ENVIRONMENTAL INITIAL STUDY

INITIAL STUDY CHECKLIST
PROPOSED MITIGATED NEGATIVE DECLARATION
Northern Humboldt Union High School District
Arcata High School Athletic Facilities Improvement Project

Prepared by:
SHN
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May 2020

Abbreviations and Acronyms

AASHTO	American Association of State Highway Transportation Officials
ACM	asbestos-containing materials
AFD	Arcata Fire Department
AHS	Arcata High School
AMRTS	Arcata Mad River Transit System
APD	Arcata Police Department
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BMP	best management practices
B.P.	before present
CAC	Certified Asbestos Consultant
CalTrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCE	Community Choice Energy
CCR	California Code of Regulations
CDFW	California Department of Fish & Wildlife
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGP	Construction General Permit
CGS	California Geological Survey
CH_4	methane
CO_2	carbon dioxide
CWA	Clean Water Act
DI	drainage inlet
DOC	California Department of Conservation
DOORS	Diesel Off-Road Online Reporting Systems
DPM	diesel particulate matter
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
HBGS	Humboldt Bay Generating Station
HBMWD	Humboldt Bay Municipal Water District
HBPP	Humboldt Bay Power Plant
HFC	hydrofluorocarbon
HSU	Humboldt State University
HTA	Humboldt Transit Authority
HWMA	Humboldt Waste Management Authority
IS	Initial Study
LID	low impact development
LRA	Local Responsibility Area
LUST	leaking underground storage tank
MCAQMD	Mendocino County Air Quality Management District
MHS	McKinleyville High School
MMRP	Mitigation Monitoring & Reporting Plan
$MMTCO_2e$	million metric tons of CO_2 equivalent
MND	Mitigated Negative Declaration
$MTCO_2e/yr$	metric tons of CO_2 equivalent per year
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NCAB	North Coast Air Basin
NCRWQCB	North Coast Regional Water Quality Control Board
NCUAQMD	North Coast Unified Air Quality Management District
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NHUHSD	Northern Humboldt Union High School
NOA	naturally-occurring asbestos
NRCS	National Resource Conservation Service
NWIC	Northwest Information Center
NWS	National Weather Service
OPR	Governor's Office of Planning & Research
OWTS	Onsite Wastewater Treatment System
PA	Public Address
PF	Public Facility

Abbreviations & Acronyms (Cont'd)

PFC	perfluorocarbon
PG&E	Pacific Gas & Electric
$PM_{2.5}$	Particulate Matter (2.5 micrometers and smaller)
PM_{10}	Particulate Matter (10 micrometers and smaller)
PRC	Public Resources Code
PVC	poly vinyl chloride
QSD	Qualified SWPPP Developer
RCEA	Redwood Coast Energy Authority
RGL	Regulatory Guidance Letter
ROG	reactive organic gases
ROW	right-of-way
RTS	Redwood Transit Authority
SFBAAB	San Francisco Bay Area Air Basin
SF6	hexafluoride
SMAQMD	Sacramento Metropolitan Air Quality Management District
SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
THPO	Tribal Historic Preservation Officer
UBC	Uniform Building Code
US-101	US Highway 101
USACE	United States Army Corp of Engineers
USC	US Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish & Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VDECS	Verified Diesel Emission Control Strategies
VMT	vehicle miles traveled
WRA	William Rich & Associates

Northern Humboldt Union High School District
ENVIRONMENTAL CHECKLIST FORM

1. **Project Title:** Arcata High School Athletic Facilities Improvement Project

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

   Northern Humboldt Union High School District
   2755 McKinleyville Avenue
   McKinleyville, CA 95519

3. **Contact Person and Phone Number**: Roger Macdonald, District Superintendent, (707) 839-6470

4. **Project Location:** The project is located in Arcata, California, southwest of the intersection of US Highway 101 and Sunset Avenue. The project is 3.7 miles east of the Pacific Ocean, at a 37-foot elevation above sea level (see Figure 1). The project is located in the northeastern quarter of Section 29, Township 06 North, Range 01 East, in the Humboldt Meridian. The Assessor's Parcel Number (APN) for the project site is 505-111-004 (see Figure 2). The parcel contains an assessed lot size of 18.50 acres, and the proposed project will occur on 7.9 acres of this parcel. Water infrastructure improvements are also proposed in the City right-of-way for Sunset Avenue as shown in Figure 3. The project site is located "offsite" from the AHS main campus. The coordinates for the project's central location are latitude 40.878746° and longitude -124.085756°.

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

   Northern Humboldt Union High School District
   2755 McKinleyville Avenue
   McKinleyville, CA 95519

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

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

8. **Existing Facilities and Use:** The project site consists of two irrigated sports fields that support several Arcata High Sports (AHS) athletic programs. The western field hosts AHS soccer practices and select games, and the eastern field hosts AHS baseball and football practices. The project site has been used by AHS as an athletic facility for over 50 years. The facility is host to practice and games during the fall, spring, and summer seasons. These events take place on weekdays and/or weekends during daylight hours. It is estimated that there has been an attendance of over 300 people at a single sports event. For further detail of the project site's existing condition, see Section 2.1 of the Project Description.

9. **Description of Project:** The Northern Humboldt Union High School District (NHUHSD) proposes the redevelopment of the existing athletic venue. The proposed athletic facility will include an all-weather track, football field, soccer field, baseball diamond, batting cages, restrooms, and concession building. The entire site would be regarded, and drainage features would be redesigned to improve conditions and usability of the fields. Vehicular access to the proposed facility will be available by a proposed driveway/entrance. Off-street parking will be provided at the proposed facility. Existing driveway/entrance surfaces would be regraded, widened, and paved to improve access to the athletic facilities. For further detail of the proposed project, see Section 2.2 of the Project Description.

10. **Surrounding Land Uses and Setting:** The project site is bordered to the north by railroad tracks from the North Coast Railroad Authority, Arcata City Trail (part of Humboldt Bay Trail), Foster Avenue, a vacant lot, Sunset Terrace Apartments, and low-density residential neighborhoods. To the east, the project is bordered by Sunset Avenue, Woodridge Apartments, Arcata Skate Park, H Street, and US Highway 101. The project is bordered to the South by Woodridge Apartments, Greenwood Cemetery, and the AHS main campus. To the west, the project is bordered by Shay Park, Jolly Giant Creek, and the Lower Twin Parks Apartments.

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

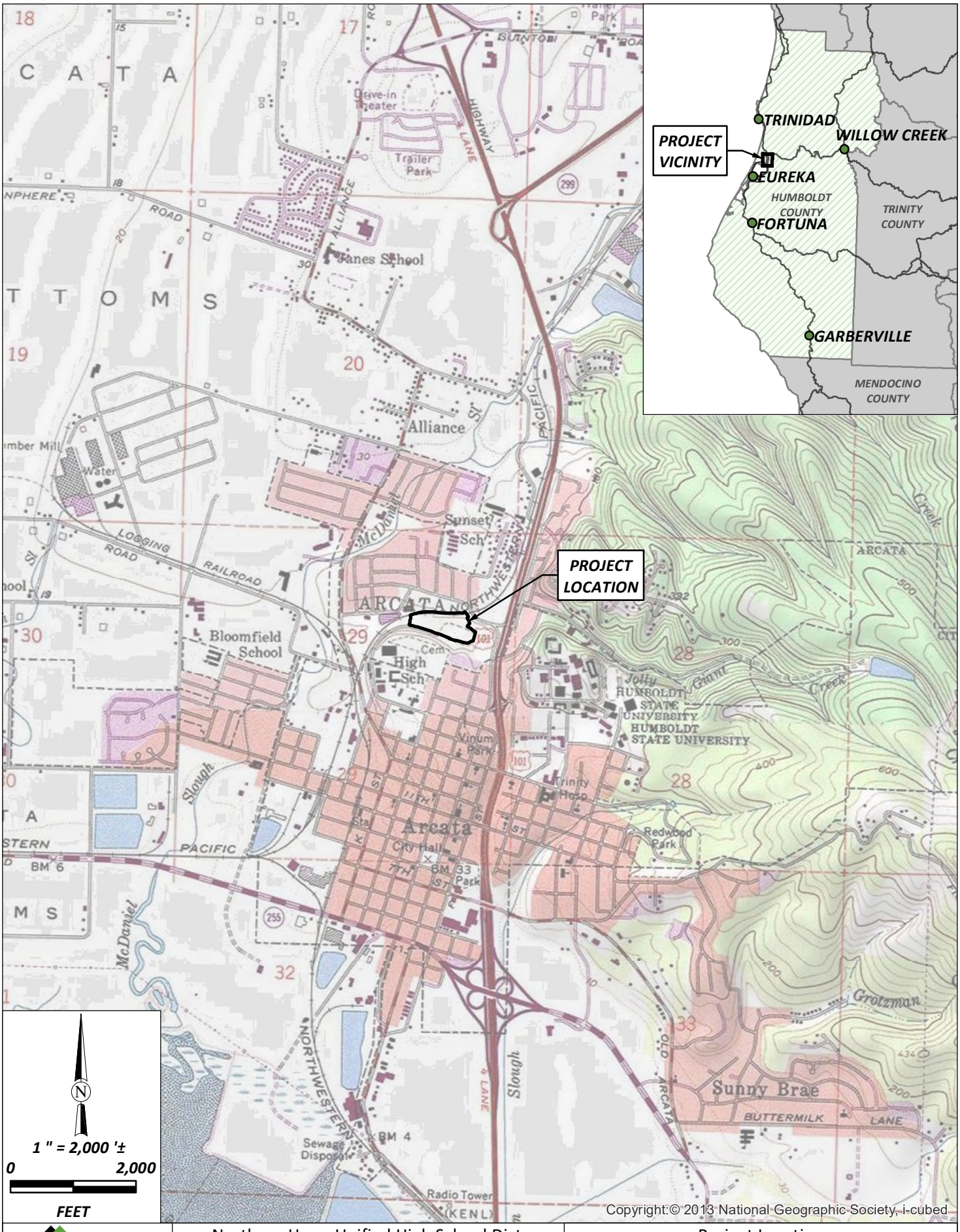
- Division of the State Architect
- California Department of Fish and Wildlife
- City of Arcata Public Works-Engineering Department

12. **Tribal Consultation:** A request for tribal consultation pursuant to AB 52 was initiated on 01/30/2020 with the Wiyot Tribe, Bear River Band of Rohnerville Rancheria, and Blue Lake Rancheria. The Tribes requested consultation on February 18, 2020 and a site visit was conducted on February 24, 2020, with the Tribal Historic Preservation Officer's from the Tribes and William Rich and Associates (WRA) (project archaeologist). The meeting concluded with a request by the Tribes for exploration of the soils at the site in the area where the maximum depth of excavation (15 feet) would occur for installation of a proposed sewage pumping tank.

Based on the direction provided during the site visit, a Cultural Resources Investigation was prepared by WRA, which involved a pedestrian archaeological field survey over approximately 15 acres and shovel probes along the margin of the existing access road in the footprint of the proposed sewage pumping tank on the lower field and along the upper terrace edge. The Cultural Resources Investigation concluded that no significant archaeological or historic period resources appear to exist in the limits of the project area. However, the Investigation notes that there is a possibility for uncovering archaeological and historic materials within any former topsoil (A/B) horizons that may lie intact below covered surfaces. The sewage pumping tank is the deepest element of the project (15 feet) and is the most likely location to reach intact topsoil horizons. For this reason, the Investigation recommends an archaeological monitor be present to identify and evaluate Native American archaeological materials that may be discovered during excavation for installation of the proposed sewage pumping tank. For all other construction activities, the Investigation recommends implementation of an Inadvertent Discovery Protocol. The Investigation concludes that with implementation of these recommendations, the proposed project would not result in a substantial adverse change to archaeological or historical resources (WRA, 2020).

The Tribes reviewed the results of the Cultural Resources Investigation and provided comments on May 11, 2020 that they concurred with the archaeological monitoring and Inadvertent Discovery Protocol recommended for implementation during construction of the project. The requirement for archaeological monitoring during excavation for installation of the proposed sewage pumping tank and implementation of an Inadvertent Discovery Protocol during other construction activities, has been included as mitigation for the proposed project (see Section V – Cultural Resources and Section XVIII – Tribal Cultural Resources for additional information).

13. **Purpose of this Document:** This document only seeks to analyze the environmental impacts of the construction and operation of the proposed improvements to the Arcata High School athletic facilities.



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SHN	Northern Hum. Unified High School Dist. A.H.S. Athletic Facilities CEQA Arcata, California	Project Location SHN 017050.130
	February 2020 | CEQA_Fig1_ProjectLocation	Figure 1

0 150

1"=150'±

FOSTER AVE.

APPROXIMATE PARCEL BOUNDARY (FROM HUMBOLDT CO. GIS)

APN: 505-111-004

APN: 505-111-004

SUNSET AVE.

H ST.

IMAGE SOURCE:
USGS NAIP, 2018

Northern Hum. Unified High School District
A.H.S. Athletic Facilities CEQA
Arcata, California

Project Parcel

SHN 017050.130

March 2020 | CEQA_Fig2_ProjectParcel | Figure 2

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IMAGE SOURCE:
GOOGLE, 2016

Northern Hum. Unified High School District
A.H.S. Athletic Facilities CEQA
Arcata, California

Project Area

SHN 017050.130

April 2020 | CEQA_Fig3_ProjectArea | Figure 3

SECTION 1.0
INTRODUCTION

1.1 Introduction and Regulatory Guidance

This document is an Initial Study (IS) that summarizes the technical studies prepared for the proposed NHUHSD Arcata High School Athletic Facilities Improvement Project and provides justification for a Mitigated Negative Declaration (MND). This document has been prepared in accordance with the current California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines. The purpose of this document is to evaluate the potential environmental impacts of the proposed improvements to the Arcata High School athletic facilities along Sunset Avenue and Foster Avenue in the City of Arcata. Mitigation measures have been proposed to avoid or minimize any significant impacts that were identified.

1.2 Lead Agency

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

1.3 Purpose of the Initial Study

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

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

1.4 Review Process

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

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

Roger Macdonald, District Superintendent
Northern Humboldt Union High School District
2755 McKinleyville Avenue
McKinleyville, CA 95519

SECTION 2.0
PROJECT DESCRIPTION

2.1 Project Location and Setting

Regional Setting

The proposed project is located within the City of Arcata. Arcata is located in Humboldt County, on the northern coast of California, and is the second-largest city in the County. The City is approximately 7.25-square-miles in size and is situated on a coastal terrace at the north edge of Humboldt Bay, the second largest marine embayment in California. The average 30-year precipitation between October 1 and September 30 for the region is 40.33 inches, with most of the precipitation occurring between October and April (NWS, 2019).

Local Setting

The proposed project is located in the Arcata Heights/Northtown neighborhood. Arcata's natural landforms include forested hillsides to the east; a sloping coastal terrace in the central area of town; a river corridor to the north; and flat bottomlands known as the Arcata Bottom, forested coastal dunes, bayfront, and tidelands to the west and south. Arcata is bordered by the Mad River to the north, Arcata Bay to the south, the Arcata Bottom to the west, and Fickle Ridge to the east. These features form distinctive natural edges to the City's planning area and are some of its most important aesthetic resources.

Project Location

The project site is 3.7 miles east of the Pacific Ocean (see Figure 1). The project site is situated between approximately 32- and 40-foot above mean sea level, with the highest elevations located towards the eastern end of the site and the lowest elevation towards the western end of the site. The APN for the project site is 505-111-004 (see Figure 2). The parcel contains an assessed lot size of 18.50 acres, and the proposed project will occur on approximately 7.9 acres of this parcel. Water infrastructure improvements are also proposed in the City right-of-way for Sunset Avenue as shown in Figure 3. The coordinates for the project's central location are latitude 40.878746° and longitude -124.085756°. The project site is located in the northeastern quarter of Section 29, Township 06 North, Range 01 East, in the Humboldt Meridian.

The project site is located below and adjacent to the AHS main campus. AHS is a part of the NHUHSD. AHS serves grades 9 – 12 and has approximately 889 students currently enrolled (CDE, 2018). The project site is bordered to the north by railroad tracks from the North Coast Railroad Authority, Arcata City Trail (part of Humboldt Bay Trail), Foster Avenue, a vacant lot, Sunset Terrace Apartments, and low-density residential neighborhoods. To the east, the project is bordered by Sunset Avenue, Woodridge Apartments, Arcata Skate Park, H Street, and US Highway 101. The project is bordered to the South by Woodridge Apartments, Greenwood Cemetery, and the AHS main campus. The southern slope remains a shrub-forest zone between the project site and the Greenwood Cemetery and AHS main campus, which are situated on top of the bluff to the south. To the west, the project is bordered by Shay Park, Jolly Giant Creek, and the Lower Twin Parks Apartments.

Site History

Prior to the 1950s, the project site was developed for agricultural uses by the McCall family and contained a ranch house and two fields that were bisected by Jolly Giant Creek (see Figure 4). In the early 1950s, the project site was sold to Arcata High School and developed with a track and athletics field (see Figure 5). By 1963, the track and sports field became the primary use of the site (see Figure 6). The existing storage sheds on the site were constructed in the 1970s. The site was redeveloped into its current configuration in the 1990s when the track was removed, and the site became predominantly used for soccer, football, and baseball.

Figure 4. Pre-1950s Aerial of Project Site (Looking East)

Figure 5. Early-1950s Aerial of Project Site (Looking South)

Figure 6. Early-1960's Aerial of Project Site (Looking West)

Existing Conditions

As shown in Figure 7, the project site consists of two irrigated sports fields that support various Arcata High School (AHS) athletic programs. The western field hosts AHS soccer practices and select games, and the eastern field hosts AHS baseball and football practices. The soccer field on the west is separated from the football/baseball field to the east by a chain-link fence running north to south. The project site has been used by AHS as an athletic facility for over 50 years.

Figure 7. Aerial of Existing Athletic Fields

Development associated with the existing athletic facility includes the following:

- Soccer and football goal structures
- Scoreboard
- Baseball diamond
- Pitching practice space
- Batting cages

- Four sets of bleachers (total capacity - 200 persons)
- A storage shed containing groundskeeping and baseball equipment
- Multi-use structure (i.e. maintenance and custodian storage, women's and men's restroom)
- Storage/shipping container
- Interior and perimeter fencing
- Groundwater well house
- Stormwater drainage system
- Gravel access road for groundskeepers and coaching staff

Existing access to the project site is provided by a gravel road traveling between the AHS Main Campus (by way of M Street) and Sunset Avenue, directly passing the project site to the north and west. Vehicle access is limited by locked gates located at the AHS Main Campus and Sunset Avenue entrances. The access road is utilized by pedestrians and authorized AHS vehicles/equipment. The project site does not contain off-street parking or designated turnaround areas for students and parents. As a result, Sunset Avenue and the surrounding streets become congested with vehicles conducting pick-ups/drop-offs during athletic events hosted at the facility.

The athletic facility hosts practice and games during the fall, spring, and summer seasons. Events take place on weekdays and/or weekends during daylight hours. The type, season, days, frequency, and approximate attendance of athletic events at the existing facility are shown in Table 1.

Table 1. Use of Existing Athletic Facility

Sport	Team	Location	Schedule			Attendance		
			Frequency	Day of Week	Time	Parents	Students	Visiting Students
Practices								
Fall Season								
AHS Football	Men's JV*	AHS	5 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	20	n/a
	Men's Varsity	AHS	5 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	33	n/a
AHS Soccer	Men's Varsity	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	25	n/a
	Women's Varsity	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	25	n/a
Spring Season								
AHS Track and Field	Co-Ed JV & Varsity	HSU	4 - 5/week	Weekdays	16:00 - 18:30	n/a	60	n/a
AHS Baseball	Men's JV	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	16	n/a
	Men's Varsity	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	20	n/a
Summer Season								
AHS Football	Men's Varsity	AHS	3/week	Mon, Wed, Fri	16:00 - 19:00	n/a	30	n/a
American Legion Baseball	Men's U17	AHS	3/week	Mon, Wed, Fri	16:00 - 19:00	n/a	16	n/a
	Men's U19	AHS	3/week	Mon, Wed, Fri	16:00 - 19:00	n/a	20	n/a
Home Games								
Fall Season								
AHS Football	Men's JV*	HSU	1/week 5/season	Fri	17:00	Avg = 700 Max = 900		
	Men's Varsity	HSU	1/week 5/season	Fri	19:30			
AHS Soccer	Men's Varsity	AHS	1 - 2/week 8/season	Wed & Sat	Wed: 15:30 Sat: 13:00	200 - 300		
	Women's Varsity	AHS	1 - 2/week 8/season	Wed & Sat	Wed: 17:00 Sat: 11:00			
Spring Season								
AHS Track and Field	Co-Ed JV & Varsity	HSU	1/season	Weekday	15:30 - 19:00	80		
AHS Baseball	Men's JV	AHS	1 - 2/week 18/season (including 1 Tournament)	Mon, Wed, Sat	Mon & Wed: 15:30 Sat: 11:00	50 - 100		
	Men's Varsity	Arcata Ball Park	1 - 2/week 6/season	Mon, Wed, Sat	Mon & Wed: 15:30 Sat: 11:00	100 - 200		
Summer Season								
American Legion Baseball	Men's U17	Arcata Little League Field	1/week 8/season	Weekdays	16:00 - 19:00	50 - 100		
	Men's U19	Arcata Little League Field	1/week 8/season	Weekdays	16:00 - 19:00	100 - 200		

* JV Football did not have a team the last two years.

As shown in Table 1, use of the field for AHS athletics is intermittent. This is in part due to the variable condition of natural turf surfaces throughout the year, as well as the lack of appropriate equipment, infrastructure, seating, parking, access, and appurtenances necessary for AHS athletics to entirely utilize the existing facility.

Wetlands and Drainage Features

Site topography rises steeply on the northern, eastern, and southern sides of the site, shaping the project site into a basin. The surrounding bluff slopes are dominated by woody vegetation comprised of a mix of native and non-native species. Invasive English ivy (*Hedera helix*), Himalayan berry (*Rubus armeniacus*), and elm-leaf blackberry (*Rubus ulmifolius* var*. anoplothyrsus*) are widespread on the surrounding slopes. The athletic fields and surrounding slopes flow towards drainage ditches on the southern, eastern, and northern edges of the site, which ultimately drain to Jolly Giant Creek. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park. The City of Arcata Public Works Department occasionally performs maintenance activities to the culvert outlet of Jolly Giant Creek. Equipment accesses the site by way of the existing gravel access road from Sunset Avenue and an underdeveloped route from the gravel access road to the culvert outlet.

The site has been modified since at least the 1940s through changes in land use, grading, and vegetation management, resulting in varying hydrologic conditions. During removal of the former track, the football field was re-graded such that the centerline running from east to west is crowned, with a gentle swale-like depression encircling this elevated portion to drain the sports field. An extensive drainage system was installed, with varying amounts of water conveyance. The drainage system lies underneath the sports field, ranging from approximately one to three feet below grade, as evidenced by 23 drain inlets (DIs) dispersed across the field. Additional DIs may be present within tall, unmanaged vegetation along the southern boundary of the field. A subsurface polyvinyl chloride (PVC) pipe irrigation system lies above this drainage system, approximately one foot below ground surface across the footprint of the athletic fields. Twenty valves serve 160 irrigation sprinkler heads across the two fields.

Natural turf surfaces at the site are managed by AHS groundskeepers by conducting regular mowing, irrigating, sports striping, weeding, and gopher trapping. Dominant species are primarily non-native grass and forb species typically associated with managed lawns and fields. Dominant species include Kentucky bluegrass (*Poa pratensis*), creeping bentgrass (*Agrostis stolonifera*), English daisy (*Bellis perenne*), and creeping buttercup (*Ranunculus repens*), among others.

