed Project”.

In analyzing the impacts of the proposed land use designation and zoning district changes, this document generally considers potential future redevelopment facilitated by the changes in allowable uses and development standards, in addition to the residential, medical, and commercial development associated with the Proposed Project.

Other Public Agencies whose approval is, or may be required: City of Eureka Design Review Committee (design review approval), City of Eureka Building Division (building permit), and City of Eureka Public Works Division (stormwater permit, potential encroachment permit).

Tribal Consultation: Pursuant to PRC Section 21080.3.1, the City reached out to tribes traditionally and culturally affiliated with the geographic area of the Proposed Project on February 22, 2024. Additional details on tribal outreach and resulting mitigation measures are discussed in Section V - Cultural Resources. No Tribe indicated they would like to formally consult under AB 52.

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Figure 1. Subject Parcel (APN 010-261-012) Aerial View (Source: Eureka City Web GIS, 2023)



Figure 2. Subject Parcel Vicinity Map (Source: Google Earth, 2023)

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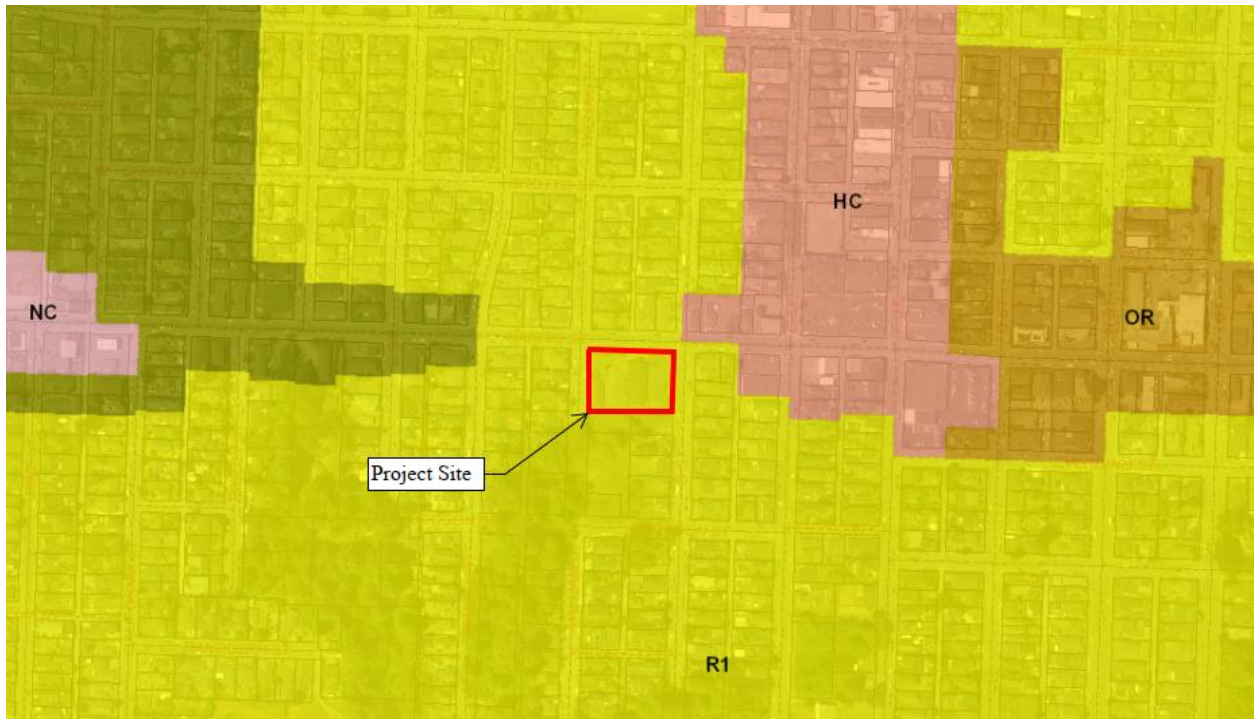


Figure 3. Subject Parcel Current Zoning District (R1) and Proximity to Proposed Zoning District (HC) (Source: Eureka City Web GIS, 2023)

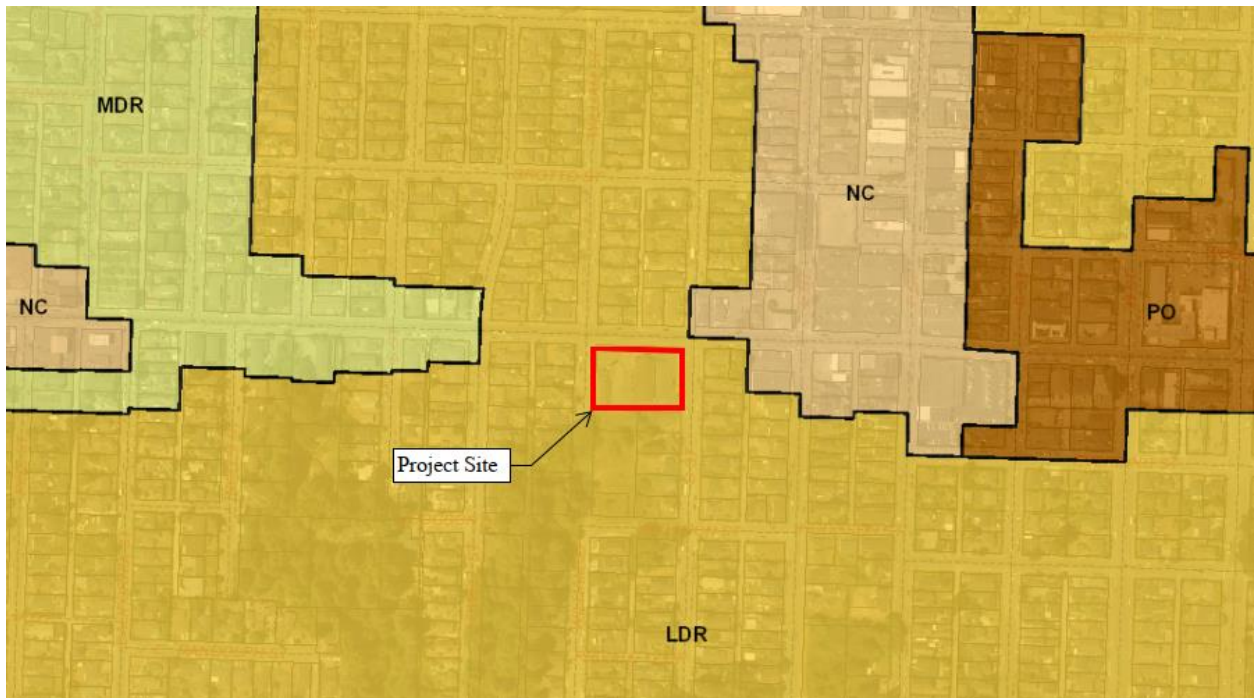


Figure 4. Subject Parcel Current General Plan Land Use Designation (LDR) and Proximity to Proposed General Plan Land Use Designation (NC) (Source: Eureka City Web GIS, 2023)

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.

Cristin Kenyon
 Cristin Kenyon, AICP, Development Services Director
 City of Eureka

9/16/24
 Date

Summary of Potential Project Impacts: Below is a table that summarizes the impact potential for each category of impacts discussed and analyzed in this Initial Study.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
I. Aesthetics			✓	
II. Agriculture and Forestry Resources				✓
III. Air Quality		✓		
IV. Biological Resources		✓		
V. Cultural Resources		✓		
VI. Energy		✓		

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
VII. Geology/Soils		✓		
VIII. Greenhouse Gas Emissions		✓		
IX. Hazards and Hazardous Materials			✓	
X. Hydrology/Water Quality			✓	
XI. Land Use/Planning			✓	
XII. Mineral Resources				✓
XIII. Noise		✓		
XIV. Population/Housing			✓	
XV. Public Services			✓	
XVI. Recreation			✓	
XVII. Transportation			✓	
XVIII. Tribal Cultural Resources		✓		
XIX. Utilities/Service Systems			✓	
XX. Wildfire				✓
XXI. Mandatory Findings of Significance		✓		

Recommended Mitigation Measures: Below is a list of mitigation measures that are identified in the following checklist and would be recommended as conditions of project approval.

I. Aesthetics

None.

II. Agricultural and Forestry Resources

None.

III. Air Quality

Mitigation Measure AQ-I: Measures to Reduce Air Pollution from Construction.

To reduce fugitive dust generation during any demolition, excavation, or earthmoving construction activities as a result of the Proposed Project, the following dust control measures shall be implemented by the construction contractors during construction activity at the Proposed Project site:

- Water all exposed surfaces in active construction areas as necessary to minimize dust generation and use erosion control measures to prevent water runoff containing silt and debris from entering the storm drain system;
- Cover trucks hauling soil, sand, and other loose material;
- Pave, water, or apply non-toxic soil stabilizers on unpaved access roads and parking areas;
- Sweep paved access roads and parking areas daily during construction;
- Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.
- Maintain and properly tune all construction equipment in accordance with the manufacturer's specifications.

Mitigation Measure AQ-2. Measures to Reduce Air Pollution to Onsite Sensitive Receptors.

The applicant and/or its construction contractors shall use filters with a minimum efficiency reporting value of 13 (MERV-13) in the indoor air heating, ventilation, and air conditioning (HVAC) systems for the existing and proposed buildings. The applicant and/or its property managers shall ensure filters are replaced at manufacturer-recommended frequencies.

IV. Biological Resources

Mitigation Measure BIO-1: Avoidance and Minimization Measures to Protect Special Status Birds and Nesting Birds.

No noise- or vibration-generating construction activities within 100 feet of the gulch habitat to the southwest of the parcel shall occur between March 15th and August 15th, when birds may be nesting on the adjacent property. If construction during this time is unavoidable, a qualified biologist shall conduct a pre-construction survey for nesting bird pairs, nests, and eggs within 100 feet of the construction limits. If an active nest is encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW), as applicable, and implemented to prevent abandonment of the active nest.

V. Cultural Resources

Mitigation Measure CUL-1 and CUL-2: Inadvertent Discovery Protocol Mitigation Measures.

Mitigation Measure CUL-1: Inadvertent discovery protocol must be followed for any future ground disturbing activities at the site, as outlined below:

1. If archaeological resources are encountered during construction activities, all onsite work must cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist shall be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band, Blue Lake Rancheria, and Wiyot Tribe are to be contacted immediately to evaluate the discovery and, in consultation with the project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or

faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structure remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.

2. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Eureka.

Mitigation Measure CUL-2: In the event of discovery or recognition of any human remains during construction activities, the landowner or person responsible for excavation would be required to comply with the State Health and Safety Code Section §7050.5. Construction activities within 100 feet of the find shall cease until the Humboldt County Coroner has been contacted at 707-445-7242 to determine that no investigation of the cause of death is required. If the remains are determined to be, or potentially be, Native American, the landowner or person responsible for excavation would be required to comply with PRC §5097.98. In part, PRC §5097.98 requires that the Native American Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC would then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the landowner or the person responsible for the excavation work for the appropriate means of treating the human remains and any associated grave goods within 48 hours of being granted access to the site. Additional provisions of PRC §5097.98 shall be complied with as may be required.

VI. Energy

Refer to **Mitigation Measure AQ-1: Measures to Reduce Air Pollution from Construction.**

VII. Geology/Soils

Mitigation Measure GEO-1: Geotechnical Investigation.

Prior to the issuance of any building permits, the applicant shall secure the services of a qualified licensed professional to perform a site-specific design-level geotechnical investigation, in compliance with City of Eureka requirements, including detailed information on site elevations, soil types, and depth to groundwater. The investigation shall determine the project's geotechnical conditions, including seismic shaking and liquefaction hazards, unstable soils hazards, and destabilization and erosion hazards associated with drainage and measures to address these hazards. Analysis presented in the geotechnical investigation shall conform to the California Geological Survey (CGS) recommendations presented in the Guidelines for Evaluating Seismic Hazards in California. Briefly, the guidelines recommend that the investigation include: a site screening evaluation; evaluation of on- and off-site geologic hazards; detailed field investigation; quantitative evaluation of hazard potential; and recommendations to reduce identified hazards. All design measures, recommendations, design criteria, and specifications set forth in the design-level geotechnical investigation shall be implemented as a condition of project approval.

Refer to **Mitigation Measure CUL-1 and CUL-2: Inadvertent Discovery Protocol Measures.**

VIII. Greenhouse Gas Emissions

Refer to **Mitigation Measure AQ-1: Measures to Reduce Air Pollution from Construction.**

IX. Hazards and Hazardous Materials

None.

X. Hydrology/Water Quality

None.

XI. Land Use/Planning

None.

XII. Mineral Resources

None.

XIII. Noise

Mitigation Measure NOI-1: Construction Noise Limits.

The operation of tools and equipment used in association with any future construction, repair, alteration, or demolition at the site shall be limited to between the hours of 8 a.m. and 5 p.m., Monday through Friday, and between the hours of 9 a.m. and 5 p.m. on Saturdays, unless further restricted by any required permit. In addition, no heavy equipment-related construction activities shall be allowed on Sundays or on holidays.

Mitigation Measure NOI-2. Acoustical Analysis for New Residential Buildings.

Prior to the issuance of building permits for new housing units, the project applicant shall prepare final design plans that incorporate building design and acoustical treatments to ensure compliance with State Building Codes and City noise standards. A project-specific acoustical analysis shall be prepared to ensure that the design incorporates controls to reduce interior noise levels to 45 A-weighted Decibel (dBA) Day-Night Average Sound Level (DNL) or lower within the residential units. The project applicant shall conform with any special building construction techniques requested by the City's Building Department, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking.

XIV. Population/Housing

None.

XV. Public Services

None.

XVI. Recreation

None.

XVII. Transportation

None.

XVIII. Tribal Cultural Resources

Refer to **Mitigation Measure CUL-1 and CUL-2: Inadvertent Discovery Protocol Measures.**

XIX. Utilities and Service Systems

None.

XX. Wildfire

None.

XXI. Mandatory Findings of Significance

Refer to **Mitigation Measure AQ-1: Measures to Reduce Air Pollution from Construction, Mitigation Measure AQ-2: Measures to Reduce Air Pollution to Onsite Sensitive Receptors, Mitigation Measure BIO-1: Avoidance and Minimization Measures to Protect Special Status and Nesting Birds, Mitigation Measure CUL-1 and CUL-2: Inadvertent Discovery Protocol Measures During Ground Disturbance, Mitigation Measure GEO-1: Geotechnical Investigation, Mitigation Measure NOI-1: Construction Noise Limits, and Mitigation Measure NOI-2: Acoustical Analysis for New Residential Buildings.**

CEQA Initial Study - Harris Medical Center Project

I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				✓
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
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?			✓	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			✓	

SETTING:

The subject parcel (APN 010-261-012), approximately 1.01 acres in size, is located at 272 Harris Street, near Henderson Center in central Eureka. The surrounding area is developed primarily with residential and commercial uses. Harris Street, a two-lane, paved major arterial street, and residences are directly to the north of the Proposed Project site. D Street bounds the property to the east, and Williams Street bounds the property to the west. South of the property is residentially zoned land and residences. Henderson Center, a commercial area of Eureka with many businesses, restaurants, and public facilities, is located directly to the northeast of the property. The property is currently developed with a large, multi-story former church building, outbuildings, cell tower, and parking spaces. See *Figure 1* and *Figure 2* for existing aesthetic conditions onsite.

Humboldt County has a wide range of scenic and visual resources, including coastline, mountains, hills, ridgelines, inland water features, forests, agricultural features, and rural communities (Humboldt County General Plan, 2017). The City’s certified Local Coastal Program identifies scenic coastal areas including the City’s islands, Second and Third Sloughs, Eureka Slough Wildlife refuge, and City lands northerly of Jacobs Avenue. The Project Site is outside of the Coastal Zone and is not visible from these scenic coastal areas.

DISCUSSION & FINDINGS:

a) For purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. The Proposed Project site is not located near any designated scenic vistas, nor is the site visible from a designated scenic vista. Thus, the Proposed Project would have no impact.

b) The Proposed Project site does not have specifically designated scenic resources. No specific scenic highways near the Proposed Project have been officially designated by the Caltrans State Scenic Highway System Map (2023), though State Highway 101 in its entirety in Humboldt County is eligible for designation. Highway 101 is located approximately one (1) mile west of the Proposed Project site,

and the Proposed Project site is not visible from the highway. The site is not a designated historic property and is not eligible for local, state or federal listing, as existing buildings are less than 50 years in age. Therefore, the Proposed Project would not substantially damage scenic resources, including trees, rock outcropping, and historic buildings within a state scenic highway, and no impact would occur.

c) Per CEQA Guidelines §15387, an urbanized area is one that has a population of 50,000 (CEQA Statute and Guidelines, 2023). According to the US Census Bureau, Eureka has an approximate population of 26,129 people, and is therefore not considered an urbanized area, per CEQA definitions. The existing visual character of the site is an abandoned former church and associated outbuildings. See *Figure 5* and *Figure 6* for views of the site from the closest public access point (Harris Street).



Figure 5: Existing Site Visual Conditions, looking East on Harris St. (Source: Google Maps, 2023)



Figure 6: Existing Site Visual Conditions, looking West on Harris St. (Source: Google Maps, 2023)

Both the currently proposed mixed-use development and any future redevelopment project facilitated by the Zoning Reclassification and General Plan Map Amendment could impact the existing visual character through building modifications, additional structures, and other site modifications. The Proposed Project site is located at a topographically elevated point within the City of Eureka and is surrounded by a grid-pattern of streets. Views of the site and surroundings are mostly from street corridors, and any development of the site would not impact view corridors down existing streets, regardless of height. Therefore, onsite building changes including potential additional building height and FAR allowable under the proposed HC zoning district would not impact existing publicly-accessible view corridors surrounding the site.

No specific designs of potential buildings have yet been planned to date; however, any site changes would likely be an upgrade from the current, abandoned site infrastructure. Building modifications would be required to obtain a Building Permit through the City of Eureka and would be reviewed for consistency with the Zoning Code, which the City of Eureka comprehensively updated in 2019 to include many new objective standards that were not in existence when the site was originally developed. These standards were added with the intent of improving the aesthetics of development and the relationship of the development to the public realm, including objective design standards (EMC §155.312), and more significant requirements for outdoor lighting (EMC §155.308.050), screening of waste/recyclable material storage (EMC §155.308.070), fences and walls (EMC §155.320),

landscaping (EMC §155.328), signs (EMC §155.340), and parking (EMC §155.324). When a Building Permit is applied for and the construction cost of the project is greater than \$55,000, which is anticipated for this project, certain existing nonconforming site features are required to be brought into compliance with existing development standards, including outdoor lighting, waste storage, short-term bicycle parking, screening from adjacent residential properties, and parking lot landscaping.

Additionally, EMC §155.412.040 (Design Review) requires new buildings that are 500 sq. ft. or more and 30% or greater building additions to obtain Design Review, a discretionary process to ensure the street-facing façades of proposed developments exhibit high quality design, complement neighboring properties, and contribute to Eureka's distinctive identity and unique sense of place. The Proposed Project includes two new buildings greater than 500 sq. ft., thus Design Review would be required and the new buildings would be reviewed based on the Design Review Criteria (Surrounding Context, Pedestrian Environment, Architectural Style, Articulation and Visual Interest, Materials, Safety, and Landscaping). The new buildings would also have to be consistent with the objective design standards of the code, including but not limited to standards related to exterior materials, building entries, and specific architectural features on new street-facing building facades.

Therefore, the Proposed Project, any future redevelopment project facilitated by the Zoning Reclassification and General Plan Map Amendment, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. A less than significant impact would occur.

d) The subject parcel is bounded primarily by existing residences as well as commercial businesses in nearby Henderson Center. Street lights are provided on both the northwest corner of the site (intersection of Williams Street and Harris Street) and the northeast corner of the site (intersection of D Street and Harris Street). In the vicinity of the site street lights exist (attached to power poles) at intersections along Harris Street.

Proposed Project construction would be limited to day-time hours. During Proposed Project operation, overnight use of the site by residents in the proposed townhouse buildings which would be similar to surrounding residential uses. The proposed urgent care center would be open until 8 P.M., nightly, so nighttime use of the property would be frequent. Thus, exterior lighting would likely be installed for safety and security purposes. All lighting would be required to conform with EMC §155.308.050, which establishes standards for outdoor lighting to minimize light pollution, including requirements that lighting be downcast, shielded, and dark-sky compliant.

In addition to the Proposed Project, any future redevelopment project facilitated by the Zoning Reclassification and General Plan Map Amendment may also involve night lighting, however, any outdoor lighting would be required to conform with the City Zoning Code to minimize light pollution.

Therefore, the Proposed Project, and any future development of the site facilitated by the Proposed Project, would not create a new source of substantial light or glare, nor adversely affect day or nighttime views in the area. A less than significant impact would occur.

MITIGATION MEASURES:

None.

Sources:

- 1) California Scenic Highway Mapping System. 2023. <https://dot.ca.gov/programs/design/lap-landscapearchitecture-and-community-livability/lap-liv-i-scenic-highways>.
- 2) US Census QuickFacts. 2022. <https://www.census.gov/quickfacts/eurekacitycalifornia>.
- 3) CEQA Statute and Guidelines. 2023. https://www.califaep.org/docs/CEQA_Handbook_2023_final.pdf.
- 4) Humboldt County General Plan for Areas Outside the Coastal Zone. 2017. <https://humboldt.gov/DocumentCenter/View/61984/Humboldt-County-General-Plan-complete-document-PDF>.
- 5) City of Eureka, 2040 General Plan. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 6) Eureka Municipal Code (EMC). 2024. <https://codelibrary.amlegal.com/codes/eureka/latest/overview>.

<p>II. AGRICULTURE & FOREST 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 Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:</p>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
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?				✓

SETTING:

The subject parcel is zoned RI with a land use designation of LDR. The proposed Zone Reclassification and General Plan Map Amendment would change the zoning of the site to HC and the land use designation to NC. The site is developed with existing structures, paved parking areas, and maintained landscaping. The site has been developed with a church and is proposed to be developed with medical, commercial retail, and residential facilities.

There is no farmland or timberland on the property. Per the 1920 Sanborn map for the area, the site was two separate vacant residential lots with a central alley, indicating the site was slated for development as far back as 1920. Aerial imagery from 1948 shows the site was originally part of the

forested gulch south of the site, but images from 1958 and 1965 show the site slowly lost vegetation and likely gained fill overtime. Aerial imagery from 1970 shows the site totally devoid of vegetation and flat, and by approximately 1976, the existing church had been constructed onsite.

DISCUSSION & FINDINGS:

a) The Farmland Mapping and Monitoring Program of the California Resources Agency has not mapped farmland in Humboldt County. According to the County of Humboldt's Web GIS portal, the site is not located on Prime Farmland, Unique Farmland or Farmland of Statewide Importance, and is not part of a Williamson Act contract. The site is already developed with and surrounded by residential and commercial uses in the heart of urban Eureka. The site is not zoned for agriculture or forest or timberland uses. Therefore, the Proposed Project, and any future redevelopment facilitated by the Proposed Project, would not convert farmland to a non-agricultural use. No impact would occur.

b) The site is not zoned for an agricultural use and is not proposed to be zoned for an agricultural use. The site is not in a Williamson Act contract. Therefore, the Proposed Project and any future redevelopment facilitated by the Proposed Project would not conflict with any existing zoning for agricultural use, or a Williamson Act contract. No impact would occur.

c) The site is not zoned for forest land, timberland, or Timber Production. Therefore, the Proposed Project and any future redevelopment facilitated by the Proposed Project would not conflict with existing zoning for timber, forestland, or timberland production. No impact would occur.

d) No forestland is located onsite, nor is any conversion of forestland proposed. The Proposed Project and any future redevelopment facilitated by the Proposed Project would not result in the loss or conversion of forestland to non-forest use. No impact would occur.

e) No farmland or forest land would be impacted as a result of the Proposed Project or any future redevelopment project at this site; therefore, there would be no change in the availability or use of agriculturally viable land or forest or timberland areas. No impact would occur.

MITIGATION MEASURES: None.

Sources:

- 1) Humboldt County Web GIS. 2024. <https://webgis.co.humboldt.ca.us/HCEGIS2.0/>.
- 2) California Department of Conservation, 2024. California Dept. of Conservation Website. <https://maps.conservation.ca.gov/dlrp/ciff/>.
- 3) California Public Resources Code (PRC). 2024. <https://codes.findlaw.com/ca/public-resources-code/prc-sect-4526/>.
- 4) City of Eureka, 2040 General Plan. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

CEQA Initial Study - Harris Medical Center Project

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management 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 Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?		✓		
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?		✓		
c) Expose sensitive receptors to substantial pollutant concentrations?		✓		
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?			✓	

SETTING:

The site is within the North Coast Air Basin (NCAB) and is subject to the authority of the North Coast Unified Air Quality Management District (NCUAQMD). The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards except for the state 24-hour particulate (PM₁₀) standard, which relates to concentrations of suspended airborne particles that are ten micrometers or less in size. PM₁₀ emissions include, but are not limited to, smoke from wood stoves, dust from traffic on unpaved roads, vehicular exhaust emissions, and airborne salts and other particulate matter naturally generated by ocean surf. Due to the "nonattainment" status for PM₁₀, the NCUAQMD prepared a draft PM₁₀ Attainment Plan in 1995. The PM₁₀ Attainment Plan identifies cost effective control strategies that can be implemented to bring PM₁₀ to within California standards. Methods include transportation measures (e.g., public transit, ridesharing, and bicycle incentives, etc.), land use measures (infill development), and combustion measures (hearth/wood burning stove limitations).

The City of Eureka's 2040 General Plan has established specific goals and policies to improve air quality. Relevant policies include the following:

- *Policy AQ-1.3: Require new discretionary developments to incorporate mitigation measures that utilize Best Management Practices and reduce emissions from both construction and operational activities, consistent with the NCUAQMD requirements and State regulations.*

- *Policy AQ-1.5: Require consultation and coordination with the NCUAQMD for any projects that may have a potential health risk or may expose the public to hazardous air pollutants, as well as determining compliance with adopted rules and regulations.*

- *Policy AQ-1.6: Require buffering of uses, facilities, and operations that may produce toxic or hazardous air pollutants and/or odors (e.g., commercial and industrial uses, highways, etc.) to provide an adequate distance from sensitive receptors (e.g., housing and schools), consistent with California Air Resources Board recommendations.*

The site is a 1.01-acre property that is already developed with an existing building formerly used as a church, outbuildings, and existing paved parking areas. It is accessed by Harris Street, a major arterial street in Eureka with 10,810 average daily trips (based on a 2016 count by the City of Eureka). The site is located approximately 400 feet from the nearest transit stop at Lowell and Harris and 660 feet from a major transit stop at F and Harris, with sidewalks allowing safe access to/from the stops. Harris Street also includes a bike lane, and future redevelopment of the Proposed Project site would trigger compliance with the City's short-term bicycle parking requirements, which require one short-term bicycle parking space for each six dwelling units as well as one short-term bicycle parking space for each 1,000 sq. ft. of floor area for other uses, to a maximum of 15 short-term bicycle parking spaces. The Proposed Project proposes 16 bicycle parking spaces. In addition, the Proposed Project would include a minimum of (2) electric vehicle charging parking spaces.

DISCUSSION & FINDINGS:

a) and b) As noted above, the NCUAQMD is currently listed as being in “attainment” or is “unclassified” for all federal health protective standards for air pollution and has been designated “nonattainment” for PM₁₀. In determining whether a project has significant air quality impacts on the environment, agencies often apply their local air district's thresholds of significance to projects in the review process. The NCUAQMD and the City have not formally adopted thresholds of significance for air quality pollutants. The NCUAQMD recommends using the Best Available Control Technology (BACT) emission rates for stationary sources as defined and listed in the NCUAQMD Rule and Regulations, Rule 110 – New Source Review and Prevention of Significant Deterioration (PSD), Section 5.1 – BACT (pages 8-9), updated in 2015. The BACT emissions rates include significance thresholds for reactive organic compounds (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and total particulate matter (PM₁₀, and PM_{2.5}). Significance thresholds from BACT include both daily (pounds per day) and annual (tons per year) limits.

The Proposed Project, and potential future redevelopment facilitated by the Zone Reclassification and General Plan Map Amendment, have the potential to create PM₁₀ emissions from construction and operational activities:

Construction: Site construction of the Proposed Project is anticipated to take between one (1) and two (2) years for full site buildout. Construction of the buildings would be staggered; the entire site would not be built out at once. During construction, scraping, grading, tilling, excavating, building construction, landscaping, and vehicle traffic could generate emissions and dust. Heavy equipment, including backhoes, excavators, etc., would be utilized. These construction activities, and potential future construction activities facilitated by the zoning/land use designation reclassification, would generate PM₁₀ and dust.

Daily and annual emission rates for air quality and greenhouse gas emissions (GHGs) for the Proposed Project were estimated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.24. CalEEMod quantifies direct emissions from construction and operation activities, including vehicle use, as well as indirect emissions, such as GHG emissions from energy use and water use. The CalEEMod analysis and results can be found in *Appendix 2*. Information for the analysis was derived from information from the Proposed Project description. Within the model, the most fitting Land Use Types were used. Specifically Land Use Types and lot area square footages were inputted

into the model as follows: 5,680 sq. ft. of “Commercial - Medical Office Building” for the converted church, 6,150 sq. ft. of “Residential – Condo/Townhouse” for the proposed residential units, 36 units of “Parking Lot”, and 1,000 sq. ft. of “Commercial - Quality Restaurant” for the proposed commercial space were used. The commercial space would be a juice bar, café, or coffee shop, which CalEEMod does not have specific Land Use Types, with the closest type designated as “Quality Restaurant” which was selected to represent the café (*Appendix 2*). For the analysis, default values were used where appropriate. Non-default values were sourced from the Proposed Project description or were determined using the best available information. The resulting estimated emissions from construction are shown in Table 7, and are compared to thresholds of significance from the BAAQMD and NCUAQMD, where applicable, for daily volumes of criteria pollutants.

Table 7: Construction Air Quality Pollutant Emissions Compared to BACT Significance Thresholds (Source: CalEEMod, 2024 – Appendix 2)

Pollutant	Proposed Construction Project Emissions - Unmitigated		NCUAQMD (BACT) Significance Thresholds		Exceeds Threshold?
	Maximum Tons/year	Average Lbs./day	Tons/year	Lbs./day	
ROG	0.28	1.52	40	50	No
NO _x	0.71	3.9	40	50	No
CO	0.84	4.59	100	500	No
SO _x	<0.005	0.01	40	80	No
PM ₁₀ (Total)	0.04	0.20	15	80	No
PM _{2.5} (Total)	0.03	0.14	10	50	No

Although the PM₁₀ Attainment Plan does not include project-specific requirements, NCUAQMD Rule 104, Section D – Fugitive Dust Emissions is used to address non-attainment for PM₁₀ by prohibiting specific activities and providing reasonable precautions to prevent particulate matter from becoming airborne. Under Rule 104, Section D “no person shall allow handling, transporting, or open storage of materials in such a manner which allows or may allow unnecessary amounts of particulate matter to become airborne.” Rule 104, Section D provides the following reasonable precautions that would be taken to prevent particulate matter from becoming airborne, including, but not limited to, the following provisions:

- Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.
- Using water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- Applying asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.
- Promptly removing earth or other track out material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment,

erosion by water, or other means.

As the Proposed Project site is accessible from paved roads, dust emissions from vehicular traffic are less likely. However, to ensure impacts to air quality from construction are less than significant, **Mitigation Measure AQ-I** has been incorporated to minimize air pollution during project construction. With Mitigation Measure AQ-I incorporated, the Proposed Project, and any future site redevelopment facilitated by the zoning reclassification, would comply with local air quality plans and the City of Eureka 2040 General Plan regarding particulate matter.

Operation: Once construction has been completed, minimal dust is anticipated to be generated as commercial and residential activities at the site would occur on impervious, hardpack surfaces such as asphalt and concrete with access via paved roads. Operation of the Proposed Project would utilize an existing building for medical office/clinic uses and up to twelve (12) new residential units, as well as construction of a commercial space consistent with the surrounding area. The primary activities that would generate pollutant emissions would be daily vehicle traffic of employees, residents, and patients, delivery truck traffic, and the potential use of a mobile back-up fuel powered generator during power outages. The amount of daily vehicle traffic and miles traveled would be minimized by the fact that the Proposed Project site is at a central location within an urbanized/infill area in close proximity to transit and bicycle/pedestrian infrastructure. Also, the Proposed Project includes a mix of complementary uses, and the site is also in close proximity to both residential neighborhoods and a commercial district (Henderson Center).

Air quality pollutants from operational activities were estimated using CalEEMod (*Appendix 2*). Assumed Land Use Types within the model were identical to those used for construction activities, and default values were used unless Proposed Project-specific information was available. The CalEEMod model utilizes higher default values for operational traffic than calculated in the Proposed Project description. These higher default values in the model were used to provide a more conservative estimate of operational air quality emissions. Use of a mobile backup generator during power outages, although infrequent, was considered in the model as well. Results of estimated operational emissions are shown in Table 8. As shown, operational emissions from the Proposed Project are significantly under required thresholds.

Table 8: Operation Air Quality Pollutant Emissions Compared to BACT Significance Thresholds (Source: CalEEMod, 2024 – Appendix 2)

Pollutant	Proposed Operational Project Emissions - Unmitigated		NCUAQMD (BACT) Significance Thresholds		Exceeds Threshold?
	Maximum Tons/year	Average Lbs./day	Tons/year	Lbs./day	
ROG	0.44	2.4	40	50	No
NO _x	0.34	1.87	40	50	No
CO	1.72	9.40	100	500	No
SO _x	<0.005	0.01	40	80	No

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PM ₁₀ (Total)	0.17	0.91	15	80	No
PM _{2.5} (Total)	0.05	0.27	10	50	No

All estimated construction and operational-related emissions are less than the significance thresholds (Tables 7 and 8). Thus, the Proposed Project’s construction and operational emissions are considered to have a less than significant impact.

The change from a residential to a mixed-use zoning district does open the site up to a broader mix of allowed uses, but the proposed HC zoning district is intended to promote a pedestrian-oriented environment and does not allow many of the auto-oriented use types included in the City’s Zoning Code, including fast-food drive throughs, fuel/service stations, heavy equipment sales/service, vehicle sales/rental, vehicle repair, or vehicle towing. Future re-development of the site to accommodate new uses allowed under the HC zoning district would likely require discretionary Design Review which would in turn trigger subsequent CEQA review.

As a result, with **Mitigation Measure AQ-I** incorporated, the Proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment under an applicable federal or state air quality standard. Impacts would be less than significant with mitigation incorporated.

c) Sensitive Receptors as defined by the NCUAQMD are any Class I Area (National Parks and Wilderness) and/or any other areas deemed sensitive by the Air Pollution Control Officer (APCO) including, but not limited to preschools and daycare centers, K-12 schools, senior retirement housing, and hospitals. There are no APCO-designated sensitive receptors within at least a 1,000-foot radius of the site. Zoe Barnum High School, the nearest school, is located 0.35 miles (approximately 1,850 feet) west of the site. The nearest park to the Proposed Project site is Da’ Yas Park, also known as Jacob-Hanley Ballfield Park & Playground, approximately 2,040 feet northwest of the site. The closest day care center to the site is Winzler Children’s Center, located approximately 3,330 feet northwest of the site. The closest senior center, per Google Maps, is Gary Langdon Center, located approximately 1,875 feet east/northeast of the site. The nearest hospital, St. Joseph’s Hospital, is located 1.21 miles northeast of the Proposed Project site.

Additionally, there are groups of people more affected by air pollution than others. The California Air Resources Board (CARB) has identified the following persons that are most likely to be affected by air pollution: children under 14, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. The nearest sensitive receptors to the Proposed Project site include residential homes. The nearest residential home is located just 15 feet south of the Proposed Project parcel. Approximately four (4) residences are located 60 feet to the east of the Proposed Project parcel, across D Street, and four (4) residences are located approximately 65 feet to the west of the Proposed Project parcel, Williams Street. An additional five

(5) residences are located to the north of the site, across Harris Street, approximately 75 feet from the Proposed Project parcel, and additional residences are located on all sides of the parcel.

Additionally, the Proposed Project has the potential to bring sensitive receptors to the Proposed Project site, either through patients accessing healthcare, or through sensitive receptors living in the proposed residential units. Air Districts in California typically require an analysis of health impacts when projects are within 1,000 feet of highways or major roadways which have an Annual Average Daily Traffic (AADT) greater than 30,000. The site is located between Albee Street and Union Street on Harris Street and has an AADT of approximately 10,810 trips. The site is also located approximately 900 feet south of Henderson Street, and approximately 1,000 feet west of H street, both of which are also major arterial roadways. To be conservative, it is assumed that, in combination, nearby roadways within 1,000 feet of the site have a combined AADT of greater than 30,000.

CARB recommends that exposure reduction measures be considered for a proposed land use where individuals would be exposed to high concentrations of pollution from a highway or major roadway. Potential exposure reduction measures include HVAC filters, described by their MERV. HVAC filters with a rating of 13 or higher have been found to provide an 85% reduction to indoor concentrations of traffic-generated PM_{2.5} (CARB, 2017). Therefore, to minimize potential health impacts to *onsite sensitive receptors* potentially brought onsite by the Proposed Project, or future onsite sensitive receptors brought onsite by future site redevelopment facilitated by the zoning/land use designation reclassification, **Mitigation Measure AQ-2** has been included to require the use of MERV-13-rated filters within HVAC systems of existing and proposed buildings.

There is the potential for fugitive dust emissions to impact sensitive receptors, primarily nearby residences, during construction of the Proposed Project and future redevelopment facilitated by the Zone Reclassification and General Plan Map Amendment. To reduce fugitive dust generation during any future demolition, excavation, or earthmoving construction activities at the site, standard dust control measures have been included as **Mitigation Measure AQ-1**. In addition, to reduce impacts to onsite sensitive receptors in close proximity to high-traffic volume roadways, **Mitigation Measure AQ-2** has been incorporated to require MERV-13 filters within the HVAC systems for existing and proposed buildings. With the implementation of **Mitigation Measures AQ-1 and AQ-2**, the Proposed Project would not conflict with any applicable air quality management plan, and would not result in any construction-phase adverse impacts to nearby sensitive receptors, including potential onsite sensitive receptors. Impacts would be less than significant with mitigation incorporated.

d) The Proposed Project involves residential, commercial, and medical development. None of the proposed onsite activities (e.g., small café, urgent care facility, and residential units) are typically associated with land uses that emit excessive objectionable odor (e.g., livestock projects).

Regarding operational impacts of future redevelopment facilitated by the Zone Reclassification and General Plan Map Amendment, there are numerous potential land uses that could result from the change of LDR/RI land use designation/zoning district to NC/HC (see *Table 1*). Conditional uses would require additional review under CEQA; however, principally permitted uses may not require additional review under CEQA if they are exempt from Design Review. Generally, Design Review would be required for principally permitted uses for new buildings, the addition of 30% or more floor

area to existing buildings, and wireless telecommunication facilities (EMC §155.412.040 Design Review).

Principally permitted uses that could be allowed without Design Review, depending on project specifics, at this site under the proposed HC zoning district that are not principally permitted under the current RI zoning district include the following: multi-family dwellings, single-family attached homes (townhomes), general indoor/outdoor retail (small), mobile vendors, restaurant/café/beverage sales, car share facilities, commercial lodging, day care facility, fitness/dance/health facility (small), general services, medical offices and clinics, offices, personal services, artisan manufacturing, civic institutions, colleges/trade schools (upper floor), instructional services, government facilities, and non-commercial places of assembly. None of these uses are typically associated with land use types that would produce objectionable odors (e.g., waste disposal sites). Any Conditional Uses within the NC/HC land use designation/zoning district would require additional discretionary City review and therefore would trigger subsequent CEQA review.

Therefore, the Proposed Project would not result in other emissions, including odors adversely affecting a substantial number of people. Impacts would be less than significant.

MITIGATION MEASURES:

Mitigation Measure AQ-1. Measures to Reduce Air Pollution from Construction.

To reduce fugitive dust generation during any demolition, excavation, or earthmoving construction activities as a result of the Proposed Project, the following dust control measures shall be implemented by the construction contractors during construction activity at the Proposed Project site:

- Water all exposed surfaces in active construction areas as necessary to minimize dust generation and use erosion control measures to prevent water runoff containing silt and debris from entering the storm drain system;
- Cover trucks hauling soil, sand and other loose material;
- Pave, water, or apply non-toxic soil stabilizers on unpaved access roads and parking areas;
- Sweep paved access roads and parking areas daily during construction;
- Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.
- Maintain and properly tune all construction equipment in accordance with the manufacturer's specifications.

Mitigation Measure AQ-2. Measures to Reduce Air Pollution to Onsite Sensitive Receptors.

The applicant and/or its construction contractors shall use filters with MERV-13 in the HVAC systems for the existing and proposed buildings. The applicant and/or its property managers shall ensure filters are replaced at manufacturer-recommended frequencies.

Sources:

- 1) NCUAQMD Criteria Pollutant Attainment status – Planning & CEQA. 2024.
<https://www.ncuaqmd.org/planning-ceqa>.

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- 2) Eureka City Web GIS. 2024. <https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604>.
- 3) NCUAQMD Rule 110 & Website. 2015. <https://ncuaqmd.specialdistrict.org/files/397b4b794/Rule+110.pdf>.
- 4) NCUAQMD PM₁₀ Attainment Plan Draft Report. 1995. <https://ncuaqmd.specialdistrict.org/files/6f1ad639b/NCUAQMD+Attainment+Plan+5-95.pdf>
- 5) Bay Area Air Quality Management District (BAAQMD). CEQA Thresholds and Guidelines Update. 2022. <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- 6) US EPA. Report on the Environment “Particulate Matter Emissions”. 2018. <https://cfpub.epa.gov/roe/indicator.cfm?i=19>.
- 7) Draft Humboldt Regional Climate Action Plan (CAP), 2024. https://humboldt.gov/DocumentCenter/View/131636/Humboldt-RCAP_Public-Draft_w-Appendices?bidId=.
- 8) City of Eureka, 2040 General Plan. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 9) Eureka Municipal Code (EMC). 2024. <https://codelibrary.amlegal.com/codes/eureka/latest/overview>.
- 10) California Emissions Estimator Model (CalEEMod). Version 2022.1.1.24. <https://www.caleemod.com/>.

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IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✓		
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?		✓		
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?		✓		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			✓	
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?				✓

SETTING:

The Proposed Project site is located on Harris Street in Eureka, on one legal parcel of approximately 1.01 acres. The site is fully developed, since 1976, with an existing building that was a former church, outbuilding, and paved parking area. The site is located approximately 126 feet above mean sea level (Google Earth, 2024), within the Elk River HUC-12 Watershed area and the Eureka Plain Planning Watershed (Humboldt County Web GIS, 2024). The Elk River Watershed area drains into Humboldt Bay. Average annual precipitation is approximately 46 inches per year (PRISM, 2024). Stormwater from the property flows into the City of Eureka stormwater drainage system. The site is located outside of the Coastal Zone, outside of mapped wetlands, and is not within a mapped Federal Emergency Management Agency (FEMA) flood zone (City of Eureka GIS Web Application, 2024; National Wetlands Inventory, 2024).

No wetlands, waterbodies, watercourses, streamside management areas, or vernal pools are located onsite. Approximately six (6) planted landscaping trees are located on the property, along the frontage of Harris Street; no other natural tree stands or habitat areas are located onsite. The nearest potential

habitat area is a gulch area of Martin Slough, located offsite of the parcel, approximately 100 feet to the southwest.

Publicly available data from the USFWS, CDFW, and the California Native Plant Society (CNPS) were reviewed to evaluate potential sensitive species onsite. No known special-status plant species, sensitive natural communities, or fish and wildlife species are known to be located onsite, per the California Natural Diversity Database (CNDDDB). Additionally, no wildlife corridors, critical habitat areas, habitat conservation plans, wetlands, or other sensitive areas are mapped onsite (CNDDDB, 2024; USFWS, 2024).

CNDDDBs QuickView Mapping Tool was used to generate a list of sensitive species potentially located within the Eureka Quadrangle (4012472), and included the City of Eureka, portion of Humboldt Bay, Samoa Peninsula, and the dunes near the coast (Figure 7). The search resulted in 87 records of sensitive species potentially located in the quadrangle. Of the 87 sensitive species, 37 were plants or natural communities and 50 were animals. See Appendix 3 for the full list of species potentially located within the quadrangle.

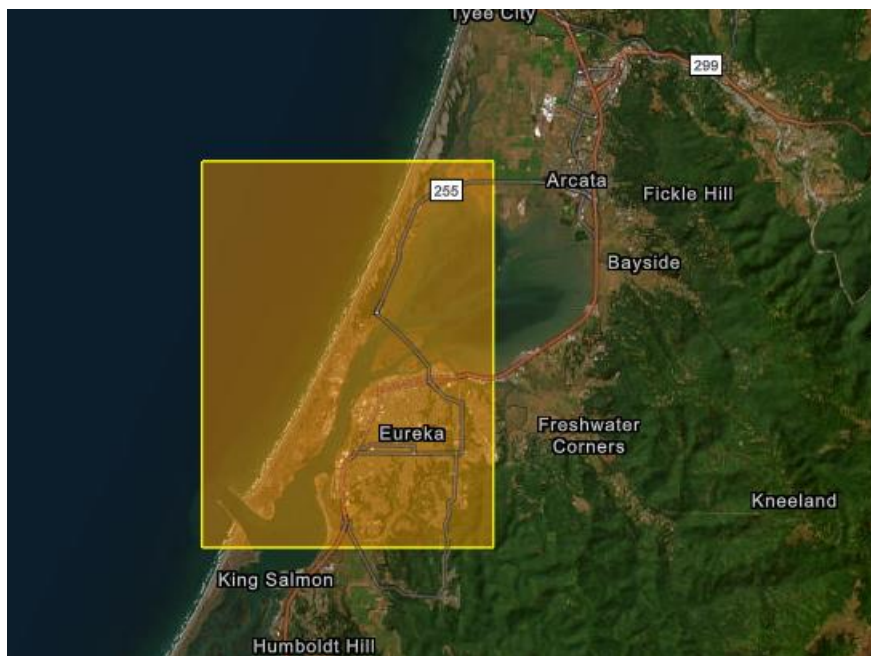


Figure 7: Area Assessed for Potential Sensitive Species using CNDDDB's QuickView Tool (Source: California Natural Diversity Database, 2024)

The City of Eureka 2040 General Plan has goals and policies pertaining to biological protection. Particularly relevant are the Goals and Policies of the Natural Resources section, including Water Resources, Biological Resources and Open Space. Relevant policies are as follows:

- *Policy NR-1.5 Best Management Practices. Require the implementation of Best Management Practices (BMPs) to minimize erosion, sedimentation, and water quality degradation resulting from the construction of new impervious surfaces.*

- *Policy NR-1.6 Water Quality. Regulate construction and operational activities to incorporate stormwater protection measures and Best Management Practices in accordance with the City's National Pollution Discharge Elimination System to minimize adverse effects of wastewater and stormwater discharges.*
- *Policy NR-2.1 Development in Gulches and Greenways. Allow limited development within Eureka's gulches and greenways and permit private property owners adjacent to gulch and greenway areas to develop, provided sensitive species habitat, fish and wildlife corridors, and the hydrologic capacity of the resource are protected, and vegetation removal does not occur below the high-water mark or in areas subject to flooding.*
- *Policy NR-2.6 Buffers. Require the provision and maintenance of reasonably sized buffers between sensitive habitat and adjacent urban uses to minimize disturbance of the resources, as appropriate. Buffers need not be larger than is recommended by a qualified professional ecologist (such as an ecologist, biologist, or wetland scientist).*
- *Policy NR-2.7 Tree and Native Vegetation Preservation and Use. Encourage preservation of existing healthy trees and native vegetation through site planning and maintenance, promote the use of low-maintenance, low water-use native plants and trees, prohibit the use of highly invasive plants, and discourage the use of invasive species in landscaping.*
- *Policy NR-3.2 Wildlife Movement. Preserve, enhance, and create interconnected open space and natural areas along sloughs, rivers, creeks, gulches and greenways, and other naturalized areas to provide for wildlife movement and protect biodiversity.*

DISCUSSION & FINDINGS:

a) – c) The Proposed Project site is a fully developed site located within the City of Eureka. New development on the site would be infill development on an urban lot with no wildlife habitat and no related potential fish and wildlife impacts. The site has minimal vegetation to support habitat for listed and sensitive species. The nearest habitat area is an off-property gulch 100 feet to the southwest of the parcel. As described above, a CNDDDB quad search was conducted for the property. Of the 50 sensitive animal species in the quadrangle, there was one (1) amphibian species, 23 bird species, 13 fish species, three (3) insect species, seven (7) mammal species, two (2) mollusks, and one (1) reptile species. The full list of species is available in *Appendix 3*.

The site is fully developed and does not contain suitable habitat (forests, open land, watercourses, wetlands, riparian areas, etc.) for any species identified as a candidate, sensitive, or special status. No vernal pools, wetlands, riparian areas, springs, watercourses, or waters of the State or US are present onsite. The individual trees onsite could provide habitat for some mammal or bird species; however, these trees are not expected to be impacted by project activities.

In addition, the Proposed Project and any future redevelopment of the site facilitated by the Zoning Reclassification and General Plan Map Amendment would be required to avoid water quality and hydrological impacts on nearby sensitive habitats during construction and post-construction activities consistent with the City's Urban Storm Water Quality Management and Discharge Control Ordinance and Municipal Separate Storm Sewer Systems (MS4) General Permit. The site is 1.01 acres

in size and any construction project disturbing one or more acres of land is regulated by the Construction General Permit (CGP) and requires a Stormwater Pollution Prevention Plan (SWPPP) to demonstrate compliance with the CGP. Because the site is near sensitive habitat, even if less than one acre of ground disturbance were proposed, the City would require an Erosion and Sediment Control Plan to avoid and minimize construction-phase impacts. The Erosion and Sediment Control Plan would detail how site construction would implement BMPs and keep sediment and construction wastes out of public waterways, including the nearby gulch. At a minimum, an Erosion and Sediment Control Plan would be required to be developed prior to construction and would be signed off on prior to the issuance of grading or building permits.

Regarding post-construction stormwater management, projects that create or replace 5,000 square feet or more of impervious surface, including redevelopment projects, require a post-construction Stormwater Control Plan (SCP) consistent with the low-impact-development (LID) standards included in the Humboldt LID manual. Even projects that replace between 2,500 and 5,000 square feet of impervious surface require a minimum of one Site Design Measure such as a vegetated swale and must meet a calculated runoff reduction standard. Because the site is currently covered in impervious surfaces now without any existing LID features, new development would result in an improvement in stormwater management over current conditions, avoiding impacts to nearby habitat areas.

The Proposed Project and any future redevelopment of the site facilitated by the Zoning Reclassification and General Plan Map Amendment are likely to involve landscaping (the EMC requires certain landscaping, and, as described above, LID features would be required and may include plantings). The EMC addresses potential impacts of landscaping on surrounding habitat, such as issues with planting invasive species that can spread and colonize nearby sensitive habitat, by requiring at least 75 percent, by count, of all new in-ground shrubs groundcover, and trees to be native to Eureka as listed by the CNPS, with the remainder being noncompeting exotic species. In addition, the EMC sets limits on noise levels and requires onsite lighting to be downcast such as not to spill onto adjacent properties or nearby habitat.

Nesting and migratory birds may be present in the vegetation of the gulch property to the southwest. If so, these species could be impacted by construction activities (e.g., noise, vibration of earthwork, etc.). As such, **Mitigation Measure BIO-1** is incorporated to require avoidance of noise or vibration-generating construction activities within 100' of the gulch area during nesting bird season (mid-March to mid-August), or, if avoidance of construction during this time is infeasible, a pre-construction survey would be conducted for nesting bird pairs, nests, and eggs within 100 feet of construction limits. With regard to the currently proposed site development, this mitigation measure would only impact construction of the western townhome units, as that is the only construction proposed in proximity to the gulch area.

No habitat, riparian corridors, wetlands, identified sensitive natural communities, wetlands, marshes, vernal pools, or waters of the State or United States exist onsite that could be directly impacted by the Proposed Project. Indirect impacts to the nearby gulch would be mitigated through development of a SCP, and a SWPPP or an Erosion and Sediment Control Plan. These would be requirements of the Proposed Project, or any future site redevelopment facilitated by the zoning/land use designation reclassification.

Therefore, no impact to a candidate, sensitive, or special status species is anticipated from the Proposed Project. The Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Through compliance with existing regulations, the Proposed Project would not have a substantial adverse effect on federally protected wetlands or wet areas as defined by Section 404 of the Clean Water Act. With **Mitigation Measure BIO-I** incorporated, a less than significant impact would occur.

d) Wildlife movement corridors are areas that connect suitable wildlife habitat areas in an otherwise fragmented region. The Proposed Project site is located within the City of Eureka, adjacent to developed urban areas on an existing, developed site. No wildlife corridors are located onsite and therefore the Proposed Project would not directly impact wildlife movement. Mitigation measures would be implemented during construction to reduce potential impacts, as discussed above, to migratory wildlife, including migratory birds who could be utilizing the gulch habitat area offsite. Additionally, the EMC requires that all outdoor lighting be directed downward and away from adjacent lots and nearby wildlife habitat.

Therefore, with incorporation of **Mitigation Measure BIO-I**, the Proposed Project would 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. Impacts would be less than significant with mitigation incorporated.

e) The Proposed Project, as planned, does not involve the removal of trees, and any future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment would be required to follow the City's tree removal regulations (Eureka Municipal Code 155.304.140). In addition, the requirements of the City's Urban Storm Water Quality Management and Discharge Control Ordinance and City's MS4 General Permit, the lighting and landscaping requirements of the EMC, and bird nesting **Mitigation Measure BIO-I** included in this Initial Study, ensure the Proposed Project, and any future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, would not conflict with the biological resource protection policies of the General Plan or development standards of the EMC. Therefore, the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

f) No Habitat Conservation Plans, Natural Community Conservation Plans, or any other local, regional, or state habitat conservation plans have been adopted in the area. Therefore, no impact would occur.

MITIGATION MEASURES:

Mitigation Measure BIO-I: Avoidance and Minimization Measures to Protect Special Status and Nesting Birds.

No noise- or vibration-generating construction activities within 100 feet of the gulch habitat to the southwest of the parcel shall occur between March 15th to August 15th, when birds may be nesting on the adjacent property. If construction during this time is unavoidable, a qualified biologist shall conduct a pre-construction survey for nesting bird pairs, nests, and eggs within 100 feet of the construction limits. If an active nest is encountered, species-specific measures shall be prepared by a

qualified biologist in consultation with the USFWS or CDFW, as applicable, and implemented to prevent abandonment of the active nest.

Sources:

- 1) Humboldt County Web GIS. 2024. <https://webgis.co.humboldt.ca.us/HCEGIS2.0/>.
- 2) City of Eureka 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 3) Google Earth. 2024.
- 4) PRISM Climate Group. 2024. <https://prism.oregonstate.edu/explorer/>.
- 5) City of Eureka Web GIS. 2024. <https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604>.
- 6) CNDDDB Maps and Data. 2024. <https://apps.wildlife.ca.gov/bios6/>.
- 7) USFWS Critical Habitat Area Map. 2024. https://www.arcgis.com/apps/Embed/index.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77&extent=-124.1522,38.0501,-121.4496,39.2098&zoom=true&scale=true&details=true&disable_scroll=true&theme=light.
- 8) CNPS Inventory of Rare Plants. 2024. <https://rareplants.cnps.org/>.
- 9) National Wetlands Inventory. 2024. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>.
- 10) Humboldt Low Impact Development (LID) Manual. <https://humboldt.gov.org/2486/Stormwater-Program>.
- 11) City of Eureka Stormwater Program. 2024. <https://www.eurekaca.gov/307/Stormwater>.
- 12) Eureka Municipal Code (EMC). 2024. <https://codelibrary.amlegal.com/codes/eureka/latest/overview>.

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

SETTING:

On February 22, 2024, a referral was circulated for the Proposed Project at 272 Harris Street to the Tribal Historic Preservation Officers of the Bear River Band, the Wiyot Tribe, and the Blue Lake Rancheria. The referral indicated that the Proposed Project would include a General Plan Amendment changing the land use designation from LDR to NC, a Zone Reclassification changing the zoning district from R1 to HC, and development of the site with an urgent care, medical spa, offices, and residential units. Additionally, separate AB 52 and California Government Code (CGC) §65352 notification referrals were sent to local tribes on February 22, 2024 for further review and comment. It was indicated in all three (3) referrals that ground disturbing activity would occur.

Tribal Response:

Of the three referrals sent to the three local tribes, one response was received from the Bear River Band stating they had no comments or requests. No requests for AB 52 consultation were received, and no requests for mitigation measures were received.

DISCUSSION & FINDINGS:

a) A structure must be treated as a historic resource if it is listed in, or determined to be eligible for listing in, the California Register of Historic Resources. Historical significance may be inferred from any of the following factors:

- 1) Association with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
- 2) Association with the lives of persons important to local, California, or national history.
- 3) Embodiment of the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.
- 4) Embodiment, or a likelihood thereof, of information important to the prehistory or history of the local area, California, or the nation.

The site is not located within a designated local, state or national Historic District, and the site and existing structures are not listed on the National Register of Historic Places, the California Register of Historic Resources, or Local Register of Historic Places. The property is already developed with existing buildings and parking, built in 1976. The existing buildings are less than 50 years old and are not of historical significance. There are no known historical buildings or resources on the property. Therefore, no impact would occur.

b) There are no known archaeological resources located within the property. However, because there is potential to discover a previously unknown sensitive resource during ground-disturbing activities, **Mitigation Measure CUL-1** has been incorporated to ensure potential impacts to archeological resources remain less than significant.

c) There are no known human remain locations onsite. However, because there is potential to discover human remains during ground-disturbing activities, **Mitigation Measure CUL-2** has been incorporated to ensure any potential impact would be less than significant. Impacts would be less than significant with mitigation incorporated.

MITIGATION MEASURES:

Mitigation Measure CUL-1: Inadvertent discovery protocol shall be followed for any future ground disturbing activities at the site, as outlined below:

1. If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist shall be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band, Blue Lake Rancheria, and Wiyot Tribe are to be contacted immediately to evaluate the discovery and, in consultation with the project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structure remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.
2. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Eureka.

Mitigation Measure CUL-2: In the event of discovery or recognition of any human remains during construction activities, the landowner or person responsible for excavation would be required to comply with the State Health and Safety Code Section §7050.5. Construction activities within 100 feet of the find shall cease until the Humboldt County Coroner has been contacted at 707-445-7242 to determine that no investigation of the cause of death is required. If the remains are determined to be, or potentially be, Native American, the landowner or person responsible for excavation would be required to comply with PRC §5097.98. In part, PRC §5097.98 requires that the NAHC shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC would then identify the person or persons it believes to be the most likely descendant from the

deceased Native American, who in turn would make recommendations to the landowner or the person responsible for the excavation work for the appropriate means of treating the human remains and any associated grave goods within 48 hours of being granted access to the site. Additional provisions of PRC §5097.98 shall be complied with as may be required.

Sources:

- 1) National Register of Historic Places. <https://www.nps.gov/subjects/nationalregister/database-research.htm>.
- 2) California Register of Historic Resources. https://ohp.parks.ca.gov/?page_id=21238.
- 3) Local [Eureka] Register of Historic Places. <https://www.eurekaca.gov/DocumentCenter/View/3357/LocalRegister-of-Historic-Places-sorted-by-APN>.
- 4) California Government Code (CGC) [§65352](#)
- 5) State Health and Safety Code §7050.5
- 6) Public Resource Code (PRC) §5097.98

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

SETTING:

Electricity at the Proposed Project site is currently provided by an existing service from PG&E. PG&E also supplies natural gas to the site. No off-site or onsite improvements of utility lines or electrical infrastructure would need to occur for the Proposed Project.

The State of California Building Energy Efficiency Standards under the CBC, known widely as Title 24, outline requirements for all new commercial and residential construction projects. Title 24 is part of California’s wider strategy to require all new commercial construction projects to be zero net energy by 2030 (California Energy Efficiency Strategic Plan, 2011). Title 24 standards would apply to any new buildings (e.g., new residential structures) and modification of existing buildings (e.g., remodeling the church building) under approved building permits from the City of Eureka.

The 2040 City of Eureka General Plan includes goals and policies related to energy as part of the Mobility and Utilities (e.g., Our Infrastructure) element. Relevant energy policies are described further in section b), below.

DISCUSSION & FINDINGS:

a) Energy would be needed for the proposed residential, medical, and commercial uses, and for any future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment.

Construction

The Proposed Project would temporarily use energy during construction of the residential, medical, and commercial facilities. Temporary energy use in connection with Proposed Project construction would entail consumption of diesel fuel and gasoline by construction equipment and by the transportation of earth moving equipment, construction materials, supplies, and construction personnel. Given the construction period and implementation of State regulations regarding vehicle emission and fuels standards, such as the Low Carbon Fuel Standard and anti-idling regulations, energy use related to construction would not be wasteful or inefficient.

Inefficient construction-related fuels use would also be avoided due to the measures in **Mitigation Measure AQ-I** (Measures to Reduce Air Pollution from Construction). Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by Mitigation Measure AQ-I). Because construction would not encourage activities that would result in the use of large amounts of fuel and energy in a wasteful manner, and with the incorporation of Mitigation Measure AQ-I which would reduce idling time,

impacts related to the inefficient use of construction-related fuels would be less than significant with mitigation.

Operation

All new structures and existing building modifications at the site would be subject to Title 24 of the California Code of Regulations (incorporated by reference in EMC §150.016 [California Energy Code Adopted]) which contains energy conservation standards applicable to residential and non-residential buildings throughout California designed to reduce wasteful and unnecessary energy consumption. No construction would occur until a commercial building permit, demonstrating compliance with Title 24, is obtained through the City of Eureka. For the existing church building, this would trigger energy upgrades (e.g., HVAC system upgrades, mechanical, plumbing, and electrical upgrades, etc.) that would ultimately make the existing building more energy efficient. The proposed new residential buildings would be required to install rooftop-mounted solar panels to offset residential energy use. PG&E would continue to serve the site's energy needs and the Proposed Project would not require additional PG&E upgrades.

A minimum of two (2) electric vehicle (EV)-equipped charging spaces and 16 bicycle parking spaces would be provided by the Proposed Project to incentivize decarbonized transportation methods. The project site is located within 660 feet of a major transit stop, which would promote public transportation to the site.

The proposed zoning reclassification would allow the Proposed Project, or potential future mixed-use projects, to be developed on an existing, unoccupied developed site in close proximity to existing mixed-use residential, commercial, and retail services. The Proposed Project is a mixed-use development and infill housing project that would increase the number of residents in an area with well-established public services, which ultimately would reduce vehicle miles traveled (VMT) from residents traveling from further areas in the City to access these same public services. Similarly, the Proposed Project would add medical and commercial services in close proximity to residents, which would reduce VMT from residents in the area traveling further distances to access medical services elsewhere in the City.