Wetland Delineations performed in spring 2019 encompassed the project site and lands occurring immediately adjacent to the project site. Subsurface observations concluded that underlying soils include drain sand on the western field and various fill topsoil layers on the eastern field. Soil compaction on the eastern field is attributed to former industrial uses and the former track. Subsidence from soil compaction and organic matter oxidation has led to elevated DIs, causing water to pool before reaching the drainage system, creating a wetter condition than that which was present when the drainage system was constructed (SHN, 2019c).

Despite the area being intensively managed for athletic uses, wetland conditions occur across a large portion of the project site. Wetland conditions are attributed to drainage patterns, irrigation, hydrophytic turf vegetation, current management practices, and the facility's position at the base of slopes within a historical narrow alluvial plain. Therefore, a distinction is made between human-induced wetlands (i.e. non-aquatic areas) and natural wetlands (i.e. aquatic areas) (SHN, 2019c). The non-aquatic areas observed on the site reflect human-induced, abnormal wetland conditions (see Figure 8). The formation of non-aquatic areas occurred in part as a result of the site's position within a historical alluvial plain associated with Jolly Giant Creek. Furthermore, past and present development, use, and maintenance of the site, including the growth of turf grasses (most of which are considered hydrophytes), regular irrigation, poorly functioning drainage systems, and soil compaction have contributed to the human-induced, abnormal wetland conditions. However, according to the guidance in CFR 328.3(c), the U.S. Army Corps of Engineers (USACE) does not assert authority over these non-aquatic wetlands (see Section 6.3 USACE Regulatory Guidance Letter). Therefore, approximately 2.48 acres of the study area is identified as non-aquatic areas with three-parameter wetland characteristics (SHN, 2019c).

Figure 8. View of Upland and Non-Aquatic Areas (Looking West)

The aquatic areas observed on the site reflect natural wetland conditions (see Figure 9). Aquatic areas are located along the southern boundary of the existing athletic fields. The formation of aquatic areas occurred as a result of the landscape position within a historical alluvial plain associated with Jolly Giant Creek, between the poorly drained and crowned athletic field and the southern slope. The aquatic area is defined by a narrow, intermittent drainage and connected wetland along the entire southern boundary, flowing west along the base of the hill. An existing fence line transects the aquatic area, separating a majority of the aquatic area from the adjacent athletic fields. Unlike the non-aquatic areas described above, the aquatic areas are not subject to disturbances from mowing and vegetation management. In the absence of mowing and vegetation management, naturally-occurring wetland vegetation has become established (SHN, 2019c). Pursuant to the Section 404 of the Clean Water Act (CWA; 33 U.S. Code [USC] 1344), as amended, and 33 Code of Federal Regulations (CFR) Section 328.3 (U.S. Code of Federal Regulations), the USACE asserts authority over these aquatic areas (Waters of the U.S). Therefore, approximately 0.62 acres of the study area are identified as aquatic areas with three-parameter wetland characteristics (SHN, 2019c).

Figure 9. View of Aquatic Areas (Looking South)

In summary, Wetland Delineations performed in spring 2019 concluded that approximately 2.48 acres of the study area are identified as non-aquatic area with three-parameter wetland characteristics, and approximately 0.62 acres of the study area are

identified as aquatic area with three-parameter wetland characteristics. The remaining 5.53 acres of the study area are identified as upland (SHN, 2019c).

2.2 Proposed Project

The project proposes the development of an improved athletic facility in the City of Arcata. The majority of the proposed project will occur within the footprint of the existing athletic field, below the AHS main campus. The proposed project includes construction and operation of the following (see Figure 10):

- Football field encircled with an all-weather eight-lane track with new track and field event equipment (e.g., pole vault runway, long jump, triple jump pits and runways, shot put field, and discuss cage).
- Baseball diamond that would also function as a soccer field.
- Temporary seating area for approximately 400 - 500 persons.
- Double station batting cages.
- Multi-use building (i.e. maintenance and custodian storage, women's and men's restroom, and ticket and concessions booth).
- Approximately 24-foot-wide paved driveway/entrance from Sunset Avenue with a bus/passenger drop off area, and ADA parking stalls.
- Compacted gravel parking lot with standard parking stalls.
- Approximately 5-foot-wide pedestrian pathway alongside the paved access road from Sunset Avenue.
- Concrete paving adjacent to the proposed athletic field for spectator access and seating areas.
- Entry plaza with entry feature and landscaping.
- Sewer/Wastewater connection from the project site to the AHS main campus, within the footprint of the existing gravel access road.
- Replacement of existing water meter.
- Fire hydrant with connection to City's water main (including valves, restrained joints, and thrust blocking).
- Extension of the existing gravel access road from AHS main campus to provide partial access for Jolly Giant Creek culvert outlet maintenance activities.

The proposed project would be constructed with funding from Measure N with the intent to upgrade, repair, install, and construct physical education fields and facilities. The proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD adopted Resolution 12/2019-20 on April 23, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements. The design of the proposed project will be required to comply with the requirements of the Division of the State Architect, NHUHSD, and other State entities.

Facility Construction

Construction would occur on approximately 7.9 acres. Construction activities are estimated to last approximately 6 months, beginning in late spring/early summer 2020. Construction of the proposed project includes the following activities:

- Demolish and removal of existing structures.
- Remove and stockpile minimum 12" of topsoil at the site. The majority of the site will be excavated to a depth of approximately 1 to 6 feet below existing grade. The maximum depth of excavation will be to approximately 15 ft. below existing grade for the installation of a proposed sewage pumping tank.
- Cut material will be hauled to an appropriate landfill or recycling facility that accepts soil for reuse.
- Install rock and subdrain materials for the drain system.
- Install underground utilities and where applicable, connect to existing infrastructure.
- Construct parking, access, and pedestrian surfaces.
- Construct the multi-use building.
- Construct athletic surfaces (i.e., track, football, soccer, and baseball fields).

Construction access would be provided from Sunset Avenue. A traffic control plan would be required for the project prior to the start of construction; such plans are typically required to specify access routes, speed limits, flagging, etc. Construction equipment would include bulldozers, excavators, loaders, dump trucks, compactors, graders, pavers, concrete trucks, and other standard construction vehicles. All construction staging would occur within the boundaries of the site. The proposed project would incorporate best management practices (BMPs) during construction to minimize stormwater runoff in compliance with the State Water Resources Control Board's (SWRCB's) Construction General Permit.

The existing access from Sunset Avenue used by the City to perform maintenance activities to the Jolly Giant Creek culvert outlet will no longer be available after the proposed improvements to the athletic fields. For this reason, the gravel access road from the AHS main campus will be partially extended along the edge of the riparian corridor of Jolly Giant Creek (see Figure 10). The gravel access road will not be constructed within the riparian corridor, and no riparian vegetation will be impacted by this improvement.

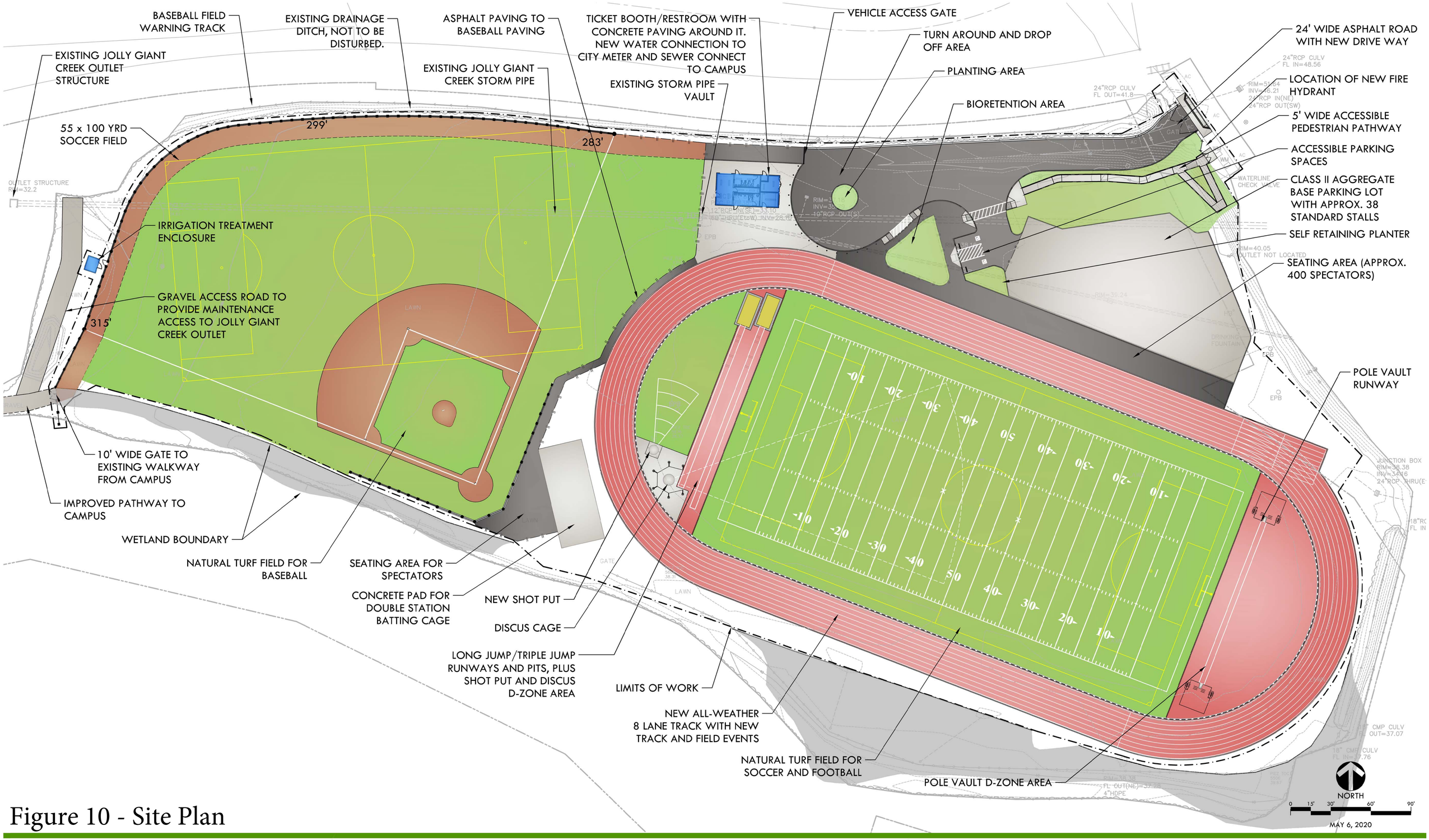

Figure 10 - Site Plan

MAY 6, 2020

Athletic Facilities Improvements
Arcata High School
Arcata, CA

LANDSCAPE ARCHITECTURE
CIVIL ENGINEERING
SPORT PLANNING & DESIGN
2455 The Alameda, Ste. 200
Santa Clara, CA 95050
tel: 408.985.7200
fax: 408.985.7260
www.verdedesigninc.com

Mitigation for Howell's montia Impacts

All Howell's montia (*Montia howelii*) populations will be permanently impacted by the proposed project. To mitigate for the proposed projects impacts on Howell's montia, NHUHSD will implement a Howell's montia mitigation plan. A brief description of the Howell's montia mitigation plan is provided below:

Soils containing Howell's montia seed will be scraped and excavated by hand following seed set and desiccation of the parent plants typically in early summer. Soils containing the seed will be stockpiled and kept moist in a shaded location onsite during the construction period. Following construction, the stockpiled soil will be placed in locations with suitable hydrologic conditions and disturbance regimes to ensure the species persistence onsite.

Surficial hydrology will change as a result of this project, and the areas that support Howell's montia now will not be suitable following completion of the project. Therefore, Howell's montia planting through soil spreading will be conducted in two phases. The first phase will occur following completion of construction prior to the first soaking rains and will occur in the aquatic wetland areas south of the project area. A minimal amount of soil will be spread immediately adjacent to the constructed field where the aquatic wetlands meet the managed field. It is likely that hydrology will be suitable for Howell's montia in this location following completion of the project, however there is a risk of it being too saturated. Seeded soil will be placed at mid-elevations of the slope up to the developed field, which is to be raised above the current elevation. The remaining half of the seed-containing soils will remain stockpiled and covered until soaking rains have occurred and winter hydrology is more evident. Areas with suitable hydrology and disturbance/maintenance regimes will be located when winter hydrology is more evident at and the remaining soil will be spread in these locations. Seed spread through soil movement is highly effective for transplanting this species. A maximum number of locations will be seeded to increase the chance that a suitable location will be seeded for the persistence of Howell's montia onsite.

The mitigation plan is discussed in greater detail in Section IV (Biological Resources) including soil stockpiling methods, spreading methods, proposed seeding locations, and monitoring.

Facility Operation

The proposed facility will host practice and games during the fall, spring, and summer seasons. Events take place on weekdays and/or weekends during daylight hours. The type, season, days, frequency, and average attendance of athletic events at the proposed facility are shown in Table 2. Use of the athletic facility will occur between dawn and dusk. Therefore, operation of stadium lighting is not required. Minor lighting will be required to accommodate maintenance and closure activities following the use of the proposed facility. The proposed athletic facility will not be accessible to vehicles outside of organized athletic events. However, pedestrian access to the site will be available to the public for limited use outside of organized athletic events. The proposed project would not increase the student capacity at AHS and would not involve any temporary relocation of students during construction.

Table 2. Use of Proposed Athletic Facility

Sport	Team	Location	Schedule			Attendance		
			Frequency	Day of Week	Time	Parents	Students	Visiting Students
Practices								
Fall Season								
AHS Football	Men's JV*	AHS	5 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	20	n/a
	Men's Varsity	AHS	5 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	33	n/a
AHS Soccer	Men's Varsity	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	25	n/a
	Women's Varsity	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	25	n/a
Spring Season								
AHS Track and Field	Co-Ed JV & Varsity	AHS	4 - 5/week	Weekdays	16:00 - 18:30	n/a	60	n/a
AHS Baseball	Men's JV	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	16	n/a
	Men's Varsity	AHS	4 - 6/week	Weekdays & Sat	16:00 - 19:00	n/a	20	n/a
Summer Season								
AHS Football	Men's Varsity	AHS	3/week	Mon, Wed, Fri	16:00 - 19:00	n/a	30	n/a
American Legion Baseball	Men's U17	AHS	3/week	Mon, Wed, Fri	16:00 - 19:00	n/a	16	n/a
	Men's U19	AHS	3/week	Mon, Wed, Fri	16:00 - 19:00	n/a	20	n/a
Home Games								
Fall Season								
AHS Football	Men's JV*	HSU, MHS, or AHS	1/week 5/season	Fri or Sat	17:00	HSU = 900 max MHS = 600 max AHS = 700 max		
	Men's Varsity		1/week 5/season	Fri or Sat	19:30			
AHS Soccer	Men's Varsity	AHS	1 - 2/week 8/season	Wed & Sat	Wed: 15:30 Sat: 13:00	200 - 300		
	Women's Varsity	AHS	1 - 2/week 8/season	Wed & Sat	Wed: 17:00 Sat: 11:00			
Spring Season								
AHS Track and Field	Co-Ed JV & Varsity	AHS	1/season	Weekday	15:30 - 19:00	80		
AHS Baseball	Men's JV	AHS	1 - 2/week 18/season (including 1 Tournament)	Mon, Wed, Sat	Mon & Wed: 15:30 Sat: 11:00	50 - 100		
	Men's Varsity	AHS	1 - 2/week 6/season	Mon, Wed, Sat	Mon & Wed: 15:30 Sat: 11:00	100 - 200		
Summer Season								
American Legion Baseball	Men's U17	AHS	1/week 8/season	Weekdays	16:00 - 19:00	50 - 100		
	Men's U19	AHS	1/week 8/season	Weekdays	16:00 - 19:00	100 - 200		
Other Uses								
AHS Physical Education		AHS	5/week	Weekdays	8:15 - 15:20	n/a	300 max	n/a
Public		TBD						

* JV Football did not have a team the last two years.

Stormwater Drainage

The proposed project will result in approximately 2.1 acres of new impervious surfaces from structures, pedestrian walkways, vehicle access routes, and parking spaces. As the proposed project is located on NHUHSD property under the authority of the State of California, the proposed project is exempt from local development requirements, including MS4 requirements that are implemented by the City of Arcata. However, the proposed stormwater system will be designed to comply with the requirements of the Humboldt Low Impact Development Stormwater Manual to the extent feasible. To meet these requirements, the proposed project incorporates various site design measures and low impact development (LID) features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces (SHN, 2020a). In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. This will include the following drainage improvements: 1) raising the finished grade of the athletic fields by approximately one foot; 2) installing a rock/drain layer beneath the football/soccer field within the track and beneath the outfield of the baseball field; and 3) installing a sand channel drainage system at the surface of the football/soccer field and the outfield of the baseball field (SHN, 2020a). These stormwater and drainage improvements will capture runoff from proposed impervious surfaces and sources of stormwater runoff in order to improve drainage on the athletic playing fields, reduce impacts to water quality, and ensure the rate of post- construction runoff does not exceed pre-construction runoff.

Traffic and Circulation

As indicated in Figure 3 (Conceptual Site Plan), the proposed project will be accessible from Sunset Avenue by way of an approximately 24-foot-wide paved driveway/entrance and an approximately 5-foot-wide pedestrian pathway. Additionally, the proposed project will provide a paved bus/passenger drop off area, ADA parking stalls, and a gravel parking lot with standard parking stalls. Access and parking features will be constructed in compliance with the requirements of the Division of the State Architect.

Since the athletic fields are detached from the AHS main campus, the site is considered an "offsite" facility. During athletic events at the proposed facilities, if all ADA and standard parking stalls are occupied, attendees that have disabilities will need to be dropped off using the ADA compliant drop-off area. All other attendees will be able to park their vehicles offsite at the AHS main campus parking lot and access the athletic facility from an existing gravel access road.

The proposed athletic facility will also be used by AHS physical education instructors and students. Shuttle service will be provided from the AHS main campus to the athletic facility for those individuals with disabilities and others assisting them. For those who are physically capable, access from the AHS main campus to the athletic facility will be provided by an existing gravel access road.

SECTION 3.0
ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

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

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

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

☐ I find that although the proposed project COULD have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

5/15/20
Date

Roger Macdonald
Printed Name

Northern Humboldt Union High School District
For

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue identifies:

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

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. Scenic vistas in the project vicinity include views of natural features such as topography, water courses, outcrops, and natural vegetation, as well as man-made scenic structures. The City of Arcata has designated scenic routes in the General Plan (i.e. US Highway 101 and Samoa Boulevard), vistas (i.e. Fickle Hill and the Arcata Bottom), and areas of historic and cultural value (i.e. the Plaza). According to the California Scenic Highway Mapping System, there are no designated state scenic highways in the project vicinity. US Highways 101 and 299 are listed as "Eligible State Scenic Highways - Not Officially Designated" (Caltrans, 2017).

The project site is bordered to the north by remnant railroad tracks from the North Coast Railroad Authority, Arcata City Trail (part of Humboldt Bay Trail), Foster Avenue, a vacant lot, and low- and medium-density residential development. To the east, the project is bordered by Sunset Avenue, Arcata Skate Park, high-density residential development, H Street, and US Highway 101. The project is bordered to the South by high-density residential development, Greenwood Cemetery, and the AHS main campus. To the west, the project is bordered by Shay Park, Jolly Giant Creek, and Lower Twin Parks Apartments. The site topography rises steeply on the north, east, and south sides of the parcel, shaping the parcel into a basin that drains to the west. Due to the site's topography, shape, and surrounding development, the project site cannot be seen from scenic vistas such as Fickle Hill or the Arcata Bottom. Views of the project site are most visible from Sunset Avenue and Foster Avenue.

The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years. The western field hosts AHS soccer practices and select games, and the eastern field hosts AHS baseball and football practices. The facility hosts practice and games during the fall, spring, and summer seasons. Events take place on weekdays and/or weekends during daylight hours. Existing lighting on the site is limited to security lighting and pedestrian-scale lighting for custodial use. The athletic field surfaces are managed by AHS groundskeepers by conducting regular mowing, irrigating, sports striping, weeding, and gopher trapping. Existing access to the project site is provided by a gravel road between the AHS Main Campus and Sunset Avenue. As shown in Figure 11 and Figure 12, the project site can be observed from vantage points along Sunset Avenue and Foster Avenue.

Figure 11: View of the project site from Sunset Avenue

Figure 12: View of the Western Field from Foster Avenue

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

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

Scenic vistas are defined as expansive views of highly valued landscapes from publicly accessible viewpoints. Scenic vistas include views of natural features such as topography, water courses, outcrops, and natural vegetation, as well as man-made scenic structures. Scenic vistas in the project vicinity include Fickle Hill and the Arcata Bottom.

The project site's topography rises steeply on the north, east, and south, shaping the site into a basin. Due to the site's topography, shape, and surrounding development, the project site cannot be seen from scenic vistas in the project vicinity (i.e. Fickle Hill and the Arcata Bottom). As shown in Figure 11 and Figure 12, the project site can be observed from vantage points along Sunset Avenue and Foster Avenue, however, these locations are not designated scenic vistas. Furthermore, the project site is currently developed as an outdoor athletics facility and the proposed project would develop the site consistent with the existing aesthetic baseline.

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

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

California's Scenic Highway Program was created by the State Legislature in 1963. According to the California Scenic Highway Mapping System, there are no designated state scenic highways in Humboldt County. US Highways 101 and 299 are listed as "Eligible State Scenic Highways - Not Officially Designated" (Caltrans, 2017). Furthermore, the project site does not contain any scenic resources such as landmark trees, rock outcroppings, or historic buildings that would be impacted by the project.

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

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project area is characteristic of an urban environment, with residential neighborhoods and apartments, roadways, and parks in the vicinity of the project site. Due to the aging condition of the existing athletic facility, the visual quality of the site has degraded over time. As shown in Figure 11 and Figure 12, the project site can be observed from publicly accessible vantage points along Sunset Avenue and Foster Avenue.

The project proposes improvements to the existing athletic facility. During construction activities, the existing visual character and quality of the project site will reflect that of a typical construction site. Upon completion of construction activities, the visual character and quality of the project site will be improved by the proposed project through the modernization of athletic surfaces and facilities, improvement of spectator seating, and development of landscaping. Landscaping in various locations throughout the project site will be effective in ornamenting the site.

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

d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?* No Impact

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. Existing lighting on the site is limited to security lighting and pedestrian-scale lighting for custodial use. Similar to the existing use of the site, the proposed project will be operated on weekdays and/or weekends during daylight hours. Therefore, the proposed project does not require substantial lighting for athletic events after dark. The proposed project will require the installation and use of security and pedestrian-scale lighting for custodial use. The proposed light sources are similar to the existing

light sources on the project site and would not be considered a new source of substantial light. In addition, the proposed improvements to the site are not of the type to result in a new source of glare.

For the reasons explained above, the proposed project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the proposed project would result in no impact on this resource category.

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The eastern portion of Arcata is located on forested slopes of Fickle Hill. The slopes contain mostly second growth conifer stands. These forested lands are both publicly and privately held. The western and southern portions of the City are located in the Arcata Bottom which are primarily utilized for cattle grazing among other agricultural purposes. Prime Farmland within the City boundary has not been mapped by the California Department of Conservation's Important Farmland Series Mapping and Monitoring Program (DOC, 2020).

The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years. The athletic field surfaces are managed by AHS groundskeepers by conducting regular mowing, irrigating, sports striping, weeding, and gopher trapping. The site topography rises steeply on the north, east, and south sides of the parcel, shaping the parcel into a basin-like feature. As evident from the historical and existing use of the site, the character and condition of the site is not suitable for agricultural or timber production. The site is not subject to a Williamson Act or Timberland Production contract.