Therefore, the Proposed Project would not result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant with **Mitigation Measure AQ-I** incorporated.

b) The City's 2040 General Plan has goals and policies pertaining to energy, including the following three policies:

- *Policy U-5.1 Energy Conservation. Promote energy conservation, and development of alternative, nonpolluting, renewable energy sources for community power in both the public and private sectors.*
- *Policy U-5.2 Energy Conserving Land Use Practices. Implement energy conserving land use practices that include compact and mixed-use development, provision of bikeways and pedestrian paths, and the incorporation and enhancement of transit routes and facilities.*
- *Policy U-5.3 Design Process. Engage with property owners and developers early in the design process to incorporate energy saving strategies into appropriate projects.*

The Proposed Project would provide EV-charging parking spaces, require energy-efficient upgrades of the existing onsite church building due to the change of use, and require the installation of solar panels on the proposed residential buildings to offset energy usage (Policy U-5.1). The Proposed Project is a housing and mixed-use infill development that would allow denser development on an existing developed, unoccupied site (Policy U-5.2). The Proposed Project would allow for a mix of commercial, medical, and residential uses, bringing new residents closer to existing public services and bringing public services closer to existing residents (Policy U-5.2). The Proposed Project would promote multi-modal transportation due to project siting within close proximity to a major transit stop, designated bicycle paths, and pedestrian walkways and would provide a minimum of 16 bicycle parking spaces (Policy U-5.2). In addition, the applicant has been working closely with the City of Eureka and would continue to work closely with the City as the Proposed Project transitions into more detailed design, building, and construction (Policy U-5.3).

The Proposed Project would temporarily require the use of construction equipment in order to construct the components of the Proposed Project; however, these activities would be temporary and would not interfere with the broader energy goals of the City or state. All proposed new onsite constructions and modifications of existing buildings would be developed in compliance with Title 24 regulations, which encourage and require energy-saving strategies. Any future redevelopment onsite facilitated by the Zoning Reclassification and General Plan Map Amendment would also need to meet these energy requirements and be consistent with the Policies within the General Plan. Therefore, the Proposed Project would conflict with or obstruct a state or local plan for renewable energy and energy efficiency. Impacts would be less than significant.

MITIGATION MEASURES:

Refer to Mitigation Measure AQ-I.

Sources:

- 1) City of Eureka, Building Division. 2024. <https://www.eurekaca.gov/164/Building>.
- 2) California Building Standards Code, Title 24. 2022. <https://www.dgs.ca.gov/en/BSC/Codes>.
- 3) City of Eureka Municipal Code (EMC), Chapter 150.120: Energy Conservation. https://codelibrary.amlegal.com/codes/eureka/latest/eureka_ca/0-0-0-39007.
- 5) City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

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VII. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			✓	
ii) Strong seismic ground shaking?		✓		
iii) Seismic-related ground failure, including liquefaction?		✓		
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		✓		
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?		✓		
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?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		
<p>SETTING: The site is a 1.01-acre parcel located in the City of Eureka, within Humboldt County. Humboldt County is a rural area of California, subject to many potential natural hazards including sea level rise, wildfires, landslides, earthquakes, and flooding. Humboldt County is located within Northern California’s Coast Ranges Geomorphic Province, which is a geologically active region at risk for strong ground shaking. Humboldt County is located within the two highest of five seismic risk zones specified by the Uniform Building Code. The Cascadia Subduction Zone runs north offshore of Humboldt, Del Norte, Oregon, and Washington. Landslides and soil slips are common due to the combination of sheared rocks, shallow soil profile development, steep slopes, and heavy seasonal precipitation (Humboldt County 2025 General Plan Update. Natural Resource and Hazards Report; Pg. 10-9).</p> <p>Alquist Priolo fault zones are regulatory zones surrounding the surface traces of active faults in California (USGS, 2023). No Alquist Priolo Fault Zones are located near the Proposed Project site.</p>				

The nearest zone is 4.11 miles to the southwest of the parcel, near Humboldt Hill (Humboldt Web GIS, 2024).

The site is located entirely on soils classified as Urban land-Halfbluff-Redsands complex, 0 to 5 percent slopes by the US Department of Agriculture Natural Resources Conservation Service (NRCS). These soils have a Map Unit of 212, and typically contain urban, land, and residential uses. They are comprised of fine sandy loam, sandy loam, loamy sand, and sand, are moderately well-drained soils (NRCS Web Soil Survey, 2024).

The property contains slopes of 0% to 8%. No historic landslides or fires are mapped within the Proposed Project area. The property is not at risk of flooding from sea level rise or dam failure inundation. The property is not located within a mapped FEMA Flood Zone. The site is not listed as an area of potential liquefaction and is located within a Low Instability/Relatively Stable area for seismic safety (Humboldt Web GIS, 2024).

Historically, the site was part of the gulch greenway to the southwest of the site, per 1948 aerial imagery. By 1970, all vegetation had been removed from the property and it had been filled with between 10 to 15 feet of fill and by 1976, the existing church had been constructed onsite, on top of the fill. Over the years, the foundation of the church in the southwestern corner has settled and the applicant has obtained a foundation repair permit to repair the existing building foundation (Permit B21-0265).

Today, as noted above, a majority of the site is covered in exiting pavement, buildings and other impervious surfaces.

DISCUSSION & FINDINGS:

a) Discussion and findings relating to potential substantial adverse effects, including the risk of loss, injury, or death for each subcategory are as follows:

i) 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.

There are no earthquake faults delineated on Alquist Priolo Fault Zone maps within the Proposed Project area (CGS, 2010 and Humboldt Web GIS, 2024). As described above, the nearest Zone is located over 4 miles from the site. Therefore, based on the distance to active fault zones, surface rupture due to faults is not likely and impacts would be less than significant.

ii) and iii) Earthquakes on active faults in the region have the capacity to produce a range of ground shaking intensities in the Proposed Project area. Ground shaking may affect areas hundreds of miles distant from an earthquake's epicenter. Ground motion during an earthquake is described by the parameters of acceleration and velocity as well as the duration of the shaking. A common measure of ground motion is peak ground acceleration (PGA). The PGA for a given component of motion is

the largest value of horizontal acceleration obtained from a seismograph. PGA is expressed as the percentage of the acceleration due to gravity (g). Moderate earthquake hazard areas are defined as areas with ground accelerations of less than .092g and Violent earthquake hazard areas have ground accelerations of 0.65g to 1.24g. The CGS, Probabilistic Seismic Hazards Mapping Ground Motion Page (www.conservation.ca.gov) indicates a maximum PGA on the order of 0.61g for a seismic event with a 10 percent probability of exceedance in 50 years (design basis earthquake).

Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion and are converted to a fluid state because of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in temporary, fluidlike behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. According to the City of Eureka Web GIS, the site is not in an area designated as subject to liquefaction. The nearest area is located over 900 feet south of the parcel.

However, the site is constructed on historic fill material, and because the church has experienced structural foundation settling, the applicant would be required to obtain a Geotechnical Investigation prior to the issuance of building permits. The Geotechnical Investigation would include site-specific information on site elevations, soil types, and depth to groundwater in order to determine the geotechnical conditions of the site. The report would include an analysis of the onsite hazards, including a quantitative evaluation of hazard potential, detailed field investigations, estimation of ground-motion parameters, evaluation of liquefaction and lateral spreading, and recommendations to reduce identified hazards, per Guidelines for Evaluating Seismic Hazards in California. This has been incorporated as **Mitigation Measure GEO-1**.

The new structures associated with the Proposed Project, and any future structures associated with potential site redevelopment facilitated by the zoning/land use designation reclassification, would be required to follow all seismic standards outlined in the CBC. Therefore, with Mitigation Measure GEO-1 incorporated, the Proposed Project would not expose people or structures to substantial adverse effects resulting from strong seismic ground shaking or seismic-related ground failure, including liquefaction. Impacts would be less than significant with mitigation incorporated.

iv) Slope failures, commonly referred to as landslides, include many phenomena that involve the downslope displacement and movement of material, either triggered by static (i.e., gravity) or dynamic (i.e., 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 Proposed Project site does not contain any areas of known slope instability. The site is designated as an area of low instability / relatively stable. No historic landslides are mapped on the property. The site is relatively flat, with slopes ranging from 0% to 8%. Therefore, the Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. No Impact.

b) The site is developed, with a majority of the site covered by buildings and pavement. Any site development or future redevelopment facilitated by the Proposed Project may involve grading and/or excavations for building footings, utility trenching, drainage swales, etc. As part of development, a Building Permit would need to be obtained from the City of Eureka. The Site is 1.01 acres in size and any construction project disturbing one or more acres of land is regulated by the CGP and requires a SWPPP to demonstrate compliance with the CGP. Because the site is near sensitive habitat, even if less than one acre of ground disturbance were proposed, which is anticipated with the Proposed Project, the City would require an Erosion and Sediment Control Plan to avoid and minimize construction-phase impacts. Erosion control measures would include but not be limited to silt fences, straw wattles, and soil stabilization controls. Therefore, the Proposed Project would not result in substantial soil erosion, or the loss of topsoil and a less than significant impact would occur.

c) As described in section a), above, the site is not in an area designated as prone to liquefaction or in an area with historic landslides. The site is 1.01 acres in an existing developed area of Eureka. Design and construction of the Proposed Project would incorporate appropriate engineering practices to ensure seismic stability as required by the CBC and City standards. However, because the site is constructed on historic fill, and because the existing building foundation has experienced structural issues in the past, the Proposed Project is required to obtain a Geotechnical Investigation prior to the issuance of any building permits, as mandated by **Mitigation Measure GEO-1**. The Geotechnical Investigation would analyze lateral spreading, subsidence, liquefaction, and/or collapse, and all recommendations in the Geotechnical Investigation would be required to be implemented as a part of Proposed Project construction. Therefore, impacts would be less than significant with mitigation incorporated.

d) Expansive soils possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying. Structural damage may occur over a long period of time due to expansive soils, usually the result of inadequate soil and foundation engineering or the placement of structures directly on expansive soils. The Urban land-Halbluff-Redsands complex soils that the site is located on are not known to be expansive soils, however, subsidence issues with the existing church foundation suggest the potential for unstable fill soils with potential expansive or shrinking characteristics. Shrink-swell characteristics of the onsite soils, and potential geohazards associated with onsite soil types, would be investigated within the Geotechnical Investigation required in **Mitigation Measure GEO-1**. All resulting design measures, recommendations, design criteria, and specifications outlined in the Geotechnical Investigation would be incorporated into project construction prior to the issuance of building permits. In addition, the Proposed Project, and any potential future site redevelopment facilitated by the zoning/land use designation reclassification, would comply with structural requirements per the CBC and the City of Eureka. Therefore, impacts would be less than significant with mitigation incorporated.

e) The site is serviced by existing City of Eureka municipal sewage disposal and water supply facilities. Therefore, any future redevelopment project would not have septic tanks or other alternative wastewater disposal systems. No Impact.

f) There are no known unique paleontological resources or unique geologic features at the site. The Proposed Project includes earthwork for the proposed buildings. Additional earthwork could occur with potential future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment. Although the site has been previously developed, it is possible that excavation could unearth paleontological resources. As such, an inadvertent discovery protocol for paleontological resources has been included as part of **Mitigation Measure CUL-I**. With the proposed **Mitigation Measure CUL-I**, the Proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts would be less than significant with mitigation incorporated.

MITIGATION MEASURES:

Mitigation Measure GEO-I – Geotechnical Investigation: Prior to the issuance of any building permits, the applicant shall secure the services of a qualified licensed professional to perform a site-specific design-level geotechnical investigation, in compliance with City of Eureka requirements, including detailed information on site elevations, soil types, and depth to groundwater. The investigation shall determine the Proposed Project’s geotechnical conditions, including seismic shaking and liquefaction hazards, unstable soils hazards, and destabilization and erosion hazards associated with drainage and measures to address these hazards. Analysis presented in the geotechnical investigation shall conform to the CGS recommendations presented in the Guidelines for Evaluating Seismic Hazards in California. Briefly, the guidelines recommend that the investigation include: a site screening evaluation; evaluation of on- and off-site geologic hazards; detailed field investigation; quantitative evaluation of hazard potential; and recommendations to reduce identified hazards. All design measures, recommendations, design criteria, and specifications set forth in the design-level geotechnical investigation shall be implemented as a condition of project approval.

Mitigation Measure CUL-I – Inadvertent Discovery Protocol Measures

Sources:

- 1) Humboldt County Web GIS. 2024. <https://webgis.co.humboldt.ca.us/HCEGIS2.0/>.
- 2) City of Eureka Web GIS. 2024. <https://arcgis-svr.ci.eureka.ca.gov/portal/apps/webappviewer/index.html?id=49037ddcf4474c6ba4bdb661ee203604>.
- 3) Humboldt County 2025 General Plan Update. <https://humboldt.gov.org/205/General-Plan>.
- 4) Natural Resources Conservation Service (NRCS), Web Soil Survey. 2024. <https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>.
- 5) California Geological Survey (CGS). 2010. <http://maps.conservation.ca.gov/cgs/fam/>
- 6) California Building Code (CBC). 2022. <https://www.dgs.ca.gov/BSC/Codes>.
- 7) Department of Conservation, Probabilistic Seismic Hazards Assessment. 2024. <https://www.conservation.ca.gov/cgs/psha>.
- 8) City of Eureka Building Division. 2024. <https://www.eurekaca.gov/164/Building>.
- 9) City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 10) California Geological Survey (CGS). 2008. Guidelines for Evaluating Seismic Hazards in California.

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

SETTING:

GHGs are emitted into the atmosphere from a variety of sources, including the combustion of fuel for energy and transportation, cement manufacturing, and refrigerant emissions. GHGs are gases that can trap heat in the atmosphere, a process that is analogous to the way a greenhouse traps heat. GHGs are emitted from human activities, as well as through natural processes. Increasing GHG concentrations in the atmosphere are leading to global climate change. In Eureka, climate change impacts of particular concern are coastal erosion, flooding, and habitat modification.

The primary GHGs that are of concern for development projects include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. Emissions of CO₂ are largely by-products of fossil fuel combustion and emissions of CH₄ primarily result from off-gassing associated with agricultural practices and landfills (CARB, 2017).

GHGs are regulated on federal, state, and local levels. At the state level, AB 32 Scoping Plan (2017 Update) contains the main strategies California will use to reduce GHG emissions. AB 32 was originally passed by the California Global Warming Solutions Act of 2006 and details strategies and GHGs reduction goals for projects across the state, including the now-achieved requirement to reduce statewide GHG emissions to 1990 levels by 2020 (a 28% reduction). In 2016, AB 32 was amended to require California to reduce GHG emissions to 40% below 1990 levels by 2030, and in 2022, the updated Scoping Plan was released to obtain carbon neutrality by 2045, which would be an 85% reduction in GHG emissions below 1990 levels (CARB, 2022).

Locally, the City of Eureka has been coordinating with the County and other Humboldt County cities to finalize a Humboldt County Regional Climate Action Plan (CAP) to reduce GHG emissions countywide. The first draft of the CAP was released in 2022, and a revised draft was released in August 2024. The CAP explores locally oriented strategies to reduce emissions from vehicle travel, electricity consumption, natural gas use, landfill waste generation, and other sources of GHGs.

The City, County, Region, and State have existing programs and policies in place that reduce and minimize GHG emissions:

- Draft Humboldt County Regional Climate Action Plan (2024)
- City of Eureka 2040 General Plan (2018)
- California Air Resources Board Climate Change Scoping Plan (2022)
- NCUAQMD Particulate Matter Attainment Plan (1995)

DISCUSSION & FINDINGS:

a) GHG emission impacts are inherently cumulative in nature, given the global impact of climate change. The Proposed Project would significantly impact GHG emissions if it were to generate substantial GHG emissions exceeding the CEQA thresholds of significance adopted by the NCAQMD, City of Eureka, or Humboldt County. None of these jurisdictions have adopted thresholds of significance for GHG emissions. However, the Bay Area Quality Management District (BAAQMD) has established GHG thresholds that can be used for significance determinations. These thresholds are used by other Cities and Counties in California without adopted thresholds of significance. Thus, for the analysis of GHG emissions, BAAQMD’s GHG thresholds are used to evaluate the significance of the Proposed Project’s GHG emissions. For land use development projects, the BAAQMD GHG threshold is “annual emissions less than 1,100 metric tons per year (MT/yr.) of CO₂e” (BAAQMD, 2017). The BAAQMD also requires that land use projects be consistent with local GHG reduction strategies, including adopted local CAPs. As mentioned above, the City of Eureka does not yet have an adopted CAP.

Sources of GHG emissions from construction of the Proposed Project would include construction employee vehicles and equipment (short-term impacts). Heavy equipment operations produce GHG emissions mainly in the form of carbon dioxide with small amounts of methane and nitrous oxide. Additionally, the operation of the Proposed Project or any future redevelopment project facilitated by the Zoning Reclassification and General Plan Map Amendment would generate GHG emissions from vehicle trips from residents, customers, workers and deliveries (VMT) and from gas and electric consumption in buildings resulting from heating, cooling, lighting, and appliance use.

CalEEMod was used to estimate construction and operational GHG emissions. Information for the CalEEMod Analysis (*Appendix 2*) was derived from applicant information and the Proposed Project description, and default parameters were used where appropriate (e.g., construction equipment list, default HVAC for new residences, etc.). Mitigation measures available in the model, such as carpooling, Title 24 compliance, the offset of propane use, and use of renewable energy, were not included in the analysis and therefore the CalEEMod analysis represents a conservative estimation of Proposed Project emissions. The results are summarized in Table 9.

Table 9. Estimated GHG Emissions from Construction and Operation of Proposed Project (Source: CalEEMod, 2024 – Appendix 2)			
Emission Source	CO ₂ e (MT/yr)	BAAQMD Threshold (MT/yr)	Exceeds Threshold?
Construction - Unmitigated	138	1,100	No
Operation - Unmitigated	291	1,100	No

As can be seen in **Error! Reference source not found.**, emissions of GHGs would be below the BAAQMD CEQA threshold, and therefore significant or cumulative impacts to the environment due to GHG emissions from the Proposed Project are not likely. In addition, regarding construction-phase GHG emissions, all construction equipment would be maintained to meet current emissions standards as required by the CARB.

Regarding operation-phase GHG emission, construction of any future buildings and existing building

modifications would be required to follow Title 24 standards of the CBC. Proposed new residential structures would be required to install rooftop-mounted solar panels to offset energy usage. The Proposed Project would include a minimum of 16 bicycle parking spaces and two (2) EV charging spaces. The site is well-positioned to be accessed via existing adjacent pedestrian walkways, public transit stops located within 400 and 660 feet of the site, and/or the existing bicycle lane on Harris Street.

The site is located in central Eureka, in close proximity to dozens of local shops, residences, and other public services. The Proposed Project would allow for a mix of both commercial, medical, and residential uses, bringing new residents closer to existing public services and bringing public services closer to existing residents. As such, the Proposed Project could actually have a reduction in VMT through (1) reducing the distance that existing residents in the area of the Proposed Project site would drive to access medical services, and/or from (2) adding residents to an area with existing public services who would otherwise live elsewhere in the County and potentially drive a longer distance to access these public services.

While the proposed HC zoning designation would allow for a broad array of future uses and allow the parcel to be used more intensively (e.g., an increased FAR), the size of the parcel limits the amount of use and corresponding increase in vehicle trips. In addition, the Proposed Project is infill development. Proposed residential townhomes are intended to support onsite employees, which would reduce miles traveled from other parts of the city. In addition, the proximity to housing and access to bicycle lanes and sidewalks increases the likelihood that people walking or bicycling would be able to access the site. There are also nearby bus stops to serve the site. These would reduce the reliance on motorized trips and contribute to a reduction in GHG emissions. In addition, development of the site is considered urban in-fill with a mix of residential and commercial uses, pedestrian infrastructure (sidewalks, public transit, bike lanes), neighborhood employment opportunities, services within walking (1/4 mile) or bicycling (1 mile) distance, and multimodal commute choices, all contributing to reduction in GHG emissions. Thus, the Proposed Project would not generate GHGs, either directly or indirectly, that would have a significant impact on the environment and impacts would be less than significant.

b) The Proposed Project, is consistent with the following draft GHG reduction Goals, Strategies, Objectives, and Implementation Measures listed in the following plans:

1. 2024 Draft Humboldt Regional Climate Action Plan

- Measure TR-3: Reduce regional VMT by increasing mixed-use development in infill priority areas in alignment with HCAOG's baseline connectivity score included in the RTP.
- The site is an existing vacant, underutilized, developed site located near existing residential areas and commercial centers (Henderson Center). The Proposed Project is located within Census Tract 2, with a population of 5,705, and a density of 4,805 people per square mile. Approval of the Proposed Project would facilitate mixed-uses within an infill priority area with the highest population density in the City (per Census Reporter, 2024). The proposed multi-family housing would be located near major job centers, commercial business districts, and within .25 miles of a transit stop. The nearest transit stop

is located approximately 400 feet from the site. Harris Street is also an existing Class II Bikeway, which provides a restricted right-of-way for cyclists.

- Measure TR-5: Require commercial and industrial employers with 25 employees or more to develop a Transportation Demand Management Plan.
 - The Proposed Project estimates a total of 19 employees, below the trigger for this measure.
- Measure TR-6: Decarbonize 15% of passenger vehicle miles traveled by 2030 and 100% by 2045 through increased adoption of low and zero-emission vehicles and development of a regional electric vehicle charging and hydrogen fueling network.
 - The Proposed Project will add two (2) electric vehicle charging stations to the site.
- Measure BE-4: Reduce existing nonresidential building natural gas consumption by 5% by 2030.
- Measure BE-5: Decarbonize 95% of new residential building construction by 2027.
- Measure BE-6: Decarbonize 95% of new nonresidential building construction by 2027.
 - The existing and proposed new buildings would have natural gas connections, but new buildings and existing building modifications would be required to comply with current Title 24 standards of the CBC which requires more efficient equipment than in the past, as well as solar on the proposed new residences. The CAP anticipates implementation of BE-4 – BE-6 primarily through ordinances (e.g., reach codes) which have not yet been adopted.

2. City of Eureka 2040 General Plan (2018)

The City of Eureka 2040 General Plan includes Goals and Policies associated with improving air quality and reducing GHG emissions throughout the City of Eureka. The Proposed Project is consistent with applicable Policies are as follows:

- *Policy AQ-1.2. GHG Reduction. Continue to work with Redwood Coast Energy Authority to implement appropriate measures to reduce regional greenhouse gas emissions in Eureka, such as incentivizing the use of alternative energy sources, and periodically updating the City's greenhouse gas inventory and reduction plan, consistent with State reduction targets and regulations.*
- *Policy AQ-1.3. New Development. Require new discretionary developments to incorporate mitigation measures that utilize Best Management Practices and reduce emissions from both construction and operational activities, consistent with the NCUAQMD requirements and state regulations.*
- *Policy AQ-1.4. Off-Street Parking. Encourage and incentivize premium parking spaces for carpool, vanpool, and alternative energy vehicles, and encourage the development and addition of electric vehicle charging stations in parking lots.*
- *Policy AQ-1.7. Large Employers. Encourage large employers to allow for flexibility in the work schedule that would reduce emissions of air pollutants, such as more alternative schedules and telecommuting, in addition to providing incentives for non-single occupancy vehicle commuting modes including public transit, electric vehicles, carpooling, and non-motorized transportation.*
- *Policy U-5. Renewable Energy. Encourage new development to install renewable energy systems and facilities (e.g., solar and wind energies) consistent with the City's greenhouse gas emission reduction goals.*

- *LU-1.3. Beneficial Development. Support development that affords benefits to all segments of the community that... applies practices that help to reduce development's carbon footprint.*
- By promoting infill development, developing mixed-use activities on the site in a high-population density area, providing access to alternative transportation methods through bicycle and EV parking spaces, requiring new residential buildings to offset energy usage through the construction of rooftop solar, siting mixed-use and residential uses in close proximity to a variety of multimodal transportation options and within close proximity to public transportation, incorporating air quality control mitigation measures for construction, improving the energy efficiency of onsite buildings, and ensuring all new or remodeled buildings follow Title 24 energy efficiency requirements of the CBC, the Proposed Project would be consistent with the City of Eureka 2040 General Plan applicable Air Quality and Greenhouse Gas policies.

3. California Air Resources Board Climate Change Scoping Plan (2022)

The 2022 Climate Change Scoping Plan developed by the CARB provides context and strategies to help achieve statewide greenhouse gas emission reduction goals. If a residential or mixed-use project is consistent with all of the key project attributes in Appendix D of the 2022 CARB Scoping Plan, it is “clearly” consistent with the policies and goals of the Scoping Plan. However, lead agencies may determine, with adequate additional supporting evidence, that projects incorporating some, but not all, of the key project attributes are still consistent with the State’s climate goals in the 2022 Scoping Plan.

- The Proposed Project would meet four (4) of the eight (8) key project attributes in Appendix D of the 2022 Scoping Plan: 1) the project is located on an infill site surrounded by existing urban uses and proposes to redevelop an underutilized site that is served by existing utilities and public services; 2) the project would not result in the loss or conversion of natural and working lands; 3) the project is located in proximity to existing transit stops; and 4) the project would result in no net loss of existing affordable units.
- Additionally, proposed buildings associated with the Proposed Project would comply with the CBC. The existing onsite building would be brought into compliance; remodeling of the building would require upgrading the existing mechanical and electrical systems to more energy-efficient modern systems. The proposed residential structures would be required to offset energy usage through rooftop solar. At least two (2) EV-charging parking spaces would be made available, in support of the use of electric vehicles. In addition to solar, the Proposed Project would source energy from PG&E or Redwood Coast Energy Authority (RCEA). PG&E offers several rate plans that range from consisting of 38 percent eligible renewables in the base rate to 100 percent solar in the Green Saver rate in 2022 (Draft Humboldt Regional CAP, 2024). In 2022, RCEA’s REPower electricity option sourced 50 percent of its supply from eligible renewable sources, while the REPower+ option supplied 100 percent from solar, wind, and eligible hydroelectric at a GHG emissions rate of zero (Draft Humboldt Regional CAP, 2024). The applicant has not committed to any of the greener options discussed above, but even if the applicant chooses the PG&E base rate (currently at 38% eligible renewable), PG&E is on track to meet the 60% renewable energy mix by 2030 (PG&E website, 2023).

4. NCUAQMD PM₁₀ Attainment Plan (1995)

The NCUAQMD prepared a draft PM₁₀ Attainment Plan with the goal of achieving and maintaining state ambient air quality standards for PM₁₀. This report includes a description of the planning area (NCUAQMD), and 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 standards are exceeded. The plan includes three areas of recommended control strategies to meet these goals – transportation, land use and burning. Control measures for these areas are included in the Attainment Plan. Compliance with the control measures in the PM₁₀ Attainment Plan would not only result in a reduction of PM₁₀ emissions but would also result in a reduction of GHG emissions. Control strategies focused on reducing transportation emissions, more efficient land use patterns, and reducing emissions from burning activities.

The proposed buildings and existing building modifications would be designed to meet the CBC and Title 24 Standards. The site is located within 400 feet of a transit stop and adjacent to existing developed residential and commercial areas. With incorporation of **Mitigation Measure AQ-I**, the Proposed Project would meet air quality measures described in the NCUAQMD PM₁₀ Attainment Plan. Impacts would be less than significant with incorporation of Mitigation Measure AQ-I.

MITIGATION MEASURES:

Refer to **Mitigation Measure AQ-I. Measures to Reduce Air Pollution.**

Sources:

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- 3) Bay Area Air Quality Management District (BAAQMD). CEQA Thresholds and Guidelines Update. 2022. <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- 4) Draft Humboldt Regional Climate Action Plan (CAP), 2024. humboldt.gov/DocumentCenter/View/131636/Humboldt-RCAP_Public-Draft_w-Appendices?bidId=.
- 5) NCUAQMD Rule 110 & Website. 2015. <https://ncuaqmd.specialdistrict.org/files/397b4b794/Rule+110.pdf>.
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- 8) Pacific Gas & Electric (PG&E). 2023. <https://www.pge.com/en/clean-energy.html>.
- 9) Humboldt County Bike Routes. 2024. <https://humboldt.gov/3403/Bike-Routes>.
- 10) Humboldt Transit System. 2024. <https://hta.org/agencies/redwood-transit-system/>.
- 11) California Office of Planning and Research (OPR), Technical Advisory on Evaluating Transportation Impacts In CEQA. 2018. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

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12) City of Eureka, 2040 General Plan. 2018.

[https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=.](https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=)

13) California Air Resources Board (CARB). Scoping Plan. 2022.

[https://ww2.arb.ca.gov/news/california-releases-final-2022-climate-scoping-plan-proposal.](https://ww2.arb.ca.gov/news/california-releases-final-2022-climate-scoping-plan-proposal)

14) Census Reporter. Humboldt County Tract 2. 2024.

<https://censusreporter.org/profiles/14000US06023000200-census-tract-2-humboldt-ca/>

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IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	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?			✓	
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?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
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?				✓
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 for people residing or working in the project area?				✓
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓
<p>SETTING: The site is an existing, developed site within central Eureka. The site has historically been used for religious/faith gatherings/services, and is developed with an existing church, outbuildings, a cell tower, and paved parking area. The church was constructed in 1976.</p> <p>The site has not historically been used for industrial purposes, hazardous waste storage, or other significant hazardous materials or hazardous waste generating activities. The State Water Resources Control Board (SWRCB) Geotracker website (accessed January 2024) did not identify any cleanup sites on the subject parcel. The nearest Cleanup Program site is the “Trueman Vroman” Leaking Underground Storage Tank (LUST) Cleanup site, a closed case located at 335 Harris Street, approximately 300 feet east of the Proposed Project site. Additionally, the “Tetrault Henderson Center Rocket” LUST Cleanup site, also a closed case, is located at 414 Harris Street, approximately 310 feet east of the Proposed Project site.</p>				

The site has a CalEnviroScreen score of between 30 to 35% (CalEnviroScreen 3.0, accessed January 2024). The CalEnviroScreen mapping tool helps identify California communities that are most affected by sources of pollution, and where people are often especially vulnerable to pollution effects. The scores are mapped so that different communities can be compared. Scores range between 1-100%. An area with a high score is one that experiences a much higher pollution burden than areas with low scores. The low score of 30 to 35% indicates that the subject parcel is not likely to be recognized as a highly disadvantaged area from environmental pollution.

The closest schools to the Proposed Project site are Zoe Barnum High School (0.35 miles west of the site), St. Bernard's Academy (0.5 miles north of the site), and Pacific View Charter School (0.5 miles northwest of the site). Eureka Police Department is located 1.7 driving miles from the site, or a 5-minute drive. The closest airports are Samoa Field Airport, located approximately 2.3 air miles west of the property, and the Murray Field Airport (KEKA), located approximately 3.13 air miles northeast of the property.

The site is not located within a FEMA Flood Zone or a dam failure inundation zone. According to the Humboldt County Web GIS, the site is located in a Local Responsibility Area (LRA) for fire protection and is served by the Humboldt Bay Fire Department. The Proposed Project is not located in the Coastal Zone and would not be directly inundated by a tsunami or sea level rise.

DISCUSSION & FINDINGS:

a) and b) The Proposed Project involves changing the land use designation and zoning district of the site, and anticipated site development of residential, café, and medical uses onsite. A hazardous material is any material that poses a significant hazard to human health, safety, or the environment, such as substances that are flammable, corrosive, reactive, oxidizers, combustible, toxic or radioactive. These include substances that require a Material Safety Data Sheet, information provided by the manufacturer about the chemical's properties, hazards, safe handling practices and other technical and scientific information. The California Fire Code includes specific requirements for the storage, handling, and use of hazardous materials, including compressed gases, flammable/combustible liquids, and flammable gases and solids. In addition, businesses that handle hazardous materials over threshold amounts (55 gallons for liquids, 500 pounds for solids, and 200 cubic feet for compressed gases) are required to submit a Hazardous Materials Business Plan (HMBP) to the Humboldt County Department of Health and Human Services – Division of Environmental Health (HCDEH), Hazardous Materials Unit I and submit the HMBP electronically to the California Environmental Reporting System (CERS).

The HMBP would discuss all hazardous materials and waste potentially generated by a business. Approval of this plan would require a business to track and maintain hazardous material and waste volumes and would require regular reporting to CERS. This is a local requirement and is thus not included as a Mitigation Measure.

Allowable uses in the HC zoning district could involve the routine use, transport, generation, and/or disposal of hazardous materials. Specific to the Proposed Project, the onsite medical facilities, including the urgent care facility, rural health clinic, and medical spa, would routinely transport, use, and dispose of hazardous materials and potentially hazardous waste. Hazardous materials include, but

are not limited to, needles, human fluids, biomedical hazardous substances, and medicines. A certified medical waste hauler would be contracted to safely transport and properly dispose of any medical-related hazardous materials and waste generated onsite. As discussed above, details of exactly which types of hazardous materials and hazardous waste (including volumes, sources, and types), how they are safely transported and/or disposed of, and description of spill prevention techniques would be required during submittal and approval of the HMBP to HCDEH. Additionally, any medical operations onsite would be required to comply with applicable federal, state, and local handling, storage, and disposal requirements to ensure no significant hazards to the public or the environment are created by the Proposed Project.

In addition, any future use of hazardous materials at the site would be subject to California Environmental Protection Agency (Cal/EPA) hazardous materials regulations consolidated under the State's Unified Program enforced by the Department of Toxic Substances Control (DTSC), the SWRCB, North Coast Regional Water Quality Control Board (NCRWQCB), NCUAQMD, and the Department of Resources Recycling and Recovery (CalRecycle). The Cal/EPA administers the Unified Program via local Certified Unified Program Agencies (CUPAs). The CUPA for Humboldt County is HCDEH. The HCDEH Hazardous Materials Unit has jurisdiction over the Proposed Project area and is tasked with local CUPA inspections and compliance.

Worker exposure to hazardous materials is regulated by the California Department of Industrial Relations, 42 Division of Occupational Safety and Health (Cal/OSHA) and requires worker safety protections. Cal/OSHA enforces hazard communication regulations that require worker training and hazard information (signage/postings) compliance. In addition, hazard communication compliance includes procedures for identifying and labeling hazardous substances, communicating information related to hazardous substances storage, handling, and transportation and preparation of health and safety plans to protect employees. Therefore, as the Proposed Project would be required to comply with the above regulations, hazardous materials programs, and worker safety agencies, the Proposed Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and would not create a hazard to the public or the environment through reasonably foreseeable accidental conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

c) The site is not located within a quarter mile of a school. The nearest school, Zoe Barnum High School, is located 0.35 miles west of the site. As such, the Proposed Project would not result in any increased risk of exposure to schools within one quarter mile. Therefore, no impact would occur.

d) The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, per the SWRCB's GeoTracker website. Therefore, no impact would occur.

e) The closest airports to the site are Samoa Field Airport, located approximately 2.3 air miles west of the property, and the Murray Field Airport (KEKA), located approximately 3.13 air miles northeast of the property. Neither airport is within 2 miles of the Proposed Project site. The site is not located within an airport land use plan. Any future buildings must not exceed the 55-foot height limit in the HC zoning district which would not obstruct air traffic. Therefore, the Proposed Project would not

impact airport use, airport operations, or aircraft safety within two (2) miles of an airport. Therefore, no impact would occur.

f) The Humboldt County Office of Emergency Services (OES) is the primary local coordination agency for emergencies and disasters impacting the site, and the County at large. The County of Humboldt has developed an Emergency Operations Plan, a guidance document which addresses the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and human-caused disasters in or affecting Humboldt County. Humboldt County OES provides a zone map for specific evacuation zones within the County. The site is located within zone EUR-E026, which encompasses the area from Harris Street to Allard Avenue, and from Highway 101 to D street. OES has authored numerous emergency response plans, including a Dam Failure Contingency Plan, Flood Contingency Plan, Local Assistance Center Plan, and a Tsunami Evacuation Plan. The site is not located within a Tsunami Zone, FEMA Flood Zone, or Dam Failure Inundation Zone, per Humboldt County Web GIS, and would not impact implementation of any authored emergency response plans from Humboldt OES. No other emergency response plans or emergency evacuation plans are known.

Furthermore, the site is located on Harris Street in Eureka. Harris Street is a major arterial street in Eureka designed to carry significant traffic volumes. It is anticipated that employees, residents, and patrons onsite would have access to Harris Street and would thus be able to quickly evacuate in an emergency. As such, the Proposed Project would not impair the implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. A less than significant impact would occur.

g) The California Department of Forestry and Fire Protection maps identify fire hazard severity zones in state responsibility areas (SRA) and LRA for fire protection. The SRA area does not extend into the City limits. The LRA fire severity map designates areas of the City as High Fire Hazard Severity Zones, Moderate Fire Hazard Severity Zones, or Unzoned. The Proposed Project site is in an Unzoned area. The site is served by the Humboldt Bay Fire District. The risk of causing a wildfire would not be significant during construction and operation because the Proposed Project activities would comply with state and local requirements. Equipment used would be "fire-safe", i.e., operating under a fire safety plan and equipped with spark arrestors, per requirements. Additionally, the subject parcel is a developed lot without significant vegetation to fuel a wildfire. As required by fire code and the CBC, all proposed buildings onsite would be developed with fire suppression systems in accordance with local and state laws. The Proposed Project would increase onsite fire safety and fire suppression capacities. For example, the existing church building does not currently have automatic fire sprinklers. With the proposed change of use and interior remodeling, the building would be required to have an automatic sprinkler system. Therefore, the Proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

MITIGATION MEASURES:

None

Sources:

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- 5) State Certified Unified Program. 2024. <https://calepa.ca.gov/cupa/>.
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- 10) Cal OSHA. 2024. <https://www.dir.ca.gov/dosh/>.
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X. <u>HYDROLOGY AND WATER QUALITY.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	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?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✓
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:			✓	
i) result in substantial erosion or siltation on- or off-site;			✓	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			✓	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			✓	
iv) impede or redirect flood flows?				✓
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

SETTING:

The site is located on Harris Street, on one legal parcel of approximately 1.01 acres, in central Eureka. The parcel has been developed with an existing church and paved parking area since 1976 and a cell tower since 2008. Of the 1.01-acre parcel, approximately 71% of the parcel, or 0.72 acres, is already developed with impervious surfaces, including the church, cell tower, outbuilding and paved parking areas; the remaining areas are landscaped.

The site is located at approximately 126 feet above mean sea level (Google Earth, 2024). The site is within the Eureka Plain Watershed (Humboldt County Web GIS, 2024), which encompasses Humboldt Bay and the watersheds that drain into Humboldt Bay, including Jacoby, Freshwater, and Salmon Creeks and Elk River. The Eureka Plain Watershed comprises 141,160.81 acres. Specifically, the site is located within Elk River HUC 12 Watershed, and, more specifically, the Martin Slough Super Planning Watershed of the Eureka Plain Watershed Area (Humboldt County Web GIS, 2024). Average annual precipitation is approximately 46 inches per year (PRISM, 2024). The nearest

waterway is a gulch area of Martin Slough, located offsite of the parcel to the southwest. The property is approximately 100 feet from this gulch area. No Wild or Scenic Rivers exist close to the property.

The Eureka Plain Watershed is part of the North Coastal Water Basin, which is subject to the NCRWQCB North Coast Basin Plan (2018). The North Coast Basin Plan designates the Eureka Plain Hydrologic Units as having adequate water supply to meet currently projected requirements. The Plan describes Ruth Lake Reservoir, which provides municipal water to the Eureka area, as having enough storage to continue providing adequate storage capacity for current projected uses.

The Lower Elk River and Martin Slough Area, within the Elk River Watershed, is designated as “Impaired” per section 303(d) of the Clean Water Act, for excessive sediment and for indicator bacteria (SWRCB, 2018). A waterbody that is impaired for a particular constituent or stressor requires the development of a Total Maximum Daily Load (TMDL), which is a pollution control plan for the waterbody and the associated constituent or stressor. The TMDL identifies the quantity of the constituent that can be safely assimilated by a waterbody without violating water quality standards. A TMDL has been approved by the EPA for the Upper Elk River Watershed, per the Action Plan for the Upper Elk River Sediment TMDL (SWRCB, 2018). This Action Plan applies directly to the 44.2 square miles of the Upper Elk River. The Proposed Project site is located in the Lower Elk River Area and is not subject to the requirements of the Action Plan (*Figure 8*).

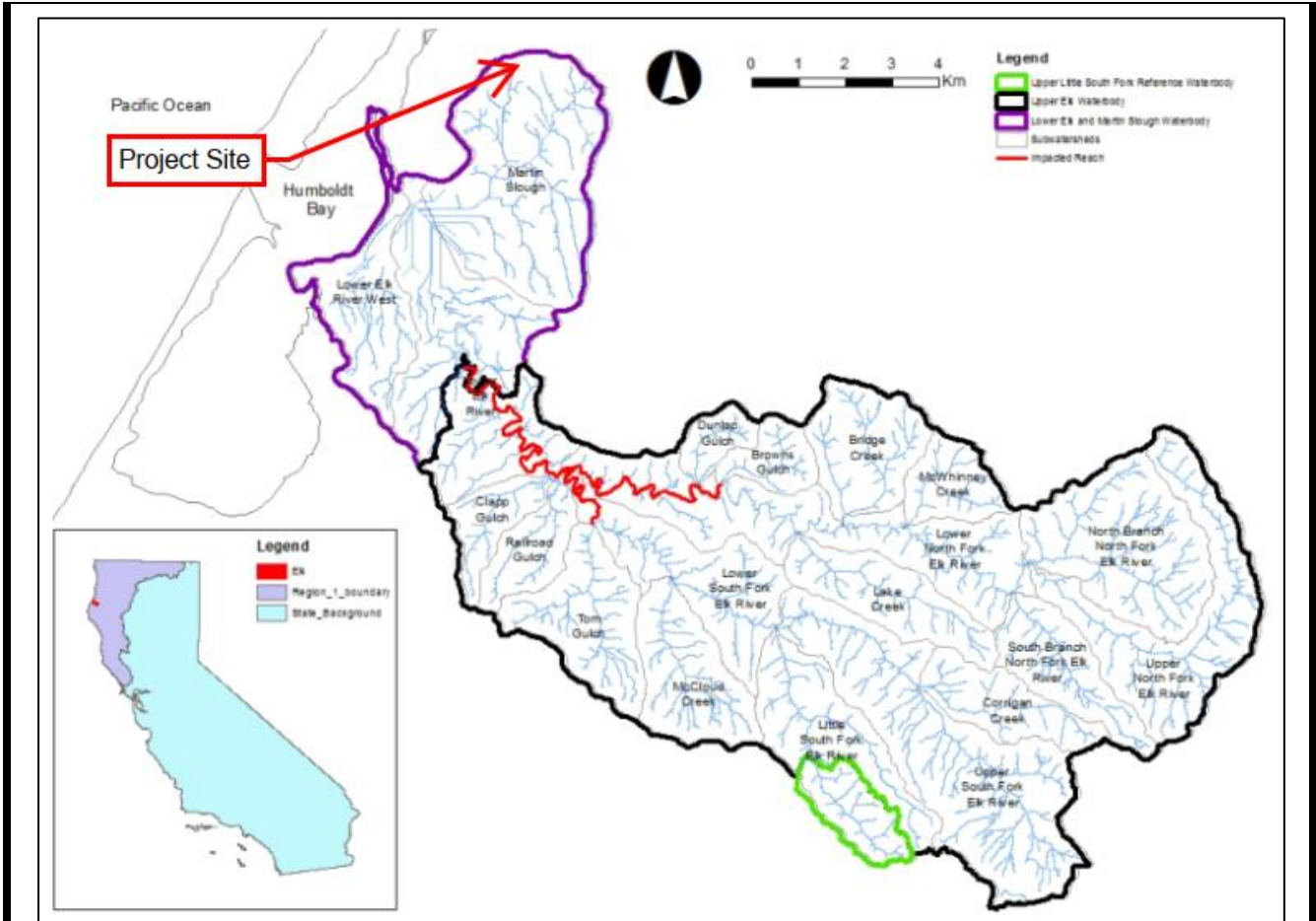


Figure 8: Proposed Project Site in Relation to Elk River Watershed (Source: Upper Elk River: Technical Analysis for Sediment, Tetra Tech, Inc., 2015)

The site is located within the Eureka Plain Groundwater Basin (Basin No. I-009), per the Groundwater Basin Boundary Assessment Tool (2024). The Eureka Plain Groundwater Basin covers approximately 58 square miles in and around the Humboldt Bay Area. As part of the Sustainable Groundwater Management Act (SGMA), the California Department of Water Resources (DWR) prioritized 515 groundwater basins and subbasins in California as either high, medium, low, or very low based on eight components to determine which basins are in overdraft and/or require groundwater management (DWR, 2024). The Eureka Plain Groundwater Basin is designated as a “Very Low” priority groundwater basin (SGMA Basin Prioritization Dashboard, 2024).

The site is located within the MS4 General Permit Boundary within the City of Eureka, per the SWRCB’s MS4 General Permit area. The MS4 General Permit requires that the City require projects to comply with post-construction stormwater requirements based on low-impact development standards. In the City of Eureka, these low-impact development standards are enumerated in the Humboldt Low Impact Development Stormwater Manual Version 3.0 (“Humboldt LID Manual”) (2021).

The water and wastewater service to the site is provided by the City of Eureka. The site is not within a mapped FEMA flood zone, a tsunami hazard zone, a seiche zone, an area at risk of mudflow, or an area at risk of inundation.

DISCUSSION & FINDINGS:

The Proposed Project and future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment would involve grading and excavation of the site for building remodeling and new building development (e.g., foundations, utility trenching, potential stormwater features, etc.), and for replacement of other impervious surfaces (e.g., asphalt). All construction would occur greater than 150 feet from watercourses.

This type of construction and operation of heavy equipment has the potential to disturb soil and pavement, which could be entrapped in stormwater and result in sediment discharged from the site. Stormwater may include debris, particulates, and petroleum hydrocarbons due to improper storage of materials. As part of the permitting process with the City of Eureka, the applicant would be required to obtain a Building Permit and develop an associated Erosion and Sediment Control Plan to address potential impacts to water quality from construction. This Plan would detail BMPs onsite, including erosion control and sediment prevention BMPs. BMPs are activities or measures determined to be practicable, acceptable to the public, and cost effective in preventing water pollution or reducing the amount of pollution generated by non-point sources.

The property is 1.01 acres, with approximately 0.72 acres of existing impervious area. The Proposed Project would not disturb greater than an acre of land, but if a potential future project facilitated by the Zoning Reclassification and General Plan Map Amendment disturbs more than an acre, the project would require coverage under the SWRCB CGP, per Order No. 2022-0057-DWQ. If required to obtain a CGP, a SWPPP would be developed. The SWPPP would document the stormwater dynamics at the site, the BMPs water quality protection measures that will be used during construction and post construction, and the frequency of inspections.

The site is located within the MS4 General Permit Area and is thus subject to the SWRCB's General Permit requirements for post-construction, implemented through the Humboldt LID Manual. The requirements of the Humboldt LID Manual are mandatory components of the permitting process and are thus not included as a Mitigation Measure.

The Humboldt LID Manual requires different submittals for different types of projects, based on the type and scale of the project. The following requirements would apply to the Proposed Project, or any potential future site redevelopment (refer to the Humboldt LID Manual for specifics):

- If a project creates or replaces less than 2,500 sq. ft. of impervious surface, the project is exempt from the program.
- If a project creates or replaces greater than 2,500 sq. ft. of impervious surface, but less than 5,000 sq. ft. of impervious surface, the project is designated as a "Small Project" and is required to submit a Stormwater Information Sheet, follow the instructions of Part B of the Manual, and develop a Small Project SCP. The City would need to review and sign off on the SCP.
- If a project creates or replaces greater than 5,000 sq. ft. of impervious surface, the project is designated as a "Regulated Project" and is required to submit a Stormwater Information Sheet,

follow instructions of Part C of the Humboldt LID Manual, develop a Preliminary SCP, and develop a Final SCP. The City would need to review and sign off on the SCP.

- If a project creates or replaces greater than one acre of impervious surface and creates a net increase in impervious surface, the project is designated as a “Hydromodification Project” and is required to submit a Stormwater Information Sheet, follow instructions of Part C, develop a Preliminary SCP, develop a Final SCP, and design stormwater features such that post-project runoff does not exceed estimated pre-project flow rate for the two-year, 24-hour precipitation event. The City would need to review and sign off on the SCP.

The exact type of project (e.g., “Regulated Project” vs. “Hydromodification Project”) would be determined during the building permit phase. However, the Proposed Project would replace greater than 5,000 sq. ft. of impervious surface, and therefore would require development of an SCP. The SCP would require City review and sign-off, prior to issuance of any building permits.

As the Proposed Project is required to comply with existing stormwater and waste discharge orders, and would require development of a SCP prior to project construction, the project would not violate water quality standards or waste discharge requirements. Therefore, impacts would be less than significant.

b) The site is located within the Eureka Plain Groundwater Basin, which is designated as a Low Priority Basin per the SGMA. A significant portion of the Site is already developed with impermeable surfaces, and neither construction nor operation of future development would require the use of local groundwater, as the Site is, and would be required to remain, connected to the City of Eureka’s municipal water supply. Any water used during or post-construction would be taken from the City of Eureka’s municipal water supply. No significant impact to groundwater recharge from infiltration would take place because the total area of impervious surfaces at the Site would either remain roughly the same or decrease as the result of implementation of LID features associated with a required post-construction SCP. As a result, the Proposed Project would not decrease water supplies, interfere with groundwater recharge, or impeded sustainable groundwater management of the basin. No impact would occur.

c.i.) There are no waterways or watercourses on the site. The nearest watercourse is located offsite, approximately 150 feet from the southwest corner of the property. This watercourse would not be directly impacted by the Proposed Project. As discussed above, the site is already developed with 0.72 acres of impervious surfaces. At most, potential future redevelopment of the site could increase onsite impervious surface area by 0.29 acres of impervious surface, but is more likely to decrease impervious surface due to current LID standards. Redevelopment of the site would likely trigger the need for a post-construction SCP, which would require implementation of LID features detailed in a SCP described above as required by the MS4 General Permit. See the discussion in subsection a), above, for requirements mandated by the Humboldt LID Manual for different types of projects. The site is connected to the City of Eureka stormwater drainage system. By following the requirements of the MS4 General Permit, the Proposed Project would not substantially alter the existing drainage pattern of the site or area, either through direct alteration of a watercourse, or through the addition of impervious surfaces. Impacts would be less than significant.

c.ii.) The site is not located within a mapped FEMA Flood Hazard Zone. Redevelopment of the site would likely trigger the need for a post-construction SCP, described above, per MS4 General Permit requirements. Any increased runoff from the addition of impervious surface would be required to be reviewed and signed off on by the City during the MS4 permitting process. A less than significant impact would occur.

c.iii) See discussion in subsections a), c.i), and c.ii), above. The site is connected to the City of Eureka municipal storm drainage system. Site disturbance and development would be required to obtain Building Permits, complete with an Erosion and Sediment Control Plan, from the City of Eureka, and would be required to comply with the Humboldt LID Manual, depending on the type of project classification. If the Proposed Project, or any additional future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, disturbed or replaced a minimum of 2,500 sq. ft. of impervious surface, a post-construction SCP, as described in the Humboldt County LID Stormwater Manual, would be required. The City of Eureka would need to approve and sign off on the proposed SCP prior to construction or site disturbance. Therefore, the Proposed Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor would it provide substantial additional sources of polluted runoff. A less than significant impact would occur.

c.iv) The site is not located within a mapped FEMA Flood Hazard Zone or in an area prone to inundation. Therefore, the Proposed Project would not impede or redirect flood flows. No impact would occur.

d) The site is not located in a flood hazard, tsunami, seiche zone, or an area at risk of inundation. Therefore, the Proposed Project would not increase the risk of pollutants due to project inundation within those areas. No impact would occur.

e) The Proposed Project is located within the Eureka Plain Groundwater Basin, a “Low Priority Basin” as designated by state law. This Basin is not subject to a Sustainable Groundwater Management Plan. See also discussions under subsections a) – d), above. In addition, the site is located in the Eureka Plain Watershed, which is part of the North Coastal Water Basin. The North Coast Water Basin is subject to the NCRWQCB’s North Coast Basin Plan (2018). The Proposed Project does not conflict with this Basin Plan. If greater than an acre of land was disturbed in future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, the project would need to comply with the SWRCB CGP, under Waste Discharge Order 2022-0057-DWQ. Additionally, the site is located within an MS4 General Permit Area, and any designated project would be required to implement a post-construction SCP to address water quality and avoid impacts to groundwater and stormwater. Therefore, the Proposed Project, and potential future site redevelopment, would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management Plan. Impacts would be less than significant.

MITIGATION MEASURES:

None.

Sources:

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- 1) Google Earth, 2024.
- 2) Humboldt County Web GIS. 2024. <https://webgis.co.humboldt.ca.us/HCEGIS2.0/>.
- 3) PRISM Climate Group. 2024. <https://prism.oregonstate.edu/explorer/>.
- 4) North Coast Regional Water Quality Control Board (NCRWQCB) – Eureka Plain Watershed. 2024.
https://www.waterboards.ca.gov/northcoast/water_issues/programs/watershed_info/eureka_plain/.
- 5) State Water Resources Control Board (SWRCB)– List of Impaired Waters. 2018.
https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2018_integrated_report.html
- 6) Groundwater Basin Boundary Assessment Tool. 2024. <https://gis.water.ca.gov/app/bbat/>.
- 7) Tetra Tech, Inc. Upper Elk River: Technical Analysis for Sediment. 2015.
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- 9) Sustainable Groundwater Management Act (SGMA) Basin Prioritization Dashboard. 2024.
<https://gis.water.ca.gov/app/bp-dashboard/final/>.
- 10) Department of Water Resources (DWR) – SGMA. 2024.
<https://water.ca.gov/Programs/Groundwater-Management/SGMA-Groundwater-Management>.
- 11) Humboldt Low Impact Development (LID) Stormwater Manual, v3.0. 2021.
<https://northcoaststormwatercoalition.org/>.
- 12) State Water Resources Control Board (SWRCB) Municipal Stormwater Program. 2024.
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- 13) SWRCB Construction General Permit. 2024.
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- 14) NCRWQCB's Basin Plan. 2018.
https://www.waterboards.ca.gov/northcoast/water_issues/programs/basin_plan/.
- 15) City of Eureka, 2040 General Plan. 2018.
<https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

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XI. <u>LAND USE/PLANNING.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				✓
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?			✓	

SETTING:

The Proposed Project site is located in central Eureka, adjoining Harris Street. It is developed with existing church and outbuilding structures, paved parking areas, and a cell tower. Immediately adjacent zoning designations include RI and HC. Immediately adjacent General Plan designations include LDR and NC.

Within the City of Eureka, applicable land use plans and policies include the City of Eureka 2040 General Plan, including the City’s Housing Element, and the EMC. The City of Eureka adopted their most recent General Plan, the “City of Eureka 2040 General Plan” on October 15, 2018. The previous General Plan for the City was adopted in February, 1997. Although the Housing Element is a component of the General Plan, it gets updated on a different and more frequent timeline, with the most recent 2019-2027 Housing Element adopted in 2019. The Housing Element is designed to achieve State-mandated housing objectives, including identifying adequate sites for a range of housing opportunities, assisting in the development of adequate and affordable housing, addressing constraints to meeting the City’s housing needs, conserving and improving the condition of housing, and promoting housing opportunities for all persons. The 2019-2027 Housing Element of the General Plan was last amended on October 8th, 2022, and certified by the California Department of Housing and Community Development on March 16, 2023.

Relevant policies to the Proposed Project include the following, from the City of Eureka 2040 General Plan and the 2019-2027 Housing Element:

- *Policy LU-1.3 Beneficial Development. Support development that affords benefits to all segments of the community that: a. Offers varied housing choices. b. Provides for mixed use development; c. Develops underutilized or vacant parcels; d. Reuses and expands upon underutilized or dilapidated buildings; e. Furthers the attraction and/or retention of businesses targeted in the Eureka Economic Development Strategic Plan; and f. Enhances the City’s tax base.*
- *Policy LU-3.1. Variety of Commercial Uses. Provide sufficient land for a broad range of viable commercial, office and mixed uses to meet the needs of the community, capture local and visitor spending, and contribute to the City’s economic vitality.*
- *Policy LU-3.6 Henderson Center Visioning. Support the Henderson Center Merchant’s Association efforts to solidify a Henderson Center “brand”; enhance the look and feel of the district; strengthen Henderson Center as a prime retail shopping district; boost the district’s status as a neighborhood commercial center; address the real and perceived traffic safety issues of the district; and stimulate economic growth within the district.*

- *Policy LU-5.1 Range of Densities. Provide sufficient land in a range of residential densities to enable citizens from a wide array of economic levels and stages of life to live in Eureka, and to accommodate the existing and future workforce.*
- *Policy LU-6.2 Infill First. Promote development of vacant infill properties and redevelopment/reuse of economically underutilized sites and buildings to accommodate new growth and internal densification prior to considering potential annexation.*
- *Policy H-1.12 Diverse Housing Development Options. Continue to provide a diverse range of housing development options beyond typical single-family and multi-family developments, such as: small lot subdivisions, urban lot split subdivisions, conservation subdivisions, internal conversions, adaptive reuse, mixed-use development, tiny houses, efficiency dwelling units, micro-units, and shared housing. As novel methods of providing additional housing are developed, evaluate their feasibility and consistency.*
- *Policy H-1.19 Upzoning. Where feasible and consistent with the objectives of the General Plan, support requests by property owners to “upzone” their property to land use and zone classifications that allow for an increase in residential density, particularly where such properties are on or near the edges of zone districts with higher densities.*
- *Policy H-2.1 Facilitate Diverse Options. Facilitate the development of a diverse range of housing options including, but not limited to: single-family homes, Accessory Dwelling Units (ADUs), multifamily rental housing, condominiums, townhomes, live/work units, housing in mixed-use developments, dense multi-story developments, tiny houses, efficiency dwelling units, microunits, shared housing, owner-occupied affordable housing, and other housing types.*
- *Policy H-2.4 Maximum Density Infill. Promote and encourage the development of the last remaining vacant lots in the City with housing units at the highest density allowed in each respective zone district*
- *Policy HS-5.1 Health Care Facilities. Continue to coordinate with public and private health care providers to develop new, and strengthen existing, health care facilities within the City in order to continue providing adequate health care services for Eureka and the surrounding communities of Humboldt Bay.*

Within the State of California, a City’s share of regional housing needs is determined by the Regional Housing Needs Assessment (RHNA) process. Per the most recent RHNA process for the Humboldt region, the City of Eureka has been allocated a share of 952 additional new housing units prior to 2027.

DISCUSSION & FINDINGS:

a) The Proposed Project would change the existing zoning district and land use designation from R1 to HC and LDR to NC, respectively. Proposed site uses include commercial and residential uses. This change and subsequent planned site development would facilitate redeveloped and reuse of the site from its current vacant state. No public access across the site currently exists, and the proposed zoning and land use designation change and the anticipated development, would not divide an

established community. No impact would occur.

b) The subject property is a natural extension of Henderson Center; the site is large and developed for use as a community gathering space (a church) and is therefore more consistent with the commercial development pattern east along Harris in Henderson Center (where there are larger sites with larger commercial buildings) compared to the low-density residential development on the other sides of the site. The General Plan states that the city envisions this area to intensify as a pedestrian-oriented, limited scale neighborhood shopping district (pg. 21). The incorporation of rural and urgent care medical offices, a medical spa, a café, and multi-family housing is compatible with this pedestrian-oriented district.

Applicable land use plans, policies and regulations covering the Proposed Project site include the City of Eureka's 2040 General Plan, including the Housing Element, and the EMC. Relevant General Plan and Housing Element policies are included above under "Setting." The Proposed Project and associated site development is aligned with and furthers the goals and policies of the Housing Element in the following ways:

- The Proposed Project would facilitate mixed-use commercial/residential development on an existing underutilized/vacant church site near an existing commercial area. The Zoning Reclassification and General Plan Map Amendment would allow greater flexibility of use which will help encourage continued adaptive reuse of this developed, infill property into the future.
- The Proposed Project would allow for multi-family housing development, which is currently not allowed at the site.
- The Proposed Project involves creation of housing close to Henderson Center, providing access for residents, employees, and clients to transit and community services such as shopping and restaurants.
- The Proposed Project development would support enhancement of the Henderson Center area by adding public services (e.g., medical and urgent care services) and providing housing.
- The Proposed Project development would be infill development, rather than contributing to urban sprawl.
- Development of the Proposed Project would encourage spending and contribute to the City's economic vitality.
- Development of the Proposed Project on this property and conversion of the existing church could enhance the City's tax base.
- The Proposed Project would involve development of new health care facilities within the City of Eureka in order to enhance health care services for Eureka citizens and surrounding residents.

In addition, approval of the Proposed Project would allow for development of multi-family residential and other residential uses onsite. The proposed site development includes eight (8) to twelve (12) previously unconsidered additional units that would count toward the City's RHNA numbers. These additional units would not be possible within the current zoning without subdivision. Potential future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment could also contribute to the City's RHNA numbers, consistent with the goals and policies of the Housing Element.

The above would remain true with potential future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, as the principally permitted uses described in Table I would be consistent with the Policies and Goals of the City of Eureka 2040 General Plan and Housing Element. Conditionally permitted uses would require additional site and environmental review for consistency with local plans. For example, construction of new structures would require Design Review to ensure the proposed developments exhibit designs compatible with the neighboring properties.

The proposed land use designation and zoning district changes would be consistent with the City of Eureka's 2040 General Plan, including the Housing Element, and the EMC. Other areas of analysis in this document address the potential conflict of the Proposed Project with other applicable land use plans, policies, or regulations. Therefore, based on this section and the analysis conducted elsewhere in this document, it was determined that the Proposed Project would not be in conflict with any adopted land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

MITIGATION MEASURES:

None.

Sources:

- 1) California Department of Housing and Community development. *Housing Elements*. 2023. <https://www.hcd.ca.gov/planning-and-community-development/housing-elements>.
- 2) City of Eureka Housing Element. 2022. <https://www.eurekaca.gov/681/Planning-Library>.
- 3) Eureka Municipal Code (EMC). 2024. <https://codelibrary.amlegal.com/codes/eureka/latest/overview>.
- 4) City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

XII. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	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?				✓
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?				✓
<p>SETTING: The mineral resource production in Humboldt County is primarily limited to sand, gravel, and other base aggregate. The State Surface Mining and Reclamation Action (SMARA) of 1975 is a State policy for the reclamation of mineral lands. The County of Humboldt Web GIS Portal includes parcels containing mineral resources as reported by SMARA. The Proposed Project site is not designated as containing mineral resources.</p> <p>DISCUSSION & FINDINGS: a) and b). No mineral resources and no mineral resource extraction currently occur within or near the site. The Proposed Project, and any future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, would not affect the availability of a known mineral resource that would be of value to the region, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a specific, general plan, or other land use plan because there are no important mineral resources identified in the City’s General Plan or Municipal Code. Therefore, the Proposed Project would not impact mineral resources. No impact would occur.</p> <p>MITIGATION MEASURES: None.</p>				

Sources:

- 1) SMARA, 1975. SMARA Website <https://humboldt.gov/DocumentCenter/View/353/Surface-Mining-andReclamation-Act-of-1975-PDF?bidId=>.
- 2) Humboldt County Web GIS. 2024. <https://webgis.co.humboldt.ca.us/HCEGIS2.0/>.
- 3) City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 4) Eureka Municipal Code (EMC). 2024. <https://codelibrary.amlegal.com/codes/eureka/latest/overview>.