According to the Natural Resource Conservation Service (NRCS) Web Soil Survey, the underlying soils in the study area have the USDA-NRCS classification of Jollygiant (0 to 2 percent slopes), Timmons and Lepoil soils (0 to 2 percent slopes), Timmons and Lepoil soils (2 to 9 percent slopes), and Lepoil-Candymountain complex (2 to 15 percent slopes) (NRCS, 2020). However, test pits dug on the site reveal that the underlying soils include drain sand on the western field and various fill topsoil layers on the eastern field. Soil compaction on the eastern field is attributed to former industrial uses and the former track (SHN, 2019c).

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

a) *Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?* Less-Than-Significant Impact

Prime Farmland within the City boundary has not been mapped by the California Department of Conservation's Important Farmland Series Mapping and Monitoring Program (DOC, 2020). The underlying soils in the study area have the USDA-NRCS classification of Jollygiant (0 to 2 percent slopes), Timmons and Lepoil soils (0 to 2 percent slopes), Timmons and Lepoil soils (2 to 9 percent slopes), and Lepoil-Candymountain complex (2 to 15 percent slopes). Of the soils identified by Web Soil Survey, Jollygiant (0 to 2 percent slopes) is listed as Prime Farmland if irrigated and drained, and Timmons and Lepoil soils (0 to 2 percent slopes) is listed as Prime Farmland if irrigated (NRCS, 2020). However, the project site is currently developed as an outdoor athletics facility and would

continue to function as such under the proposed project. Underlying soils include drain sand on the western field and various fill topsoil layers on the eastern field. These materials were brought to the site during construction of the existing athletic facility and would not be considered prime Farmland (SHN, 2019c). As evident from the historical and existing use of the site, as well as subsurface investigations, the character and condition of the site does not reflect Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

For the reasons explained above, the proposed project will not convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project site has been used by AHS as an athletic facility for over 50 years and is zoned Public Facility. The project site is not under a current Williamson Act contract and is not zoned for agricultural use.

For the reasons explained above, the proposed project will not conflict with existing zoning for agricultural use or a Williamson Act Contract. Therefore, the proposed project would result in no impact on this resource category.

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project site has been used by AHS as an athletic facility for over 50 years and is zoned Public Facility. The project site does not contain forestry or timberland resources and is not zoned for Timberland Production.

For the reasons explained above, the proposed project will not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code (PRC) section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). Therefore, the proposed project would result in no impact on this resource category.

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project site has been used by AHS as an athletic facility for over 50 years. The project site does not contain forestry or timberland resources. The nearest forest land to the site is located on the east side of US Highway 101.

For the reasons explained above, the proposed project will not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, the proposed project would result in no impact on this resource category.

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project site has been used by AHS as an athletic facility for over 50 years. The project site does not contain farmland or forest land resources.

For the reasons explained above, the proposed project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the proposed project would result in no impact on this resource category.

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The site topography rises steeply on the north, east, and south sides of the parcel, shaping the parcel into a basin-like feature.

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

Sensitive receptors (e.g., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effect of air pollution than the general population. Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest known potential sensitive receptor to the proposed project includes the Woodridge Apartments (>35 ft.). Other sensitive receptors in the vicinity of the proposed project include, but are not limited to, Arcata Skate Park (>50 ft. north), Sunset Terrance Apartments (>135 ft.), residences to the north (> 210 ft.), Larson Park (>235 ft.), the Arcata High School main campus (>350 ft.), Arcata Elementary School (>710 ft.), and the Lower Twin Parks Apartments (>745 ft.).

Regulatory Framework: Activities affecting air quality in Humboldt County are subject to the authority of the North Coast Unified Air Quality Management District (NCUAQMD) and the California Air Resources Board (CARB). The NCUAQMD is a regional environmental regulatory agency which has jurisdiction over Humboldt, Del Norte, and Trinity counties in Northern California. The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM_{10}) standard in Humboldt County only (CARB, 2018b). In 1995, the NCUAQMD prepared a Draft Particulate Matter (PM_{10}) Attainment Plan to identify the primary sources of PM_{10} in the District and recommend control measures (NCUAQMD, 1995). In the Draft Plan, the largest source of particulate matter is fugitive dust emissions from vehicular traffic on unpaved roads.

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

Table 3. Summary of Criteria Air Pollutants

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

Criteria Air Pollutant	Major Sources	Human Health Effects
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel (CAPCOA, 2011).	A respiratory irritant; aggravates lung and heart problems. A precursor to ozone. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere (CAPCOA, 2011).
Ozone (O_3)	A colorless or bluish gas (smog) formed by a chemical reaction between reactive organic gases (ROGs) and nitrous oxides (NOx) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills (CAPCOA, 2011).	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield (CAPCOA, 2011).
Particulate Matter (PM_{10} & $PM_{2.5}$)	Produced by power plants, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others (CAPCOA, 2011).	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; asthma; chronic bronchitis; irregular heartbeat; non-fatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (CAPCOA, 2011).
Sulfur Dioxide (SO_2)	A colorless gas formed when fuel containing sulfur is burned and when gasoline is extracted from oil. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships (CAPCOA, 2011).	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain (CAPCOA, 2011).
Hydrogen Sulfide (H_2S)	A colorless gas with the odor of rotten eggs. The most common sources of H_2S emissions are oil and natural gas extraction and processing, and natural emissions from geothermal fields. It is also formed during bacterial decomposition of human and animal wastes and is present in emissions from sewage treatment facilities and landfills. Industrial sources include petrochemical plants, coke oven plants, and kraft paper mills (CARB, 2020a).	Can induce tearing of the eyes and symptoms related to overstimulation of the sense of smell, including headache, nausea, or vomiting. A few studies suggest that asthmatics may be at increased risk of exacerbation of their asthma symptoms (CARB, 2020a).
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries (CARB, 2020b).	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems (CARB, 2020b).
Sulfate	A sub-fraction of ambient particulate matter. Emissions of sulfur-containing compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. A small amount of sulfate is directly emitted from combustion of sulfur-containing fuels, but most ambient sulfate is formed in the atmosphere (CARB, 2020c).	Much like health effects of $PM_{2.5}$, sulfate can cause reduced lung function, aggravated asthmatic symptoms, and increased risk of emergency department visits, hospitalizations, and death in people who have chronic heart or lung diseases (CARB, 2020c).
Vinyl Chloride	A colorless gas with a mild, sweet odor. Most vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products, thus may be emitted from industrial processes. Vinyl chloride has been detected near landfills, sewage treatment plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents (CARB, 2020d).	Short-term exposure to high levels (10 ppm or above) of vinyl chloride in air causes central nervous system effects, such as dizziness, drowsiness, and headaches. The primary non-cancer health effect of long-term exposure to vinyl chloride through inhalation or oral exposure is liver damage. Inhalation exposure to vinyl chloride has been shown to increase the risk of angiosarcoma, a rare form of liver cancer in humans (CARB, 2020d).

Criteria Air Pollutant	Major Sources	Human Health Effects
Visibility Reducing Particles	These particles vary greatly in shape, size, and chemical composition, and come from a variety of natural and manmade sources. Some haze-causing particles are directly emitted to the air such as windblown dust and soot. Others are formed in the air from the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, and organic carbon particles) which are the major constituents of fine PM. These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment (CARB, 2020e).	Haze not only impacts visibility, but some haze-causing pollutants have been linked to serious health problems and environmental damage as well. Exposure to particles up to 2.5 ($PM_{2.5}$) and 10 microns (PM_{10}) in diameter in the ambient air can contribute to a broad range of adverse health effects, including premature death, hospitalizations, and emergency department visits for worsened heart and lung diseases (CARB, 2020e).

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

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

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

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

Sampling and analysis of the site found that portions of the existing multi-use structure (i.e. maintenance and custodian storage, women's and men's restroom) were constructed using ACM. Asbestos concrete drainage pipes are potentially present beneath the existing athletic fields and structure. However, existing subsurface drainage features were not accessed to determine the presence or absence of ACM (Brunelle & Clark, 2017).

Lead: As described in Table 3, exposure to lead can lead to harmful health effects in humans. Sampling and analysis of the site found that some paint coatings at the existing multi-use structure contain lead (Brunelle & Clark, 2017).

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

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

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

The project is located in Humboldt County, which is located in the NCAB and is subject to the jurisdiction of the NCUAQMD. The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM_{10}) standard in Humboldt County only (CARB, 2018b). As stated previously, the NCUAQMD prepared a Draft Particulate Matter (PM_{10}) Attainment Plan in May 1995. The Draft Plan includes a description of the planning area, an emissions inventory, general attainment goals, and a listing of cost-effective control strategies. The NCUAQMD's Attainment Plan established goals to reduce PM_{10} emissions and eliminate the number of days in which State standards are exceeded.

Construction

Construction of the proposed project has the potential to temporarily contribute to PM_{10} concentrations from dust generation. NCUAQMD's Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity (NCUAQMD, 2020). The following standard conditions for controlling dust emissions during construction will be required as **Mitigation Measure AQ-1** in order to provide consistency with the Draft Particulate Matter (PM_{10}) Attainment Plan.

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

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

Operation

The Draft Particulate Matter (PM_{10}) Attainment Plan includes three areas of recommended control strategies to achieve attainment status: transportation, land use, and burning. The project design incorporates control measures identified in the PM_{10} Attainment Plan appropriate to this type of project, such as:

Transportation. The project site is located in the Arcata Heights/Northtown neighborhood in the City of Arcata and in the vicinity of residential neighborhoods. The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. However, the existing athletic facility is incapable of adequately hosting several AHS athletic events due to poor conditions and outdated appurtenances, necessitating AHS to host various athletic events at other locations, such as the HSU Redwood Bowl and City of Arcata Ball Park. The proposed athletic facility will provide a centralized location for AHS athletics events, which will be accessible by various motorized/non-motorized transportation corridors. For example, the project site is approximately 320 ft. from US Highway 101 (US-101) southbound interchange, and 900 ft. from the US-101 northbound interchange, providing convenience for motorized travel and access. Furthermore, the proposed athletic facility is located directly adjacent to the Arcata City Trail (part of Humboldt Bay Trail), providing convenience for non-motorized travel and access.

Land Use. The project site is located in the Arcata Heights/Northtown neighborhood in the City of Arcata and in the vicinity of residential neighborhoods. The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project site is located within walking and biking distance of the AHS main campus, Humboldt State University (0.3 miles), and the City of Arcata Plaza and Downtown area (0.8 miles). The close proximity of the site to existing residential, educational, commercial, employment centers, and motorized/non-motorized transportation corridors will encourage the use of alternative modes of transportation by future residents, which will reduce vehicle miles traveled and the emissions of particulate matter.

Burning. The project proposes the development of an improved athletic facility. The proposed maintenance, restroom, and concessions building will use heating sources other than woodstoves or fireplaces, which will significantly reduce PM_{10} emissions generated from heating during the long-term operation of the project.

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

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

The project is located in Humboldt County, which is located in the NCAB and is subject to the jurisdiction of the NCUAQMD. The NCUAQMD is listed as "attainment" or "unclassified" for all the federal and state ambient air quality standards with the exception of the state 24-hour particulate (PM_{10}) standard in Humboldt County only (CARB, 2018b). Construction of the proposed project includes demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping, which include activities and equipment which may result in the emission of PM_{10}, for which Humboldt County is non-attainment under state ambient air quality standards.

In determining whether a project has significant impacts on the environment from criteria air pollutants, the local air district's CEQA thresholds of significance are typically applied to projects in the review process. However, the NCUAQMD has not adopted a numerical threshold for determining the significance of criteria air pollutants from land use projects (NCUAQMD, 2020). For the purpose of assessing air quality impacts of land use projects in CEQA documents, the NCUAQMD recommends the use of thresholds and guidance adopted by other air districts in the State.

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

For the purpose of this analysis, use of the BAAQMD screening criteria is a conservative metric due to nature and characteristics of the San Francisco Bay Area Air Basin (SFBAAB) when compared to the NCAB. The SFBAAB is comprised of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara, and parts of Solano and Sonoma counties. The SFBAAB is a geographically expansive and broad metropolitan region comprised of extensive industrial, commercial, and residential development. Past and present development combined with the regions complex transportation patterns have resulted in "non-attainment" status for various criteria air pollutants throughout the SFBAAB. In order to achieve "attainment" status, the BAAQMD rules and regulations regarding the generation of criteria air pollutants and/or precursors are more restrictive than those adopted by the NCUAQMD. Therefore, use of the BAAQMD screening criteria is a conservative metric for the proposed project, which is located in an air basin that is only non-attainment for the State standard for PM_{10}.

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

Table 4. BAAQMD Air Quality Screening Criteria

Land Use Type	Construction-Related Screening Size (acres)[1]	Operational-Related Screening Size (acres)[1]	Project Size (acres)
City Park	67	2,613	7.9
1. BAAQMD, 2017			

Furthermore, NCUAQMD's Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity (NCUAQMD, 2020). As previously discussed in subsection a), the standard measures provided in **Mitigation Measure AQ-1** shall be

required for controlling dust emissions during construction activities. Therefore, a cumulatively considerable net increase in PM_{10} will not result from the proposed project.

With the adoption of **Mitigation Measure AQ-1** and for the reasons explained above, the proposed project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

This discussion addresses whether the proposed project would expose sensitive receptors to substantial concentrations of criteria air pollutants or toxic air contaminants during construction activity including naturally-occurring asbestos, lead and asbestos-containing materials, fugitive dust ($PM_{2.5}$ and PM_{10}), and DPM.

As noted in the Air Quality Setting, high concentrations of criteria air pollutants and toxic air contaminants can result in adverse health effects to humans. Some population groups are considered more sensitive to air pollution than others; in particular, children, elderly, and acutely or chronically ill persons, especially those with cardio-respiratory diseases such as asthma and bronchitis. Land uses that generally house more sensitive people include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. The nearest known potential sensitive receptor to the proposed project includes the Woodridge Apartments (>35 ft.). Other sensitive receptors in the vicinity of the proposed project include, but are not limited to, Arcata Skate Park (>50 ft. north), Sunset Terrance Apartments (>135 ft.), residences to the north (> 210 ft.), Larson Park (>235 ft.), the Arcata High School main campus (>350 ft.), Arcata Elementary School (>710 ft.), and the Lower Twin Parks Apartments (>745 ft.).

The NCUAQMD has not adopted guidance for health risk assessments or health risk significance thresholds. However, the NCUAQMD recommends on their website the use of the California Air Pollution Control Officers Association (CAPCOA) guidance document entitled "Health Risk Assessment for Proposed Land Use Projects" to assist lead agencies with the requirements of CEQA when projects may involve exposure to toxic air contaminants (NCUAQMD, 2020). The document primarily focuses on addressing long-term public health risk impacts from and to proposed land use projects. The document does not provide guidance on how risk assessments for construction projects should be addressed in CEQA (CAPCOA, 2009).

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

- Land use projects with toxic emissions that impact receptors. Examples of these types of projects include combustion-related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, and quarry operations.
- Land use projects that will place receptors in the vicinity of existing toxic sources. This would occur when residential, commercial, or institutional developments are proposed to be located in the vicinity of existing toxic emission sources such as stationary sources, high traffic roads, freeways, rail yards, and ports.

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

Construction

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

Asbestos and Lead-Containing Materials: The project proposes to demolish the existing structures at the project site. An asbestos and limited lead-based paint survey was completed by a certified lead inspector/assessor and certified asbestos consultant to evaluate the presence of asbestos-containing materials and lead-based paint or lead-containing surface coatings at the project site. Sampling and analysis of the site detected asbestos-containing materials and/or lead-based paint in portions of the existing multi-use structure to be demolished (Brunelle & Clark, 2017). Demolition of the existing structures has the potential to result in exposure of people to asbestos-containing materials and/or lead-based paint present within the structure.

Demolition activities associated with the proposed project must comply with the asbestos regulations from the National Emissions Standards for Hazardous Air Pollutants (NESHAP), which are administered by the NCUAQMD (NCUAQMD, 2020). These regulations require the following procedures:

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

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

Demolition activities associated with the proposed project must comply with Title 17, California Code of Regulations Division 1, Chapter 8 (Lead Based Paint Regulations), which addresses requirements for the removal of components painted with lead-based paint during site clearing and demolition of existing structures. The construction contractor shall be required to comply with these provisions. The removal of all lead-based paint materials shall be conducted by a certified lead supervisor or certified lead worker, as defined by §35008 and §35009 of the Lead Based Paint Regulations.

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

Criteria Air Pollutants: Construction of the proposed project includes demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping, which include activities and equipment that may result in the emission of criteria air pollutants. As previously noted, the BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a land use project could result in potentially significant impacts related to criteria air pollutant emissions. Projects below the applicable screening criteria would not exceed thresholds for criteria air pollutants established by the BAAQMD for land-use projects, other than permitted stationary sources. BAAQMD screening criteria include a "city park" category which is compared to the construction of the proposed project for the purpose of this analysis. As discussed in subsection a) and shown in Table 4, the project is proposed to occur on approximately 7.9 acres, which is well below the BAAQMD screening project size of 67 acres for construction of a "city park". Therefore, construction of the proposed project would not expose sensitive receptors to substantial concentrations of criteria air pollutants.

As previously discussed in subsection a), fugitive dust has the potential to be generated during construction from activities including demolition, site preparation, grading, and trenching. Fugitive dust particles can range in size and are often classified as PM_{10} and/or $PM_{2.5}$. Fugitive dust generated from construction activity can result in nuisances and localized health impacts (see Table 3). However, construction activities such as demolition, site preparation, grading, and trenching would be transitory, occurring intermittently over the entire construction site, occurring over a short timeframe of approximately 6 months. Moreover, the NCAUQMD Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity. As previously discussed in subsection a), **Mitigation Measure AQ-1 s**hall be required to reduce impacts from fugitive dust generation during construction activities to less than significant.

Diesel PM. The use of diesel-powered equipment during construction activity would generate DPM, which is a known carcinogen. The majority of heavy diesel equipment used during construction activity would occur during grading of the project site. However, construction activities would be transitory, occurring intermittently over the entire construction site and over a short timeframe of approximately 6 months. Residents and other sensitive receptors located within the vicinity of the project site would be exposed to construction contaminants only for the duration of construction activity. These brief exposure periods would substantially limit exposure to hazardous emissions.

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

retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits). The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.

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

Operation

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. An outdoor athletics facility is not a type of land use that would generally be considered to emit toxic emissions. As noted in the Air Quality Setting, these types of land uses typically include combustion-related power plants, gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, and quarry operations. However, the proposed project does have the potential to result in the emissions of criteria air pollutants, which would be primarily from vehicle traffic.

Criteria Air Pollutants. As previously noted, the BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant impacts related to criteria air pollutant emissions. Projects below the applicable screening criteria would not exceed thresholds for criteria air pollutants established by the BAAQMD for land-use projects. BAAQMD screening criteria include a "city park" category which is compared to the operation of the proposed project for the purpose of this analysis. As discussed in subsection a) and shown in Table 4, the project is proposed to occur on approximately 7.9 acres, which is well below the BAAQMD screening project size of 2,613 acres for operation of a "city park". Therefore, operation of the proposed project will not expose nearby sensitive receptors to substantial pollutant concentrations.

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

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

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

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

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

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

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

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

- Conduct digging, backfilling, and paving of utility trenches in such a manner as to minimize the creation of airborne dust.

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. Arcata's natural landforms include forested hillsides to the east; a sloping coastal terrace in the central area of town; a river corridor to the north; and flat bottomlands known as the Arcata Bottom, forested coastal dunes, bay front and tidelands to the west and south. Arcata is bordered by the Mad River to the north, Arcata Bay to the south, the Arcata Bottom to the west, and Fickle Hill to the east. These features form distinctive natural edges to the City's planning area.

The project site is bordered to the north by railroad tracks from the North Coast Railroad Authority, Arcata City Trail (part of Humboldt Bay Trail), Foster Avenue, a vacant lot, and low- and medium-density residential development. To the east, the project is bordered by Sunset Avenue, Arcata Skate Park, high-density residential development, H Street, and US Highway 101. The eastern slopes and northern slopes surrounding the site were man-made for road and railroad infrastructure. The project is bordered to the south by high-density residential development, Greenwood Cemetery, and the AHS main campus. The southern bluff slope remains a shrub-forest zone between the project site and the Greenwood Cemetery and AHS main campus situated on top of the bluff to the south. To the west, the project is bordered by Shay Park, Jolly Giant Creek, and high-density residential development.

The project site consists of two existing irrigated sports fields that support several AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years. Natural turf surfaces at the site are managed by AHS groundskeepers by conducting mowing, irrigating, fertilizing, sports striping, weeding, and gopher trapping. Dominant vegetation species are primarily non-native grass and forb species typically associated with managed lawns and fields. Dominant vegetation species include Kentucky bluegrass, creeping bentgrass, English daisy, and creeping buttercup, among others. The surrounding bluff slopes are dominated by woody vegetation comprised of a mix of native and non-native species. Invasive English ivy, Himalayan berry, and elm-leaf blackberry are widespread on the surrounding slopes. The site topography rises steeply on the north, east, and south sides of the parcel, shaping the parcel into a basin that drains to the west toward Jolly Giant Creek and its associated wetlands. Jolly Giant Creek runs through a culvert approximately 10 feet beneath the surface of the project site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

Wetlands
In spite of the area being intensively managed for athletic uses, wetland conditions occur across a large portion of the project site. Wetland conditions are attributed to drainage patterns, irrigation, hydrophytic turf vegetation, current management practices, and the facility's position at the base of slopes within a historical narrow alluvial plain. Therefore, a distinction is made between human-induced wetlands (i.e. non-aquatic areas) and natural wetlands (i.e. aquatic areas) (SHN, 2019c).

The non-aquatic areas observed on the site reflect human-induced, abnormal wetland conditions (see Figure 8). The formation of non-aquatic areas occurred in part as a result of the site's position within a historical alluvial plain associated with Jolly Giant Creek. Furthermore, past and present development, use, and maintenance of the site, including the growth of turf grasses (most of which are considered hydrophytes), regular irrigation, poorly functioning drainage system, and soil compaction has contributed to the human-induced, abnormal wetland conditions. However, according to the guidance in CFR 328.3(c) and USACE Regulatory Guidance Letter (RGL) 86-09, the USACE does not assert authority over these non-aquatic wetlands. Therefore, approximately 2.48 acres of the study area is identified as non-aquatic area with three-parameter wetland characteristics (SHN, 2019c).

The aquatic areas observed on the site reflect natural wetland conditions (see Figure 9). Aquatic areas are located along the southern boundary of the existing athletic fields. The formation of aquatic areas occurred as a result of the landscape position within a historical alluvial plain associated with Jolly Giant Creek, between the poorly drained and crowned athletic field and the southern slope. The aquatic area is defined by a narrow, intermittent drainage and connected wetland along the entire southern boundary, flowing west along the base of the hill. An existing fence line transects the aquatic area, separating a majority of the aquatic area from the adjacent athletic fields. Unlike the non-aquatic areas described above, the aquatic areas are not subject to disturbances from mowing and vegetation management. Pursuant to the Section 404 of the CWA (33 U.S. Code [USC] 1344), as amended, and 33 CFR Section 328.3, the USACE asserts authority over these aquatic areas (Water of the U.S). Therefore, approximately 0.62 acres of the study area is identified as aquatic areas with three-parameter wetland characteristics (SHN, 2019c).

Special-Status Plant Species
Of the 72 special-status plant species potentially occurring in the Arcata North and surrounding quadrangles, 59 are considered to have low or no potential to occur within the project area, and 13 are considered to have a moderate or high potential of occurrence, including one special-status species that was observed. Site investigations were conducted during appropriate seasons for detecting species with moderate or higher potential for occurrence. Howell's montia, a 2B.2 special-status plant species was observed within the project area during the surveys. No additional special-status plant species were observed, nor is it likely that additional special-status plant species occur within the project area due to historical and continued disturbance and use and the presence of non-native vegetation species (SHN, 2019a).

The special status species Howell's montia is present along the northern fence line and the fence line separating the western field from the eastern field. It is closely associated with moderately wet conditions and continuous weed and vegetation management along the fence line. Howell's montia occurs in seven distinct populations ranging from a few scattered individuals to dense mats of numerous individuals. The total area occupied by Howell's montia onsite is approximately 1,097 square feet. Howell's montia is a diminutive annual plant that requires disturbance and does not tolerate competition from other species. The mowing and use of a vinegar-based herbicide in the late spring (after it has flowered) by the AHS groundskeepers have allowed this species to flourish onsite in these very limited areas (SHN, 2019a).

Special-Status Animal Species
Of the 65 special-status animal species reported from the Arcata North and surrounding quadrangles, 52 animal species are considered to have a no or a low potential to occur within the study area and 13 species have a moderate to high potential of occurrence based on the available habitat. One special-status wildlife species was observed during the field visit on April 16, 2019. A Great egret (*Ardea alba*) was observed foraging for earthworms in the eastern portion of the project area. The special-status criteria for this species is particularly for nesting colonies and none were observed within the study area (SHN, 2019a).

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. Surveys of the site were conducted in preparation of a Biological Report, which addresses environmentally sensitive habitat areas and special-status species present or

potentially occurring within the site, evaluates project-related impacts, and recommends appropriate avoidance and minimization measures (SHN, 2019a). Special-status plant and animal species present within the study area are described below.

Special-Status Plant Species

As noted in the Biological Resources Setting, 13 special-status plant species have moderate to high potential of occurrence on the project site, including one special-status species that was observed; Howell's montia. No additional special-status plant species were observed, nor is it likely that additional special-status plant species occur within the project area due to historical and continued disturbance and use and the presence of non-native species (SHN, 2019a).

Howell's montia is an annual herb in the Montiaceae family. It is neither state nor federally listed but is listed on the California Rare Plant Rank. Its elevation range is reported from 10 to 1,215 meters above sea level. Within its range state-wide, its blooming period is reported as March through May. This species is reported from vernally mesic meadows and seeps, north coast coniferous forests, and sometimes roadside habitats (SHN, 2019a).

The Howell's montia populations observed within the project area are within the center of and along the north sides of the fields. This species occurs in several distinct populations along the northern fence between the access road and the mowed soccer field grass, as well as along the fence between the soccer field and the football field. A total of seven populations were observed for a total area of 1,097 square feet. Population density varied from a few scattered individuals to dense mats of numerous individuals. Occurrences of Howell's montia are strongly related with persistent winter moisture, and compacted soils, however, herbicide application along the fence-line appears to be maintaining the populations at this site by removing competing weedy species that would otherwise dominate these locations.

Based on the proposed project design, construction of the project would result in impacts to the Howell's montia populations present on the site (SHN, 2019a). Therefore, a Howell's Montia Mitigation Monitoring and Reporting Plan (MMRP) was prepared to describe appropriate measures which will reestablish Howell's montia onsite following completion of the project. Measures to maximize survival and persistence of the species onsite long term, and monitoring and reporting requirements, are documented in the MMRP to ensure the success and proper maintenance of the mitigation (SHN, 2020b). Measures described in the Howell's Montia MMRP include, but are not limited to the following:

- Seed Banking
  - Remove native soils within areas of the mapped population,
  - Stockpile the seed containing soil in shaded areas protected from construction activity and accidental disturbance,
  - Cover, label, and identify the stockpiled soil to prevent damage.
- Population Reestablishment
  - Identify suitable Howell's montia habitat for population reestablishment,
  - Locations for population reestablishment will be made weed free,
  - Stockpiled seed containing soil will be spread within the selected locations displaying suitable habitat for Howell's montia.
- Maintenance
  - Perform regular maintenance to allow established populations to flourish and outcompete competitive vegetation.
- Monitoring
  - Complete an as-planted report within three months of re-seeding efforts,
  - Perform qualitative (visual assessment) and quantitative sampling for the five years following completion of the population reestablishment efforts.

Adherence to the Howell's Montia MMRP shall be required as **Mitigation Measure BIO-1** to reestablish Howell's Montia populations on the project site after completion of the project (SHN, 2020b). The project's adherence to the MMRP through implementation of **Mitigation Measure BIO-1** will allow successful Howell's montia repopulation, creating healthy, persistent, and self-sustaining populations of Howell's montia in an area equal to or greater than the area occupied by Howell's montia impacted by the project.

Special-Status Animal Species

As noted in the Biological Resources Setting, 13 special-status animal species have moderate to high potential of occurrence on the project site, including one special-status species that was observed; Great egret.

The Great egret is a colonial nester in large trees. Rookery sites are located near marshes, tideflats, irrigated pastures, and margins of lakes and rivers. The special-status criteria for this species is particularly for nesting colonies, and none were observed within the study area.

Due to the existing use of the site as an athletic facility, there are limited nesting and denning opportunities within the project site. Considering the managed nature and regular use of the project site, special-status species are expected to choose less disturbed habitat for nesting and roosting, such as the adjacent open space to the west of the project area. Regardless, areas along the perimeter of the project site offer potential habitat for nesting opportunity. Due to the potential for nesting, roosting, and denning activities on the perimeter of the project site, vegetation removal and other ground-disturbing activities for the proposed project should occur outside of the typical nesting season for migratory birds (September through February). If project activities cannot occur outside the nesting bird season (generally March 1 through August 31), **Mitigation Measure BIO-2** shall be implemented, requiring a qualified biologist to conduct nesting bird surveys within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the U.S. Fish & Wildlife Service (USFWS) and California Department of Fish & Wildlife (CDFW) and implemented to prevent the abandonment of active nests. Consistent with **Mitigation Measure BIO-2**, the following steps shall be taken:

- A qualified biologist shall conduct surveys no more than seven days prior to activities, within the construction limits and within 100 feet (200 feet for raptors) of the construction limits.
- If an active nest is located during the survey, a no-disturbance buffer shall be established around the nest by the qualified biologist, in consultation with CDFW and USFWS.
- Protective buffers (no-disturbance area around the nest) will be established at a distance determined by the biologist based on the nesting species, its sensitivity to disturbance, and type of and duration of disturbance expected. Protective buffers shall remain in place until the young have fledged.
- Construction activities outside buffers may proceed while active nests are being monitored, at the discretion of the qualified biologist. If active nests are found to be at risk due to construction activities, construction activities shall be delayed until the qualified biologist determines that the young have fledged.

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

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. Riparian habitat is located to the northwest of site (beginning at the outlet of Jolly Giant Creek) and to the south of the site (at the base of the southern slope). According to the Biological Report prepared for the project, several sensitive natural communities also exist in the vicinity of the proposed project, however no sensitive natural communities occur within the project footprint (SHN, 2019a).

As a result of the proposed project, the existing access from Sunset Avenue used by the City to perform maintenance activities to the Jolly Giant Creek culvert outlet will no longer be available. For this reason, the gravel access road from the AHS main campus to the project site will be partially extended along the edge of the riparian corridor of Jolly Giant Creek (see Figure 10). The gravel access road will not be constructed within the riparian corridor, and no riparian vegetation will be impacted by this improvement.

The project does not propose any development within riparian habitat or sensitive natural communities. For the reasons explained above, the proposed project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local of regional plans, policies, regulations, or by CDFW or USFWS. Therefore, the proposed project will have a less-than-significant impact on this resource category.

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. As described in the Biological Resources Setting, the project site contains both aquatic wetlands and non-aquatic wetlands. The non-aquatic areas observed on the site reflect human-induced, abnormal wetland conditions. These conditions are primarily a result of past and present development, use, and maintenance of the site, including the growth of turf grasses (most of which are considered hydrophytes), regular irrigation, poorly functioning drainage system, and soil compaction has contributed to the human-induced, abnormal wetland conditions (SHN,

2019c). For the purpose of this analysis, non-aquatic wetland areas are not defined as state or federally protected wetlands. This assertion is supported by CFR 328.3 and USACE RGL 86-09.

The aquatic areas observed on the site reflect natural wetland conditions that provide quality wetland habitat and function. These conditions are primarily a result of the landscape position within a historical alluvial plain associated with Jolly Giant Creek, between the poorly drained and crowned athletic field and the southern slope. The aquatic area is defined by a narrow, intermittent drainage and connected wetland along the entire southern boundary, flowing west along the base of the hill. An existing fence line transects the aquatic area, separating a majority of the aquatic area from the adjacent athletic fields. Unlike the non-aquatic areas described above, the aquatic areas are not subject to disturbances from mowing and vegetation management (SHN, 2019c). For the purpose of this analysis, aquatic wetland areas are defined as state or federally protected wetlands.

The proposed improvements to the athletic fields have been designed to avoid adjacent state or federally protected wetland areas. The project will occur throughout the footprint of the existing athletic facility and nearby developed areas (i.e., access roads, public right-of-way [ROW], landscape areas, storage areas, etc.) on areas characterized as non-aquatic and upland areas. The only impact to jurisdictional wetlands will be a temporary impact that will result from the removal of existing infrastructure. This includes the removal of fencing and stormwater infrastructure (i.e., DIs and piping) that is currently located within the wetland areas on the southern portion of the site. Removal of this infrastructure will ultimately improve the existing condition of wetlands on the site. To minimize the temporary impacts to wetlands during infrastructure removal, the contractor will comply with the following requirements: 1) No heavy equipment will be used within the wetland boundary; 2) If a mini-excavator or other small tracked vehicles are used, metal plates or plywood will be placed underneath to reduce compaction and disturbance of the wetlands; and 3) hand tools will be the primary method used for removal of existing infrastructure in wetland areas at the site. These requirements have been included as **Mitigation Measure BIO-3.** With the implementation of **Mitigation Measure BIO-3**, the temporary wetland impacts would be less than significant.

With the implementation of **Mitigation Measure BIO-3** and for the reasons explained above, the proposed project will not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Therefore, the proposed project will have a less-than-significant impact with mitigation incorporated on this resource category.

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. Wildlife movement corridors within the vicinity of the project consist of Jolly Giant Creek and Jolly Giant Creek's riparian corridor. Jolly Giant Creek runs through a culvert approximately 10 feet beneath the surface of the project site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

The proposed project will be developed within the footprint of the existing athletic facility and nearby developed areas (i.e., access roads, public ROW, landscape areas, storage areas, etc.). The position and configuration of the proposed project will not expand the footprint of the site such that nearby wildlife movement corridors will not be encroached upon.

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. Although the proposed project is located in the City of Arcata, the proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD adopted Resolution 12/2019-20 on April 23, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements. However, the proposed project will be required to comply with the existing regulatory requirements of State and federal agencies including the USFWS, USACE, NCRWQCB, and CDFW. To comply with these regulations, the project has been designed and mitigated to comply with the existing regulatory requirements related to the protection of wetlands, riparian areas, water quality, and sensitive plant and animal species.

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

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

No habitat conservation plans, or other similar plans have been adopted for the project site or project area. According to the Biological Report prepared for the project, several sensitive natural communities exist in the vicinity of the proposed project. However, no sensitive natural communities occur within the project footprint or will be affected by the proposed project (SHN, 2019a).

For the reasons explained above, the proposed project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community, Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, the proposed project will have a less-than-significant impact on this resource category.

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

Mitigation Measure BIO-1: Adherence to the Howell's Montia MMRP shall be required to reestablish Howell's montia populations on the project site (SHN, 2020b). Steps and measures to ensure successful reestablishment of Howell's montia include, but are not limited to the following:

- Seed Banking
  - Remove native soils within areas of the mapped population,
  - Stockpile the seed containing soil in shaded areas protected from construction activity and accidental disturbance,
  - Cover, label, and identify the stockpiled soil to prevent damage.
- Population Reestablishment
  - Identify suitable Howell's montia habitat for population reestablishment,
  - Locations for population reestablishment will be made weed free,
  - Stockpiled seed containing soil will be spread within the selected locations displaying suitable habitat for Howell's montia.
- Maintenance
  - Perform regular maintenance to allow established populations to flourish and outcompete competitive vegetation.
- Monitoring
  - Complete an as-planted report within three months of re-seeding efforts,
  - Perform qualitative (visual assessment) and quantitative sampling for the five years following completion of the population reestablishment efforts.

Mitigation Measure BIO-2: If project activities cannot occur outside the bird nesting season (generally March 1 through August 31), the following steps shall be taken to prevent the abandonment of active nests:

- A qualified biologist shall conduct surveys no more than seven days prior to activities, within the construction limits and within 100 feet (200 feet for raptors) of the construction limits.
- If an active nest is located during the survey, a no-disturbance buffer shall be established around the nest by the qualified biologist, in consultation with CDFW and USFWS.
- Protective buffers (no-disturbance area around the nest) will be established at a distance determined by the biologist based on the nesting species, its sensitivity to disturbance, and type of and duration of disturbance expected. Protective buffers shall remain in place until the young have fledged.
- Construction activities outside buffers may proceed while active nests are being monitored, at the discretion of the qualified biologist. If active nests are found to be at risk due to construction activities, construction activities shall be delayed until the qualified biologist determines that the young have fledged.

Mitigation Measure BIO-3: To minimize the temporary impacts to wetlands during infrastructure removal, the contractor will comply with the following requirements:

- No heavy equipment will be used within the wetland boundary.
- If a mini-excavator or other small tracked vehicles are used, metal plates or plywood will be placed underneath to reduce compaction and disturbance of the wetlands.
- Hand tools will be the primary method used for removal of existing infrastructure in wetland areas at the site.

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs.

The project location occurs within the ancestral territory of the Wiyot Tribe. Early archaeological sites identified within the high elevation coastal interior of this region exceed 7,000 years before present (B.P.) and similar archaeological assemblages have been documented on the coastal terraces about ten miles to the north of Arcata. Identified archaeological sites in the vicinity of Humboldt Bay, closest to the project area, seem to be generally associated with the mid- to late-Holocene period, within the last three millennia. Wiyot cultural ethnographic sites are also known in the general north Arcata vicinity, distributed mostly along the margins of Humboldt Bay, Daniels Slough, and Lower Mad River. These sites include villages, hunting and gathering areas, trails, and other places; however, none are listed for the specific project area. The subject landform was certainly within the resource catchment area of the nearest villages, and was likely to have been traversed through, being in the course of a perennial creek on the margin between the Arcata Bottom and upland areas. The presence of freshwater and associated resources in this area would have been attractive to indigenous populations in the past (WRA, 2020).

Prior to the 1950s, the project site was developed for agricultural uses by the McCall family and contained a ranch house and two fields that were bisected by Jolly Giant Creek (see Figure 4). In the early 1950s, the project site was sold to Arcata High School and developed with a track and athletics field (see Figure 5). By 1963, the track and sports field became the primary use of the site (see Figure 6). The existing storage sheds on the site were constructed in the 1970s. The site was redeveloped into its current configuration in the 1990s when the track was removed, and the site became predominantly used for soccer, football, and baseball.

During construction of the existing athletic facility, the site underwent extensive earthmoving and a drainage system was installed, with varied amounts of water conveyance. The drainage system lies underneath the sports field, ranging from approximately one to three feet below grade, as evidenced by 23 DIs dispersed across the field. Underlying soils include drain sand on the western field and various fill topsoil layers on the eastern field. Twenty valves serve 160 irrigation heads (sprinklers) across the existing athletic fields.

During the winter and spring of 2020, a Cultural Resources Investigation was prepared by WRA for the proposed project. The methods employed in the Investigation included a record search at the Northwest Information Center (NWIC), and a review of other published archaeological and historical literature pertinent to the project area. Correspondence was conducted with the Native American Heritage Commission (NAHC), local tribal representatives, and other knowledgeable individuals. A comprehensive field survey was performed over the entire project area and an adjacent buffer (~15 acres). The Investigation also included shovel probes along the margin of the existing access road in the footprint of the proposed sewage pumping tank on the lower field and along the upper terrace edge. The Cultural Resources Investigation concluded that no significant archaeological or historic period resources appear to exist in the limits of the project area.

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

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

As described in the Cultural Resources Setting, the project site has been used for agricultural, residential, and public facility uses historically. The entire property exhibits evidence of ground disturbance from past uses which included grading and substantial

land recontouring. The site currently contains the Arcata High School athletic fields, which includes a maintenance building and athletic-related facilities.

As noted in the Cultural Resources Setting, a Cultural Resources Investigation was prepared for the proposed project. The Investigation concluded that no significant historic period resources appear to exist in the limits of the project area. Specifically, the Investigation concluded that the existing building and container on the site were built after 1970 and are not considered historical (WRA, 2020). However, there is the potential to uncover unknown historical resources during construction of the project. For this reason, an Inadvertent Discovery Protocol has been included as **Mitigation Measure CR-1** for the proposed project.

With the implementation of **Mitigation Measure CR-1** and for the reasons explained above, it has been determined that the proposed project will not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Across the majority of the site, subsurface materials consist of varying thicknesses of fill overlying native soils that were previously placed in the past to develop the site to its existing condition (SHN, 2018; 2019b). Due to the past disturbance of the site, the presence of unique archaeological resources is unlikely. The majority of surface and subsurface disturbances associated with the proposed project will occur within the center of the project site to facilitate the improvement of the proposed athletic fields and related appurtenances. Most of the site will be excavated to a depth of approximately 3 to 6 feet below existing grade for the removal and installation of utilities. The maximum depth of excavation will be to approximately 15 feet below existing grade for the installation of a proposed sewage pumping tank.

A request for tribal consultation pursuant to AB 52 was initiated on January 30, 2020 with the Wiyot Tribe, Bear River Band of Rohnerville Rancheria, and Blue Lake Rancheria. The Tribes requested consultation on February 18, 2020 and a site visit was conducted on February 24, 2020, with the Tribal Historic Preservation Officers from the Tribes and WRA (project archaeologist). The meeting concluded with a request by the Tribes for exploration of the soils at the site in the area where the maximum depth of excavation (15 feet) would occur for installation of a proposed sewage pumping tank.

Based on the direction provided during the site visit, a Cultural Resources Investigation was prepared by WRA, which involved a pedestrian archaeological field survey over approximately 15 acres and shovel probes along the margin of the existing access road in the footprint of the proposed sewage pumping tank on the lower field and along the upper terrace edge. The Cultural Resources Investigation concluded that no significant archaeological resources appear to exist in the limits of the project area. However, the Investigation notes that there is a possibility for uncovering archaeological materials within any former topsoil (A/B) horizons that may lie intact below covered surfaces. The sewage pumping tank is the deepest element of the project (15 feet) and is the most likely location to reach intact topsoil horizons. For this reason, the Investigation recommends an archaeological monitor be present to identify and evaluate Native American archaeological materials that may be discovered during excavation for installation of the proposed sewage pumping tank. For all other construction activities, the Investigation recommends implementation of an Inadvertent Discovery Protocol. The Investigation concludes that with implementation of these recommendations, the proposed project would not result in a substantial adverse change to archaeological or historical resources (WRA, 2020).

The Tribes reviewed the results of the Cultural Resources Investigation and provided comments on May 11, 2020 that they concurred with the archaeological monitoring and Inadvertent Discovery Protocol recommended for implementation during construction of the project. The requirement for archaeological monitoring during excavation for installation of the proposed sewage pumping tank and implementation of an Inadvertent Discovery Protocol during other construction activities, has been included as **Mitigation Measure CR-1** for the proposed project.

With the implementation of **Mitigation Measure CR-1** and for the reasons explained above**,** the proposed project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Across the majority of the site, subsurface materials consist of varying thicknesses of fill overlying native soils that were previously placed in the past to develop the site to its existing condition (SHN, 2018; 2019b). Due to the past disturbance of the site, the presence of human remains is unlikely.

However, there is a possibility that human remains, and historic burial sites could exist in the area and may be uncovered during project development. As such, if human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5). The Humboldt County Coroner will be contacted to determine if the cause of death must be investigated. If the Coroner determines that the remains are of Native American origin, it will be necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097). The Coroner will contact the NAHC. The Tribal Historic Preservation Officers (THPOs) for the Wiyot Tribe, Blue Lake Rancheria, and the Bear River Band of Rohnerville Rancheria, descendants, or most likely descendants, of the deceased will be contacted and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98. Work may resume if the NAHC is unable to identify a descendant or the descendant failed to make a recommendation. The Inadvertent Discovery Protocol for the discovery of human remains is included as **Mitigation Measure CR-2**.

With the implementation of **Mitigation Measure CR-2** and for the reasons explained above, it has been determined that the proposed project will not disturb any human remains, including those interred outside of formal cemeteries. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

CR-1. Implementation of the recommendations in the WRA Cultural Resources Investigation (2020) shall be required during the proposed project's construction activity to minimize impacts to archaeological and historical resources. These recommendations include the following:

- **Archaeological Monitoring:** In coordination with the Wiyot Tribe, Blue Lake Rancheria, and the Bear River Band of the Rohnerville Rancheria, an archaeological monitor shall be present to identify and evaluate Native American archaeological materials that may be discovered during excavation for installation of the proposed septic pumping tank, which is designed to lie at 15 feet depth, within a 20 x 20 foot area. This is the deepest element of the project and is the most likely location to reach reported intact topsoil horizons.
- **Inadvertent Discovery Protocol:** If archaeological or historical 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 significant 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 (THPOs) for the Wiyot Tribe, Blue Lake Rancheria, and Bear River Band of Rohnerville Rancheria are also to be contacted immediately to evaluate the discovery, and in consultation with the project proponent and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials which could be encountered include obsidian and chert debitage or formal tools, grinding implements, (e.g., pestles, handstones, bowl mortars, slabs), locally darkened midden, deposits of shell, faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations, structural remains, or concentrations of artifacts made of glass, ceramics, metal or other materials found in buried pits, old wells or privies.

CR-2. If human remains are discovered during project construction, work will stop at the discovery location, within 20 meters (66 feet), and any nearby area reasonably suspected to overlie human remains (Public Resources Code, Section 7050.5). The Humboldt County Coroner will be contacted to determine if the cause of death must be investigated. If the Coroner determines that the remains are of Native American origin, it will be necessary to comply with state laws relating to the disposition of Native American burials, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) (Public Resources Code, Section 5097). The Coroner will contact the NAHC. The Tribal Historic Preservation Officers (THPOs) for the Wiyot Tribe, Blue Lake Rancheria, and the Bear River Band of Rohnerville Rancheria, descendants, or most likely descendants, of the deceased will be contacted and work will not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in Public Resources Code, Section 5097.98. Work may resume if the NAHC is unable to identify a descendant or the descendant failed to make a recommendation.

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. In Humboldt County, energy is used as a transportation fuel and as electrical and heat energy in homes, businesses, industries, and agriculture. The majority of primary energy used in Humboldt County is imported, with the exception of biomass energy. Although the majority of electricity is generated in the county, a large portion of it is generated using natural gas. The county imports about 90% of its natural gas; the rest is obtained locally from fields in the Eel River valley. Essentially all of the county's transportation fuels are imported (Schatz Energy Lab, 2005).

Humboldt County is remotely located at the end of the electrical and natural gas supply grids, which limits both energy supply options and system reliability. Pacific Gas & Electric (PG&E) owns the natural gas and electricity transmission and distribution systems in Humboldt County. There is one major natural gas supply line that serves the county and four electrical transmission circuits (Schatz Energy Lab, 2005).

Prior to May 2017, the portions of Humboldt County on the PG&E electrical grid received electricity from the PG&E power mix. This included electricity produced at the PG&E Humboldt Bay Generating Station (HBGS), which is located just south of the City of Eureka along Humboldt Bay. The HBGS began commercial operation in 2010 and normally runs on natural gas, with ultra-low sulfur diesel as its backup fuel. The HBGS is 33 percent more efficient than the previous Humboldt Bay Power Plant (HBPP) fossil fuel units (PG&E, 2020).