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XIII. NOISE. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) 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?		✓		
b) Result in the generation of excessive ground borne vibration or ground borne noise levels?		✓		
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓

SETTING:

The site is located within a mixed-use area of Eureka, where residential neighborhoods surround Henderson Center and other commercial development along the Harris Street corridor. The site fronts Harris Street and is currently developed with an unoccupied former church building, associated outbuildings, and a cell tower. With approval of the Proposed Project, noise at the site would increase from construction and operational activities compared to the current vacant nature of the site conditions.

The City of Eureka 2040 General Plan establishes exterior and interior noise standards for various types of land uses, and daytime and nighttime noise level performance standards for stationary noise sources. Table N-1 of the 2040 General Plan (pg. 183) displays 2016 traffic noise levels along local streets. The Proposed Project site is located on Harris Street, between Union and E Streets, which was recorded as having noise levels of 66 dBA at 50 feet from the road. Additionally, Figure N-2 of the 2040 General Plan displays future roadway noise exposure based on the amount of assumed development allowed under the 2040 General Plan, and projects traffic noise levels to remain at 66 dBA at 50 feet from the road on Harris between Union and E Streets. *Figure 9* (Figure N-2 of the 2040 General Plan) shows normally acceptable noise exposure for different land use categories.

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LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE - L _{dn} or CNEL (db)						
	50	55	60	65	70	75	80
Residential - Low Density Single Family, Duplex, Mobile Home							
Residential – Multiple Family							
Residential Mixed Use (Multi Family and Office/Commercial Use)							
Transient Lodging – Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business, Commercial, Professional							
Industrial, Manufacturing, Utilities, Agriculture							
Normally Acceptable	Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.						
Conditionally Acceptable	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.						
Normally Unacceptable	New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design.						
Clearly Unacceptable	New construction or development generally should not be undertaken.						

SOURCE: ESA, 2018

Figure 9: Eureka Noise Compatibility Levels by Land Use Category (Source: 2040 General Plan, 2018).

Additionally, the 2040 City of Eureka General Plan includes Goals and Policies associated with Noise, including the following relevant policies:

- Policy N-1.3: Consider the compatibility of new development with the existing noise environment when reviewing discretionary proposals.
- Policy N-1.4: Require development of new noise-sensitive land uses (such as hospitals, convalescent homes, schools, churches, and wildlife habitat) that are proposed in areas exposed to existing or projected exterior noise levels in Figure N-2 or interior noise levels exceeding the levels specified in Table N-3 or the performance standards of Table N-4 to mitigate noise impacts.
- Policy N-1.5: Require new stationary noise sources to mitigate noise impacts on noise-sensitive uses in which exterior level noises exceed the standards in Table N-4.

- *Policy N-1.6: Emphasize site planning and project design for all development requiring noise mitigation measures. Consider noise barriers only following the integration of all other practical design-related noise mitigation measures into the project.*
- *Policy N-1.7: Require development of noise-sensitive uses proposed in areas subject to frequent, high-noise events (such as aircraft overflights, or truck traffic) to adequately evaluate and mitigate the potential for noise-related impacts. Implement mitigation to ensure noise-related annoyance, sleep disruption, speech interference, and other similar effects are minimized using metrics and methodologies appropriate to the effect(s) to be assessed and avoided. See Figure N-2.*
- *Policy N-1.8: Acoustical Analysis. Require an acoustical analysis as part of the environmental review process for development of noise-sensitive land uses proposed in noise contour areas that are above the acceptable noise standard or for new development in noise contours shown in Table N2 that produce noise above those standards identified in Figure N-1. This analysis shall meet the following requirements: a. Be the financial responsibility of the applicant. b. Be prepared by a qualified person experienced in the field of acoustics. c. Include representative noise level measurements with sufficient sampling periods and locations to adequately describe local conditions. d. Estimate projected future (20-year) noise levels in terms of the Standards of Tables N-1 and N2, and compare those levels to the adopted policies of the Noise Element. e. Recommend appropriate mitigation to achieve compliance with the adopted policies and standards of the Noise Element. f. Estimate interior and exterior noise exposure after the prescribed mitigation measures have been implemented.*
- *Policy N-1.9: Mixed Use Development. Require new mixed-use developments and other uses that generate high noise levels to locate potentially incompatible noise sources away from the residential portion of the development where feasible and desirable.*
- *Policy N-1.11: Roadway Mitigation Measures. Include noise mitigation measures in the design of any improvements along existing streets and highways. When feasible, measures should consider natural buffers or the use of setbacks between roadways and adjoining noise sensitive uses.*
- *Policy N-1.13: Construction Noise. Minimize construction-related noise and vibration by limiting construction activities within 500 feet of noise-sensitive uses to between 7:00 a.m. to 7:00 p.m., unless further restricted through permitting.*
- *Policy N-1.14: Vibration. Require an assessment of vibration-induced construction activities and development near highways and rail lines, in close proximity to historic buildings and archaeological sites, to ensure no damage occurs.*

DISCUSSION & FINDINGS:

a) The Proposed Project involves changes of the zoning district and land use designation, and subsequent development of the site with residential, commercial, and medical uses. Inherently, construction and operation of the anticipated site development, or potential future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, have the potential to generate noise and noise impacts. Noise impacts from construction would be temporary

and would include the sound of machinery and equipment, potential drilling for foundations and/or utility trenching, noise from construction vehicular traffic, and various tools, generators, etc., as needed. Construction is proposed to occur over a period of 1 – 2 years, and would include demolition of the existing garage building, remodeling of the existing church building, (including upgrading plumbing, mechanical, and electrical components and adding the full 2nd floor), removal of existing pavement, excavation to lay new foundations for the proposed new structures, construction of two new buildings, infrastructure improvements, paving, landscaping, and parking, traffic, and signage improvements.

The 2040 General Plan Policy N.1.13 limits construction-related noise activities within 500 feet of noise sensitive uses (including residences) to the hours of 7:00 a.m. and 7:00 p.m. As the project is located adjacent to numerous residences, including the closest residence located 15 feet to the south of the parcel, this requirement would apply to any construction occurring at the site. To ensure impacts on nearby residents from construction are less than significant, **Mitigation Measure NOI-I** has been incorporated. Mitigation Measure NOI-I further restricts construction activities with heavy equipment to between the hours of 8 a.m. and 5 p.m. on Mondays through Fridays, the hours of 9 a.m. to 5 p.m. on Saturdays, and no construction on Sundays and holidays.

After construction, noise from operation of the Proposed Project would include the operation of building heating and cooling systems, landscaping/maintenance activities, vehicular traffic, medical equipment (indoors), delivery truck traffic, residential noise, garbage service, and miscellaneous tools/equipment. During power outages, the applicant would bring a mobile generator onsite to power essential medical systems (e.g., refrigerators). The mobile generator would increase onsite operational noise; however, this would only be used for back-up power in the event of an emergency and would not be permanently onsite. Residential and medical office developments are both typically considered to be noise-sensitive land uses, as opposed to land uses that generate significant noise levels. The proposed uses are not expected to generate significant noise levels that would be noticeable above the ambient noise environment in the project area. Noise levels would be similar to what is currently experienced at properties in the vicinity.

The noise from operation of a potential future site redevelopment project facilitated by the Zoning Reclassification and General Plan Map Amendment would vary widely. As shown in Table I, principally permitted uses allowed in the HC zoning district, that do not require a Conditional Use Permit, and therefore may not require discretionary review (if Design Review is not triggered) include: multi-family dwellings, single-family attached homes (townhomes), general indoor/outdoor retail (small), mobile vendors, restaurant/café/beverage sales, car share facilities, commercial lodging, day care facility, fitness/dance/health facility (small), general services, medical offices and clinics, offices, personal services, artisan manufacturing, civic institutions, colleges/trade schools (upper floor), instructional services, government facilities, and non-commercial places of assembly. Noise levels would vary greatly from these different potential site uses.

Regardless of specific site use, the City of Eureka 2040 General Plan policies require evaluation of noise-related impacts and potential mitigation measures to address impacts and ensure compliance with City standards, especially in close proximity to sensitive receptors. Ambient noise levels in the project area are elevated and typical of an urbanized area with a mixture of residential and commercial

land uses. The main source of noise in the project area is traffic noise on Harris Street. Table N-1 in the 2040 General Plan (pg. 183) displays 2016 traffic noise levels at local streets. Harris Street, between Union and E street, was recorded as having noise levels of 66 dBA at 50 feet from the road.

The project is proposing to change the land use category of the site from LDR, a residential land use, to NC, a mixed-use residential and commercial land use. See *Figure 9*, for acceptable exterior noise levels within the existing and proposed land use categories. Low Density Single Family Residential Land Use Categories have a “Normally Acceptable” range of noise between 45 and 60 decibels (dB), a “Conditionally Acceptable” range of 55 dB to 70 dB, and a “Normally Unacceptable” range of noise between 70 dB to 75 dB, and a “Clearly Unacceptable” range of noise of 75+ dB. By contrast, the proposed NC land use designation, a Residential Mixed-Use Land Use Category, as well as the proposed residential and medical mixed-use development, would have a “Normally Acceptable” range of noise between 50 and 70 dB, a “Conditionally Acceptable” range of 65 dB to 70 dB, and a “Normally Unacceptable” range of noise between 75 dB to 85+ dB.

As mentioned above, Harris Street was recorded as having noise levels of 66 dBA at 50 feet from the road, which falls within the normally and conditionally acceptable ranges of noise compatibility for residential mixed-use developments. 2040 General Plan Table N-3 sets the maximum allowable interior noise exposure for residential projects at 45 dBA Ldn or DNL, and attenuation requirements are geared toward achieving that goal. To ensure the Proposed Project meets the City interior noise standards for new housing construction, **Mitigation Measure NOI-2** has been included requiring a project-specific acoustical analysis for new residential buildings, and requiring building design mitigation as necessary to ensure interior noise levels remain under the 45 DNL threshold (e.g., sound-rated windows and doors, sound-rated wall construction, acoustical caulking, etc.). With the incorporation of Mitigation Measure NOI-2, the project would comply with the City interior noise standards for new housing construction. Impacts would be less than significant with mitigation incorporated.

b) Implementation of the Proposed Project would generate ground-borne vibration and noise levels during construction through the use of construction machinery and equipment. Per Caltrans’ 2020 Transportation and Construction Vibration Guidance Manual, 0.7 inches per second Peak Particle Velocity (PPV) of vibration is considered “disturbing”. It is not anticipated that vibrations would exceed this threshold. Per the Caltrans Vibration Guidance Manual, a study by the Federal Transportation Administration in 2018 quantified the PPV a person would experience at 25 feet from the source: Vibratory roller – 0.210 PPV, Large bulldozer – 0.089 PPV, Jackhammer – 0.035 PPV. The use of jackhammers, bulldozers, and vibratory rollers may be required during construction, but they would be temporary. With the inclusion of **Mitigation Measure NOI-1**, the Proposed Project would not expose persons to or generate excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant with mitigation incorporated.

c) There are no private airstrips in the project area. The project site is not located within two (2) miles of a public airport or public use airport. The closest airports to the site are Samoa Field Airport, located approximately 2.3 air-miles west of the property, and the Murray Field Airport (KEKA), located approximately 3.13 air miles northeast of the property. Neither airport is within two (2) miles of the project site. Therefore, the Proposed Project would not be within the vicinity of a private

airstrip, nor expose people residing or working in the project area to excessive noise levels. No impact would occur.

MITIGATION MEASURES:

Mitigation Measure NOI-1. Construction Noise Limits

The operation of tools and equipment used in association with any future construction, repair, alteration, or demolition at the site shall be limited to between the hours of 8 a.m. and 5 p.m., Monday through Friday, and between the hours of 9 a.m. and 5 p.m. on Saturdays, unless further restricted by any required permit. In addition, no heavy equipment-related construction activities shall be allowed on Sundays or on holidays.

Mitigation Measure NOI-2. Acoustical Analysis for New Residential Buildings

Prior to the issuance of building permits for new housing units, the project applicant shall prepare final design plans that incorporate building design and acoustical treatments to ensure compliance with State Building Codes and City noise standards. A project-specific acoustical analysis shall be prepared to ensure that the design incorporates controls to reduce interior noise levels to 45 dBA DNL or lower within the residential units. The project applicant shall conform with any special building construction techniques requested by the City's Building Department, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking.

Sources:

- 1) California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual. 2020. <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf>.
- 2) City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

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

SETTING:

The 1.01-acre site is a developed site within a residential neighborhood, adjacent to the Henderson Center commercial district, and near other residential neighborhoods and commercial centers and corridors in central Eureka. The site is currently developed with an unused church building, associated outbuildings, a cell tower, and a paved parking area. The site is accessed off of Harris Street.

The City of Eureka includes 9.4 square miles (6,016 acres) of land (with 447 developable acres of land designated for general commercial in the 2040 General Plan). The Proposed Project involves changing the land use designation and zoning district of the site from LDR/RI to NC/HC, as well as site development to convert the church building to medical use and add residences and commercial space. Per the 2040 General Plan Environmental Impact Report (EIR), approximately 62 acres of existing NC land is located within the City, with 36 of those acres developable. According to the 2022 US Census Bureau, Eureka has an approximate population of 26,129 people.

The current RI zoning district for the site allows for residential uses, including two single-family homes on one parcel (attached or detached) in addition to an ADU and junior ADU (the junior ADU is only allowed if it or the primary residence it is contained within are owner-occupied). The minimum lot size in the RI zoning district is 5,000 square feet, so this 1.01-acre site could be subdivided into a maximum of eight RI parcels to allow for up to 16 primary residences and eight ADUs (8 junior ADUs would also be allowed each in conjunction with an owner-occupied primary residence). However, the proposed medical offices and clinics and café space would not be allowed under the current zoning district. Under the proposed HC zoning district, medical offices and clinics, cafés, and multi-family housing are allowed, and there is no maximum number of dwelling units allowed per parcel; the maximum number is limited by the overall maximum FAR of 2.5 (i.e., all structures on the 1.01-acre site could not exceed 109,988-sq. ft. of floor area).

The floor areas of each existing/proposed structure are as follows: 12,304 sq. ft. of new residential structures, 1,600 sq. ft. of new commercial building, 16,340 sq. ft. total floor area post-remodel in the existing church building, and 684 sq. ft. of new employee break room building. The total floor area of the Proposed Project would be 30,928, for an overall FAR of 0.71.

DISCUSSION & FINDINGS:

a) The site is currently zoned RI, which is primarily intended for single-family homes and ADUs, but also conditionally allows current civic/recreational uses including non-commercial places of assembly (i.e., churches). With the proposed zoning change to HC, additional residential uses, mixed-use development, and commercial development would be allowed onsite. The Proposed Project involves construction of eight (8) to twelve (12) residential townhome-style units, with an estimate of 24 to 36 residents onsite. Future potential for redevelopment of the site, based on HC zoning, could allow for dozens of additional residents in future build-out scenarios; however, the site is only 1.01 acres and is limited by size and building restrictions. Using 80 persons as a potential number of residents in a future build-out scenario, which is highly unlikely and is not the intent or desire of the applicant, assuming all residents were from out of the City limits, the site could increase City population by less than a fraction of a percent. Therefore, the project would not directly induce substantial population growth.

No new infrastructure or road extensions are proposed or needed. Other uses allowed within the proposed HC zoning district would not directly or indirectly significantly increase population growth (see Table 2). Therefore, the project would not directly or indirectly cause substantial population growth. Impacts would be less than significant.

b) No housing currently exists onsite. The applicant is proposing to add eight (8) to twelve (12) housing units onsite. Any future redevelopment of the site facilitated by the Zoning Reclassification and General Plan Map Amendment would not result in the elimination of existing housing, as there is none currently. Therefore, the Proposed Project would not displace existing housing or people. No impact would occur.

MITIGATION MEASURES:

None.

Sources:

- 1) US Census QuickFacts. 2022. (<https://www.census.gov/quickfacts/eurekacitycalifornia>)
- 2) 2040 City of Eureka General Plan Environmental Impact Report (EIR). 2018. <https://www.eurekaca.gov/806/2040-General-Plan-Update-Preparation>.
- 3) City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 4) Eureka Municipal Code (EMC). 2024. <https://codelibrary.amlegal.com/codes/eureka/latest/overview>.

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 Incorporation	Less Than Significant Impact	No Impact
a) Fire protection?			✓	
b) Police protection?			✓	
c) Schools?			✓	
d) Parks?			✓	
e) Other public facilities?			✓	

SETTING:

The Proposed Project site is located within the City of Eureka limits. An EIR was certified for the City’s 2040 General Plan on October 15, 2018, in conjunction with adoption of the General Plan (State Clearinghouse #2016102025). The 2040 General Plan EIR analyzed Citywide buildout in different land use designations through 2040. The EIR accounted for 83,111 sq. ft. of anticipated incremental growth within the NC land use designation and an increase of 1,290 dwelling units in areas with commercial, office, and mixed-use land use designations. The EIR found impacts on public services both from an increase in residential units in mixed-use areas and increase of development within the NC land use designation to be less than significant. The proposed site development would result in 8 to 12 residential units, which corresponds to less than 1% of the 1,290 units anticipated in the City’s 2040 General Plan EIR.

DISCUSSION & FINDINGS:

a) Humboldt Bay Fire Department provides fire protection services to the City of Eureka. The 2040 General Plan EIR anticipates response times and Insurance Services Office (ISO) ratings will remain at current or above target levels throughout the current 20-year plan period (through 2040) accounting for projected growth. Given that the existing buildings at the site are aging and any new buildings would be constructed consistent with current fire code standards, future redevelopment facilitated by the Project is not anticipated to increase the risk of fire and thus demand for fire service at the site. Any fires at the site are likely to be within the typical range of service calls. Humboldt Bay Fire Department has five stations in the Eureka area. The closest station is Fire Station Three, located at 2905 Ocean Ave in Eureka. This station is approximately 0.8 miles, or three driving minutes, west of the project site. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of fire protection. Impacts would be less than significant.

b) Police protection is provided by the City of Eureka Police Department and the nearest police station is located 1.7 driving miles from the site, or a 5-minute drive. The 2040 General Plan EIR analyzed future growth through 2040 in accordance with buildout of the General Plan and found that Police service ratios are expected to remain at current or above target levels throughout the planning period analyzed. Proposed site development would include installation of security cameras and security lighting, which could improve security compared to the current vacant nature of the site.

Additionally, the project site is easily within driving range of emergency services, including fire and police protection. Site development, as proposed, could result in an increase of approximately 24 to 36 residents in eight (8) to twelve (12) residential units (assuming three people per unit). An additional 24 to 36 persons would not likely impact response times or substantially induce significant population growth such that public facilities (e.g., schools, parks, libraries, or public health services) are negatively impacted. Impacts would be less than significant.

c) The site is within the City of Eureka School District, and the closest schools are Zoe Barnum High School (0.4 driving miles west of the site), St. Bernard's Academy (0.5 miles north of the site), and Pacific View Charter School (0.5 miles northwest of the site). The site would be developed with multi-family residences, medical office/clinic, and commercial uses under the proposed HC zoning district. Residences developed at the Site would be served by Grant Elementary, Winship Middle and Eureka High. The number of new residences proposed (8 to 12) would not be substantial enough to have a significant impact on performance objectives for schools. Therefore, the Proposed Project, and any future redevelopment facilitated by the Proposed Project, would not result in substantial adverse physical impacts associated with school facility demand. Impacts would be less than significant.

d) According to the 2040 General Plan EIR, the City has a ratio of community and neighborhood park space to residents of approximately 4.9 acres per 1,000 residents, which is well-above City standards. The nearest parks and recreational facilities to the project site are the Da' Yas Park, Carson Park and Playground, and the Eureka Waterfront Trail through Palco Marsh. These and other nearby facilities are currently underutilized and would actually benefit from increased sanctioned use. The Project would not directly or indirectly result in the need for new parks, or expansion of the existing park system as it would facilitate the redevelopment of a brownfield site (previously developed land) as opposed to developing a "greenfield" site (land which has never been developed). Future redevelopment facilitated by the Proposed Project would be commercial and residential. Given parking, open space, and other development standards, the number of new residences that would be built on the site (8 to 12), either alone or in combination with commercial uses, would not be substantial enough to have a significant impact on park and recreational facility use. Impacts would be less than significant.

e) The Proposed Project would *add* medical public services in the form of an urgent care facility and a rural health clinic. Medical services in Humboldt County have been reported to be sparse. Many residents voice difficulty in finding a doctor or accessing medical care. There is only one other non-hospital urgent care facility within the City of Eureka and wait times can be extremely lengthy. Therefore, this project would act as a public benefit by providing more medical resources for residents of the City of Eureka and Humboldt County as a whole. Impacts would be less than significant.

In addition, the parcel is currently developed with a vacant church, which is not paying taxes within the City Limits. By allowing for mixed-use development onsite, the Proposed Project has the potential for increased property and potentially sales tax which in turn would better support public services over existing conditions. As 1) the residential growth and development proposed from the Project was found to have a less than significant impact on public services in the City's General Plan EIR, 2) the Proposed Project would not induce substantial population growth, 3) the Proposed Project is

located in close proximity to emergency services, 4) the Proposed Project would increase site security compared to its current conditions, 5) the Proposed Project would add much-needed medical public facilities (i.e., urgent care facility and rural health clinic) to the City, and 6) the Proposed Project could potentially increase property tax for public services in Eureka, the proposed site development and potential future site redevelopment facilitated by the zoning/land use designation reclassification would not result in substantial adverse physical impacts associated with new or altered governmental facilities relating to fire protection, police protection, schools, parks, or other public facilities. Therefore, impacts would be less than significant.

MITIGATION MEASURES:

None.

Sources:

- 1) Google Maps, 2024.
- 2) 2040 City of Eureka General Plan Environmental Impact Report (EIR). 2018.
<https://www.eurekaca.gov/806/2040-General-Plan-Update-Preparation>.
- 3) The Lumberjack; Humboldt's Heinous Healthcare.
<https://thelumberjack.org/2023/03/28/humboldts-heinous-healthcare/>.
- 4) City of Eureka, 2040 General Plan. 2018.
<https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

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XVI. RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) 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?			✓	
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓

SETTING:

The site is located at 272 Harris Street, which is located in central Eureka. Eureka has over 20 parks. The nearest park to the project site is Da' Yas Park, also known as Jacob-Hanley Ballfield Park & Playground, approximately 2,040 feet northwest of the site.

DISCUSSION & FINDINGS:

a) See analysis under subpart (d) of Section XV. "Public Services" above. According to the City of Eureka 2040 General Plan EIR, the current ratio of community and neighborhoods park space to residents in Eureka is 4.9 acres per 1,000 residents, well above the recommended 1 acre per 1,000 persons for neighborhood parks and 3 acres per 1,000 residents for community parks. The 2040 General Plan EIR comprehensively evaluated environmental impacts that would result from General Plan implementation, including the impact of creating a total of 1,886 additional housing units by 22040, including 1,290 dwelling units in areas with commercial, office, and mixed-use land use designations. The General Plan EIR anticipates residents from these new housing units will generally utilize the existing 133 acres of neighborhood and community parks, and no additional parks and recreational facilities will be required to maintain minimum ratios of park space to population. The Proposed Project is consistent with the growth assumptions underlying the General Plan EIR.

The Proposed Project contains a maximum of 12 units, which would likely result in the increase of approximately 29 persons, based on the average household size of 2.35 for the City of Eureka. Potential future site redevelopment could provide housing for additional units, and thus additional residents; however, the site is only 1.01 acres and the number of potential units in the future is limited by size. It is unlikely that these additional residents, either from the Proposed Project or future potential site redevelopment facilitated by the zoning/land use designation reclassification, would negatively impact local parks through use. Therefore, the project would not increase the use of existing parks and recreational facilities such that substantial physical deterioration would occur or be accelerated. Impacts would be less than significant.

b) Future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment could include recreational facilities allowed by the HC zoning district. However, the site is a developed infill site and construction of recreational facilities would need to comply with zoning regulations and would require future permitting and/or building permit review. Therefore, it is not anticipated that the project would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No impact would occur.

MITIGATION MEASURES:

None.

- 1) Google Maps, 2024.
- 2) City of Eureka Parks and Playgrounds Map. 2018.
<https://www.eurekaca.gov/DocumentCenter/View/272/Parks-and-Playgrounds-Map-PDF>.
- 3) City of Eureka, 2040 General Plan. 2018.
<https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
- 4) City of Eureka, 2040 General Plan Environmental Impact Report (EIR). 2018.
[eurekaca.gov/DocumentCenter/View/3257/Draft-Environmental-Impact-Report-PDF](https://www.eurekaca.gov/DocumentCenter/View/3257/Draft-Environmental-Impact-Report-PDF)

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XVII. TRANSPORTATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	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?			✓	
b) Conflict or be inconsistent with CEQA guidelines section 15064.3 (b)?			✓	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d) Result in inadequate emergency access?			✓	

SETTING:

The site is a 1.01-acre site located in central Eureka on 272 Harris Street, near existing residences and the commercial area of Henderson Center. The site is developed with an existing vacant church and outbuildings, a paved parking area, and a cell tower.

Harris Street, a major arterial street within the City of Eureka, provides access to the site. Harris Street is comprised of two paved east-bound lanes, with a Class II bicycle facility located adjacent to the right east-bound lane. Harris Street runs east and west through Eureka, from its intersection with State Highway 101 approximately three miles east to its intersection with Hall Ave, and subsequently Myrtle Avenue. Pedestrian sidewalks are present along Harris Street. The site is currently accessed by three driveways, one from Harris Street, one from Williams Street, and one from D Street. Williams Street and D street are defined as local streets. The 2040 General Plan defines a local street as “two-lane low-speed, low volume roadways that provide direct access to adjacent properties. [Local Streets] typically serve the interior of neighborhoods [and are] not intended for through traffic.” Williams Street is a neighborhood serving local street which terminates at the southwest corner of the site where a gulch/greenway of Martin Slough begins. D Street is also a neighborhood serving local street that dead ends less than 1,000 feet south of the site.

The nearest public transit stop to the project is at the intersection of Harris Street and Lowell Street, located approximately 400 feet west of the project site. Another bus stop, the F Street and Harris Street major transit stop, is located approximately 660 feet east of the project site. Both stops are accessible utilizing the pedestrian sidewalk from the project site.

The City has a Mobility Element in their 2040 General Plan that includes goals and policies related to streets and highways, pedestrian and bicycle systems, and transit systems, including the following relevant policies:

- *Policy M-1.6. Dense Development. Integrate transportation and land use decisions to enhance opportunities for development that is compact, walkable, and transit friendly.*

- *Policy M-2.4 Vehicle Miles Traveled. Consider the applicability of using transportation performance metrics such as Vehicle Miles Traveled (VMT) and associated thresholds for measuring transportation*

system impacts consistent with the California Environmental Quality Act (CEQA) guideline and State law, as well as for making General Plan consistency determinations and developing transportation financing programs.

- *Policy M-2.7 Traffic Studies for Development Projects.* At the discretion of the City Engineer or when a project is expected to generate 50 or more peak hour trips or that could result in any vehicle trip increase in an area already operation below the established standards, require the preparation of site-specific traffic studies. Any project that is anticipated to generate significant traffic impacts will be required to mitigate such impacts.
- *Policy M-2.9 Multi-modal Access.* Promote the provision of multi-modal access to activity centers such as commercial and employment uses, Downtown, Old Town, schools, and parks.
- *Policy M-3.9 Facilities at New Developments.* Where applicable, require new development to provide bicycle access to and through projects, as well as properly and securely installed bicycle parking and/or storage, and to construct, dedicate and/or pay its equitable share contribution to the citywide system.

The HCAOG's Regional Transportation Plan, also known as VROOM 2022-2042, developed land use and transportation policies to promote proactive planning and encourage efficient land use from a multimodal transportation perspective in rural Humboldt County. Applicable Policies include the following:

- *Policy Land-1. Reduce Driving.* HCAOG encourages and supports land use planning and projects that accommodate reducing driving, such as through infill development, pedestrian friendly streets, bicycle infrastructure, and transit-oriented development.
- *Policy Land-2. Expand Transit Ridership.* HCAOG advocates for and supports land use policies and programs that will enable enriched intra- and inter-regional transit service and multi-modal connections in urbanized areas throughout the county.
- *Policy Land-3. Sustainable Tax Base.* HCAOG advocates for local governments to develop codes and ordinances that result in land use development patterns that will be affordable to maintain, for the life of the infrastructure, with the communities' tax base and fee revenues, that will foster healthy municipal cash flows and affordable housing supply.
- *Policy Land-4. Nearby Access to Essential Services.* HCAOG supports mixed-use land uses for fostering successful commercial and work opportunities near where people live, and advocates for mixed-use development patterns to include affordable housing and essential services for people with low and very low incomes.
- *Policy Land-5. Transportation for Compact, Mixed-Use Development.* HCAOG shall work towards increasing coordination with land use decision-making agencies to identify and prioritize specific transportation investments needed to support compact, mixed-use development. HCAOG recognizes transit-oriented development transit service as valuable investments for achieving efficient land use.

- *Policy Land-6. Repurpose for Compact, Mixed-Use Development. HCAOG will encourage and support local agencies to pursue opportunities to repurpose antiquated land uses, such as gas stations, parking lots, and large shopping centers, to support compact, mixed-use development and sustainable mobility options.*

The City was awarded a Caltrans Sustainable Communities Grant to develop the Eureka Bike Plan in 2023. The Bike Plan is still under development. HCAOG's 2018 Humboldt Regional Bicycle Plan includes projects, objectives, and policies to develop and maintain a comprehensive a regional bicycle network, and to encourage land use planning that supports and encourages bicycle-friendly transit.

DISCUSSION & FINDINGS:

a) The Proposed Project is an infill development project on an unoccupied site that proposes to add residences and medical and commercial services within an existing, densely populated area within the City of Eureka. The project site is located within Census Tract 2, which has a population of 5,705 and a population density of 4,805 people per square mile (Census Reporter, 2024). This is the highest population density within the City of Eureka limits.

The Proposed Project supports the Policies of the City of Eureka 2040 General Plan, and the Land Use & Transportation Policies in HCAOG's VROOM 2022-2042 Regional Transportation Plan, listed above. Per the Policies, the General Plan and HCAOG specifically support dense, infill residential and mixed-use development, increased transit ridership, increased services near residences and vice versa, increased tax base, increased efficient use of existing under-utilized land, and increased residential and mixed-use development near existing well-connected transit areas of the City. The Proposed Project is a mixed-use project, which would be located next to existing residences and nearby existing commercial services in Henderson Center. The site is an existing, paved site developed with a church that is currently unoccupied and not contributing to the City's tax base.

The project adds residents and adds medical/commercial services within a residential/ mixed-use area. As new residents and public services are proposed to be brought to an area of existing mixed-use development, it is likely that the Proposed Project would result in an increase in ridership of public transit. Regarding a potential public transit ridership increase, the Governor's Office of Planning and Research (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA (2018) states that lead agencies generally should not treat an increase in transit from infill development as an adverse impact on multimodal transportation networks, because although it increases ridership, it also adds destinations for riders, thus improving proximity and accessibility to services for local residents (pg. 19). Therefore, the potential increase in ridership from the Proposed Project would not have an adverse impact on existing transit facilities.

The site is highly walkable, bikeable, and connected to public transit. It is within 660 feet of an HCAOG-designated major transit stop at the F Street and Harris Street intersection, as well as a second nearby transit stop at the Harris Street and Lowell Street intersection. An existing Class II Bikeway is located on Harris Street, providing a restricted right-of-way for cyclists to access the site. Additionally, designated buffered bike lanes exist along H and I Street in Eureka, located 4 blocks from the project site, and the Proposed Project would include a minimum of 16 bicycle parking spaces.

Pedestrian access via ADA-accessible sidewalks is available on all access streets, including Harris, Williams, and D Streets.