Beginning in May 2017, electricity service for the City of Arcata was transitioned to the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program. The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce greenhouse gas emissions, and reinvest in local energy infrastructure. The electricity continues to be distributed and delivered through the existing PG&E electrical grid. The CCE program currently procures approximately 47% of its power from renewable and carbon-free sources (RCEA, 2020). The proposed project will be automatically enrolled in the RCEA CCE program and will contribute towards increasing the amount of renewable power placed on California's grid.

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

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

Construction

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

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

Operation

The proposed project will involve the continued operation of athletic facilities during daytime hours, which will occur on an intermittent basis and do not have the potential to result in significant energy use. During operation of the proposed project, energy from the RCEA CCE program would be used for facility lighting, scoreboard, and public address (PA) system operation, restroom and concessions appliances, and landscape irrigation. The CCE program procures approximately 47% of its power from renewable sources (RCEA, 2020). Operational energy use will also be in the form of fuel consumption for facility maintenance and operation of motor vehicles traveling to and from the facility for practice and athletic events. Fuel consumption will occur on an intermittent basis and is not anticipated to result in significant energy use above the existing baseline condition. In addition, it is anticipated that the project would result in a reduction in vehicle miles traveled (VMT) since it would provide a centralized location in the City of Arcata for existing athletic events.

The multi-use building (i.e. storage, restroom, and concessions) proposed by the project would be required to comply with Title 24 Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations), which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. It has generally been the presumption throughout the State of California that compliance with Title 24 (as well as compliance with the federal and state regulations) ensures that projects will not result in the inefficient, wasteful, and unnecessary consumption of energy.

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

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

The project proposes improvements to existing athletic fields that are used during daytime hours on an intermittent basis. This is not a type of project that would have the potential to conflict with or obstruct state or local plans for renewable energy or energy efficiency. Instead, the project will be consistent with plans for renewable energy or energy efficiency since it will receive electricity from a CCE program with a power mix containing 47% renewable energy sources, will be required to comply with the Title 24 Building Energy Efficiency Standards, and will result in reduced VMT by providing a centralized location to hold existing athletic events.

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

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. Arcata is located within the Coast Ranges Geomorphic Province of California, which is characterized by subparallel north- to northwest-trending mountain ranges and intermountain and coastal alluvial valleys and plains. Topography in the province is controlled by the predominant geological structural trends within the Coast Range that generally consist of northwest trending synclines, anticlines, and faulted blocks.

The center of project site is relatively flat and developed with two athletic fields. Elevations rise steeply on the north, east, and south sides of the project site, shaping the site into a basin that drains to the west. The project site is located in a narrow alluvial plain associated with Jolly Giant Creek. Jolly Giant Creek flows through a culvert approximately 10 feet beneath the surface of the project site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

Subsurface investigations of the project site indicate that the site is underlain by a layer of fine-grained, poorly drained fill soils that were placed in the past to develop the site. These soils have high water retention capacity and tend to be weak and soft when wet. They have poor infiltration capacity, and therefore tend to slowly transmit rainfall and remain wet for long periods. Subsurface materials encountered at the site during this investigation, as well as previous investigations, consist of varying thicknesses of fill overlying native soils that were previously placed in the past to develop the site to its existing condition (SHN, 2018; 2019b).

The project site is in an area characterized as relatively stable, with the potential for liquefaction (Humboldt County, 2020). According to the California Department of Conservation, the project site is underlain by a geologic formation described as “marine and nonmarine

(continental) sedimentary rocks (Pleistocene-Holocene) - Alluvium, lake, playa, and terrace deposits; unconsolidated and semi-consolidated. Mostly nonmarine but includes marine deposits near the coast" (DOC, 2010).

Due to the dynamic crustal deformation near the Mendocino Triple Junction, there is a high level of seismicity in the north coast region of California, which is the most seismically active region in the continental United States. The project site lies within the broad Mad River fault zone, which consists of a series of northwest-trending, northeast-dipping thrust faults that extend from Arcata to Trinidad. The project site is transected by the northern trace of the Fickle Hill fault (City of Arcata, 2020). However, this Fickle Hill fault trace is not identified as an Alquist-Priolo fault. Thorough investigation of the northern trace found no evidence of Holocene surface fault rupture, indicating the potential of surface fault rupture from this fault trace is extremely low (SHN, 2019d).

The project site is located approximately 1,140 feet northeast of the nearest Alquist-Priolo fault (DOC, 1983). Because many active faults are complex and consist of more than one branch, each earthquake fault zone extends approximately 200 to 500 feet on either side of the mapped fault trace. The project site is approximately 580 feet northeast of the Alquist-Priolo Fault Zone boundary that surrounds this particular fault trace.

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

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

Seismically-induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. The magnitude and nature of fault rupture can vary for different faults or even along different strands of the same fault. Surface rupture can damage or collapse buildings, cause severe damage to roads and pavement structures, and cause failure of overhead as well as underground utilities.

The project site is approximately 1,140 feet northeast of the Fickle Hill Fault, and approximately 580 feet northeast of the Alquist-Priolo Fault Zone boundary that surrounds the Fickle Hill Fault (Humboldt County, 2020). The project site is also transected by the northern trace of the Fickle Hill fault (City of Arcata, 2020). However, the northern trace is not classified as an Alquist-Priolo fault. Thorough investigation of the northern trace found no evidence of Holocene surface fault rupture, indicating the potential of surface fault rupture from this fault trace is extremely low (SHN, 2019d). Since the project area is not traversed by a known active fault and is not within 200 feet of an active fault trace, surface fault rupture is not considered to be a significant hazard for the project site.

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

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

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

The project site is currently developed as an outdoor athletic facility and would continue to function as such under the proposed project. Structures associated with the proposed project are limited to two football goal posts, two score boards (eastern and western fields, respectively), and a multi-use building (i.e. storage, restroom, and concessions). No structures that would allow long-term habitation (e.g., residences, hospitals, etc.) are proposed by the project. The site will primarily be used for outdoor athletic activities with intermittent use of the multi-use building.

The State of California provides minimum standards for building design through the California Building Code (CBC). Where no other building codes apply, CBC Chapter 29 regulates excavation, foundations, and retaining walls. The CBC applies to building design and construction in the State and is based on the federal Uniform Building Code (UBC) used widely throughout the country. The CBC has been modified for California conditions with numerous more detailed and/or more stringent regulations.

Specific minimum seismic safety and structural design requirements are set forth in CBC Chapter 16. The Code identifies seismic factors that must be considered in structural design.

Regional and site-specific conditions of the project site were examined by SHN in preparation of a Geotechnical Investigation. The Geotechnical Investigation provides recommendations relating to the design and construction of the proposed project. Based on the results of the Geotechnical Investigation, the project site is determined to be suitable for construction of the proposed project, provided all site-specific recommendations are incorporated into the project design and construction. Therefore, adherence to the recommendations of the Geotechnical Investigation shall be required as **Mitigation Measure GEO-1** to minimize potential risks from strong seismic ground shaking (SHN, 2018; 2019b).

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

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

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

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

Design and construction of the project would incorporate appropriate engineering practices to ensure seismic stability as required by the CBC. In addition, the proposed project shall adhere to the recommendations of the Geotechnical Investigation relating to the design and construction of the proposed project (SHN, 2018; 2019b). This requirement has been included as **Mitigation Measure GEO-1** to minimize potential risks from seismic hazards.

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

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

Slope failures, commonly referred to as landslides, include many phenomena that involve the downslope displacement and movement of material, either triggered by static (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 youthful and steep topography of the coast range is known for its potential for landslides.

The project site is currently developed as an outdoor athletic facility and would continue to function as such under the proposed project. Elevations are primarily flat within the center of the project site, with elevations rising steeply on the north, east, and south sides of the site, shaping the site into a basin. The majority of surface and subsurface disturbances associated with construction of the proposed project will occur within the footprint of the existing athletic fields. The slopes to the north, east, and south will remain undisturbed throughout construction and operation of the proposed project. There are no documented on- or offsite landslide hazard areas identified within the project site or the immediate vicinity.

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

b) *Result in substantial soil erosion or the loss of topsoil?* Less-Than-Significant Impact

The project site is currently developed as an outdoor athletic facility and would continue to function as such under the proposed project. Elevations are primarily flat within the center of the project site, with elevations rising steeply on the north, east, and south sides of the site, shaping the site into a basin.

Construction
The majority of surface and subsurface disturbances associated with construction of the proposed project will occur within the footprint of the existing athletic fields. The slopes to the north, east, and south will remain undisturbed throughout construction of the proposed project. In addition, the project does not involve the removal of any vegetation outside of the project footprint that could result in erosion.

Construction of the proposed project will be subject to the SWRCB's Construction General Permit (CGP). The CGP requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD) and incorporation of BMPs for construction, including site housekeeping practices, erosion control, inspections, maintenance, worker training in pollution prevention measures (see Section X [Hydrology and Water Quality]). Therefore, the risk of soil erosion during construction of the proposed project is minimal.

Operation
The proposed project, which involves the continued operation of athletic facilities, is not of the nature to cause substantial erosion or loss of topsoil. As described in the Stormwater Control Plan prepared for the project (SHN, 2020a), the proposed project incorporates various site design measures and low impact development (LID) features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces. These improvements will capture runoff from proposed impervious surfaces and sources of stormwater discharge in order to improve drainage on the athletic playing fields, reduce impacts to water quality, and ensure the rate of post- construction runoff does not exceed pre-construction runoff. In addition to these benefits, the proposed stormwater improvements will minimize the potential for soil erosion during project operation.

For the reasons explained above, it has been determined the proposed project will not result in substantial soil erosion or the loss of topsoil. Therefore, the proposed project would result in a less-than-significant impact.

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

The project site is currently developed as an outdoor athletic facility and would continue to function as such under the proposed project. Elevations are primarily flat within the center of the project site, with elevations rising steeply on the north, east, and south sides of the site, shaping the site into a basin. According to the Humboldt County GIS system, the project site is located in an area characterized as relatively stable, and an area of potential liquefaction (Humboldt County, 2020). There are no documented on- or offsite landslide hazard areas identified within the project site or the immediate vicinity.

Design and construction of the project would incorporate appropriate engineering practices to ensure seismic stability as required by the CBC. In addition, the proposed project shall adhere to the recommendations of the Geotechnical Investigation relating to the design and construction of the proposed project (SHN, 2018; 2019b). This requirement has been included as **Mitigation Measure GEO-1** to minimize potential risks from geologic hazards, including in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.

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

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

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

The Geotechnical Investigation prepared for the project indicates the site is underlain by a layer of fine-grained, poorly drained fill soils. Subsurface materials encountered at the site during this investigation, as well as previous investigations, consist of varying thicknesses of fill overlying native soils that were previously placed in the past to develop the site in its existing condition (SHN, 2018; 2019b). Due to the soil conditions at the site, much of the existing fill soils will be removed and replaced with engineered fill materials that are suitable for the proposed improvements to the athletic fields and structures. The recommendations for replacing existing substandard fill soils at the site are detailed in the Geotechnical Investigation (SHN, 2018; 2019b) and have been included as **Mitigation Measure GEO-1**.

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

e) *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?* No Impact

Consistent with the recommendations of the Geotechnical Investigation prepared for the project, the project does not propose the construction or operation of septic systems or alternative wastewater disposal systems due to unsuitable subsurface conditions (SHN, 2018). Therefore, the proposed restroom facilities at the site would be connected to the City of Arcata's wastewater system.

For the reasons explained above, it has been determined the proposed project will not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, the proposed project would have no impact on this resource category.

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

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

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

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

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

GEO-1: Adherence to all project specific recommendations in the SHN Geotechnical Investigation (2018; Section 5.0, pgs. 5-14) and SHN Updated and Additional Geotechnical Recommendations (2019b), shall be required during design and construction of the proposed project.

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs.

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

- Carbon dioxide (CO_2), primarily a byproduct of fossil fuel combustion in stationary and mobile sources;
- Nitrous oxide (N_2O), a byproduct of fuel combustion and also associated with agricultural operations such as the fertilization of crops;
- Methane (CH_4), commonly created by off-gassing from agricultural practices (e.g., livestock), wastewater treatment, and landfill operations;
- Chlorofluorocarbons (CFCs), which were used as refrigerants, propellants, and cleaning solvents, although their production has been mostly prohibited by international treaty;
- Hydrofluorocarbons (HFCs), which are now widely used as a substitute for chlorofluorocarbons in refrigeration and cooling; and
- Perfluorocarbons (PFCs) and sulfur hexafluoride (SF6) emissions, which are commonly created by industries such as aluminum production and semiconductor manufacturing.

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

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

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

It is noted that CARB announced in July 2018, that the State has already met the AB 32 goal of reducing emissions to 1990 levels by 2020 approximately four years early (CARB, 2018a). As stated in the Executive Summary of the 2018 Edition of the California Greenhouse Gas Emissions Inventory: 2000-2016:

"The inventory for 2016 shows that California's GHG emissions continue to decrease, a trend observed since 2007. In 2016, emissions from routine GHG emitting activities statewide were 429 million metric tons of CO_2 equivalent ($MMTCO_2e$), 12 $MMTCO_2e$ lower than 2015 levels. This puts total emissions just below the 2020 target of 431 million metric tons. Emissions vary from year-to-year depending on the weather and other factors, but California will continue to implement its greenhouse gas reductions program to ensure the state remains on track to meet its climate targets in 2020 and beyond."

The NHUHSD has not adopted quantitative thresholds for determining the significance of GHG emissions, nor has the District adopted a qualified plan, policy, or regulation to reduce emissions that qualifies for tiering in CEQA documents (per State CEQA Guidelines Section 15183.5(a)). The City of Arcata adopted a Community Greenhouse Gas Reduction Plan in August 2006 that identifies measures to meet GHG reduction targets for 2020. However, the City's Community Greenhouse Gas Reduction Plan does not include emissions reduction strategies applicable to NHUHSD and AHS operations.

The project site is located in the NCAB and is under the jurisdiction of the NCUAQMD. The NCUAQMD has also not adopted quantitative thresholds for determining the significance of GHG emissions, nor has the NCUAQMD adopted a qualified plan, policy, or regulation to reduce emissions that qualifies for tiering in CEQA documents (per State CEQA Guidelines Section 15183.5(a)) (NCUAQMD, 2020). In the absence of quantitative thresholds or a Climate Action Plan from NHUHSD, City of Arcata, or NCUAQMD, thresholds and guidance adopted by other air districts in the State are used for the purposes of this analysis.

In the NCAB, the closest air district to the proposed project that has adopted GHG significance thresholds is the Mendocino County Air Quality Management District (MCAQMD). MCAQMD has adopted an operational emissions threshold of 1,100 metric tons of CO_2e per year ($MTCO_2e$/yr) (MCAQMD, 2010). This threshold is also recommended for use by the BAAQMD and the SMAQMD. The SMAQMD also recommends use of this threshold for analyzing GHG emissions from construction activity. This threshold was developed to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32, SB 32, the Scoping Plan, and Executive Orders (SMAQMD, 2018). As such, this threshold has been adopted for use in the NCAB and is one of the most used thresholds in the State for analyzing the potential impacts of construction and operational GHG emissions. For the reasons noted above, the threshold of 1,100 $MTCO_2e$/yr is used to evaluate the proposed project's construction and operational GHG emissions. If the threshold is exceeded, then the project would have a cumulatively considerable contribution to a significant cumulative environmental impact and would conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions.

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

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The majority of the proposed project will occur within the footprint of the existing athletic fields. The proposed project would generate both direct and indirect GHG emissions. Direct GHG emissions include emissions from construction activities, area sources, and mobile (vehicle) sources. Indirect GHG emissions include emissions from energy consumption, solid waste, and water demand. Project construction activities would result in a temporary increase in GHG emissions, including exhaust emissions from on-road haul trucks, worker commute vehicles, and off-road heavy-duty equipment. Project operation would result in an increase in GHG, including exhaust emissions from employee, student, and parent trips, as well as from energy consumption, solid waste, and water demand.

The BAAQMD has developed project screening criteria to provide lead agencies and project applicants with a conservative indication of whether operation of a project could result in potentially significant impacts related to GHG emissions. Projects below the applicable screening criteria would not exceed the threshold of 1,100 $MTCO_2e$/yr adopted by the BAAQMD, SMAQMD, and MCAQMD. The BAAQMD screening criteria includes a "city park" category (BAAQMD, 2017). Much like a city park, the proposed project will function as an outdoor recreational space, and provide outdoor athletic and recreation opportunities for students, parents, and community members. Furthermore, the proposed project bears resemblance to a city park by providing public visitation appurtenances and infrastructure, such as restrooms, drive aisles, parking spaces, and walkways. Therefore, for the purpose of this analysis, the proposed project is compared to the BAAQMD operational screening criteria for a "city park". As shown in Table 5, the proposed project is well below the BAAQMD screening project size for operation of a "city park". Due to the fact that the proposed project is well below the operational screening criteria size (600 acres), it is conservatively estimated that GHG emissions from construction activity would also be well below the 1,100 $MTCO_2e$/yr threshold. Therefore, construction and

operation of the proposed improvements to the AHS athletic fields would not generate GHG emissions that would result in a cumulatively considerable contribution to a significant cumulative environmental impact.

Table 5. BAAQMD GHG Emissions Screening Criteria

Land Use Type	Operational Screening Size	Project Size
City Park	600 acres	7.9 acres
Source: BAAQMD, 2017		

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

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

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

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

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

As discussed above, GHG emissions from construction and operation of the proposed project would be well below the threshold of significance adopted by the BAAQMD, SMAQMD, and MCAQMD (1,100 $MTCO_2e/yr$) for determining the significance of GHG emissions. This threshold was developed to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32, SB 32, the Scoping Plan, and Executive Orders (SMAQMD, 2018). In addition, the project will be consistent with plans for reducing GHG emissions since it will receive electricity from a Community Choice Energy program with a power mix containing 47% renewable energy sources, will be required to comply with the Title 24 Building Energy Efficiency Standards, and will result in reduced VMT by providing a centralized location to hold existing athletic events.

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

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years. The athletic field surfaces are managed by AHS groundskeepers by conducting regular mowing, irrigating, sports striping, weeding, fertilizing, and gopher trapping. Pesticides and herbicides are applied to the athletic field surfaces by AHS groundskeepers in adherence to warning labels and storage recommendations from the individual manufacturers. AHS groundskeepers clean and maintain existing structures, equipment, and restrooms with use of commercially available paints, solvents, and cleaning products. These products are used in adherence to warning labels and storage recommendations from the individual manufacturers.

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

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

Land uses that are considered sensitive receptors typically include residences, schools, parks, childcare centers, hospitals, convalescent homes, and retirement homes. Sensitive receptors (e.g., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effect of air pollution than the general population. The nearest known potential sensitive receptor to the proposed project includes the Woodridge Apartments (>35 ft.). Other sensitive receptors in the vicinity of the proposed project include, but are not limited to, Arcata Skate Park (>50 ft. north), Sunset Terrance Apartments (>135 ft.), residences to the north (> 210 ft.), Larson Park (>235 ft.), the Arcata High School main campus (>350 ft.), Arcata Elementary School (>710 ft.), and the Lower Twin Parks Apartments (>745 ft.).

The Humboldt County Public Works Department operates six county airports. Airports nearest the project site include the Murray Field (~5.4 mi.), the California Redwood Coast-Humboldt County Airport (~.9 mi.), and the Kneeland Airport (~13.7 mi.). The proposed project site and surrounding area are characterized by features typical of an urban landscape.

The project site is not identified in any fire hazard severity zone maps. Fire prevention, fire protection, and emergency medical services in the project area are provided by the Arcata Fire District. The nearest fire station to the site is the Arcata Fire Station at 631 9th Street, located approximately one mile to the south of the project site. The Mad River Fire Station is also located at 3235 Janes Road, approximately 2.7 miles to the north of the project site.

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

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

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

Construction

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

Operation

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

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

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

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

Construction

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

application practices, it is unlikely that any hazardous materials used during construction activity would be released in a manner that would create a significant hazard to the public or the environment.

Operation

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

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

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

The project site is currently developed as an outdoor athletics facility for Arcata High School and would continue to function as such under the proposed project. This is not a type of land use that generally would emit hazardous emissions or handle significant quantities of hazardous or acutely hazardous materials, substances, or waste. Schools within one-quarter mile of the project site include the AHS main campus (0.1 mi.) and Arcata Elementary School (0.18 mi.).

Construction

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

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

Operation

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

For the reasons explained above, it has been determined the proposed project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?* No Impact

The State's Hazardous Waste and Substances Sites List (Cortese List, Government Code Section 65962.5) identifies sites with leaking underground fuel tanks, hazardous waste facilities subject to corrective actions, solid waste disposal facilities from which there is a known migration of hazardous waste, and other sites where environmental releases have occurred. According to review of the information available on the SWRCB Geotracker and the DTSC Envirostor websites, the project site is not identified as containing

hazardous materials contamination or the storage of hazardous materials (DTSC, 2020) and is not identified as containing a leaking underground storage tank site or another cleanup site (SWRCB, 2020). There are no other known sites containing hazardous materials contamination in the project area that would have the potential to impact the project site.

For the reasons explained above, it has been determined the proposed project will not 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 create a significant hazard to the public or the environment. Therefore, the proposed project will have no impact on this resource category.

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

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Public Airports nearest the project site include the Murray Field (~5.4 mi.), the California Redwood Coast-Humboldt County Airport (~6.9 mi.), and the Kneeland Airport (~13.7 mi.).

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. This type of project is not of the nature to substantially impact emergency response or evacuation.

The project site is accessible from an existing gravel access road, by way of Sunset Avenue or the AHS main campus. The primary access for the project site is from Sunset Avenue, which is narrow and provides limited maneuverability for emergency vehicles. The project proposes a new 24-foot wide paved driveway/entrance from Sunset Avenue to facilitate simultaneous and safe ingress and egress, significantly improving the existing access to the site. In addition, the project proposes onsite parking and a drop-off/turnaround area for vehicles. The proposed drive aisles and parking facilities will be designed to meet emergency access standards and accommodate the onsite maneuvering of emergency vehicles. As such, the proposed project will provide improved emergency access to the project site compared to existing conditions.

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

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

As noted in the Hazards and Hazardous Materials Setting, the project site is not identified in any fire hazard severity zone maps. As discussed in Section 20 (Wildfire), the proposed project is not of the nature to exacerbate or expose people/structures to wildland fires. As such, the proposed project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site is 3.7 miles east of the Pacific Ocean (see Figure 1). The project site is situated between approximately 32- and 40-foot above mean sea level, with the highest elevations located towards the eastern end of the site and the lowest elevation towards the western end of the site.

The project site is located in the Eureka Plain Hydrologic Unit, Humboldt Bay Watershed, and North Coast Region. The North Coast Regional Water Quality Control Board (NCRWQCB) adopts and implements the Water Quality Control Plan (Basin Plan) for the North Coast Region, which identifies beneficial uses and recognizes water quality problems unique to the region.

The project site is located in the Mad River Groundwater Basin and Mad River Lowland Sub-basin (Basin No. 1-8.01). The approximately 24,600-acre groundwater basin is bounded by Arcata Bay to the south, the Mad River to the north, and mountains of the Jurassic and Cretaceous Franciscan Formation to the east (Department of Water Resources [DWR], 2004). The DWR has ranked the Mad River Lowland Sub-basin as a "Very Low" priority because of the condition of the basin and the minimal risk of overdraft and other impacts (DWR, 2019).

Flood zones are geographic areas that the Federal Emergency Management Agency (FEMA) has defined according to varying levels of flood risk. These zones are depicted on a community's Flood Insurance Rate Map (FIRM). Each flood zone reflects the anticipated type of flooding in the area. According to FIRM Panel 06023C0689F, the project site is located in an area of minimal flood hazard, (Zone X) (FEMA, 2016).