Construction associated with the Proposed Project would result in a short-term increase in construction-related vehicle trips on Harris Street and within the area, including construction employees, equipment, and haul/delivery truck trips for delivery and disposal of construction materials. Due to the short-term nature of these impacts and consistency with other development projects in an already developed area, construction activities would not result in adverse impacts or conflicts with plans governing the local roadway system.

Operation of the Proposed Project would involve an increase of daily traffic to and from the area, from residents, medical patients, patrons of the commercial space, employees, and visitors. As shown in Tables 3-6 in the Project Description (pgs. 9-10), the Proposed Project would generate a maximum of 235 trips per day (including 159 trips from medical patients and employees, 48 trips from residents, and 28 trips from café patrons). Peak hour traffic on Harris Street occurs at 11 a.m. and 4 p.m., according to traffic data from the City of Eureka. It is anticipated that 27 total estimated trips would occur during peak hour traffic (including 10 trips from medical patients, 12 trips from residents, and 5 trips from café patrons). Policy M-2.7 (see Setting above) requires, at the discretion of the City Engineer, projects which could generate 50 or more peak hour trips prepare a site-specific traffic study. Project referrals were sent to the City Engineer and it was determined at that time no traffic study would be required of the site.

As the site is currently unoccupied, onsite development of any kind would inherently increase traffic volumes. However, the site is in an existing developed area designed to handle traffic volumes associated with residential and mixed-use land use designations. Due to the proximity to the major transit stop, these trip and peak hour traffic estimates are conservative as it is expected that some employees, residents, and patients would use public transit. Additionally, these trip estimates do not account for potential *reductions* in vehicle trips as a result of implementation of the Proposed Project. The Proposed Project would bring crucial medical services to a centrally located area of Eureka that is currently devoid of medical services, which could reduce vehicle trips from nearby residents who would otherwise travel further distances to access these necessary public services. Similarly, the Project would bring residents to an area located adjacent to existing commercial and retail services. Future mixed-use site redevelopment would pose a similar benefit.

The Proposed Project would not remove or change the location of any existing or proposed sidewalks, bicycle lanes, or public transportation facilities. Sidewalks would likely be upgraded and improved with construction of the Proposed Project, per requirements of the City of Eureka and CBC. Therefore, the Project would not impact bicycle or pedestrian facilities or associated plans.

As the Proposed Project would support infill and mixed-use development, is well connected to existing transit and bicycle services, would increase tax revenues, would increase medical services and housing capacity in an existing well-connected area, would include bicycle parking, and would increase transit ridership, the Project, and future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, would not conflict with (and would likely benefit) the Policies of the Regional Transportation Plan, the Humboldt Regional Bicycle Plan, and the City of

Eureka General Plan. Therefore, the Proposed Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, or pedestrian facilities. A less than significant impact would occur.

b) CEQA Guidelines §15064.3, subdivision (b), (“CEQA Guidelines”, for the purposes of this section), involves VMT, which represents the total number of daily miles driven by persons traveling to and from a defined geographic area. VMT can vary broadly, depending on the type of project and the number of people commuting to the site from a variety of distances. CEQA Guidelines indicate that land use projects would have a significant impact if the project resulted in VMT exceeding an applicable threshold of significance. The City of Eureka has not yet defined VMT thresholds of significance; however, Eureka is the economic hub of Humboldt County and the densest city in rural Humboldt County with 2,780.2 persons/square mile (Census Quick Facts). Because of the proximity of jobs and services to housing in Eureka, the OPR’s Site Check tool maps Eureka’s households’ per capita VMT as at least 15% below the regional average. The CEQA Guidelines also state that if existing models or methods are not available to estimate the VMT for the project being considered, a lead agency may analyze the project’s VMT qualitatively, such as evaluation of factors including the availability of transit, proximity to other destinations, etc.

In this case, as the City of Eureka has not adopted VMT thresholds of significance, a qualitative analysis is appropriate. The OPR’s Technical Advisory on Evaluating Transportation Impacts in CEQA provides some guidance for qualitatively analyzing transportation impacts. Under “Screening Thresholds for Land Use Projects”, the Technical Advisory states that “lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of those uses) proposed within 0.5 miles of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT” (pgs. 13-14). This assumption would not apply to some projects (e.g., those that replace affordable housing). As this is not the case, the proximity of the project site to transit should be qualitatively evaluated as it relates to VMT.

The Technical Advisory defines a “major transit stop” as an existing bus transit service or the intersection of two or more bus routes with a combined frequency of service interval of 15 minutes or less during afternoon peak commute periods, per PRC §21064.3. Per the Eureka Transit Authority Website, all of the Eureka routes (including the Gold Route, the Purple route, the Red route, the Green route, and the Rainbow route) serve the F & Harris Street transit stop, located 660 feet east of the project site (See *Figure 10*). Per the timetables provided on the website, between the routes, the F & Harris Street transit stop is serviced at least every 15 minutes, Monday to Friday. Additionally, on January 18, 2024, the HCAOG amended VROOM 2022-2042, to include seven identified major transit stops, including the transit stop at the corner of F Street and Harris Street, approximately 660 feet from the project site. Therefore, the Proposed Project is located within 0.5 miles of a “major transit stop or an existing stop along a high-quality transit corridor.”

As such, impacts to VMT from the Proposed Project would be less than significant, and the Project would be consistent with CEQA guidelines §15064.3 (b). A less than significant impact would occur.

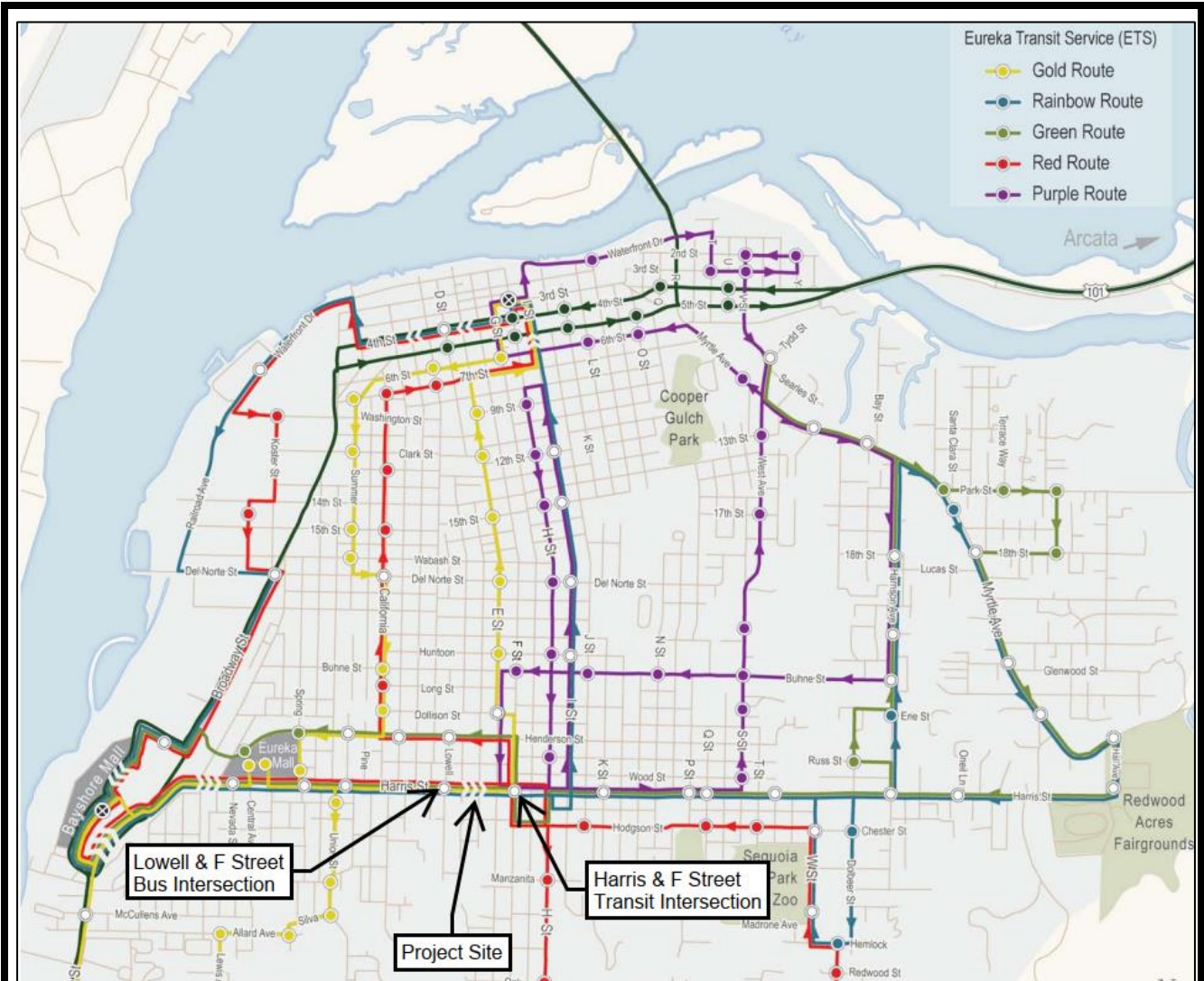


Figure 10: Eureka Transit Authority Bus Routes and Major Intersections in Relation to Project Site
 (Source: Humboldt County Transportation Services Guide, 2010).

c) The Proposed Project and any potential future redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment, would involve improvements to existing structures or construction of new structures confined to the bounds of the 1.01-acre parcel. All activities associated with redevelopment would occur entirely on the site and would not result in any changes to road geometry. No changes to existing streets or public access are proposed, although the Proposed Project could trigger an evaluation of surrounding sidewalks and potential repairs to bring existing sidewalks up to City of Eureka and CBC standards. Site access, circulation, and traffic signs would be reviewed for consistency with code standards involving vision clearance areas at ingress/egress access points, limits on driveways, and internal pedestrian access. The project does not involve any potentially dangerous traffic or transportation hazards, nor does it propose any incompatible uses (e.g., farm equipment) that could affect existing traffic or circulation in the project area.

The site is accessible from a driveway off of Harris Street, a straight, paved, major arterial street with excellent visibility on either side, with two additional driveways on Williams Street to the west and D Street to the east. The number of people accessing the site would change with redevelopment. Per the projected daily trips described in Section XVII b), above, it is estimated that the Proposed Project would generate a maximum of 235 trips per day, with 27 of those trips comprising peak hour traffic trips at 11 a.m. and 4 p.m. on Harris Street. A site-specific traffic study is required when a project could generate 50 or more peak hour trips, at the discretion of the City Engineer. As 27 peak hour traffic trips are anticipated, a site-specific traffic study has not been prepared. Project referrals were sent to the City Engineer and it was determined at that time no traffic study would be required of the site. As a result, the Proposed Project would not substantially increase hazards due to a design feature or incompatible uses. A less than significant impact would occur.

d) Harris Street is a major evacuation / emergency route for all first responder activities heading east bound within the City of Eureka. The Proposed Project would not involve street construction and would not directly block any emergency access. Harris Street is a major arterial street, designed to carry high traffic volumes. Any site development would be confined to the bounds of the 1.01-acre parcel. The building permit and/or encroachment permit process would ensure the site's internal circulation and existing driveways would allow adequate access for emergency vehicles along Harris Street and to the site per all applicable state and local laws. Therefore, the Proposed Project would not result in inadequate emergency access. A less than significant impact would occur.

MITIGATION MEASURES:

None.

Sources:

- 1) Office of Planning & Research (OPR)– Technical Advisory on Evaluating Transportation Impacts in CEQA. 2018. https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.
- 2) Eureka Transit Authority Bus Schedules. 2024. <https://hta.org/agencies/eureka-transit-service/>.
- 3) Humboldt Transit Authority. 2024. <https://hta.org/agencies/redwood-transit-system/>.
- 4) Humboldt County Transportation Services Guide. 2010. <https://trilliumtransit.com/wp-content/uploads/2010/01/Humboldt-County-Transportation-Services-Guide-Trillium-Transit-....pdf>.
- 5) Office of Planning & Research (OPR). 2024. <https://sitecheck.opr.ca.gov/>.
- 6) City of Eureka Transportation Safety Action Plan. 2021. <https://www.eurekaca.gov/DocumentCenter/View/683/Transportation-Safety-Action-Plan-2021-PDF>.
- 7) City of Eureka Bike Plan. 2023. <https://www.eurekaca.gov/840/City-of-Eureka-Bike-Plan-2023>
- 8) Office of Planning and Research's (OPR) Site Check. <https://sitecheck.opr.ca.gov/>.
9. City of Eureka, 2040 General Plan. 2018. <https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.
10. HCAOG Regional Transportation Plan (VROOM 2022-2042). https://www.hcaog.net/sites/default/files/vroom_2022-2042_full_report.pdf.
11. HCAOG Humboldt Regional Bicycle Plan. 2018. <https://www.hcaog.net/programs->

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[projects/bike-walk-roll](#).

12. EPA EJScreen Community Report. 2024. <https://ejscreen.epa.gov/mapper/>.

13. Census Reporter. Humboldt County Tract 2. 2024.

<https://censusreporter.org/profiles/14000US06023000200-census-tract-2-humboldt-ca/>.

14. Eureka Municipal Code (EMC). 2024.

<https://codelibrary.amlegal.com/codes/eureka/latest/overview>.

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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 Incorporation	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		✓		
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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		✓		

DISCUSSION & FINDINGS:

a) and b) 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 §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 §5024.1(c), and considering the significance of the resource to a California Native American Tribe.

As described in Section V. “Cultural Resources”, on February 22, 2024, referrals were sent to the Bear River Band, Blue Lake Rancheria and the Wiyot Tribe for review and comment for the project at 272 Harris Street, indicating the Proposed Project would include a General Plan Amendment changing the land use designation from LDR to NC and a Zone Reclassification changing the zoning district from R1 to HC, and development of the site with an urgent care, medical spa, offices, and residential units. Additionally, separate AB 52 and CGC §65352 Notification referrals were sent to local tribes on February 22, 2024 for further review and comment. It was indicated in all three referrals ground disturbing activity would occur.

One response was received from the Bear River Band stating they had no comments or requests regarding the Proposed Project. No request for AB 52 consultation was received, and no requests for mitigation measures were received.

Existing buildings on the site are less than 50 years old. The site is not listed on the Local Register of Historic Places, nor was the site included in the historic building inventory, or “Green Book.” Additionally, the site is not on or eligible for the California Register of Historic Resources. There are

no known tribal cultural resources located within the property. However, because there is potential to discover a previously unknown sensitive resource during ground-disturbing activities, **Mitigation Measures CUL-1 and CUL-2** have been incorporated to ensure proper inadvertent discovery protocol to reduce potential impacts to less than significant.

Therefore, with the implementation of the aforementioned mitigation measures, the Proposed Project, and any future development facilitated by the zoning/land use designation reclassification, would not cause a substantial adverse change in the significance of a tribal cultural resource. With incorporation of Mitigation Measures **CUL-1 and CUL-2**, impacts would be less than significant.

MITIGATION MEASURES:

Refer to Section V. "Cultural Resources for **Mitigation Measures CUL-1 and CUL-2. Inadvertent Discovery Protocol.**"

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XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	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?			✓	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
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?			✓	
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?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

SETTING:

The site is located within Eureka City limits near Henderson Center and is served by City water and sewer and connected to City stormwater infrastructure. The site is already developed with a church and associated buildings and parking areas. PG&E provides electricity and natural gas to the site. The site contains telecommunication infrastructure that would not be impacted by the Proposed Project.

DISCUSSION & FINDINGS:

a) No new or expanded water, wastewater treatment, storm water, electric power, natural gas, or telecommunications facilities are proposed as a result of the Proposed Project. When the church was constructed in the 1970s, the requirements for onsite retention and infiltration of stormwater did not exist yet. The Proposed Project would trigger requirements to meet LID standards through the Building Permit process. Through this process, the amount of stormwater runoff from the Proposed Project Site entering the City's drainage system would be required to either remain the same or be reduced. Therefore, the Proposed Project would have a less than significant impact on the City's stormwater drainage system.

As described under subpart (d) of Section XV. "Public Services" above, the Proposed Project would likely result in an increase of approximately 24 to 36 residents. Potential future site redevelopment facilitated by the Zoning Reclassification and General Plan Map Amendment could provide housing for additional units, and thus additional residents; however, the site is restricted by size and would not result in substantial population growth that would warrant expansion of City of Eureka public

services. In addition, existing onsite telecommunications infrastructure would not be altered by the Proposed Project.

Limited trenching to connect any new structures to existing municipal water supply and sewage disposal facilities, natural gas lines and/or telecommunications lines may be required as part of the Proposed Project and any future redevelopment project facilitated by the zoning/land use designation reclassification. The utility trenching would take place in existing developed areas and would not cause and significant environmental effects. Thus, the Proposed Project would not result in significant environmental effects related to the relocation or construction of new or expanded utilities. Therefore, impacts would be less than significant.

b) The site is currently developed but unoccupied, and as a result of the project, water use on the site would increase. Projected water numbers have not yet been defined; however, there would almost certainly be sufficient water source available for the 1.01-acre site. The City of Eureka sources water from the Mad River Watershed and Ruth Lake. The City purchases water from the Humboldt Bay Municipal Water District (HBMWD). According to the HBMWD 2020 Urban Water Management Plan, the City maintains water rights on the Mad River equivalent to 5.16 million gallons per day. In 2020, HBMWD sold the City of Eureka 3,554 acre-feet of water (or approximately 1,158,100,000 gallons). This corresponds to approximately 3.17 million gallons of water per day, nearly two million gallons less than the allotted water right, leaving the assumption that the current agreement between the City of Eureka and HBMWD could accommodate additional growth from the Proposed Project. 2020 was a dry year (PRISM, 2024). Therefore, the Proposed Project would have sufficient water supplies available during normal, dry, and multiple dry years. Impacts would be less than significant.

c) The site is served by City of Eureka wastewater services. The City of Eureka's Elk River Wastewater Treatment Plant (ERWTP) provides wastewater services for the City of Eureka. According to the ERWTP 2017 Annual Report, the plant has a permitted capacity of 8.6 million gallons per day (MGD). The plant has an average flow rate of 4.75 MGD and was designed to treat peak dry weather flows of 9.5 MGD. Peak wet weather flow design and permitted capacity is 32.2 MGD. Wastewater generated by the project would likely be consistent with existing and/or historic uses at the site and other adjacent commercial and residential uses. Therefore, the Proposed Project would not result in a determination that there is not enough capacity to process the wastewater generated in addition to existing commitments. A less than significant impact would occur.

d) and e) The city's current contracted waste hauler is Recology Humboldt County. The City of Eureka requires mandatory curbside service for all residential, multi-family, and commercial properties. The City of Eureka is a member of the Joint Power Association (JPA) Humboldt Waste Management Authority (HWMA) which operates the Hawthorne Street Transfer Station approximately 1.7 miles northwest of the site. The Proposed Project would generate solid waste during both construction and operation. Solid waste would be collected by Recology and taken to the HWMA transfer station.

Per the City of Eureka Municipal Service Review, City of Eureka waste is transferred to the Anderson Landfill in Anderson, California, and the Dry Creek Landfill in Medford, Oregon. The Anderson Landfill has a daily permitted disposal of approximately 1,018 tons per day, and a remaining capacity

of about eight million tons. Under current conditions, the Anderson Landfill is not expected to close until 2036. The Dry Creek Landfill has a remaining capacity of approximately 50 million tons. The Dry Creek Landfill has been estimated to have the remaining disposal capacity to provide for its current service area for another 75 to 100 years. Therefore, it is reasonable to assume that the two landfills could handle solid waste from the Proposed Project.

Solid waste generated by the Proposed Project would be consistent with historic and surrounding uses at the site and other adjacent commercial uses. Based on the remaining capacities at the Anderson and Dry Creek Landfills, these landfills would have sufficient capacity to serve the project's solid waste disposal needs. Therefore, a less than significant impact would occur.

MITIGATION MEASURES:

None.

Sources:

- 1) Humboldt Bay Municipal Water District Urban Water Management Plan. 2020. <https://www.hbmwd.com/files/03d84a5c2/UWMP-2020+final.pdf>.
- 2) Elk River Wastewater Treatment (ERWTP) Plant and Collections System 2017 Annual Report. 2017. <https://www.eureka.gov/ArchiveCenter/ViewFile/Item/56>.
- 3) City of Eureka Municipal Service Review. 2014. https://humboldtlaico.org/wp-content/uploads/Eureka-Adopted-MSR_1-15-14.pdf.
- 4) City of Eureka, 2040 General Plan. 2018. <https://www.eureka.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>.

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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 Incorporation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
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?				✓
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?				✓
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?				✓

SETTING:

The site is located within an urbanized and developed area of the City of Eureka. The California Department of Forestry and Fire Protection (CalFire) maps fire hazard severity zones for fire protection and prevention purposes within an SRA. The project site is not located within an SRA; the site is instead within a LRA of fire protection and is served by Humboldt Bay Fire. The LRA fire severity map designates some areas within the City limits as moderate to high fire hazard severity zones, as shown on 2040 General Plan Figure HS-4. The project site is not located within a mapped fire hazard severity zone.

DISCUSSION & FINDINGS:

a) - d) As described above, the site is not located in or near an SRA or near lands classified as “Very High Fire Hazard Severity Zone”, by CalFire. The nearest Very High Fire Hazard Severity Zone is located approximately two miles to the south. The site is within the City of Eureka, in a developed area, and there are no onsite characteristics which would contribute to an increased risk of fires. Additionally, the proposed new residential structures would be designed to meet current building code standards for fire safety, and the change of use of the existing church building would require the existing building to meet current code (e.g., installation of fire sprinklers). As the project is not located within an SRA or within land designated as a Very High Severity Zone, the Proposed Project, and potential future redevelopment, would not significantly impact emergency evacuation plans, response plans, spread of wildfire, wildfire infrastructure, or post-fire slope instability. No impact would occur.

MITIGATION MEASURES:

None.

Sources:

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- 1) CalFire - Fire Hazard Severity Zones in State Responsibility Areas. 2024. <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008>.
- 2) City of Eureka, 2040 General Plan
(<https://www.eurekaca.gov/DocumentCenter/View/1190/2040-General-Plan-PDF?bidId=>)

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XXI. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	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?		✓		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).		✓		
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

DISCUSSION & FINDINGS:

a) The Proposed Project site is an existing 1.01-acre site located in central Eureka off of Harris Street, in a transitional mixed-use area between a residential neighborhood and the Henderson Center commercial district. No streams, ponds, springs, wetlands, vernal pools, forests, grasslands, or other habitats exist on the property. The site is already developed with an existing church building (currently vacant), outbuildings, a cell tower, and a paved parking area. The site is 71% developed with impervious surface area; remaining permeable areas are landscaped with non-native plant species. The site has been highly disturbed by past uses that have modified the existing property features with a majority of the property being covered with hardscape (asphalt, concrete and packed gravel) and buildings. The project would not significantly degrade the quality of the environment because the site has been extensively altered by prior development associated with the historical use of the property. Beyond the site being already developed, it does not contain environmentally-sensitive features or habitat for sensitive species. Potential impacts to biological, cultural, and tribal cultural resources resulting from a future redevelopment project are addressed in Section IV, Section V, and Section XVIII, respectively. With implementation of the recommended mitigation measures identified in this Initial Study, the potential for the Project to degrade the quality of the environment, including wildlife species or their habitat, plant or animal communities, or important examples of California history or prehistory relating to tribal cultural resources, would be reduced to less-than-significant levels.

b) This mitigated negative declaration documents the Proposed Project’s design features and clear, specific mitigation measures that eliminate the Proposed Project’s potential, project-specific impacts on the environment or mitigate its potential impacts to a less-than-significant level. A “lead agency may determine in an initial study that a project’s contribution to a significant cumulative impact would

be rendered less than cumulatively considerable and thus is not significant” (CEQA Guidelines, §15064[h][2]). Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (CEQA Guidelines §15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

When making this determination, the lead agency may conclude that the effects of a project under review would not be cumulatively considerable where “there is no evidence of any individual potentially significant effect.” (*Sierra Club v. West Side Irrigation District* (2005) 128 Cal.App.4th 690, 701-702 (*Sierra Club*), citing *Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1358 (*Leonoff*). Importantly, the “mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project’s incremental effects are cumulatively considerable” (CEQA Guidelines §15064[h][4]).

A lead agency’s analysis of cumulative impacts in a mitigated negative declaration is not the same as the analysis required in an EIR. In the mitigated negative declaration context, the lead agency’s obligation is to determine whether the incremental effects of the project under review are “considerable”. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1996) 42 Cal.App.4th 608, 624-635 (*San Joaquin Raptor*)). A lead agency’s investigation of this question, further, does not require “some sort of grand statistical analysis” or other detailed inquiry of the type that could be appropriate in an EIR. (*San Joaquin Raptor*, p. 625). A lead agency, as noted, can correctly conclude that the impacts of a project under review are not cumulatively considerable when there is no substantial evidence that any incremental impacts of the project are potentially significant (*San Joaquin Raptor*, p. 624, citing *Leonoff*, at p. 1358).

As discussed throughout this document, implementation of the Proposed Project has the potential to result in impacts to the environment that are individually limited, however, mitigation has been incorporated to reduce any potentially significant impacts that are individually limited to a less than significant level. This document incorporates mitigation measures to reduce impacts from, Air Quality, Biological Resources, Cultural Resources, Energy, Geology & Soils, Greenhouse Gases, Noise, and Tribal Cultural Resources to less-than-significant impacts. These measures reduce the Proposed Project’s individual impacts to a less-than-significant level.

With regard to other resource categories, the Proposed Project would not have any impacts that are considered cumulatively considerable. The Proposed Project would align with the City of Eureka 2040 General Plan and EMC, including requirements related to exterior lighting, landscaping, construction-phase erosion and sediment control, and post-construction stormwater management. The property does not contain agricultural, forestry, or mineral resources. The Project is located within the NCAB, which is currently in non-attainment for PM₁₀, and would follow all requirements surrounding fugitive dust prevention. The Proposed Project would not significantly contribute to increased levels of PM₁₀ or other pollutants, including GHG emissions. The Proposed Project would require grading and building permits which would not be approved unless the project is consistent with applicable City standards and the most recent CBC. The Project would follow all regulations surrounding hazardous materials and would be required to enroll in CUPA if hazardous material storage were required. For

additional analysis on impacts to additional resource categories, see discussion in Sections I – XX, 3.2.1-3.2.20, above.

As such, with incorporation of **Mitigation Measures AQ-1, AQ-2, BIO-1, CUL-1, CUL-2, GEO-1, NOI-1, and NOI-2** mitigation measures imposed throughout this document, the Proposed Project would not contribute to environmental effects that are individually limited, but cumulatively considerable, and impacts would be less than significant with mitigation.

c) The Proposed Project's potential to result in environmental effects that could adversely affect human beings, either directly or indirectly, has been discussed throughout this document. 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, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gases, 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. Impacts would be less than significant with **Mitigation Measures AQ-1, AQ-2, BIO-1, CUL-1, CUL-2, GEO-1, and NOI-1, and NOI-2** incorporated.

MITIGATION MEASURES:

Refer to **Mitigation Measures AQ-1, AQ-2, BIO-1, CUL-1, CUL-2, GEO-1, NOI-1, and NOI-2.**

MITIGATION MEASURES, MONITORING AND REPORTING PROGRAM

Mitigation Measures are summarized below in italics. Implementation timing and method of verification for each Mitigation Measure is detailed below each Mitigation Measure.

Mitigation Measure AQ-1: Measures to Reduce Air Pollution from Construction

To reduce fugitive dust generation during any demolition, excavation, or earthmoving construction activities as a result of the Proposed Project, the following dust control measures shall be implemented by the construction contractors during construction activity associated with future redevelopment:

- *Water all exposed surfaces in active construction areas as necessary to minimize dust generation and use erosion control measures to prevent water runoff containing silt and debris from entering the storm drain system;*
- *Cover trucks hauling soil, sand, and other loose material;*
- *Pave, water, or apply non-toxic soil stabilizers on unpaved access roads and parking areas;*
- *Sweep paved access roads and parking areas daily during construction;*
- *Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.*
- *Maintain and properly tune all construction equipment in accordance with the manufacturer's specifications.*

Implementation of this measure shall occur before and during construction activities. City of Eureka Staff shall verify these requirements are included in construction plans prior to sign-off on building permits and the construction superintendent shall oversee compliance with this Mitigation Measure.

Mitigation Measure AQ-2: Measures to Reduce Air Pollution to Onsite Sensitive Receptors

The applicant and/or its construction contractors shall use filters with a MERV-13 in the HVAC systems for the existing and proposed buildings. The applicant and/or its property managers shall ensure filters are replaced at manufacturer-recommended frequencies.

Implementation of this measure shall occur during construction and/or remodeling of existing and proposed onsite buildings, and shall be continually maintained throughout the life of the project, during regular maintenance checks. City of Eureka Staff shall verify these requirements are included in construction plans prior to sign-off on the building permit and the construction superintendent shall oversee compliance of this Mitigation Measure during construction, and the property manager shall oversee compliance of this Mitigation Measure during operation.

Mitigation Measure BIO-1: Avoidance and Minimization Measures to Protect Special Status and Nesting Birds

No noise- or vibration-generating construction activities within 100 feet of the gulch habitat to the southwest of the parcel shall occur between March 15th to August 15th, when birds may be nesting on the adjacent property. If construction during this time is unavoidable, a qualified biologist shall conduct a pre-construction survey for nesting bird pairs, nests, and eggs within 100 feet of the construction limits. If an active nest is encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS or CDFW, as applicable, and implemented to prevent abandonment of the active nest.

Implementation of this measure shall occur prior to initiation of any demolition or construction activities within 100 feet of the gulch habitat to the southwest of the parcel. A qualified biologist shall conduct the survey, if required due to construction timing, and shall provide written verification of completion of the survey and results. This written verification shall be made available to City of Eureka Staff.

Mitigation Measure CUL-1: Inadvertent Discovery Protocol

Inadvertent discovery protocol shall be followed for any future ground disturbing activities at the site, as outlined below:

- 1. If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist will be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band, Blue Lake Rancheria, and Wiyot Tribe are to be contacted immediately to evaluate the discovery and, in consultation with the project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal*

remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structure remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.

- 2. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work shall stop in that area and within 100 feet of the find until a qualified paleontologist can assess the nature and importance of the find and, if necessary, develop appropriate treatment measures in conformance with Society of Vertebrate Paleontology standards, and in consultation with the City of Eureka.*

Implementation of this measure shall occur during ground disturbing activities. Implementation shall be overseen by the construction contractor, who shall inform construction employees about the measures and verify adherence to protocols. A qualified archaeologist shall be retained if needed. City of Eureka staff shall verify (1) inclusion of inadvertent discovery requirements in final plans and specifications prior to sign-off on the building permit, (2) completion of protocols as detailed in the mitigation measures upon notification of inadvertent discovery, and (3) development of a treatment plan as necessary.

Mitigation Measure CUL-2: Inadvertent Discovery Protocol of Human Remains

In the event of discovery or recognition of any human remains during construction activities, the landowner or person responsible for excavation would be required to comply with the State Health and Safety Code Section (§) 7050.5. Construction activities within 100 feet of the find shall cease until the Humboldt County Coroner has been contacted at 707-445-7242 to determine that no investigation of the cause of death is required. If the remains are determined to be, or potentially be, Native American, the landowner or person responsible for excavation would be required to comply with PRC §5097.98. In part, PRC §5097.98 requires that the NAHC shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC would then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the landowner or the person responsible for the excavation work for the appropriate means of treating the human remains and any associated grave goods within 48 hours of being granted access to the site. Additional provisions of PRC §5097.98 shall be complied with as may be required.