The center of the project site is predominantly flat with elevations rising steeply on the northern, eastern, and southern edges of the site, shaping the project site into a basin. The athletic fields and surrounding slopes flow towards drainage ditches on the southern, eastern, and northern edges of the site, which ultimately drain to Jolly Giant Creek. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park. An existing storm drain vault beneath the project site connects the existing stormwater system to the culverted portion of Jolly Giant Creek. Jolly Giant Creek has been listed as impaired for indicator bacteria. As discussed in Section IV (Biological Resources), the site also contains wetlands, which primarily occur adjacent to the drainage ditch on the southern portion of the site.

The existing drainage system at the site was installed during the development of the existing field with varying amounts of water conveyance. The drainage system lies underneath the sports field, ranging from approximately one to three feet below grade, as evidenced by 23 DIs dispersed across the field. Additional DIs may be present within tall, unmanaged vegetation along the southern boundary of the field. Subsidence from soil compaction and organic matter oxidation has led to elevated DIs, causing water to pool before reaching the drainage system, creating a wetter condition than that which was present when the drainage system was constructed (SHN, 2019c).

Natural turf surfaces at the site are managed by AHS groundskeepers by conducting mowing, irrigating, fertilizing, sports striping, weeding, and gopher trapping. Irrigation water is withdrawn from an existing groundwater well along the western boundary of the project site. Irrigation is conducted approximately 3 days per week, depending on weather conditions. A subsurface PVC pipe irrigation system lies above the drainage system, approximately one-foot below ground surface across the footprint of the athletic fields. Twenty valves serve 160 irrigation sprinkler heads across the two fields (SHN, 2019c).

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

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

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

The surface water features on the project site include drainage ditches on the southern, eastern, and northern property boundaries of the site, which ultimately drain to Jolly Giant Creek. There are also wetland areas, which primarily occur adjacent to the drainage ditch on the southern portion of the site. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park. Water quality in the Jolly Giant Creek watershed is influenced by stormwater runoff from a variety of land uses in the City of Arcata. Jolly Giant Creek is listed as impaired for indicator bacteria.

Construction

Construction of the proposed project at the site will require demolition, site preparation, grading, athletic surface and building construction, trenching, paving, architectural coating, and landscaping, which has the potential to result in water quality pollutants such as silt, debris, chemicals, paints, and other solvents. The release of such pollutants would adversely affect water quality. In addition, stormwater discharge may include debris, particulate, and petroleum hydrocarbons as a result of improper storage of construction materials, improper disposal of construction wastes, discharges resulting from construction dewatering activities, and spilled petroleum products. As such, short-term water quality impacts have the potential to occur during construction of the proposed project in the absence of any protective and avoidance measures.

However, protective and avoidance measures shall be implemented during construction of the proposed project pursuant to the requirements of the SWRCB CGP. A CGP is required for all projects that include construction activities and/or excavation that would disturb at least one acre of total land area. The SWRCB CGP will require the preparation of a SWPPP which documents the stormwater dynamics at the site, the BMPs and water quality protection measures that are used, and the frequency of inspections. 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. Implementation of the SWPPP will ensure that water quality is protected during construction activities. Adherence to the SWRCB regulatory requirements of the CGP shall ensure construction of the proposed project will not result in substantial degradation of surface or ground water quality.

Operation

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The proposed project would not involve the use of septic systems or alternative wastewater disposal systems. The project site currently contains an onsite wastewater treatment system (OWTS) that is used for the restrooms in the maintenance/restroom building at the site. This system is proposed to be removed and the proposed multi-use building (concessions, restrooms, and storage) at the site would be connected to the City of Arcata's wastewater system. Removal of the existing OWTS would improve water quality in the Jolly Giant Creek watershed by eliminating an existing bacterial source.

The City of Arcata is required to adhere to the discharge requirements of the NCRWQCB for its wastewater treatment plant. Since the early 2000s, there have been ongoing exceedances of the discharge limits for the plant. The City is planning improvements to the plant in the near future to prevent further exceedances. Due to the limited facilities proposed for the site (i.e., one building with restrooms and a small concessions booth), the intermittent use that will occur, and the limited use of the site during the rainy season when inflows to the wastewater treatment system are the highest, the wastewater discharge from the project would be minimal and would not have the potential to significantly impact the City's wastewater treatment system and contribute to violations of waste discharge requirements.

The proposed project will result in 2.1 acres of impervious surfaces. The increase in development and impervious surfaces as a result of the proposed project, and the associated increase in stormwater runoff, will likely increase the presence of sediment and urban pollutants in stormwater runoff. Stormwater that comes into contact with driveways, parking lots, and roadways is the primary pollutant source in runoff. Gasoline, grease, oil, and their constituents such as benzene and toluene, are commonly released through auto emissions, spills, leaks, gasoline tanks, oil pans, and crankcases. Lead, zinc, pyrene and other metals and hydrocarbons are components of asphalt and tires, which degrade over time and release their constituents to stormwater. Brake linings and clutch facings may wear, releasing copper and possibly asbestos. Landscaped areas may contribute hydrocarbons and pesticides, such as herbicides, insecticides, and fungicides, to stormwater runoff. Landscaping fertilizer contains nutrients, particularly nitrogen, potassium, and phosphorous. The unpaved, landscaped areas may also be a source of sediment and organic debris in stormwater. Weathering of buildings over time releases building material constituents. Heavy metals, particularly copper, lead, zinc, and chromium are released from flashings, shingles, gutters and downspouts, galvanized pipes, and metal plating. Paints and other wood preservatives may also contain hydrocarbons.

As currently happens at the site, fertilizer and pesticide application will occur in adherence to the specifications of the individual manufacturers to minimize potential degradation of surface and groundwater quality. Adverse impacts to water quality from stormwater runoff potentially containing various pollutants will be avoided through the installation of new site design measures and LID features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces. These stormwater features will capture, treat, and infiltrate runoff from new impervious surfaces, such as structures, pedestrian walkways, vehicle access routes, and parking spaces. The location and design of the proposed stormwater features are detailed in the Stormwater Control Plan prepared for the project (SHN, 2020a). The recommendations in the Stormwater Control Plan related to the design of the stormwater system have been included as **Mitigation Measure HWQ-1**. In addition, the project proposes to enhance the overall drainage condition of athletic surfaces by redesigning the existing drainage system underlying the athletic fields. The proposed stormwater and drainage improvements will reduce the volume and rate of runoff and provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions.

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

b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?* Less-Than-Significant Impact

As noted above, the proposed project will result in 2.1 acres of new impervious surfaces and includes several new site design measures and LID features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces (SHN, 2020a). In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. These stormwater and drainage improvements will result in improved infiltration capacity and have the potential to improve groundwater recharge at the site.

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. During operation of the proposed project, athletic surfaces will continue to be irrigated with water from an existing groundwater well along the western boundary of the site. The existing well house and controls will be relocated and

reconfigured to accommodate the improvement of the proposed athletic fields, but no expansion of the existing well and no additional wells are proposed. Irrigation will occur similar to the existing use and baseline condition.

Domestic water service (e.g., drinking fountains, restrooms, etc.) and fire protection (i.e., fire hydrant) will be provided to the proposed project by the City of Arcata, which receives water from HBMWD. A series of ranney wells maintained and operated by HBMWD withdraw groundwater from below the bed of the Mad River. Both the existing well on the project site and HBMWD ranney wells are located in the Mad River Groundwater Basin, which consists of two sub-basins; Mad River Lowland Sub-basin (1-8.01) and Dows Prairie Sub-basin (1-8.02). The California Department of Water Resources (DWR) has ranked both sub-basins as "Very Low" priority groundwater basins indicating that neither groundwater sub-basin is at risk of overdraft. As such, the proposed project will not interfere with the implementation of a sustainable groundwater management plan (DWR, 2019).

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

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

The surface water features on the project site include drainage ditches on the southern, eastern, and northern property boundaries of the site, which ultimately drain to Jolly Giant Creek. There are also wetland areas, which primarily occur adjacent to the drainage ditch on the southern portion of the site. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

Construction

Construction of the proposed project at the site will require demolition, site preparation, grading, and trenching, which has the potential to contribute to on- or offsite erosion and siltation. However, protective and avoidance measures shall be implemented during construction of the proposed project pursuant to the requirements of the SWRCB CGP. A CGP is required for all projects that include construction activities and/or excavation that would disturb at least one acre of total land area. The SWRCB CGP will require the preparation of a SWPPP, which documents the stormwater dynamics at the site, the BMPs and water quality protection measures that are used, and the frequency of inspections. Adherence to the SWRCB regulatory requirements shall ensure construction of the proposed project will not result in substantial erosion or siltation on- or offsite.

Operation

The proposed project has been designed to avoid impacts to the surface water features on the project site (i.e., Jolly Giant Creek, drainage ditches, and wetlands) and would, therefore, not alter the course of a stream or river. As noted above, the proposed project will result in 2.1 acres of new impervious surfaces, which has the potential to result in increased stormwater runoff and on- or offsite erosion and siltation. As discussed in the Stormwater Control Plan prepared for the project (SHN, 2020a), the proposed stormwater system will be designed consistent with the requirements of the Humboldt Low Impact Development Stormwater Manual to manage post-construction stormwater runoff through several new site design measures and LID features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces. The recommendations in the Stormwater Control Plan related to the design of the stormwater system have been included as **Mitigation Measure HWQ-1**. In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. This will include the following drainage improvements: 1) raising the finished grade of the athletic fields by approximately one foot; 2) installing a rock/drain layer beneath the football/soccer field within the track and beneath the outfield of the baseball field; and 3) installing a sand channel drainage system at the surface of the football/soccer field and the outfield of the baseball field (SHN, 2020a). These stormwater and drainage improvements will reduce the volume and rate of runoff and provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions. As such, the additional impervious surface proposed by the project would not result in substantial erosion or siltation on- or offsite.

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

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

The surface water features on the project site include drainage ditches on the southern, eastern, and northern property boundaries of the site, which ultimately drain to Jolly Giant Creek. There are also wetland areas, which primarily occur adjacent to the drainage ditch on the southern portion of the site. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

The proposed project has been designed to avoid impacts to the surface water features on the project site (i.e., Jolly Giant Creek, drainage ditches, and wetlands) and would, therefore, not alter the course of a stream or river. As noted above, the proposed project will result in 2.1 acres of new impervious surfaces, which has the potential to increase the rate or amount of stormwater runoff and result in flooding on- or offsite. During operation of the proposed project, increased volume and speed of runoff could cause runoff to reach downstream areas sooner and coincide more closely with the peak of runoff from lower areas; the effect, along with that of higher runoff, could be increased flood flows.

As discussed in the Stormwater Control Plan prepared for the project (SHN, 2020a), the proposed stormwater system will be designed consistent with the requirements of the Humboldt Low Impact Development Stormwater Manual to manage post-construction stormwater runoff through several new site design measures and LID features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces. The recommendations in the Stormwater Control Plan related to the design of the stormwater system have been included as **Mitigation Measure HWQ-1**. In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. This will include the following drainage improvements: 1) raising the finished grade of the athletic fields by approximately one foot; 2) installing a rock/drain layer beneath the football/soccer field within the track and beneath the outfield of the baseball field; and 3) installing a sand channel drainage system at the surface of the football/soccer field and the outfield of the baseball field (SHN, 2020a). These stormwater and drainage improvements will reduce the volume and rate of runoff and provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions. As concluded in the Stormwater Control Plan (SHN, 2020a), the peak discharge for the 2-year, 24-hour storm will be lower under the post-project condition (0.79 cfs) than it is under the pre-project condition (1.53 cfs). As such, the additional impervious surface proposed by the project would not result in flooding on- or offsite.

With the implementation of **Mitigation Measure HWQ-1** and for the reasons explained above, it has been determined the proposed project will not substantially alter the existing drainage pattern of the site or area, through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

The surface water features on the project site include drainage ditches on the southern, eastern, and northern property boundaries of the site, which ultimately drain to Jolly Giant Creek. There are also wetland areas, which primarily occur adjacent to the drainage ditch on the southern portion of the site. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

The proposed project has been designed to avoid impacts to the surface water features on the project site (i.e., Jolly Giant Creek, drainage ditches, and wetlands) and would, therefore, not alter the course of a stream or river. As noted above, the proposed project will result in 2.1 acres of new impervious surfaces, which has the potential to increase the rate or amount of stormwater runoff and provide additional sources of polluted runoff. As discussed in the Stormwater Control Plan prepared for the project (SHN, 2020a), the proposed stormwater system will be designed consistent with the requirements of the Humboldt Low Impact Development Stormwater Manual to manage post-construction stormwater runoff through several new site design measures and LID features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces. The recommendations in the Stormwater Control Plan related to the design of the stormwater

system have been included as **Mitigation Measure HWQ-1**. In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. This will include the following drainage improvements: 1) raising the finished grade of the athletic fields by approximately one foot; 2) installing a rock/drain layer beneath the football/soccer field within the track and beneath the outfield of the baseball field; and 3) installing a sand channel drainage system at the surface of the football/soccer field and the outfield of the baseball field (SHN, 2020a). These stormwater and drainage improvements will reduce the volume and rate of runoff and provide for greater infiltration, evaporation, and runoff quality treatment relative to existing conditions. As concluded in the Stormwater Control Plan (SHN, 2020a), the peak discharge for the 2-year, 24-hour storm will be lower under the post-project condition (0.79 cfs) than it is under the pre-project condition (1.53 cfs). As such, the additional impervious surface proposed by the project would not exceed the capacity of the existing and proposed stormwater drainage system or provide substantial additional sources of polluted runoff.

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

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

The proposed project has been designed to avoid impacts to the surface water features on the project site (i.e., Jolly Giant Creek, drainage ditches, and wetlands) and would, therefore, not alter the course of a stream or river. According to FIRM Panel 06023C0689F, the project site is located in an area of minimal flood hazard (Zone X) (FEMA, 2016). In addition, the project proposes very few structures that would have the potential to alter flood flows (e.g., multi-use building, well house, batting cages, etc.). Therefore, the potential for the proposed project to impede or redirect flood flows is negligible. Although the project would result in 2.1 acres of new impervious surfaces, stormwater and drainage improvements are proposed by the project that would ensure that post-construction stormwater runoff will be less than pre-construction runoff.

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

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

According to FIRM Panel 06023C0689F, the project site is located in an area of minimal flood hazard (Zone X) (FEMA, 2016). FEMA defines Zone X as an area subject to inundation by the 0.2 percent annual chance (or 500-year) flood event. Therefore, the project site is not located within a 100-year flood hazard area.

Due to the known seismic activity in the Pacific Rim, a tsunami or seiche could impact Humboldt Bay. The last significant known tsunami to occur in Humboldt Bay was in 1964 as result of the Gulf of Alaska earthquake. It had a recorded maximum height of twelve feet on the inside of the north spit, with lower heights occurring along the waterfront areas. The March 11, 2011 Tsunami from the Japan earthquake had minimal effects in both North Humboldt Bay and the Mad River. It is expected that the impact of a tsunami on Humboldt Bay would primarily occur along the north and south spits and the King Salmon and Fields Landing areas, which are located directly across from the opening to Humboldt Bay. There are some areas of the City of Arcata, immediately adjacent to the bay, that are within a seiche or tsunami run-up zone as identified in the Planning Scenario in Humboldt and Del Norte Counties, California for a Great Earthquake on the Cascadia Subduction Zone (CGS, 1995). These areas have been designated Natural Resource by the City of Arcata and are located over one mile from the project site. In addition, the project site is 3.7 miles east of the Pacific Ocean (see Figure 1) and is situated between approximately 32 and 40 feet above mean sea level. Therefore, the project site is not located within a tsunami or seiche zone (CAL EMA, 2009).

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

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

Water Quality Control Plan

The project site is located in the Eureka Plain Hydrologic Unit, Humboldt Bay Watershed, and North Coast Region. NCRWQCB adopts and implements the Water Quality Control Plan (Basin Plan) for the North Coast Region which identifies beneficial uses and recognizes water quality problems unique to the region.

Construction of the proposed project requires grading, earthmoving, and stockpiling activities. Due to the extent of these activities (approximately 7.9 acres), construction of the proposed project will require compliance with the SWRCB CGP. Compliance with the CGP will require development and implementation of a SWPPP that would incorporate current BMPs for construction, including site housekeeping practices, erosion control, hazardous material storage, inspections, maintenance, worker training in pollution prevention measures, and secondary containment of releases to prevent pollutants from being carried offsite via runoff.

Jolly Giant Creek has been listed as impaired for indicator bacteria (e.g., E. Coli and fecal coliform). Typical sources of indicator bacteria and pathogens to a given water body include cattle pastures, septic systems, urban runoff, or wildlife areas. The project does not propose the construction or operation of these or other sources that will contribute indicator bacteria to Jolly Giant Creek. As discussed under subsection a), the project site currently contains an OWTS that is used for the restrooms in the maintenance/restroom building at the site. This system is proposed to be removed and the proposed multi-use building (concessions, restrooms, and storage) at the site would be connected to the City of Arcata's wastewater system. Removal of the existing OWTS would improve water quality in the Jolly Giant Creek watershed by eliminating an existing bacterial source.

Sustainable Groundwater Management Plan

As discussed under subsection b), the proposed project will result in 2.1 acres of new impervious surfaces and includes several new site design measures and LID features such as self-retaining areas, a bio-retention basin, soil quality improvement and maintenance, and alternative engineered hardscape surfaces (SHN, 2020a). In addition, the project proposes to enhance the overall drainage condition of the site by redesigning the existing drainage system underlying the athletic fields. These stormwater and drainage improvements will result in improved infiltration capacity and have the potential to improve groundwater recharge at the site.

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. During operation of the proposed project, athletic surfaces will continue to be irrigated with water from an existing groundwater well along the western boundary of the site. The existing well house and controls will be relocated and reconfigured to accommodate the improvement of the proposed athletic fields, but no expansion of the existing well and no additional wells are proposed. Irrigation will occur similar to the existing use and baseline condition. Domestic water service (e.g., drinking fountains, restrooms, etc.) and fire protection (i.e., fire hydrant) will be provided to the proposed project by the City of Arcata, which receives water from HBMWD. A series of ranney wells maintained and operated by HBMWD withdraw groundwater from below the bed of the Mad River. Both the existing well on the project site and HBMWD ranney wells are located in the Mad River Groundwater Basin, which consists of two sub-basins; Mad River Lowland Sub-basin (1-8.01) and Dows Prairie Sub-basin (1-8.02). DWR has ranked both sub-basins as "Very Low" priority groundwater basins indicating that neither groundwater sub-basin is at risk of overdraft. As such, the proposed project will not interfere with the implementation of a sustainable groundwater management plan (DWR, 2019).

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

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

HWQ-1: Adherence to all project specific recommendations in the SHN Stormwater Control Plan (2020a), or similarly effective measures, shall be required during design, construction, and operation of the proposed project.

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

Setting: The proposed project is located in the Sunset neighborhood in the City of Arcata and is below and adjacent to the AHS main campus. AHS is a part of the NHUHSD. AHS serves grades 9 – 12 and has approximately 889 students currently enrolled (CDE, 2018).

The project site contains an existing athletic facility and is designated and zoned Public Facility (PF) by the City of Arcata. The project site is bordered to the north by railroad tracks from the North Coast Railroad Authority, Arcata City Trail (part of Humboldt Bay Trail), Foster Avenue, a vacant lot, Sunset Terrace Apartments, and low-density residential neighborhoods. To the east, the project is bordered by Sunset Avenue, Woodridge Apartments, Arcata Skate Park, H Street, and US Highway 101. The project is bordered to the South by Woodridge Apartments, Greenwood Cemetery, and the AHS main campus. The southern slope remains a shrub-forest zone between the project site and the Greenwood Cemetery and AHS main campus, which are situated on top of the bluff to the south. To the west, the project is bordered by Shay Park, Jolly Giant Creek, and the Lower Twin Parks Apartments.

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

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

The proposed project is located in the Sunset neighborhood in the City of Arcata. The project site is currently developed as an outdoor athletics facility for Arcata High School and would continue to function as such under the proposed project. The proposed project would improve an existing athletic facility that is an integral part of the local community.

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

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. The project site is zoned PF by the City of Arcata, which is consistent with the existing and proposed use of the site. The proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD adopted Resolution 12/2019-20 on April 23, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements. However, the proposed project will be required to comply with the existing regulatory requirements of State and federal agencies. As discussed throughout this document, the project has been designed and mitigated to comply with State and federal regulatory requirements. In all instances where potentially significant impacts have been identified, mitigation is provided to reduce each impact to less-than-significant levels. This was necessary in the following sections of the document:

- Air Quality (Section III)
- Biological Resources (Section IV)
- Cultural Resources (Section V)
- Geology and Soils (Section VII)
- Hydrology and Water Quality (Section X)
- Noise (Section XIII)
- Tribal Cultural Resources (XVIII)

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

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

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Howell's Montia Mitigation Plan)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Temporary Wetland Impact Minimization Measures)

Mitigation Measure CR-1 (Cultural and Archaeological Resources)

Mitigation Measure CR-2 (Unidentified Human Remains)

Mitigation Measure GEO-1 (Geotechnical Design Recommendations)

Mitigation Measure GEO-2 (Paleontological Resources)

Mitigation Measure HWQ-1 (Stormwater Management System Design)

Mitigation Measure NO-1 (Construction Noise)

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

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

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

The project site consists of two existing athletic fields that support various AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years. The project site does not contain any known important mineral resources.

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

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. The project site has been developed as an athletic facility since the 1950s and is zoned PF. There are no known deposits of commercially viable mineral or aggregate on the project site.

For these reasons, it has been determined that the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, the proposed project would result in no impact on this resource category.

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. The project site has been developed as an athletic facility since the 1950s and is zoned PF. There are no known deposits of commercially viable mineral or aggregate on the project site.

For the reasons discussed above, it has been determined that the proposed project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local General Plan, specific plan or other land use plan. Therefore, the proposed project would result in no impact on this resource category.

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

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

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

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. Operation of the existing AHS athletic fields is considered a noise-generating source. In the vicinity of the proposed project, noise generating sources are varied and consist of vehicle traffic along Foster Avenue, Sunset Avenue, and US Highway 101. Additionally, day to day activities at the AHS main campus are noise-generating sources. Airports nearest the project site include the Murray Field (approximately 5.4 mi.), the California Redwood Coast-Humboldt County Airport (approximately 6.9 mi.), and the Kneeland Airport (approximately 13.7 mi.). Regional airports are not a source of excessive noise levels affecting the project site.

Residential uses, schools, hospitals, churches, and libraries are typically considered sensitive noise receptors as these are locations where people sleep or expect low noise levels. The nearest known potential sensitive receptor to the proposed project includes the Woodridge Apartments (>35 feet). Other sensitive receptors in the vicinity of the proposed project include, but are not limited to, Sunset Terrance Apartments (>135 feet), residences to the north (> 210 feet), the Arcata High School main campus (>350 feet), Arcata Elementary School (>710 feet), and the Lower Twin Parks Apartments (>745 feet).

The City of Arcata has adopted noise standards, which are included in the General Plan Noise Element and Land Use Code. The proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD adopted Resolution 12/2019-20 on April 23, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements. However, for the purpose of analyzing operational noise impacts, the proposed project is compared to the City of Arcata Noise Standards, as described in Section 9.30.050 of the Arcata Land Use Code.

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

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

Construction

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. Construction of the proposed project would result in a temporary increase in ambient noise levels and may result in nuisance noise impacts to adjacent residential uses. Nuisance noise impacts typically occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), when noise-generating sources are adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

Construction activities would be transitory (occurring intermittently over the construction period) and temporary (occurring over a timeframe of approximately 6 months). However, to reduce potential nuisance noise impacts during construction, construction activities will not occur during noise-sensitive times of the day (i.e., early morning or nighttime) or on more sensitive days (i.e., Sundays and holidays). In addition, it will also be required for all stationary and construction equipment to be maintained in good working order and fitted with manufacturer-approved muffler systems. These requirements for construction activity have been

included as **Mitigation Measure NOISE-1** for the proposed project and require the following: 1) Construction activities will be limited to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday, and between 9:00 a.m. and 5:00 p.m. on Saturdays; 2) Construction activity will not occur on Sunday or holidays; and 3) All stationary and construction equipment will be maintained in good working order and fitted with manufacturer-approved muffler systems. With the implementation of **Mitigation Measure NOISE-1**, impacts to nearby sensitive receptors from construction activities will be less-than-significant.

Operation

The project site is currently developed as an outdoor athletics facility and would continue to function as such under the proposed project. However, the improvements to the athletic fields will allow additional sporting events to be held at the project site. These events are currently being held at other offsite locations (e.g., HSU, Arcata Ball Park, etc.). The nearest known potential sensitive receptors to the proposed project include residential uses, with the closest being the Woodridge Apartments (>35 feet from the eastern boundary of the site).

As noted in the Noise Setting, the proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD determined the proposed project is exempt from local regulations, ordinances, and requirements. However, for the purpose of analyzing operational noise impacts, the proposed project is compared to the City of Arcata Noise Standards, as described in Section 9.30.050 of the Arcata Land Use Code. The City's maximum allowable noise levels for receiving residential land uses is summarized in Table 6.

Table 6. Maximum Allowable Noise Level for Receiving Residences

Noise Level Descriptor	Maximum Exterior Noise Levels		
	7 am - 7 pm	7 - 10 pm	10 pm - 7 am
Hourly Leq	55 dB	50 dB	45 dB
Maximum	75 dB	75 dB	70 dB

Noise measurements from a sporting event were conducted by SHN on November 6, 2019 to establish the baseline noise conditions from operation of the existing athletic facility. Approximately 60-70 individuals were present during the sporting event, including players on the field, players off the field, referees and other officials, and spectators. There was also a small portable PA system in use during the event. Noise measurements were taken at five locations around the perimeter of the athletic fields during the sporting event. The greatest source of noise during the event was determined to be the congregation of spectators, at distances ranging between approximately 40 feet and 50 feet from the one of the established measurement locations (Location #2). The average (Leq) noise level measured during the sporting event from measurement location #2 was 56.6 dBA, with minimum and maximum noise levels of 41.4 dBA and 74.6 dBA, respectively (SHN, 2020c). These noise levels are below the maximum exterior noise levels for receiving residential uses as required by the Arcata Land use Code (see Table 6).

The noise levels from measurement location #2 are considered most representative of the noise levels that would occur during operation of the proposed project. Much like sporting events held at the existing athletic facility, maximum noise levels at the proposed athletic facility are presumed to originate primarily from congregations of spectators. The highest density of spectators at the proposed project would be located at the seating area on the north side of the track (see Figure 10). This seating area is located between 195 feet and 450 feet from the nearest residential sensitive receptors (i.e., Woodridge Apartments). Although future sporting events may have a greater number of spectators than the sporting event documented to establish the baseline noise conditions, the minimum distance from the spectators to the nearest sensitive receptors will be over three times greater than the distance from measurement location #2 (i.e., 40 to 50 feet). On average, noise levels typically attenuate (lessen) at a rate of 6 dBA per doubling of distance from the source. As such, it is estimated that the noise levels from operation of the proposed project would comply with the City's noise standards at the nearest residential uses (see Table 6). Furthermore, similar to the existing use and baseline conditions, sporting events at the proposed athletic facility will occur intermittently and during daylight hours to avoid noise-sensitive times (early morning and nighttime). Therefore, noise impacts from operation of the proposed project would be less-than-significant.

With the adoption of **Mitigation Measure NOISE-1** and for the reasons explained above, it has been determined that the proposed project will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated.

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

The proposed project's construction activity has the potential to result in minor groundborne vibration and noise. The closest land uses potentially impacted by groundborne vibration and noise are the Woodridge Apartments (>35 feet from the eastern boundary of the site). Ground vibrations from construction activities do not often reach the levels that can damage structures. Pile-driving and blasting generate the highest levels of vibration; however, neither of these activities will occur during construction of the proposed project. As discussed under subsection a), construction activity must comply with the requirements in **Mitigation Measure NOISE-1**, which place limitations on the days and hours of construction activity, to ensure that nearby land uses are not disturbed by early morning or nighttime construction activity. In addition to reducing construction noise levels, compliance with these requirements also minimizes the potential impacts of vibration on persons adjacent to the project site. Construction activities will occur for a short duration and during daytime hours and will not result in groundborne noise levels that are excessive.

With the implementation of **Mitigation Measure NOISE-1** and for the reasons discussed above, it has been determined that the proposed project will not result in the generation of excessive groundborne vibration or groundborne noise levels. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated.

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

The project site is not located within the vicinity of a private airstrip, within an airport land use plan, or within two miles of a public airport or public use airport. Airports nearest the project site include the Murray Field (~5.4 miles), the California Redwood Coast-Humboldt County Airport (~6.9 miles), and the Kneeland Airport (~13.7 miles). Due to the distance from the project site, regional airports are not a source of excessive noise levels affecting the project site.

For these reasons discussed above, it has been determined that the proposed project would not expose people residing or working in the project site to excessive noise levels. Therefore, the proposed project would result in no impact on this resource category.

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

NOISE-1: The following measures will be implemented during construction activities to reduce noise levels:

- Construction activities shall be restricted to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 5:00 p.m. on Saturdays.
- Construction activity will not occur on Sundays or holidays.
- All stationary and construction equipment will be maintained in good working order and fitted with manufacturer-approved muffler systems.

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

Setting: The project site is currently developed as an outdoor athletics facility in the Sunset neighborhood of the City of Arcata. The project site consists of two existing athletic fields that support various AHS athletic programs. The project site is located below and adjacent to the AHS main campus. AHS is a part of NHUHSD. AHS serves grades 9 – 12 and has approximately 889 students currently enrolled (CDE, 2018).

According to estimates from the California Department of Finance, the City of Arcata had an estimated population of 17,963 and 8,163 housing units as of January 2020 (DOF, 2020).

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

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. The project proposes improvement of an existing athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. The project does not propose new housing, businesses, or infrastructure that would have the potential to induce substantial population growth. For these reasons, it has been determined that the proposed project would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, the proposed project would result in no impact on this resource category.

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

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

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

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

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

Fire Protection

The project site is located within the Arcata Fire District (AFD). The AFD district boundaries encompass 65 square miles and extend west to the Pacific Ocean, north to the Clam Beach area, east to Essex, and south to Indianola and Manila. The AFD is an all-risk fire department responsible for protecting life, property, and the environment from the hazards of fire and hazardous materials incidents and providing emergency medical services. The nearest fire station to the site is the Arcata Fire Station at 631 9th Street, located approximately one mile to the south of the project site. The Mad River Fire Station is also located at 3235 Janes Road, approximately 2.7 miles to the north of the site.

Law Enforcement

Law enforcement for the City of Arcata is provided by the Arcata Police Department (APD). The Arcata Police Department provides 24-hour police protection within Arcata. The Arcata Police Department is part of the multi-agency Standardized Emergency Management System emergency response network. The main station office is at City Hall, 736 F Street, which is approximately 1.5 miles south of the site.

Schools

The project site is within the Arcata School District and the Northern Humboldt Union High School District. Public high school students in the area attend Arcata High School (1720 M Street). The proposed improvements to the existing AHS athletic fields would occur within AHS and NHUHSD property. As such, high school-aged children within the school's service boundaries would attend AHS and may utilize the project site.

Parks

The City of Arcata maintains a network of parks distributed throughout the City. Arcata's parks have varied facilities and offer many recreational and educational opportunities. Parks and recreational facilities near the project site include Shay Park, Arcata Skate Park, Larson Park, and Stewart Park.

Other Public Facilities

Other public facilities in the City of Arcata include public health services and library services. The City of Arcata does not directly provide health care programs or facilities; however, these facilities are operated in the City by a variety of health care providers and professional, as well as non-profit and other organizations. Public health services in the City of Arcata include, but are not limited to, Mad River Community Hospital, North Country Clinic, Humboldt Open Door Clinic, and numerous other smaller facilities throughout the City. Library services in the City of Arcata include the Arcata Library at City Hall, which is a branch of the Humboldt County library, and the Humboldt State University library.

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

a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant*

environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection? Less-Than-Significant Impact

Fire protection services are currently provided to the project site by the AFD. The project proposes improvement of an existing athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the AFD service area. While the proposed project may require fire protection response in the case of an emergency, the proposed project will not significantly increase the demand for fire protection services to the extent that new or physically altered facilities would be required.

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

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

Police protection services are currently provided to the project site by the APD. The project proposes improvement of an existing athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. While the proposed project may require occasional police protection response, the proposed project will not significantly increase the demand for police protection services to the extent that new or physically altered facilities would be required.

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

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

The project proposes improvement of an existing AHS athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. The proposed project will not increase student enrollment at AHS or have other impacts on existing academic-related operations at AHS that would require new or physically altered school facilities in order to maintain acceptable performance objectives.

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

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

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

The project proposes improvement of an existing AHS athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. The improved athletic facilities will also be available for use by members of the public. The proposed project will not increase student enrollment at AHS or cause other growth inducing impacts that would require new or physically altered park facilities in order to maintain acceptable performance objectives.

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

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

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

The project proposes improvement of an existing AHS athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. The proposed project will not increase student enrollment at AHS or cause other growth-inducing impacts that would require new or physically altered public facilities in order to maintain acceptable performance objectives.

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

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Howell's Montia Mitigation Plan)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Temporary Wetland Impact Minimization Measures)

Mitigation Measure CR-1 (Cultural and Archaeological Resources)

Mitigation Measure CR-2 (Unidentified Human Remains)

Mitigation Measure GEO-1 (Geotechnical Design Recommendations)

Mitigation Measure GEO-2 (Paleontological Resources)

Mitigation Measure HWQ-1 (Stormwater Management System Design)

Mitigation Measure NO-1 (Construction Noise)

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

Setting: The City of Arcata maintains a network of parks distributed throughout the City. Arcata's parks have varied facilities and offer many recreational and educational opportunities. Parks and recreational facilities near the project site include Shay Park, Arcata Skate Park, Larson Park, and Stewart Park.

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

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

The project proposes improvement of an existing AHS athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. The improved athletic facilities will also be available for use by members of the public, which may cause a slight decrease in the use of other nearby recreational facilities. The proposed project will not increase student enrollment at AHS or cause other growth-inducing impacts that would increase the use of existing parks or other recreational facilities such that physical deterioration of these facilities would occur or be accelerated.

For the reasons explained above, it has been determined that the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the proposed project would have a less-than-significant impact on this resource category.

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

The project proposes improvement of an existing AHS athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. The proposed improvements to the AHS athletic fields would result in physical impacts to the surface and subsurface of the project site. These impacts are considered to be part of the project's construction phase and are evaluated in other sections of this document including, but not limited to, Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Greenhouse Gas Emissions (Section VIII), Hazards and Hazardous Materials (Section IX), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (XVIII). In instances where significant impacts have been identified, mitigation measures are included to reduce these impacts to less-than-significant levels. No additional mitigation measures beyond those already identified would be required.

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

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Howell's Montia Mitigation Plan)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Temporary Wetland Impact Minimization Measures)

Mitigation Measure CR-1 (Cultural and Archaeological Resources)

Mitigation Measure CR-2 (Unidentified Human Remains)

Mitigation Measure GEO-1 (Geotechnical Design Recommendations)

Mitigation Measure GEO-2 (Paleontological Resources)

Mitigation Measure HWQ-1 (Stormwater Management System Design)

Mitigation Measure NO-1 (Construction Noise)

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

Setting: Arcata's local transportation and circulation network are described as shown in the City's General Plan Transportation Element (City of Arcata, 2008):

> "***Existing Roadway System.*** *Arcata's pattern of highways and streets is similar to many small and rural communities. The central business district has a traditional grid pattern of streets, with a one-way couplet system comprising the primary arterial. A non-grid series of arterial and collector streets surrounds the central business district and serves outlying residential subdivisions, neighborhood shopping centers, Humboldt State University, and industrial areas. On the outer edges of Arcata, the transportation system is comprised of rural roads and highways serving isolated farms and residences. Arcata is bisected by the State Route 101 freeway, the main state route serving the North Coast of California from San Francisco to Oregon.*"

The project site is currently developed as an outdoor athletics facility in the Sunset neighborhood of the City of Arcata. Existing access to the project site is provided by a gravel road traveling between the AHS Main Campus (by way of M Street) and Sunset Avenue. Vehicle access is limited by locked gates located at the AHS Main Campus and Sunset Avenue entrances. The access road is utilized by only pedestrians and authorized AHS vehicles/equipment. The project site is approximately 320 feet from the US Highway 101 (US-101) southbound interchange, and 900 feet from the US-101 northbound interchange.

Although the project site is developed as an outdoor athletics facility, AHS currently hosts several athletic events (i.e., home games and practices) at other facilities throughout Arcata. For example, AHS Football games are held at Humboldt State University (HSU), AHS Track and Field practices and meets are held at HSU, and AHS Baseball games are held at the Arcata Ball Park.

In 2017, the City of Arcata commissioned W-Trans to prepare the Central Arcata Areawide Traffic Study to address the cumulative impacts associated with the potential development of six sites located in the project area within three-quarters of a mile of one another. The projects analyzed in the 2017 Traffic Study included five housing projects and an open-door community health center (W-Trans, 2017). Based on the results of the 2017 Traffic Study, W-Trans prepared a Focused Traffic Study that addressed the potential change in vehicular traffic associated with the proposed improvements to the AHS athletic fields. The study also provides an inventory of existing parking, pedestrian, bicycle, and transit facilities in the vicinity of the project site (W-Trans, 2020).

Parking Facilities

No existing parking facilities are directly available at the project site. The nearest parking facilities for the project site are located on the AHS main campus. The AHS main campus parking facilities are accessed via 16th Street and provide parking spaces for staff, students, and visitors. From the AHS main campus parking facilities, the project site is currently accessible by vehicle (maintenance personnel only) or walking. From the AHS main campus to the project site, the distance is 0.9 miles via Alliance Road and Foster Avenue, or 0.6 miles via 16th Street and H Street.

While parking facilities are available at the AHS main campus, individuals have been known to park vehicles throughout nearby neighborhood streets and walk to the project site. Additionally, parents of students have been known to "temporarily" park in unauthorized locations (e.g., Sunset Avenue and Arcata Skate Park) to conduct pick-ups and drop-offs at the project site.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, curb ramps, curb extensions, and various streetscape amenities such as lighting, benches, etc. In general, a network of sidewalks, crosswalks, and curb ramps provide access for pedestrians in the vicinity of the proposed project site. These pedestrian facilities include the following (W-Trans, 2020):

- Alliance Road – From the High School to the Foster Avenue intersection, sidewalks exist continuously on Alliance Road on at least one side with crosswalks connecting the points where the sidewalk switches from one side to the other. Additionally, crosswalks exist at the intersection of Foster Avenue/Alliance Road.
- Foster Avenue – Sidewalk coverage is provided on Foster Road with a significant gap on the northerly side between the Sunset Terrace Apartments and Jay Street. There is a pathway on the south side of the street that connects to existing facilities at Jay Street and Alliance Road. Lighting is provided by overhead streetlights.
- Sunset Avenue – Continuous sidewalks are provided on the west side of Sunset Avenue south of Foster Avenue.

Bicycle Facilities

In the project area, Class II bike lanes exist on Alliance Road-K Street between Spear Avenue and 11th Street and on Foster Avenue between Jay Street and Alliance Road. Bicyclists ride in the roadway and/or on sidewalks along Sunset Avenue within the vicinity of the project site. Additionally, the Arcata City Trail (part of Humboldt Bay Trail), a multi-use paved trail, passes north of the project site (W-Trans, 2020).

Transit Systems

The Humboldt Transit Authority (HTA) provides fixed route bus service in Arcata through the Arcata and Mad River Transit System (AMRTS) and the Redwood Transit System (RTS). AMRTS Gold Route provides loop service to destinations throughout the City and stops on Alliance Road at the Foster Avenue Extension within the project vicinity. Gold Route operates Monday through Friday with approximately one-hour headways between 7:00 a.m. and 10:00 p.m.

AMRTS Orange Route provides Saturday service with approximately one-hour headways between 7:00 a.m. and 7:00 p.m. Two bicycles can be carried on most HTA buses. Bike rack space is on a first come, first served basis. Additional bicycles are allowed on HTA buses at the discretion of the driver.

Dial-a-ride, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. Arcata Dial-A-Ride service is designed to serve the needs of individuals with disabilities within the Arcata and the greater Arcata area.

Transportation Plans and Policies

The NHUHSD has not developed any transportation plans or policies that are applicable to the proposed project. The City of Arcata General Plan Transportation Element contains policies related to the performance of the circulation system for vehicular and non-vehicular modes of transportation. The proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD adopted Resolution 12/2019-20 on April 23, 2020, determining the proposed project is exempt from local regulations, ordinances, and requirements. However, in the absence of any NHUHSD transportation plans or policies, the analysis in this section discusses relevant policies from the Arcata General Plan Transportation Element.

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

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

The project proposes improvement of an existing AHS athletic facility that will provide a centralized location for existing sporting events that are currently happening in other parts of the community. As noted in the Transportation Setting, the proposed project is located on NHUHSD property under the authority of the State of California. Per Government Code Section 53094, the NHUHSD determined the proposed project is exempt from local regulations, ordinances, and requirements. However, in the absence of any NHUHSD transportation plans or policies, the analysis in this section discusses relevant policies from the Arcata General Plan Transportation Element.

According to the City's General Plan Transportation Element, numerous objectives, policies and programs have been established supporting the need for all modes of travel to be accommodated by the transportation system. This is demonstrated through General Plan Goals T-1, T-2, and T-5, which state (City of Arcata, 2008):

- **Policy T-1:** Create and maintain a balanced transportation system with choice of bus transit, bicycle, and pedestrian as well as private automobile modes. Reduce the percentage of trips that are made by automobile and provide the opportunity and facilities to divert trips from automobiles to other modes.
- **Policy T-2:** Reduce the percentage of automobiles and reduce the annual vehicle-miles of travel.
- **Policy T-5:** Create a complete, interconnected bicycle and pedestrian circulation system. Increase the percentages of person trips via walking and bicycling. Provide a pedestrian and bicycle system which serves commuter as well as recreational travel.

Vehicular Facilities

Intersection operation is discussed below as it relates to policies in the Arcata General Plan. However, any impact on intersection operation would not be considered significant under the CEQA Guidelines, because intersection operation is not a CEQA-related issue. In the Focused Traffic Study prepared by W-Trans (2020), the intersection of Foster Avenue/Alliance Road was the focus of the study since it is the most direct route between the AHS main campus and the project site. This intersection is an all-way stop-controlled intersection to the northwest of the sports field in the vicinity of the project site.

The greatest potential trip generation from the proposed project would occur during fall season football home games, which would be held at the project site approximately five times per season. However, due to the infrequency of football home games, this would be a special event and not representative of a typical day during operation of the project. An increase in trip generation more representative of a typical day would occur during baseball home games, which would be held at the project site approximately six times during the spring season, and approximately eight times during the summer season. It is estimated by NHUHSD that the expected total attendance at varsity baseball games, including athletes, staff, and spectators, is between 100 and 200 people. In the Focused Traffic Study prepared for the project (W-Trans, 2020), it is estimated that baseball home games would generate an average of zero weekday a.m. peak hour trips and an average of 66 weekday p.m. peak hour trips. It is noted that the projected trip generation for baseball home games is based on the estimated maximum number of attendees (200) to reflect the greatest potential impact during operation of the project.

Though the frequency of home baseball games is higher than home football games, it is noted that the combined frequency of both baseball games and football games still results in traffic generation on only about 30 days per year, which is infrequent enough that it still barely meets the "30th highest hour criterion" often applied to determine if the occurrence is frequent enough to be considered for analysis or design purposes. To avoid facilities with excessive capacities, American Association of State Highway and Transportation Officials (AASHTO) recommends that designs be based on volumes during the 30th highest hour. As applied to the proposed project, this recommendation would translate to there being no need for capacity improvements to accommodate site-generated traffic (W-Trans, 2020). With existing traffic volumes and the increase in trip generation from the proposed project, the proposed project would have a nominal and acceptable impact on operation of the Foster Avenue/Alliance Road intersection, especially when considered within the context of the frequency of events and the AASHTO 30th highest hour criterion (W-Trans, 2020).

The Focused Traffic Study (W-Trans, 2020) also analyzed future conditions (i.e. Future plus Project conditions) based on the scenario in the Central Arcata Areawide Traffic Study (W-Tran, 2017). As part of the 2017 Traffic Study, it was determined that the Foster Avenue/Alliance Road intersection would be expected to operate unacceptably (LOS E) under future conditions. To achieve acceptable operations at the intersection, a mini roundabout is proposed. With the proposed mini roundabout, the service level would improve to LOS B. Based on the 2017 Traffic Study analysis, the recommended roundabout would be paid for through the fees for the projects previously analyzed. The projects that the City has allocated the cost of this improvement to are already constructed, approved, or are in the approval process, so it is anticipated that the funding for the mini-roundabout will be available to the City to construct the improvement before the projected future volumes are experienced. Since the project would cause delay to increase by only 1.5 seconds at the Foster Avenue/Alliance Road intersection, which is substantially below the 5-second threshold established for the analysis, the impact would be considered acceptable and no mitigation is required.

As proposed, the project would not increase the number of athletic events but would rather centralize where existing events occur. While 66 peak hour trips are estimated for the site, these are not "new" trips to the City but would be more accurately described as existing trips being redistributed to a more centralized location. This would result in no increase in traffic citywide and has the potential to result in a reduction in vehicle miles traveled due to the closer proximity to the AHS main campus (W-Trans, 2020). Therefore, impacts to vehicular facilities from the proposed project would be less than significant.

Pedestrian Facilities

The project proposes pedestrian infrastructure from onsite to Sunset Avenue. These pedestrian facilities would improve connectivity in the project area. The existing gravel access road from the AHS main campus will continue to be available to access the project site. Therefore, impacts to pedestrian facilities from the proposed project would be less than significant.

Bicycle Facilities

There are currently existing bicycle facilities around AHS main campus and the existing sports fields. The City's General Plan states that secure bicycle parking should be provided at important activity centers, such as schools. The City also requires the number of bicycle parking spaces to be calculated as a proportion of the number of vehicle parking spaces. Bicycle facilities will be developed at the project site but may not necessarily meet the City's requirements for bicycle parking. Although the City's General Plan policies were considered for this analysis, pursuant to the NHUHSD determination under Government Code Section 53094, consistency with the Arcata General Plan or other City regulations is not required for the proposed project. Therefore, impacts to bicycle facilities from the proposed project would be less than significant.

Transit Facilities

HTA provides service on Alliance Road near the AHS main campus. The proposed project may result in minor increases in transit use but would not be responsible for a significant number of new transit trips. Therefore, impacts to transit facilities from the proposed project would be less than significant.

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

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

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

The proposed project would have no impact on vehicles miles traveled, as the project would result in no change to the student population or staff size. The proposed project would enable football and baseball games, as well as track and field practice and meets, which currently occur elsewhere, to instead take place at the project site, which is relatively centrally located in the City of Arcata. Compared to the current sports programs, many of which utilize offsite facilities, it is expected that the proposed project would result in a net reduction in VMT, as the project would not represent new athletic events, but rather the centralization of existing events near the AHS main campus (W-Trans, 2020).

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

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

The project would not change roadway geometrics that could increase hazards related to design features. Instead, the project proposes a 24-foot-wide paved driveway/entrance from Sunset Avenue to facilitate simultaneous and safe ingress and egress, significantly improving the existing access to the site. The project also proposes to construct a bus turnaround and off-street pickup and drop-off area. Under the existing condition, parents/guardians have been known to "temporarily" park in unauthorized locations (i.e. Sunset Avenue and Arcata Skate Park) to conduct pick-ups and drop-offs at the project site, effectively creating potentially hazardous traffic situations. By providing an authorized off-street pick-up and drop-off area at the project site, the proposed project will improve potentially hazardous traffic conditions along Sunset Avenue.