Implementation of this measure shall occur during ground disturbing activities. Implementation shall be overseen by the construction contractor, who shall inform construction employees about the measures and verify adherence to protocols. City of Eureka staff shall verify (1) inclusion of inadvertent discovery requirements in final plans and specifications prior to sign-off on the building permit, and (2) completion of protocols as detailed in the mitigation measures upon notification of inadvertent discovery.

Mitigation Measure GEO-1 – Geotechnical Investigation

Prior to the issuance of any building permits, the applicant shall secure the services of a qualified licensed professional to perform a site-specific design-level geotechnical investigation, in compliance with City of Eureka requirements, including detailed information on site elevations, soil types, and depth to groundwater. The investigation shall determine the project's geotechnical conditions, including seismic shaking and liquefaction hazards, unstable soils hazards, and destabilization and erosion hazards associated with drainage and measures to address these hazards. Analysis presented in the geotechnical

investigation shall conform to the CGS recommendations presented in the Guidelines for Evaluating Seismic Hazards in California. Briefly, the guidelines recommend that the investigation include: a site screening evaluation; evaluation of on- and off-site geologic hazards; detailed field investigation; quantitative evaluation of hazard potential; and recommendations to reduce identified hazards. All design measures, recommendations, design criteria, and specifications set forth in the design-level geotechnical investigation shall be implemented as a condition of project approval.

This measure shall be implemented prior to the issuance of any building permits, prior to any onsite construction. A qualified expert shall be retained to complete the Geotechnical Investigation, and results shall be provided to City of Eureka Staff. Implementation of this Mitigation Measure shall be overseen by City of Eureka Staff during the Building Permit application process and during site inspections prior to any certificate of occupancy.

Mitigation Measure NOI-1: Construction Noise Limits

The operation of tools and equipment used in association with any future construction, repair, alteration, or demolition at the site shall be limited to between the hours of 8 a.m. and 5 p.m., Monday through Friday, and between the hours of 9 a.m. and 5 p.m. on Saturdays, unless further restricted by any required permit. In addition, no heavy equipment-related construction activities shall be allowed on Sundays or on holidays.

Implementation of this measure shall occur before and during construction of the project. City of Eureka Staff shall verify these requirements are included in construction plans prior to sign-off on the building permit, and the construction superintendent shall oversee compliance with this Mitigation Measure.

Mitigation Measure NOI-2. Acoustical Analysis for New Residential Buildings

Prior to the issuance of building permits for new housing units, the project applicant shall prepare final design plans that incorporate building design and acoustical treatments to ensure compliance with State Building Codes and City noise standards. A project-specific acoustical analysis shall be prepared to ensure that the design incorporates controls to reduce interior noise levels to 45 dBA DNL or lower within the residential units. The project applicant shall conform with any special building construction techniques requested by the City's Building Department, which may include sound-rated windows and doors, sound-rated wall constructions, and acoustical caulking.

Implementation of this measure shall occur prior to issuance of building permits for the proposed new housing units, prior to construction. City of Eureka staff shall verify the implementation of this measure and confirm the required acoustical analysis has been completed and any necessary mitigation has been incorporated into the building plans prior to issuing a building permit.

CEQA Initial Study - Harris Medical Center Project

Abbreviation/ Acronym	Definition
AADT	Annual Average Daily Traffic
ADA	Americans with Disabilities Act Standards for Accessible Design
ADU	Accessory Dwelling Unit
APCO	Air Pollution Control Officer
BAAQMD	Bay Area Quality Management District
BACT	Best Available Control Technology
BMP	Best Management Practices
CalEEMod	California Emissions Estimator Model
CALFIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CERS	California Environmental Reporting System
CGC	California Government Code
CGP	Construction General Permit
CGS	California Geological Survey
CH ₄	Methane
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CUPA	Certified Unified Program Agency
dB	Decibel
dBA	A-weighted Decibel
DNL	A-weighted Decibel Day-Night Average Sound Level
DTSC	Department of Toxic Substances Control
DWR	California Department of Water Resources
EIR	Environmental Impact Report
EMC	Eureka Municipal Code
EPA	Environmental Protection Agency
ERWTP	Elk River Wastewater Treatment Plant
EV	Electric Vehicle
FAR	Floor Area Ratio

CEQA Initial Study - Harris Medical Center Project

FEMA	Federal Emergency Management Agency
GHG	Greenhouse Gas
HBMWD	Humboldt Bay Municipal Water District
HBWMA	Humboldt Bay Waste Management Authority
HC	Henderson Center Zoning District
HCAOG	Humboldt County Association of Governments
HCDEH	Humboldt County Department of Health and Human Services Division of Environmental Health
HMBP	Hazardous Materials Business Plan
Humboldt LID Manual	Humboldt Low Impact Development Stormwater Manual
HVAC	Heating, Ventilation, and Air Conditioning
HWMA	Humboldt Waste Management Authority
LDR	Low Density Residential Land Use Designation
LID	Low-Impact-Development
LRA	Local Responsibility Area
LUST	Leaking Underground Storage Tank
MDR	Medium Density Residential Land Use Designation
MERV	Minimum Efficiency Reporting Value
MGD	Million Gallons per Day
MS4	Municipal Separate Storm Sewer Systems
MT	Metric Tons
N ₂ O	Nitrous Oxide
NAHC	Native American Heritage Commission
NC	Neighborhood Commercial Land Use Designation
NCAB	North Coast Air Basin
NCRWQCB	North Coast Regional Water Quality Control Board
NCUAQMD	North Coast Unified Air Quality Management District
NO _x	Nitrogen Oxides
NRCS	Natural Resources Conservation Service
OES	Humboldt County Office of Emergency Services
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
PG&E	Pacific Gas and Electric
PGA	Peak Ground Acceleration
PM ₁₀	Particulate Matter 10 Micrometers or Smaller
PM _{2.5}	Particulate Matter 2.5 Micrometers or Smaller

CEQA Initial Study - Harris Medical Center Project

PPV	Peak Particle Velocity
PRC	Public Resources Code
RI	Residential Low Zoning District
RCEA	Redwood Coast Energy Authority
RHNA	Regional Housing Needs Assessment
ROG	Reactive Organic Compounds
SCP	Stormwater Control Plan
SGMA	Sustainable Groundwater Management Act
SO _x	Sulfur Oxides
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TMDL	Total Maximum Daily Load
USFWS	United States Fish and Wildlife Service
VMT	Vehicle Miles Traveled
WTF	Wireless Telecommunication Facility

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Stokes Church Site Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Stokes Church Site
Construction Start Date	9/15/2024
Operational Year	2025
Lead Agency	City of Eureka
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.90
Precipitation (days)	77.0
Location	40.78014820344288, -124.16637694804885
County	Humboldt
City	Eureka
Air District	North Coast Unified APCD
Air Basin	North Coast
TAZ	106
EDFZ	2
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.24

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Medical Office Building	5.68	1000sqft	0.13	5,679	0.00	0.00	—	—
Condo/Townhouse	10.0	Dwelling Unit	0.63	6,150	0.00	0.00	23.0	—
Parking Lot	37.0	Space	0.33	0.00	0.00	0.00	—	—
Quality Restaurant	1.86	1000sqft	0.04	1,856	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-2*	Limit Heavy-Duty Diesel Vehicle Idling
Construction	C-10-A	Water Exposed Surfaces
Transportation	T-1	Increase Residential Density
Transportation	T-15	Limit Residential Parking Supply
Transportation	T-32*	Orient Project Toward Transit, Bicycle, or Pedestrian Facility
Transportation	T-33*	Locate Project near Bike Path/Bike Lane
Transportation	T-34*	Provide Bike Parking

* Qualitative or supporting measure. Emission reductions not included in the mitigated emissions results.

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	37.9	37.9	9.07	10.5	0.02	0.33	0.08	0.41	0.30	0.02	0.32	—	1,924	1,924	0.08	0.03	0.46	1,934
Mit.	37.9	37.9	9.07	10.5	0.02	0.33	0.08	0.41	0.30	0.02	0.32	—	1,924	1,924	0.08	0.03	0.46	1,934

% Reduced	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.03	1.71	15.9	16.7	0.02	0.74	7.15	7.89	0.68	3.44	4.12	—	2,583	2,583	0.11	0.03	0.01	2,593
Mit.	2.03	1.71	15.9	16.7	0.02	0.74	2.83	3.57	0.68	1.35	2.04	—	2,583	2,583	0.11	0.03	0.01	2,593
% Reduced	—	—	—	—	—	—	60%	55%	—	61%	51%	—	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.61	1.52	3.90	4.59	0.01	0.14	0.13	0.20	0.13	0.06	0.14	—	828	828	0.03	0.01	0.09	832
Mit.	1.61	1.52	3.90	4.59	0.01	0.14	0.06	0.18	0.13	0.02	0.14	—	828	828	0.03	0.01	0.09	832
% Reduced	—	—	—	—	—	—	55%	14%	—	58%	—	—	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.29	0.28	0.71	0.84	< 0.005	0.03	0.02	0.04	0.02	0.01	0.03	—	137	137	0.01	< 0.005	0.01	138
Mit.	0.29	0.28	0.71	0.84	< 0.005	0.03	0.01	0.03	0.02	< 0.005	0.03	—	137	137	0.01	< 0.005	0.01	138
% Reduced	—	—	—	—	—	—	55%	14%	—	58%	—	—	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	37.9	37.9	9.07	10.5	0.02	0.33	0.08	0.41	0.30	0.02	0.32	—	1,924	1,924	0.08	0.03	0.46	1,934

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.03	1.71	15.9	16.7	0.02	0.74	7.15	7.89	0.68	3.44	4.12	—	2,583	2,583	0.11	0.03	0.01	2,593
2025	1.35	1.13	9.09	10.6	0.02	0.33	0.08	0.41	0.30	0.02	0.32	—	1,924	1,924	0.08	0.03	0.01	1,934
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.28	0.23	1.95	2.12	< 0.005	0.08	0.13	0.20	0.07	0.06	0.13	—	367	367	0.02	< 0.005	0.04	369
2025	1.61	1.52	3.90	4.59	0.01	0.14	0.03	0.18	0.13	0.01	0.14	—	828	828	0.03	0.01	0.09	832
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.05	0.04	0.36	0.39	< 0.005	0.01	0.02	0.04	0.01	0.01	0.02	—	60.7	60.7	< 0.005	< 0.005	0.01	61.0
2025	0.29	0.28	0.71	0.84	< 0.005	0.03	0.01	0.03	0.02	< 0.005	0.03	—	137	137	0.01	< 0.005	0.01	138

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2025	37.9	37.9	9.07	10.5	0.02	0.33	0.08	0.41	0.30	0.02	0.32	—	1,924	1,924	0.08	0.03	0.46	1,934
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	2.03	1.71	15.9	16.7	0.02	0.74	2.83	3.57	0.68	1.35	2.04	—	2,583	2,583	0.11	0.03	0.01	2,593
2025	1.35	1.13	9.09	10.6	0.02	0.33	0.08	0.41	0.30	0.02	0.32	—	1,924	1,924	0.08	0.03	0.01	1,934
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.28	0.23	1.95	2.12	< 0.005	0.08	0.06	0.14	0.07	0.02	0.10	—	367	367	0.02	< 0.005	0.04	369
2025	1.61	1.52	3.90	4.59	0.01	0.14	0.03	0.18	0.13	0.01	0.14	—	828	828	0.03	0.01	0.09	832
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2024	0.05	0.04	0.36	0.39	< 0.005	0.01	0.01	0.02	0.01	< 0.005	0.02	—	60.7	60.7	< 0.005	< 0.005	0.01	61.0
2025	0.29	0.28	0.71	0.84	< 0.005	0.03	0.01	0.03	0.02	< 0.005	0.03	—	137	137	0.01	< 0.005	0.01	138

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	20.2	18.5	46.0	68.6	0.09	2.35	1.30	3.66	2.35	0.33	2.69	41.0	10,052	10,093	4.62	0.19	10.3	10,275
Mit.	20.1	18.4	45.9	68.3	0.09	2.35	1.28	3.63	2.35	0.32	2.68	41.0	10,016	10,057	4.61	0.19	10.1	10,238
% Reduced	< 0.5%	< 0.5%	< 0.5%	< 0.5%	—	—	2%	1%	—	2%	< 0.5%	—	< 0.5%	< 0.5%	< 0.5%	1%	2%	< 0.5%
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	20.1	18.4	46.1	69.1	0.09	2.35	1.30	3.66	2.35	0.33	2.68	41.0	10,049	10,090	4.64	0.20	3.28	10,268
Mit.	20.0	18.3	46.1	68.8	0.09	2.35	1.28	3.63	2.35	0.32	2.68	41.0	10,013	10,054	4.63	0.19	3.27	10,231
% Reduced	< 0.5%	< 0.5%	< 0.5%	< 0.5%	—	—	2%	1%	—	2%	< 0.5%	—	< 0.5%	< 0.5%	< 0.5%	2%	< 0.5%	< 0.5%
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.52	2.40	1.87	9.40	0.01	0.05	0.86	0.91	0.05	0.22	0.27	41.0	1,573	1,614	4.27	0.10	5.26	1,756
Mit.	2.46	2.34	1.83	9.16	0.01	0.05	0.84	0.89	0.05	0.21	0.26	41.0	1,540	1,581	4.27	0.10	5.19	1,722
% Reduced	2%	2%	2%	3%	—	—	3%	3%	—	3%	2%	—	2%	2%	< 0.5%	3%	1%	2%
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.46	0.44	0.34	1.72	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	6.79	260	267	0.71	0.02	0.87	291
Mit.	0.45	0.43	0.33	1.67	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	6.79	255	262	0.71	0.02	0.86	285

% Reduced	2%	2%	2%	3%	2%	1%	3%	3%	1%	3%	2%	—	2%	2%	< 0.5%	3%	1%	2%
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2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.32	2.20	1.75	10.4	0.02	0.02	1.30	1.33	0.02	0.33	0.35	—	1,639	1,639	0.14	0.12	7.21	1,684
Area	0.51	0.50	0.01	0.89	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.86	2.86	< 0.005	< 0.005	—	2.87
Energy	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	347	347	0.04	< 0.005	—	349
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Stationary	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	20.2	18.5	46.0	68.6	0.09	2.35	1.30	3.66	2.35	0.33	2.69	41.0	10,052	10,093	4.62	0.19	10.3	10,275
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.37	2.23	1.93	11.9	0.02	0.02	1.30	1.33	0.02	0.33	0.35	—	1,639	1,639	0.16	0.12	0.19	1,680
Area	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	347	347	0.04	< 0.005	—	349
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Stationary	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	20.1	18.4	46.1	69.1	0.09	2.35	1.30	3.66	2.35	0.33	2.68	41.0	10,049	10,090	4.64	0.20	3.28	10,268

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.91	1.81	1.34	8.38	0.01	0.02	0.86	0.88	0.02	0.22	0.24	—	1,154	1,154	0.12	0.09	2.17	1,186
Area	0.45	0.45	< 0.005	0.44	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.41	1.41	< 0.005	< 0.005	—	1.42
Energy	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	347	347	0.04	< 0.005	—	349
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Stationary	0.14	0.13	0.36	0.47	< 0.005	0.02	0.00	0.02	0.02	0.00	0.02	0.00	66.2	66.2	< 0.005	< 0.005	0.00	66.5
Total	2.52	2.40	1.87	9.40	0.01	0.05	0.86	0.91	0.05	0.22	0.27	41.0	1,573	1,614	4.27	0.10	5.26	1,756
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.35	0.33	0.24	1.53	< 0.005	< 0.005	0.16	0.16	< 0.005	0.04	0.04	—	191	191	0.02	0.01	0.36	196
Area	0.08	0.08	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.23	0.23	< 0.005	< 0.005	—	0.23
Energy	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	57.5	57.5	0.01	< 0.005	—	57.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.49	0.64	1.14	0.05	< 0.005	—	2.77
Waste	—	—	—	—	—	—	—	—	—	—	—	6.30	0.00	6.30	0.63	0.00	—	22.0
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Stationary	0.03	0.02	0.07	0.09	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	11.0	11.0	< 0.005	< 0.005	0.00	11.0
Total	0.46	0.44	0.34	1.72	< 0.005	0.01	0.16	0.17	0.01	0.04	0.05	6.79	260	267	0.71	0.02	0.87	291

2.6. Operations Emissions by Sector, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.26	2.14	1.71	10.1	0.02	0.02	1.28	1.30	0.02	0.32	0.35	—	1,602	1,602	0.14	0.11	7.05	1,646

Area	0.51	0.50	0.01	0.89	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.86	2.86	< 0.005	< 0.005	—	2.87
Energy	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	347	347	0.04	< 0.005	—	349
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Stationary	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	20.1	18.4	45.9	68.3	0.09	2.35	1.28	3.63	2.35	0.32	2.68	41.0	10,016	10,057	4.61	0.19	10.1	10,238
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.30	2.17	1.88	11.6	0.02	0.02	1.28	1.30	0.02	0.32	0.35	—	1,602	1,602	0.16	0.12	0.18	1,642
Area	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	347	347	0.04	< 0.005	—	349
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Stationary	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	20.0	18.3	46.1	68.8	0.09	2.35	1.28	3.63	2.35	0.32	2.68	41.0	10,013	10,054	4.63	0.19	3.27	10,231
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.85	1.75	1.30	8.14	0.01	0.02	0.84	0.85	0.02	0.21	0.23	—	1,121	1,121	0.12	0.09	2.10	1,152
Area	0.45	0.45	< 0.005	0.44	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.41	1.41	< 0.005	< 0.005	—	1.42
Energy	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	347	347	0.04	< 0.005	—	349
Water	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Waste	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Stationary	0.14	0.13	0.36	0.47	< 0.005	0.02	0.00	0.02	0.02	0.00	0.02	0.00	66.2	66.2	< 0.005	< 0.005	0.00	66.5

Total	2.46	2.34	1.83	9.16	0.01	0.05	0.84	0.89	0.05	0.21	0.26	41.0	1,540	1,581	4.27	0.10	5.19	1,722
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.34	0.32	0.24	1.48	< 0.005	< 0.005	0.15	0.16	< 0.005	0.04	0.04	—	186	186	0.02	0.01	0.35	191
Area	0.08	0.08	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.23	0.23	< 0.005	< 0.005	—	0.23
Energy	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	57.5	57.5	0.01	< 0.005	—	57.8
Water	—	—	—	—	—	—	—	—	—	—	—	0.49	0.64	1.14	0.05	< 0.005	—	2.77
Waste	—	—	—	—	—	—	—	—	—	—	—	6.30	0.00	6.30	0.63	0.00	—	22.0
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
Stationary	0.03	0.02	0.07	0.09	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	11.0	11.0	< 0.005	< 0.005	0.00	11.0
Total	0.45	0.43	0.33	1.67	< 0.005	0.01	0.15	0.16	0.01	0.04	0.05	6.79	255	262	0.71	0.02	0.86	285

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.92	1.61	15.6	16.0	0.02	0.67	—	0.67	0.62	—	0.62	—	2,494	2,494	0.10	0.02	—	2,502
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.40	< 0.005	0.02	—	0.02	0.02	—	0.02	—	61.5	61.5	< 0.005	< 0.005	—	61.7
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.2	10.2	< 0.005	< 0.005	—	10.2
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.08	0.71	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	89.4	89.4	0.01	< 0.005	0.01	90.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.21	2.21	< 0.005	< 0.005	< 0.005	2.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.37

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.2. Demolition (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.92	1.61	15.6	16.0	0.02	0.67	—	0.67	0.62	—	0.62	—	2,494	2,494	0.10	0.02	—	2,502
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.40	< 0.005	0.02	—	0.02	0.02	—	0.02	—	61.5	61.5	< 0.005	< 0.005	—	61.7
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.2	10.2	< 0.005	< 0.005	—	10.2
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.08	0.71	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	89.4	89.4	0.01	< 0.005	0.01	90.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.21	2.21	< 0.005	< 0.005	< 0.005	2.25
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.37
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.70	1.43	13.7	12.9	0.02	0.65	—	0.65	0.59	—	0.59	—	2,064	2,064	0.08	0.02	—	2,071
Dust From Material Movement:	—	—	—	—	—	—	6.26	6.26	—	3.00	3.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.3
Dust From Material Movement:	—	—	—	—	—	—	0.03	0.03	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.87	1.87	< 0.005	< 0.005	—	1.88
Dust From Material Movement:	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.43	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	53.6	53.6	< 0.005	< 0.005	0.01	54.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.29	0.29	< 0.005	< 0.005	< 0.005	0.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.4. Site Preparation (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.70	1.43	13.7	12.9	0.02	0.65	—	0.65	0.59	—	0.59	—	2,064	2,064	0.08	0.02	—	2,071

Dust From Material Movement:	—	—	—	—	—	—	2.44	2.44	—	1.17	1.17	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.3	11.3	< 0.005	< 0.005	—	11.3
Dust From Material Movement:	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.87	1.87	< 0.005	< 0.005	—	1.88
Dust From Material Movement:	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.43	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	53.6	53.6	< 0.005	< 0.005	0.01	54.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.29	0.29	< 0.005	< 0.005	< 0.005	0.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.96	1.65	15.9	15.4	0.02	0.74	—	0.74	0.68	—	0.68	—	2,454	2,454	0.10	0.02	—	2,462
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.9	26.9	< 0.005	< 0.005	—	27.0

Dust From Material Movement:	—	—	—	—	—	—	0.08	0.08	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.45	4.45	< 0.005	< 0.005	—	4.47
Dust From Material Movement:	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.57	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	71.5	71.5	0.01	< 0.005	0.01	72.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.79	0.79	< 0.005	< 0.005	< 0.005	0.80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.13	0.13	< 0.005	< 0.005	< 0.005	0.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
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3.6. Grading (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.96	1.65	15.9	15.4	0.02	0.74	—	0.74	0.68	—	0.68	—	2,454	2,454	0.10	0.02	—	2,462
Dust From Material Movement:	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.17	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.9	26.9	< 0.005	< 0.005	—	27.0
Dust From Material Movement:	—	—	—	—	—	—	0.03	0.03	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.45	4.45	< 0.005	< 0.005	—	4.47

Dust From Material Movement:	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.06	0.06	0.57	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	71.5	71.5	0.01	< 0.005	0.01	72.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.79	0.79	< 0.005	< 0.005	< 0.005	0.80
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.13	0.13	< 0.005	< 0.005	< 0.005	0.13
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.36	1.13	9.44	10.1	0.02	0.37	—	0.37	0.34	—	0.34	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.29	1.38	< 0.005	0.05	—	0.05	0.05	—	0.05	—	247	247	0.01	< 0.005	—	248
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.24	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.8	40.8	< 0.005	< 0.005	—	41.0
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.06	0.56	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	70.0	70.0	0.01	< 0.005	0.01	71.1
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	54.8	54.8	< 0.005	0.01	< 0.005	57.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.62	9.62	< 0.005	< 0.005	0.02	9.79
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.50	7.50	< 0.005	< 0.005	0.01	7.84
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.59	1.59	< 0.005	< 0.005	< 0.005	1.62
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.30
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2024) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.36	1.13	9.44	10.1	0.02	0.37	—	0.37	0.34	—	0.34	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.29	1.38	< 0.005	0.05	—	0.05	0.05	—	0.05	—	247	247	0.01	< 0.005	—	248
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.24	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.8	40.8	< 0.005	< 0.005	—	41.0

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.06	0.56	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	70.0	70.0	0.01	< 0.005	0.01	71.1	
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	54.8	54.8	< 0.005	0.01	< 0.005	57.2	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.62	9.62	< 0.005	< 0.005	0.02	9.79	
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	7.50	7.50	< 0.005	< 0.005	0.01	7.84	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.59	1.59	< 0.005	< 0.005	< 0.005	1.62	
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.24	1.24	< 0.005	< 0.005	< 0.005	1.30	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.9. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.44	3.69	4.14	0.01	0.14	—	0.14	0.12	—	0.12	—	744	744	0.03	0.01	—	746
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.67	0.76	< 0.005	0.02	—	0.02	0.02	—	0.02	—	123	123	< 0.005	< 0.005	—	124
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.48	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	69.0	69.0	< 0.005	< 0.005	0.32	70.3
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	53.9	53.9	< 0.005	0.01	0.14	56.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.52	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	68.8	68.8	0.01	< 0.005	0.01	69.9

Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	53.9	53.9	< 0.005	0.01	< 0.005	56.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.21	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.5	28.5	< 0.005	< 0.005	0.06	29.0
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22.3	22.3	< 0.005	< 0.005	0.03	23.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.72	4.72	< 0.005	< 0.005	0.01	4.80
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.68	3.68	< 0.005	< 0.005	< 0.005	3.84
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.10. Building Construction (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	8.95	10.0	0.02	0.33	—	0.33	0.30	—	0.30	—	1,801	1,801	0.07	0.01	—	1,807
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.44	3.69	4.14	0.01	0.14	—	0.14	0.12	—	0.12	—	744	744	0.03	0.01	—	746
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.67	0.76	< 0.005	0.02	—	0.02	0.02	—	0.02	—	123	123	< 0.005	< 0.005	—	124
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.48	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	69.0	69.0	< 0.005	< 0.005	0.32	70.3
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	53.9	53.9	< 0.005	0.01	0.14	56.3
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.05	0.52	0.00	0.00	0.07	0.07	0.00	0.02	0.02	—	68.8	68.8	0.01	< 0.005	0.01	69.9
Vendor	< 0.005	< 0.005	0.09	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	53.9	53.9	< 0.005	0.01	< 0.005	56.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.02	0.21	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.5	28.5	< 0.005	< 0.005	0.06	29.0
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	22.3	22.3	< 0.005	< 0.005	0.03	23.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.72	4.72	< 0.005	< 0.005	0.01	4.80

Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.68	3.68	< 0.005	< 0.005	< 0.005	3.84
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.63	6.50	0.01	0.20	—	0.20	0.19	—	0.19	—	992	992	0.04	0.01	—	995
Paving	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.13	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.2	27.2	< 0.005	< 0.005	—	27.3
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.50	4.50	< 0.005	< 0.005	—	4.51
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.61	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	88.0	88.0	0.01	< 0.005	0.41	89.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.41	2.41	< 0.005	< 0.005	< 0.005	2.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.41
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.12. Paving (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.59	0.49	4.63	6.50	0.01	0.20	—	0.20	0.19	—	0.19	—	992	992	0.04	0.01	—	995
Paving	0.09	0.09	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.13	0.18	< 0.005	0.01	—	0.01	0.01	—	0.01	—	27.2	27.2	< 0.005	< 0.005	—	27.3
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.50	4.50	< 0.005	< 0.005	—	4.51
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	0.06	0.61	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	88.0	88.0	0.01	< 0.005	0.41	89.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.41	2.41	< 0.005	< 0.005	< 0.005	2.45
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	0.41	
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	

3.13. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	37.7	37.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architect ural Coatings	1.03	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	0.19	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	0.06	14.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.38	0.38	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.06	0.06	< 0.005	< 0.005	< 0.005	0.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating (2025) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	37.7	37.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.66	3.66	< 0.005	< 0.005	—	3.67
Architectural Coatings	1.03	1.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.61	0.61	< 0.005	< 0.005	—	0.61
Architectural Coatings	0.19	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.10	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	0.06	14.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.38	0.38	< 0.005	< 0.005	< 0.005	0.38
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.06	0.06	< 0.005	< 0.005	< 0.005	0.06
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	1.04	0.98	0.80	4.74	0.01	0.01	0.61	0.62	0.01	0.15	0.16	—	761	761	0.06	0.05	3.36	782
Condo/Townhouse	0.41	0.39	0.27	1.63	< 0.005	< 0.005	0.18	0.19	< 0.005	0.05	0.05	—	234	234	0.02	0.02	1.01	241
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Quality Restaurart	0.88	0.83	0.68	4.01	0.01	0.01	0.51	0.52	0.01	0.13	0.14	—	644	644	0.05	0.04	2.84	661
Total	2.32	2.20	1.75	10.4	0.02	0.02	1.30	1.33	0.02	0.33	0.35	—	1,639	1,639	0.14	0.12	7.21	1,684
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	1.06	1.00	0.89	5.40	0.01	0.01	0.61	0.62	0.01	0.15	0.16	—	761	761	0.07	0.06	0.09	780
Condo/Townhouse	0.41	0.39	0.29	1.89	< 0.005	< 0.005	0.18	0.19	< 0.005	0.05	0.05	—	234	234	0.03	0.02	0.03	241
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Quality Restaurart	0.89	0.84	0.75	4.57	0.01	0.01	0.51	0.52	0.01	0.13	0.14	—	644	644	0.06	0.05	0.07	659
Total	2.37	2.23	1.93	11.9	0.02	0.02	1.30	1.33	0.02	0.33	0.35	—	1,639	1,639	0.16	0.12	0.19	1,680
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.14	0.14	0.12	0.70	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	95.3	95.3	0.01	0.01	0.18	97.7
Condo/Townhouse	0.07	0.06	0.05	0.29	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	34.8	34.8	< 0.005	< 0.005	0.06	35.7
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Quality Restaurant	0.14	0.13	0.08	0.55	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	61.0	61.0	0.01	0.01	0.11	62.9
Total	0.35	0.33	0.24	1.53	< 0.005	< 0.005	0.16	0.16	< 0.005	0.04	0.04	—	191	191	0.02	0.01	0.36	196

4.1.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	1.04	0.98	0.80	4.74	0.01	0.01	0.61	0.62	0.01	0.15	0.16	—	761	761	0.06	0.05	3.36	782
Condo/Townhouse	0.34	0.33	0.22	1.38	< 0.005	< 0.005	0.15	0.16	< 0.005	0.04	0.04	—	198	198	0.02	0.01	0.86	203
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Quality Restaurant	0.88	0.83	0.68	4.01	0.01	0.01	0.51	0.52	0.01	0.13	0.14	—	644	644	0.05	0.04	2.84	661
Total	2.26	2.14	1.71	10.1	0.02	0.02	1.28	1.30	0.02	0.32	0.35	—	1,602	1,602	0.14	0.11	7.05	1,646
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	1.06	1.00	0.89	5.40	0.01	0.01	0.61	0.62	0.01	0.15	0.16	—	761	761	0.07	0.06	0.09	780
Condo/Townhouse	0.35	0.33	0.25	1.60	< 0.005	< 0.005	0.15	0.16	< 0.005	0.04	0.04	—	198	198	0.02	0.02	0.02	203
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Quality Restaurant	0.89	0.84	0.75	4.57	0.01	0.01	0.51	0.52	0.01	0.13	0.14	—	644	644	0.06	0.05	0.07	659
Total	2.30	2.17	1.88	11.6	0.02	0.02	1.28	1.30	0.02	0.32	0.35	—	1,602	1,602	0.16	0.12	0.18	1,642
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	0.14	0.14	0.12	0.70	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.02	—	95.3	95.3	0.01	0.01	0.18	97.7
Condo/Townhouse	0.06	0.05	0.04	0.24	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	29.3	29.3	< 0.005	< 0.005	0.05	30.2
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Quality Restaurant	0.14	0.13	0.08	0.55	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	61.0	61.0	0.01	0.01	0.11	62.9
Total	0.34	0.32	0.24	1.48	< 0.005	< 0.005	0.15	0.16	< 0.005	0.04	0.04	—	186	186	0.02	0.01	0.35	191

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	66.9	66.9	0.01	< 0.005	—	67.6
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	23.1	23.1	< 0.005	< 0.005	—	23.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.10	7.10	< 0.005	< 0.005	—	7.17

Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	45.6	45.6	0.01	< 0.005	—	46.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.02	< 0.005	—	144
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	66.9	66.9	0.01	< 0.005	—	67.6
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	23.1	23.1	< 0.005	< 0.005	—	23.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.10	7.10	< 0.005	< 0.005	—	7.17
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	45.6	45.6	0.01	< 0.005	—	46.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.02	< 0.005	—	144
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	11.1	11.1	< 0.005	< 0.005	—	11.2
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	3.83	3.83	< 0.005	< 0.005	—	3.87
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.18	1.18	< 0.005	< 0.005	—	1.19
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	7.55	7.55	< 0.005	< 0.005	—	7.62
Total	—	—	—	—	—	—	—	—	—	—	—	—	23.6	23.6	< 0.005	< 0.005	—	23.9

4.2.2. Electricity Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	66.9	66.9	0.01	< 0.005	—	67.6
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	23.1	23.1	< 0.005	< 0.005	—	23.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.10	7.10	< 0.005	< 0.005	—	7.17
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	45.6	45.6	0.01	< 0.005	—	46.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.02	< 0.005	—	144
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	66.9	66.9	0.01	< 0.005	—	67.6
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	23.1	23.1	< 0.005	< 0.005	—	23.4
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.10	7.10	< 0.005	< 0.005	—	7.17
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	45.6	45.6	0.01	< 0.005	—	46.1
Total	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.02	< 0.005	—	144
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	11.1	11.1	< 0.005	< 0.005	—	11.2

Condo/T	—	—	—	—	—	—	—	—	—	—	—	—	3.83	3.83	< 0.005	< 0.005	—	3.87
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.18	1.18	< 0.005	< 0.005	—	1.19
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	7.55	7.55	< 0.005	< 0.005	—	7.62
Total	—	—	—	—	—	—	—	—	—	—	—	—	23.6	23.6	< 0.005	< 0.005	—	23.9

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5
Condo/Townhouse	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	83.1	83.1	0.01	< 0.005	—	83.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	78.8	78.8	0.01	< 0.005	—	79.1
Total	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	204	204	0.02	< 0.005	—	205
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5
Condo/Townhouse	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	83.1	83.1	0.01	< 0.005	—	83.4

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	78.8	78.8	0.01	< 0.005	—	79.1
Total	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	204	204	0.02	< 0.005	—	205
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.02	7.02	< 0.005	< 0.005	—	7.04
Condo/Townhouse	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.8	13.8	< 0.005	< 0.005	—	13.8
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.1	13.1	< 0.005	< 0.005	—	13.1
Total	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	33.8	33.8	< 0.005	< 0.005	—	33.9

4.2.4. Natural Gas Emissions By Land Use - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5
Condo/Townhouse	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	83.1	83.1	0.01	< 0.005	—	83.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

Quality Restaurant	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	78.8	78.8	0.01	< 0.005	—	79.1
Total	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	204	204	0.02	< 0.005	—	205
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.04	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	42.4	42.4	< 0.005	< 0.005	—	42.5
Condo/Townhouse	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	83.1	83.1	0.01	< 0.005	—	83.4
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	0.01	< 0.005	0.07	0.06	< 0.005	0.01	—	0.01	0.01	—	0.01	—	78.8	78.8	0.01	< 0.005	—	79.1
Total	0.02	0.01	0.17	0.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	204	204	0.02	< 0.005	—	205
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.02	7.02	< 0.005	< 0.005	—	7.04
Condo/Townhouse	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.8	13.8	< 0.005	< 0.005	—	13.8
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.1	13.1	< 0.005	< 0.005	—	13.1
Total	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	33.8	33.8	< 0.005	< 0.005	—	33.9

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.29	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.10	0.01	0.89	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.86	2.86	< 0.005	< 0.005	—	2.87
Total	0.51	0.50	0.01	0.89	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.86	2.86	< 0.005	< 0.005	—	2.87
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.29	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipme	0.01	0.01	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.23	0.23	< 0.005	< 0.005	—	0.23
Total	0.08	0.08	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.23	0.23	< 0.005	< 0.005	—	0.23

4.3.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.29	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.10	0.01	0.89	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.86	2.86	< 0.005	< 0.005	—	2.87
Total	0.51	0.50	0.01	0.89	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.86	2.86	< 0.005	< 0.005	—	2.87
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.29	0.29	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.10	0.10	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Consumer	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.02	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.23	0.23	< 0.005	< 0.005	—	0.23
Total	0.08	0.08	< 0.005	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.23	0.23	< 0.005	< 0.005	—	0.23

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	1.37	1.77	3.14	0.14	< 0.005	—	7.65
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.54	0.71	1.25	0.06	< 0.005	—	3.04
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	1.08	1.40	2.48	0.11	< 0.005	—	6.05
Total	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	1.37	1.77	3.14	0.14	< 0.005	—	7.65
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.54	0.71	1.25	0.06	< 0.005	—	3.04
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	1.08	1.40	2.48	0.11	< 0.005	—	6.05
Total	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	0.23	0.29	0.52	0.02	< 0.005	—	1.27
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.09	0.12	0.21	0.01	< 0.005	—	0.50
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.18	0.23	0.41	0.02	< 0.005	—	1.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.49	0.64	1.14	0.05	< 0.005	—	2.77

4.4.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	1.37	1.77	3.14	0.14	< 0.005	—	7.65

Condo/T	—	—	—	—	—	—	—	—	—	—	—	0.54	0.71	1.25	0.06	< 0.005	—	3.04
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	1.08	1.40	2.48	0.11	< 0.005	—	6.05
Total	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	1.37	1.77	3.14	0.14	< 0.005	—	7.65
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.54	0.71	1.25	0.06	< 0.005	—	3.04
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	1.08	1.40	2.48	0.11	< 0.005	—	6.05
Total	—	—	—	—	—	—	—	—	—	—	—	2.99	3.88	6.87	0.31	0.01	—	16.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	0.23	0.29	0.52	0.02	< 0.005	—	1.27
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.09	0.12	0.21	0.01	< 0.005	—	0.50
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.18	0.23	0.41	0.02	< 0.005	—	1.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.49	0.64	1.14	0.05	< 0.005	—	2.77

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	33.1	0.00	33.1	3.30	0.00	—	116
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	4.07	0.00	4.07	0.41	0.00	—	14.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.91	0.00	0.91	0.09	0.00	—	3.19
Total	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	33.1	0.00	33.1	3.30	0.00	—	116
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	4.07	0.00	4.07	0.41	0.00	—	14.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.91	0.00	0.91	0.09	0.00	—	3.19
Total	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	5.47	0.00	5.47	0.55	0.00	—	19.1
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.36
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.15	0.00	0.15	0.02	0.00	—	0.53
Total	—	—	—	—	—	—	—	—	—	—	—	6.30	0.00	6.30	0.63	0.00	—	22.0

4.5.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	33.1	0.00	33.1	3.30	0.00	—	116
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	4.07	0.00	4.07	0.41	0.00	—	14.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.91	0.00	0.91	0.09	0.00	—	3.19
Total	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	33.1	0.00	33.1	3.30	0.00	—	116
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	4.07	0.00	4.07	0.41	0.00	—	14.3
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.91	0.00	0.91	0.09	0.00	—	3.19
Total	—	—	—	—	—	—	—	—	—	—	—	38.0	0.00	38.0	3.80	0.00	—	133
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	5.47	0.00	5.47	0.55	0.00	—	19.1
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	0.67	0.00	0.67	0.07	0.00	—	2.36
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	0.15	0.00	0.15	0.02	0.00	—	0.53
Total	—	—	—	—	—	—	—	—	—	—	—	6.30	0.00	6.30	0.63	0.00	—	22.0

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.15	0.15
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.90	2.90
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.15	0.15
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.90	2.90
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.48	0.48
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51

4.6.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.15	0.15
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.90	2.90
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.15	0.15
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.90	2.90
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.09	3.09
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.02	0.02
Condo/Townhouse	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Quality Restaurant	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.48	0.48

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.51	0.51
-------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	------	------

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.7.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.03	0.02	0.07	0.09	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	11.0	11.0	< 0.005	< 0.005	0.00	11.0
Total	0.03	0.02	0.07	0.09	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	11.0	11.0	< 0.005	< 0.005	0.00	11.0

4.8.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Total	17.3	15.8	44.0	57.2	0.08	2.32	0.00	2.32	2.32	0.00	2.32	0.00	8,059	8,059	0.32	0.06	0.00	8,086
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Emergency Generator	0.03	0.02	0.07	0.09	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	11.0	11.0	< 0.005	< 0.005	0.00	11.0
Total	0.03	0.02	0.07	0.09	< 0.005	< 0.005	0.00	< 0.005	< 0.005	0.00	< 0.005	0.00	11.0	11.0	< 0.005	< 0.005	0.00	11.0

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9.2. Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	10/1/2024	10/13/2024	5.00	9.00	—
Site Preparation	Site Preparation	10/14/2024	10/16/2024	5.00	2.00	—
Grading	Grading	10/17/2024	10/22/2024	5.00	4.00	—
Building Construction	Building Construction	10/23/2024	7/30/2025	5.00	200	—
Paving	Paving	7/31/2025	8/14/2025	5.00	10.0	—
Architectural Coating	Architectural Coating	8/15/2025	8/29/2025	5.00	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	6.00	367	0.29
Building Construction	Forklifts	Diesel	Average	1.00	6.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37
Building Construction	Welders	Diesel	Average	3.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	9.53	LDA,LDT1,LDT2
Demolition	Vendor	—	7.16	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	9.53	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.16	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	9.53	LDA,LDT1,LDT2
Grading	Vendor	—	7.16	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	9.80	9.53	LDA,LDT1,LDT2
Building Construction	Vendor	2.30	7.16	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	9.53	LDA,LDT1,LDT2
Paving	Vendor	—	7.16	HHDT,MHDT

Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	1.96	9.53	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.16	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	9.53	LDA,LDT1,LDT2
Demolition	Vendor	—	7.16	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	9.53	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.16	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	9.53	LDA,LDT1,LDT2
Grading	Vendor	—	7.16	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	9.80	9.53	LDA,LDT1,LDT2

Building Construction	Vendor	2.30	7.16	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	9.53	LDA,LDT1,LDT2
Paving	Vendor	—	7.16	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	1.96	9.53	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.16	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	12,454	4,151	11,303	3,768	870

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
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Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	1.88	0.00	—
Grading	—	—	4.00	0.00	—
Paving	0.00	0.00	0.00	0.00	0.33

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Medical Office Building	0.00	0%
Condo/Townhouse	—	0%
Parking Lot	0.33	100%
Quality Restaurant	0.00	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	204	0.03	< 0.005
2025	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Medical Office Building	198	48.7	8.06	54,483	849	209	34.7	234,103
Condo/Townhouse	73.2	81.4	62.8	26,603	231	257	198	83,854

Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Quality Restaurant	156	167	134	56,248	298	718	574	145,098

5.9.2. Mitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Medical Office Building	198	48.7	8.06	54,483	849	209	34.7	234,103
Condo/Townhouse	61.8	68.7	53.0	22,459	195	217	167	70,791
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Quality Restaurant	156	167	134	56,248	298	718	574	145,098

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.1.2. Mitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
12453.75	4,151	11,303	3,768	870

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.10.4. Landscape Equipment - Mitigated

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Medical Office Building	119,690	204	0.0330	0.0040	132,387
Condo/Townhouse	41,385	204	0.0330	0.0040	259,431
Parking Lot	12,707	204	0.0330	0.0040	0.00
Quality Restaurant	81,598	204	0.0330	0.0040	246,007

5.11.2. Mitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Medical Office Building	119,690	204	0.0330	0.0040	132,387
Condo/Townhouse	41,385	204	0.0330	0.0040	259,431
Parking Lot	12,707	204	0.0330	0.0040	0.00
Quality Restaurant	81,598	204	0.0330	0.0040	246,007

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Medical Office Building	712,604	0.00
Condo/Townhouse	283,331	0.00
Parking Lot	0.00	0.00
Quality Restaurant	563,359	0.00

5.12.2. Mitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Medical Office Building	712,604	0.00
Condo/Townhouse	283,331	0.00
Parking Lot	0.00	0.00
Quality Restaurant	563,359	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Medical Office Building	61.3	—
Condo/Townhouse	7.56	—
Parking Lot	0.00	—
Quality Restaurant	1.69	—

5.13.2. Mitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Medical Office Building	61.3	—
Condo/Townhouse	7.56	—

Parking Lot	0.00	—
Quality Restaurant	1.69	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Quality Restaurant	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Quality Restaurant	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Quality Restaurant	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.14.2. Mitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Quality Restaurant	Household refrigerators and/or freezers	R-134a	1,430	0.00	0.60	0.00	1.00
Quality Restaurant	Other commercial A/C and heat pumps	R-410A	2,088	1.80	4.00	4.00	18.0
Quality Restaurant	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
Emergency Generator	Diesel	2.00	24.0	72.0	100	0.73

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	5.52	annual days of extreme heat
Extreme Precipitation	16.6	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	18.3	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about $\frac{3}{4}$ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	1	0	0	N/A

Flooding	0	0	0	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	2	1	1	3
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	1	1	1	2
Flooding	1	1	1	2
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	0.27
AQ-PM	5.53
AQ-DPM	26.4
Drinking Water	8.57
Lead Risk Housing	75.9
Pesticides	0.00
Toxic Releases	15.7
Traffic	19.2
Effect Indicators	—
CleanUp Sites	0.00
Groundwater	60.4
Haz Waste Facilities/Generators	61.6
Impaired Water Bodies	43.8
Solid Waste	35.7
Sensitive Population	—
Asthma	73.7
Cardio-vascular	79.2
Low Birth Weights	8.85
Socioeconomic Factor Indicators	—
Education	50.2
Housing	80.7
Linguistic	29.5
Poverty	81.5

Unemployment	52.5
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7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	18.37546516
Employed	21.37815989
Median HI	23.3927884
Education	—
Bachelor's or higher	43.64172976
High school enrollment	14.67984088
Preschool enrollment	43.55190556
Transportation	—
Auto Access	30.23225972
Active commuting	74.96471192
Social	—
2-parent households	16.43782882
Voting	48.40241242
Neighborhood	—
Alcohol availability	32.93981779
Park access	27.13974079
Retail density	34.83895804
Supermarket access	56.85871936
Tree canopy	93.44283331
Housing	—
Homeownership	47.94045939

Housing habitability	29.38534582
Low-inc homeowner severe housing cost burden	15.83472347
Low-inc renter severe housing cost burden	5.00449121
Uncrowded housing	54.07416913
Health Outcomes	—
Insured adults	35.82702425
Arthritis	0.0
Asthma ER Admissions	29.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	16.9
Cognitively Disabled	6.1
Physically Disabled	16.0
Heart Attack ER Admissions	57.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	46.5
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0

No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	19.9
Elderly	41.5
English Speaking	83.8
Foreign-born	9.2
Outdoor Workers	25.9
Climate Change Adaptive Capacity	—
Impervious Surface Cover	67.3
Traffic Density	79.1
Traffic Access	0.0
Other Indices	—
Hardship	72.1
Other Decision Support	—
2016 Voting	39.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	34.0
Healthy Places Index Score for Project Location (b)	30.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Known square footage footprint of proposed residential structures is 6,150
Operations: Hearths	No wood stoves or hearths proposed.
Operations: Emergency Generators and Fire Pumps	Applicant proposes emergency onsite generator.
Construction: Construction Phases	Shorter demolition period

Element_Type	Scientific_Name	Common_Name	Element_Code	Federal_Status	State_Status	CDFW_Status	CA_Rare_Plant_Rank	Quad_Code	Quad_Name	Data_Status	Taxonomic_So
Animals - Amphibians	Rana aurora	northern red-legged frog	AAABH01021	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Amphibians - Ranidae - Rana aurora
Animals - Birds	Accipiter cooperii	Coopers hawk	ABNKC12040	None	None	WL	-	4012472	EUREKA	Unprocessed	Animals - Birds - Accipitridae - Accipiter cooper
Animals - Birds	Circus hudsonius	northern harrier	ABNKC11011	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Accipitridae - Circus hudsoniu
Animals - Birds	Elanus leucurus	white-tailed kite	ABNKC06010	None	None	FP	-	4012472	EUREKA	Mapped	Animals - Birds - Accipitridae - Elanus leucurus
Animals - Birds	Brachyramphus marmoratus	marbled murrelet	ABNNN06010	Threatened	Endangered	-	-	4012472	EUREKA	Unprocessed	Animals - Birds - Alcidae - Brachyramphus marmoratus
Animals - Birds	Chaetura vauxi	Vauxs swift	ABNUA03020	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Birds - Apodidae - Chaetura vauxi
Animals - Birds	Ardea alba	great egret	ABNGA04040	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Ardeidae - Ardea alba
Animals - Birds	Ardea herodias	great blue heron	ABNGA04010	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Ardeidae - Ardea herodias
Animals - Birds	Egretta thula	snowy egret	ABNGA06030	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Ardeidae - Egretta thula
Animals - Birds	Nycticorax nycticorax	black-crowned night heron	ABNGA11010	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Ardeidae - Nycticorax nycticorax
Animals - Birds	Charadrius montanus	mountain plover	ABNNB03100	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Charadriidae - Charadrius montanus
Animals - Birds	Charadrius nivosus nivosus	western snowy plover	ABNNB03031	Threatened	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Charadriidae - Charadrius nivosus nivosus
Animals - Birds	Falco columbarius	merlin	ABNKD06030	None	None	WL	-	4012472	EUREKA	Unprocessed	Animals - Birds - Falconidae - Fal columbarius
Animals - Birds	Falco peregrinus anatum	American peregrine falcon	ABNKD06071	Delisted	Delisted	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Falconidae - Fal peregrinus anatum
Animals - Birds	Riparia riparia	bank swallow	ABPAU08010	None	Threatened	-	-	4012472	EUREKA	Mapped	Animals - Birds - Hirundinidae - Riparia riparia
Animals - Birds	Pandion haliaetus	osprey	ABNKC01010	None	None	WL	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Pandionidae - Pandion haliaetu

Animals - Birds	Poecile atricapillus	black-capped chickadee	ABPAW01010	None	None	WL	-	4012472	EUREKA	Unprocessed	Animals - Birds - Paridae - Poecile atricapillus
Animals - Birds	Passerculus sandwichensis alaudinus	Bryants savannah sparrow	ABPBX99011	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Birds - Passerellidae - Passerculus sandwichensis alaudinus
Animals - Birds	Pelecanus occidentalis californicus	California brown pelican	ABNFC01021	Delisted	Delisted	-	-	4012472	EUREKA	Unprocessed	Animals - Birds - Pelecanidae - Pelecanus occidentalis californicus
Animals - Birds	Nannopterum auritum	double-crested cormorant	ABNFD01020	None	None	WL	-	4012472	EUREKA	Unprocessed	Animals - Birds - Phalacrocoracidae - Nannopterum auritum
Animals - Birds	Coturnicops noveboracensis	yellow rail	ABNME01010	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Rallidae - Coturnicops noveboracensis
Animals - Birds	Rallus obsoletus obsoletus	California Ridgways rail	ABNME05011	Endangered	Endangered	FP	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Birds - Rallidae - Rallus obsoletus obsoletus
Animals - Birds	Asio flammeus	short-eared owl	ABNSB13040	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Birds - Strigidae - Asio flammeus
Animals - Birds	Strix occidentalis caurina	Northern Spotted Owl	ABNSB12011	Threatened	Threatened	-	-	4012472	EUREKA	Mapped	Animals - Birds - Strigidae - Strix occidentalis caurina
Animals - Fish	Acipenser medirostris pop. 1	green sturgeon - southern DPS	AFCAA01031	Threatened	None	-	-	4012472	EUREKA	Mapped	Animals - Fish - Acipenseridae - Acipenser medirostris pop.
Animals - Fish	Acipenser medirostris pop. 2	green sturgeon - northern DPS	AFCAA01032	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Fish - Acipenseridae - Acipenser medirostris pop.
Animals - Fish	Acipenser transmontanus	white sturgeon	AFCAA01050	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Fish - Acipenseridae - Acipenser transmontanus
Animals - Fish	Eucyclogobius newberryi	tidewater goby	AFCQN04010	Endangered	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Fish - Gobiidae - Eucyclogobius newberryi
Animals - Fish	Spirinchus thaleichthys	longfin smelt	AFCHB03010	Candidate	Threatened	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Fish - Osmeridae - Spirinchus thaleichthys
Animals - Fish	Thaleichthys pacificus	eulachon	AFCHB04010	Threatened	None	-	-	4012472	EUREKA	Mapped	Animals - Fish - Osmeridae - Thaleichthys pacificus

Animals - Fish	Entosphenus folletti	northern California brook lamprey	AFBAA02110	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Fish - Petromyzontidae - Entosphenus folletti
Animals - Fish	Entosphenus tridentatus	Pacific lamprey	AFBAA02100	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Fish - Petromyzontidae - Entosphenus tridentatus
Animals - Fish	Lampetra richardsoni	western brook lamprey	AFBAA02180	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Fish - Petromyzontidae - Lampetra richardsoni
Animals - Fish	Oncorhynchus clarkii clarkii	coast cutthroat trout	AFCHA0208A	None	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus clarkii clarkii
Animals - Fish	Oncorhynchus kisutch pop. 2	coho salmon - southern Oregon / northern California ESU	AFCHA02032	Threatened	Threatened	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus kisutch pop. 2
Animals - Fish	Oncorhynchus mykiss irideus pop. 49	steelhead - northern California DPS winter-run	AFCHA0213Q	Threatened	None	-	-	4012472	EUREKA	Mapped	Animals - Fish - Salmonidae - Oncorhynchus mykiss irideus pop. 49
Animals - Fish	Oncorhynchus tshawytscha pop. 17	chinook salmon - California coastal ESU	AFCHA0205S	Threatened	None	-	-	4012472	EUREKA	Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus tshawytscha pop. 17
Animals - Insects	Bombus caliginosus	obscure bumble bee	IIHYM24380	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Insect Apidae - Bombus caliginosus
Animals - Insects	Bombus occidentalis	western bumble bee	IIHYM24252	None	Candidate Endangered	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Insect Apidae - Bombus occidentalis
Animals - Insects	Cicindela hirticollis gravida	sandy beach tiger beetle	IICOL02101	None	None	-	-	4012472	EUREKA	Mapped	Animals - Insect Carabidae - Cicindela hirticollis gravida
Animals - Mammals	Aplodontia rufa humboldtiana	Humboldt mountain beaver	AMAF01017	None	None	-	-	4012472	EUREKA	Mapped	Animals - Mammals - Aplodontiidae - Aplodontia rufa humboldtiana
Animals - Mammals	Erethizon dorsatum	North American porcupine	AMAFJ01010	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Mammals - Erethizontidae - Erethizon dorsatum
Animals - Mammals	Enhydra lutris nereis	southern sea otter	AMAJF09012	Threatened	None	FP	-	4012472	EUREKA	Unprocessed	Animals - Mammals - Mustelidae - Enhydra lutris nereis
Animals - Mammals	Taxidea taxus	American badger	AMAJF04010	None	None	SSC	-	4012472	EUREKA	Unprocessed	Animals - Mammals -

											Mustelidae - Taxidea taxus
Animals - Mammals	Lasionycteris noctivagans	silver-haired bat	AMACC02010	None	None	-	-	4012472	EUREKA	Unprocessed	Animals - Mammals - Vespertilionidae Lasionycteris noctivagans
Animals - Mammals	Lasiurus cinereus	hoary bat	AMACC05032	None	None	-	-	4012472	EUREKA	Unprocessed	Animals - Mammals - Vespertilionidae Lasiurus cinereus
Animals - Mammals	Myotis yumanensis	Yuma myotis	AMACC01020	None	None	-	-	4012472	EUREKA	Unprocessed	Animals - Mammals - Vespertilionidae Myotis yumanensis
Animals - Mollusks	Littorina subrotundata	Newcombs littorine snail	IMGASR3010	None	None	-	-	4012472	EUREKA	Unprocessed	Animals - Mollusks - Littorinidae - Littorina subrotundata
Animals - Mollusks	Anodonta californiensis	California floater	IMBIV04220	None	None	-	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Mollusks - Unionidae - Anodonta californiensis
Animals - Reptiles	Emys marmorata	western pond turtle	ARAAD02030	Proposed Threatened	None	SSC	-	4012472	EUREKA	Mapped and Unprocessed	Animals - Reptilia - Emydidae - Emys marmorata
Community - Terrestrial	Northern Coastal Salt Marsh	Northern Coastal Salt Marsh	CTT52110CA	None	None	-	-	4012472	EUREKA	Mapped	Community - Terrestrial - Northern Coastal Salt Marsh
Plants - Lichens	Sulcaria spiralifera	twisted horsehair lichen	NLT0042560	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Lichens Alectoriaceae - Sulcaria spiralifera
Plants - Vascular	Angelica lucida	sea-watch	PDAPI070G0	None	None	-	4.2	4012472	EUREKA	Unprocessed	Plants - Vascular Apiceae - Angelica lucida
Plants - Vascular	Glehnia littoralis ssp. leiocarpa	American glehnia	PDAPI13011	None	None	-	4.2	4012472	EUREKA	Unprocessed	Plants - Vascular Apiceae - Glehnia littoralis ssp. leiocarpa
Plants - Vascular	Hesperis matronalis var. brevifolia	short-leaved evax	PDASTE5011	None	None	-	1B.2	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascular Asteraceae - Hesperis matronalis var. brevifolia
Plants - Vascular	Lasthenia californica ssp. macrantha	perennial goldfields	PDAST5L0C5	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Vascular Asteraceae - Lasthenia californica ssp. macrantha
Plants - Vascular	Layia carnosae	beach layia	PDAST5N010	Threatened	Endangered	-	1B.1	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascular Asteraceae - Layia carnosae

Plants - Vascular	<i>Erysimum menziesii</i>	Menzies wallflower	PDBRA160R0	Endangered	Endangered	-	1B.1	4012472	EUREKA	Mapped	Plants - Vascula Brassicaceae - <i>Erysimum menziesii</i>
Plants - Vascular	<i>Silene scouleri</i> ssp. <i>scouleri</i>	Scoulers catchfly	PDCAR0U1MC	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Caryophyllaceae - <i>Silene scouleri</i> ssp. <i>scouleri</i>
Plants - Vascular	<i>Spergularia canadensis</i> var. <i>occidentalis</i>	western sand-spurrey	PDCAR0W032	None	None	-	2B.1	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Caryophyllaceae - <i>Spergularia canadensis</i> var. <i>occidentalis</i>
Plants - Vascular	<i>Carex arcta</i>	northern clustered sedge	PMCYP030X0	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Cyperaceae - <i>Carex arcta</i>
Plants - Vascular	<i>Carex lyngbyei</i>	Lyngbys sedge	PMCYP037Y0	None	None	-	2B.2	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Cyperaceae - <i>Carex lyngbyei</i>
Plants - Vascular	<i>Carex praticola</i>	northern meadow sedge	PMCYP03B20	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Cyperaceae - <i>Carex praticola</i>
Plants - Vascular	<i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>	coastal marsh milk-vetch	PDFAB0F7B2	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Vascula Fabaceae - <i>Astragalus pycnostachyus</i> var. <i>pycnostachyus</i>
Plants - Vascular	<i>Hosackia gracilis</i>	harlequin lotus	PDFAB2A0D0	None	None	-	4.2	4012472	EUREKA	Unprocessed	Plants - Vascula Fabaceae - <i>Hosackia gracilis</i>
Plants - Vascular	<i>Lathyrus japonicus</i>	seaside pea	PDFAB250C0	None	None	-	2B.1	4012472	EUREKA	Mapped	Plants - Vascula Fabaceae - <i>Lathyrus japonicus</i>
Plants - Vascular	<i>Lathyrus palustris</i>	marsh pea	PDFAB250P0	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Fabaceae - <i>Lathyrus palustris</i>
Plants - Vascular	<i>Ribes laxiflorum</i>	trailing black currant	PDGRO020V0	None	None	-	4.3	4012472	EUREKA	Unprocessed	Plants - Vascula Grossulariaceae - <i>Ribes laxiflorum</i>
Plants - Vascular	<i>Erythronium revolutum</i>	coast fawn lily	PMLILOU0F0	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Liliaceae - <i>Erythronium revolutum</i>
Plants - Vascular	<i>Lilium occidentale</i>	western lily	PMLIL1A0G0	Endangered	Endangered	-	1B.1	4012472	EUREKA	Mapped	Plants - Vascula Liliaceae - <i>Lilium occidentale</i>
Plants - Vascular	<i>Lycopodium clavatum</i>	running-pine	PPLYC01080	None	None	-	4.1	4012472	EUREKA	Unprocessed	Plants - Vascula Lycopodiaceae - <i>Lycopodium clavatum</i>
Plants - Vascular	<i>Sidalcea malachroides</i>	maple-leaved checkerbloom	PDMAL110E0	None	None	-	4.2	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Malvaceae - <i>Sidalcea malachroides</i>

Plants - Vascular	<i>Sidalcea malviflora</i> ssp. <i>patula</i>	Siskiyou checkerbloom	PDMAL110F9	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Vascula Malvaceae - <i>Sidalcea malviflora</i> ssp. <i>patula</i>
Plants - Vascular	<i>Sidalcea oregana</i> ssp. <i>eximia</i>	coast checkerbloom	PDMAL110K9	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Vascula Malvaceae - <i>Sidalcea oregana</i> ssp. <i>eximia</i>
Plants - Vascular	<i>Monotropa uniflora</i>	ghost-pipe	PDMON03030	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Monotropaceae <i>Monotropa uniflora</i>
Plants - Vascular	<i>Montia howellii</i>	Howells montia	PDPOR05070	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Montiaceae - <i>Montia howellii</i>
Plants - Vascular	<i>Abronia umbellata</i> var. <i>breviflora</i>	pink sand-verbena	PDNYC010N4	None	None	-	1B.1	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Nyctaginaceae - <i>Abronia umbellata</i> var. <i>breviflora</i>
Plants - Vascular	<i>Oenothera wolfii</i>	Wolfs evening-primrose	PDONA0C1K0	None	None	-	1B.1	4012472	EUREKA	Mapped	Plants - Vascula Onagraceae - <i>Oenothera wolfii</i>
Plants - Vascular	<i>Castilleja ambigua</i> var. <i>humboldtiensis</i>	Humboldt Bay owls-clover	PDSCR0D402	None	None	-	1B.2	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Orobanchaceae <i>Castilleja ambigua</i> var. <i>humboldtiensis</i>
Plants - Vascular	<i>Castilleja litoralis</i>	Oregon coast paintbrush	PDSCR0D012	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Orobanchaceae <i>Castilleja litoralis</i>
Plants - Vascular	<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Point Reyes salty birds-beak	PDSCR0J0C3	None	None	-	1B.2	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Orobanchaceae <i>Chloropyron maritimum</i> ssp. <i>palustre</i>
Plants - Vascular	<i>Collinsia corymbosa</i>	round-headed collinsia	PDSCR0H060	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Vascula Plantaginaceae <i>Collinsia corymbosa</i>
Plants - Vascular	<i>Pleuropogon refractus</i>	nodding semaphore grass	PMPOA4Y080	None	None	-	4.2	4012472	EUREKA	Unprocessed	Plants - Vascula Poaceae - <i>Pleuropogon refractus</i>
Plants - Vascular	<i>Gilia capitata</i> ssp. <i>pacifica</i>	Pacific gilia	PDPLM040B6	None	None	-	1B.2	4012472	EUREKA	Mapped	Plants - Vascula Polemoniaceae <i>Gilia capitata</i> ssp. <i>pacifica</i>
Plants - Vascular	<i>Gilia millefoliata</i>	dark-eyed gilia	PDPLM04130	None	None	-	1B.2	4012472	EUREKA	Mapped and Unprocessed	Plants - Vascula Polemoniaceae <i>Gilia millefoliata</i>
Plants - Vascular	<i>Chrysosplenium glechomifolium</i>	Pacific golden saxifrage	PDSAX07020	None	None	-	4.3	4012472	EUREKA	Unprocessed	Plants - Vascula Saxifragaceae - <i>Chrysosplenium glechomifolium</i>
Plants - Vascular	<i>Viola palustris</i>	alpine marsh violet	PDVIO041G0	None	None	-	2B.2	4012472	EUREKA	Mapped	Plants - Vascula Violaceae - <i>Viola</i>