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. This type of project is not of the nature to substantially impact emergency access.

The project site is accessible from an existing gravel access road, by way of Sunset Avenue or the AHS main campus. The primary access for the project site is from Sunset Avenue, which is narrow and provides limited maneuverability for emergency vehicles. The project proposes a new 24-foot-wide paved driveway/entrance from Sunset Avenue to facilitate simultaneous and safe ingress and egress, significantly improving the existing access to the site. In addition, the project proposes onsite parking and a drop-off/turnaround area for vehicles. The proposed drive aisles and parking facilities will be designed to meet emergency access standards and accommodate the onsite maneuvering of emergency vehicles. As such, the proposed project will provide improved emergency access to the project site compared to existing conditions.

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

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

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs.

The project location occurs within the ancestral territory of the Wiyot Tribe. Early archaeological sites identified within the high elevation coastal interior of this region exceed 7,000 years before present (B.P.) and similar archaeological assemblages have been documented on the coastal terraces about ten miles to the north of Arcata. Identified archaeological sites in the vicinity of Humboldt Bay, closest to the project area, seem to be generally associated with the mid- to late-Holocene period, within the last three millennia. Wiyot cultural ethnographic sites are also known in the general north Arcata vicinity, distributed mostly along the margins of Humboldt Bay, Daniels Sough, and Lower Mad River. These sites include villages, hunting and gathering areas, trails, and other places; however, none are listed for the specific project area. The subject landform was certainly within the resource catchment area of the nearest villages, and was likely to have been traversed through, being in the course of a perennial creek on the margin between the Arcata Bottom and upland areas. The presence of freshwater and associated resources in this area would have been attractive to indigenous populations in the past (WRA, 2020).

Prior to the 1950s, the project site was developed for agricultural uses by the McCall family and contained a ranch house and two fields that were bisected by Jolly Giant Creek (see Figure 4). In the early 1950s, the project site was sold to Arcata High School and developed with a track and athletics field (see Figure 5). By 1963, the track and sports field became the primary use of the site (see Figure 6). The existing storage sheds on the site were constructed in the 1970s. The site was redeveloped into its current configuration in the 1990s when the track was removed, and the site became predominantly used for soccer, football, and baseball.

During construction of the existing athletic facility, the site underwent extensive earthmoving and a drainage system was installed, with varied amounts of water conveyance. The drainage system lies underneath the sports field, ranging from approximately one to three feet below grade, as evidenced by 23 DIs dispersed across the field. Underlying soils include drain sand on the western field and various fill topsoil layers on the eastern field. Twenty valves serve 160 irrigation heads (sprinklers) across the existing athletic fields.

During the winter and spring of 2020, a Cultural Resources Investigation was prepared by WRA for the proposed project. The methods employed in the Investigation included a record search at the Northwest Information Center (NWIC), and a review of other published archaeological and historical literature pertinent to the project area. Correspondence was conducted with the Native American Heritage Commission (NAHC), local tribal representatives, and other knowledgeable individuals. A comprehensive field survey was performed over the entire project area and an adjacent buffer (~15 acres). The Investigation also included shovel probes along the margin of the existing access road in the footprint of the proposed sewage pumping tank on the lower field and along the upper terrace edge. The Cultural Resources Investigation concluded that no significant archaeological or historic period resources appear to exist in the limits of the project area.

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The project site does not contain any known tribal cultural resources.

A request for tribal consultation pursuant to AB 52 was initiated on January 30, 2020 with the Wiyot Tribe, Bear River Band of Rohnerville Rancheria, and Blue Lake Rancheria. The Tribes requested consultation on February 18, 2020 and a site visit was conducted on February 24, 2020, with the Tribal Historic Preservation Officers from the Tribes and William Rich and Associates (WRA) (project archaeologist). The meeting concluded with a request by the Tribes for exploration of the soils at the site in the area where the maximum depth of excavation (15 feet) would occur for installation of a proposed sewage pumping tank.

Based on the direction provided during the site visit, a Cultural Resources Investigation was prepared by WRA, which involved a pedestrian archaeological field survey over approximately 15 acres and shovel probes along the margin of the existing access road in the footprint of the proposed sewage pumping tank on the lower field and along the upper terrace edge. The Cultural Resources Investigation concluded that no significant archaeological or historic period resources appear to exist in the limits of the project area. However, the Investigation notes that there is a possibility for uncovering archaeological and historic materials within any former topsoil (A/B) horizons that may lie intact below covered surfaces. The sewage pumping tank is the deepest element of the project (15 feet) and is the most likely location to reach intact topsoil horizons. For this reason, the Investigation recommends an archaeological monitor be present to identify and evaluate Native American archaeological materials that may be discovered during excavation for installation of the proposed sewage pumping tank. For all other construction activities, the Investigation recommends implementation of an Inadvertent Discovery Protocol. The Investigation concludes that with implementation of these recommendations, the proposed project would not result in a substantial adverse change to archaeological or historical resources (WRA, 2020).

The Tribes reviewed the results of the Cultural Resources Investigation and provided comments on May 11, 2020 that they concurred with the archaeological monitoring and Inadvertent Discovery Protocol recommended for implementation during construction of the project. The requirement for archaeological monitoring during excavation for installation of the proposed sewage pumping tank and implementation of an Inadvertent Discovery Protocol during other construction activities, has been included as **Mitigation Measure CR-1** for the proposed project.

With the implementation of **Mitigation Measures CR-1** and for the reasons explained above, it has been determined that the proposed project will not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k). Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.?* Less-Than-Significant Impact with Mitigation Incorporated

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The project site does not contain any known tribal cultural resources.

As discussed under subsection a), a Cultural Resources Investigation was prepared for the proposed project by WRA and tribal consultation was conducted pursuant to AB 52 with the Wiyot Tribe, Bear River Band of Rohnerville Rancheria, and Blue Lake Rancheria. The result of these efforts was agreement by the project archeologist and the Tribes that archaeological monitoring should occur during excavation for installation of the proposed sewage pumping tank and an Inadvertent Discovery Protocol should be implemented during other construction activities. The recommendations for archaeological monitoring and an Inadvertent Discovery Protocol have been included as **Mitigation Measure CR-1** for the proposed project. Upon review of the WRA Cultural Resources Investigation (2020), the comments from the Tribes, and the requirements of **Mitigation Measure CR-1**, the NHUHSD has

determined that the proposed project will not cause a substantial adverse change in the significance of a known tribal cultural resource.

With the implementation of **Mitigation Measures CR-1** and for the reasons explained above, it has been determined that the proposed project will not cause a substantial adverse change in the significance of a tribal cultural resource that is that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Therefore, the proposed project would result in a less-than-significant impact with mitigation incorporated on this resource category.

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

Mitigation Measure CR-1 (Cultural and Archaeological Resources)

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

Setting: The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site consists of two existing irrigated sports fields that support various AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years.

Electricity

The project site has an existing connection to the electrical grid in the project area, which is maintained and operated by PG&E. Prior to May 2017, the portions of Humboldt County on the PG&E electrical grid received electricity from the PG&E power mix. This included electricity produced at the PG&E Humboldt Bay Generating Station (HBGS), which is located just south of the City of Eureka along Humboldt Bay. Beginning in May 2017, electricity service for the City of Arcata was transitioned to the Redwood Coast Energy Authority (RCEA) Community Choice Energy (CCE) program. The CCE program allows city and county governments to pool (or aggregate) the electricity demands of their communities in order to increase local control over electric rates, purchase power with higher renewable content, reduce GHG emissions, and reinvest in local energy infrastructure. The electricity continues to be distributed and delivered through the existing PG&E electrical grid. The CCE program currently procures approximately 47% of its power from renewable and carbon-free sources (RCEA, 2020).

Wastewater

The project site currently contains an onsite wastewater treatment system (OWTS) that is used for the restrooms in the maintenance/restroom building at the site. This system is proposed to be removed and the proposed multi-use building (concessions, restrooms, and storage) at the site would be connected to the City of Arcata's wastewater system.

The City of Arcata wastewater treatment plant is an innovative system that combines conventional wastewater treatment with the natural processes of constructed wetlands. The wastewater collection system consists of pipes, manholes, and lift stations. The wastewater collection system drains via gravity to eight lift stations. Wastewater is pumped from the lift stations to the wastewater treatment plant and marsh system. The wastewater treatment plant facilities include headworks, primary clarifiers, oxidation ponds, treatment wetlands, enhancement wetlands, and chlorine disinfection. Solids removed in the primary clarifiers are treated in anaerobic digesters and solids drying beds. Under normal conditions, treated wastewater is discharged to Arcata Bay after flowing through the Arcata Marsh. The City is required to adhere to the discharge requirements of the NCRWQCB for its wastewater treatment plant. Since the early 2000s, there have been ongoing exceedances of the discharge limits for the plant. The City is planning improvements to the plant in the near future to prevent further exceedances.

Water

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

The existing athletic fields are composed of natural turf surfaces, which are managed and irrigated by AHS groundskeepers. Irrigation water is withdrawn from an existing groundwater well along the western boundary of the project site. Irrigation is conducted approximately three days per week, depending on weather conditions. A subsurface PVC pipe irrigation system lies above the site drainage system, approximately one foot below ground surface across the footprint of the athletic fields. Twenty valves serve 160 irrigation sprinkler heads across the two fields (SHN, 2019c).

Stormwater
The existing drainage system at the project site was installed during the development of the athletic fields with varying amounts of water conveyance. The drainage system lies underneath the sports field, ranging from approximately one to three feet below grade, as evidenced by 23 DIs dispersed across the field. Additional DIs may be present within tall, unmanaged vegetation along the southern boundary of the field. Subsidence from soil compaction and organic matter oxidation has led to elevated DIs, causing water to pool before reaching the drainage system, creating a wetter condition than that which was present when the drainage system was constructed (SHN, 2019c).

Solid Waste
Solid waste collection service in the City of Arcata is provided by the City's solid waste contractor, Recology Arcata. Solid waste is transported to the Humboldt Waste Management Authority (HWMA) Solid Waste Transfer Station in Eureka. Large recyclable materials (scrap metal, wood, and concrete) and hazardous materials (washers, dryers, televisions, tires, etc.) are pulled from the waste stream at the Eureka facility, and the remaining solid waste is shipped to the Dry Creek Landfill in Medford, Oregon, and the Anderson Landfill in Anderson, California. There are also recycling drop off centers at Humboldt Sanitation in McKinleyville, Eel River Resource Recovery in Samoa, and HWMA in Eureka.

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

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata service area boundary and would continue to function as such under the proposed project. The proposed improvements to the AHS athletic fields include several utility infrastructure improvements such as the reconfiguration of electrical infrastructure, a new water meter, a new fire hydrant, a new wastewater line between the project site and the AHS main campus, and new stormwater and drainage improvements. These utility infrastructure improvements would result in physical impacts to the surface and subsurface of the project site. These impacts are considered to be part of the project's construction phase and are evaluated in other sections of this document including, but not limited to, Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Greenhouse Gas Emissions (Section VIII), Hazards and Hazardous Materials (Section IX), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (XVIII). In instances where significant impacts have been identified, mitigation measures are included to reduce these impacts to less-than-significant levels. No additional mitigation measures beyond those already identified would be required.

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

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. Water for the proposed project will be obtained from the City of Arcata municipal water system and an onsite groundwater well.

Municipal Water Supply
Water for domestic use (e.g., restrooms, concessions, drinking fountains, etc.) and fire protection (i.e., fire hydrant) will be provided to the project by the City of Arcata, which receives water from the HBMWD. Due to the limited facilities proposed for the site (i.e., one building with restrooms and a small concessions booth) and the intermittent use that will occur, the water use from the project

would be minimal and would not have a significant effect on the City's water system. Furthermore, the City of Arcata has an Urban Water Management Plan (UWMP) (as required by the California Water Code) that defines the current and future capacity of the water system. The UWMP concludes that HBMWD has more than enough water supply to meet municipal demand (peak rate allocation), even in single and multiple dry water years. Likewise, the City of Arcata Service Area anticipates having its entire peak rate allocation available during multiple dry years since there are no projected shortfalls in the supply available to HBMWD (City of Arcata, 2016).

Groundwater Well

During operation of the proposed project, the athletic surfaces will be irrigated with water from an existing groundwater well at the site. Irrigation will occur similar to the existing use and baseline condition. The existing well on the project site is located in the Mad River Groundwater Basin, Mad River Lowland Sub-basin (1-8.01). The DWR has ranked the sub-basins as "Very Low" priority, indicating that the groundwater sub-basin is not at risk of overdraft (DWR, 2019). Furthermore, the project site is surrounded by urban development with existing connections to the City of Arcata water distribution system. Therefore, it is presumed that the presence of nearby groundwater wells is unlikely, and the existing groundwater well serving the project site will continue to have sufficient water supplies available to serve the project.

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

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

As discussed in the Utilities and Service Systems Setting, the existing onsite wastewater treatment system at the project site is proposed to be removed and the proposed multi-use building (concessions, restrooms, and storage) would be connected to the City of Arcata's wastewater system.

Due to the limited facilities proposed for the site (i.e., one building with restrooms and a small concessions booth), the intermittent use that will occur, and the limited use of the site during the rainy season when inflows to the wastewater treatment system are the highest, the wastewater discharge from the project would be minimal and would not have the potential to significantly impact the City's wastewater treatment system. Furthermore, the City of Arcata has determined that the wastewater treatment plant has sufficient capacity for the anticipated buildout under the General Plan. This would include wastewater discharge from use of the project site for public facility purposes.

For the reasons explained above, it has been determined that the proposed project will not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. The proposed improvements to the AHS athletic fields would generate solid waste during both construction and operation.

Construction

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

Operation

During operation of the proposed project, solid waste and recyclables would be generated, primarily during sporting events at the proposed athletic facility. Solid waste and recyclables generated by the proposed project would continue to be integrated into the

AHS and City of Arcata solid waste stream and are not anticipated to generate significant amounts of solid waste above the existing baseline condition. This is partly because under existing conditions, sporting events are currently held at the project site or elsewhere in the City of Arcata. The proposed project will not increase the number of sporting events but will relocate offsite sporting events to the project site. Therefore, while the proposed project will result in an increase of solid waste generation at the project site, it will not result in a significant increase in solid waste generation within the City.

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

For the reasons explained above, it has been determined that the proposed project will not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the proposed project would result in a less-than-significant impact on this resource category.

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

The City of Arcata, through its solid waste disposal contractor (Recology Arcata), collects solid waste and recyclables generated at AHS facilities. During operation of the proposed project, the project site would generate solid waste and recyclables, which would continue to be integrated into the AHS and City of Arcata solid waste stream. As discussed under subsection d), the proposed project would not increase the number of sporting events held by AHS but will relocate offsite sporting events to the project site. As such, the proposed project would not result in a significant increase in solid waste generation within the City. The proposed project would be required to continue operating in compliance with federal, state, and local statutes and regulations related to reducing solid waste.

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

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

Mitigation Measure AQ-1 (Fugitive Dust Control Measures)

Mitigation Measure BIO-1 (Howell's Montia Mitigation Plan)

Mitigation Measure BIO-2 (Nesting Bird Surveys)

Mitigation Measure BIO-3 (Temporary Wetland Impact Minimization Measures)

Mitigation Measure CR-1 (Cultural and Archaeological Resources)

Mitigation Measure CR-2 (Unidentified Human Remains)

Mitigation Measure GEO-1 (Geotechnical Design Recommendations)

Mitigation Measure GEO-2 (Paleontological Resources)

Mitigation Measure HWQ-1 (Stormwater Management System Design)

Mitigation Measure NO-1 (Construction Noise)

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

Setting: The proposed project is located in the Sunset neighborhood in the City of Arcata. Arcata's natural landforms include forested hillsides to the east; a sloping coastal terrace in the central area of town; a river corridor to the north; and flat bottomlands known as the Arcata Bottom, forested coastal dunes, bay front, and tidelands to the west and south. Arcata is bordered by the Mad River to the north, Arcata Bay to the south, the Arcata Bottom to the west, and the Arcata Community Forest and Fickle Hill to the east.

The project site consists of two existing irrigated sports fields that support several AHS athletic programs. The project site has been used by AHS as an athletic facility for over 50 years. The project site is bordered to the north by railroad tracks from the North Coast Railroad Authority, Arcata City Trail (part of Humboldt Bay Trail), Foster Avenue, a vacant lot, Sunset Terrace Apartments, and low-density residential neighborhoods. To the east, the project is bordered by Sunset Avenue, Woodridge Apartments, Arcata Skate Park, H Street, and US Highway 101. The project is bordered to the South by Woodridge Apartments, Greenwood Cemetery, and the AHS main campus. To the west, the project is bordered by Shay Park, Jolly Giant Creek, and the Lower Twin Parks Apartments.

Most of the project site is relatively flat. Site topography on the project site rises steeply on the northern, eastern, and southern edges of the site, shaping the project site into a basin. The eastern slopes and portions of the northern slopes are man-made for transportation infrastructure. The southern bluff slope remains a shrub-forest zone between the project site and the Greenwood Cemetery and AHS main campus, situated on top of the bluff to the south. The athletic fields and surrounding slopes flow towards drainage ditches on the southern, eastern, and northern edges of the site, which ultimately drain to Jolly Giant Creek. Jolly Giant Creek runs along the northern portion of the project site through a culvert approximately 10 feet beneath the surface of the site, surfacing approximately 100 feet west of the gravel access road on the site, where it flows into a wetland/pond complex in Shay Park.

The proposed project is not located within a State Responsibility Area (SRA) designated area (CALFIRE, 2007b). The project site is in a Local Responsibility Area (LRA) where fire prevention, fire protection, and emergency medical services are provided by the Arcata Fire District. The nearest fire station to the project site is the Arcata Fire Station at 631 9th Street, located approximately one mile to the south of the subject site. The Mad River Fire Station is also located at 3235 Janes Road, approximately 2.7 miles to the north of the site. The project site is designated "Unzoned" by Fire Hazard Severity Zones (FHSZ) mapping (CALFIRE, 2007a). The majority of mapped moderate and high FHSZ in the City of Arcata LRA occur to the east of US Highway 101 within the wildland urban interface of the Arcata Community Forest. The Arcata Community Forest is located over 1 mile to the east of the project site.

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. This type of project is not of the nature to substantially impact emergency response or evacuation.

The project site is accessible from an existing gravel access road, by way of Sunset Avenue or the AHS main campus. The primary access for the project site is from Sunset Avenue, which is narrow and provides limited maneuverability for emergency vehicles.

The project proposes a new 24-foot-wide paved driveway/entrance from Sunset Avenue to facilitate simultaneous and safe ingress and egress, significantly improving the existing access to the site. In addition, the project proposes onsite parking and a drop-off/turnaround area for vehicles. The proposed drive aisles and parking facilities will be designed to meet emergency access standards and accommodate the onsite maneuvering of emergency vehicles. As such, the proposed project will provide improved emergency access to the project site compared to existing conditions.

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

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. Although parts of the City of Arcata have mapped FHSZ ratings, the project site is designated "Unzoned" (CALFIRE, 2007a). The majority of mapped "Moderate" and "High" FHSZ in the City of Arcata LRA occur to the east of US Highway 101 within the wildland urban interface of the Arcata Community Forest. The Arcata Community Forest is located over 1 mile to the east of the project site. The project site does not exhibit topography, vegetation patterns, or other factors (e.g., fuels, aspect, etc.) that would expose people or structures to a significant risk of wildland fires. Furthermore, the proposed project is not of the nature to exacerbate wildfire risks.

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

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

The project proposes improvement of the existing AHS athletic fields in the City of Arcata. The project site is within the vicinity of existing water, wastewater, stormwater, electrical, and telecommunication facilities available to service the project. The proposed project would require several utility infrastructure improvements. However, due to the location of the proposed project, the installation or maintenance of these improvements is not of the nature to exacerbate fire risk.

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

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

The project site is currently developed as an outdoor athletics facility in the City of Arcata and would continue to function as such under the proposed project. Most of the project site is relatively flat. Slopes surrounding the project site rise steeply on the northern, eastern, and southern sides of the site, shaping the project site into a basin. The athletic fields and surrounding slopes flow towards drainage ditches on the southern, eastern, and northern edges of the site, which ultimately drain to Jolly Giant Creek.

The project area is characteristic of an urban environment, with residential neighborhoods and apartments, roadways, public facilities, and parks in the vicinity of the project site. The risk of wildfire in the immediate vicinity of the project site is limited. The proposed project is consistent with the existing use of the site and is not located in an area that would expose people or structures to downslope or downstream flooding or landslides resulting from post-fire slope instability, runoff, or drainage changes.

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

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

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

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

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

The proposed project has the potential to result in significant impacts related to Air Quality (Section III), Biological Resources (Section IV), Cultural Resources (Section V), Geology and Soils (Section VII), Greenhouse Gas Emissions (Section VIII), Hydrology and Water Quality (Section X), Noise (Section XIII), and Tribal Cultural Resources (Section XVIII). However, mitigation measures have been identified and incorporated in the aforementioned sections which serve to reduce those potential impacts to a less-than-significant level.

With the incorporation and implementation of mitigation measures provided in this document, the project will not have the potential to degrade the quality of the environment, substantially reduce habitat of a fish or wildlife species, cause a fish or wildlife population to drop below the self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, the impacts of the proposed project are less-than-significant with mitigation incorporated.

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

As discussed throughout this document, the project would not increase the number of sporting events held by AHS, but would relocate these events to the project site. As such, most potential impacts from operation of the proposed project are part of the existing baseline condition. The mitigation measures required for the proposed project are primarily to mitigate the impacts of construction activity. Therefore, based on the discussion and findings in this document, there is no evidence to suggest that the proposed project would have impacts that are cumulatively considerable.

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

Based on the discussion and findings in Section III (Air Quality), Section V (Cultural Resources), and Section XIII (Noise), the project does have the potential to cause adverse effects on human beings during construction. However, mitigation measures have been identified and incorporated in the aforementioned sections which serve to reduce those potential impacts to a less-than-significant level.

With the implementation of mitigation measures included in other sections of this document and for the reasons explained above, it has been determined that the proposed project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

Mitigation Measures: See Section III (Air Quality), Section V (Cultural Resources), and Section XIII (Noise) for a description of the prescribed mitigation measures.

References

The following documents were used in preparation of this Initial Study. The reference documents are available from the Northern Humboldt Union High School District upon request. Please contact the District's Fiscal Services Director by e-mail at cvickers@nohum.k12.ca.us.

Bay Area Air Quality Management District (BAAQMD). 2017. *California Environmental Quality Act Air Quality Guidelines. May.*

Brunelle & Clark Consulting, LLC. 2017. *Asbestos Survey & Paint Sampling – Arcata High School Football/Soccer Field.*

California Air Pollution Control Officer's Association (CAPCOA). 2009. *Health Risk Assessments for Proposed Land Use Projects*. July.

- 2011*. Health Effects.*

California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook. A Community Health Perspective*.

- 2017. *2017 Climate Change Scoping Plan: The Strategy for achieving California's 2030 greenhouse gas reduction target.*
- 2018a. *8th Edition, California Greenhouse Gas Emissions Inventory: 2000-2016. California Greenhouse Gas Emissions for 2000 to 2016, Trends of Emissions and Other Indicators. Executive Summary.*
- 2018b. *Area Designation Maps / State and National.*
- 2020a. *Hydrogen Sulfide & Health.*
- 2020b. *Lead & Health.*
- 2020c. *Sulfate & Health.*
- 2020d. *Vinyl Chloride & Health.*
- 2020e. *Visibility Reducing Particles & Health.*

California Department of Conservation (DOC). 1983. Special Studies Zones – Arcata North Quadrangle.

- 2000*. A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos*.
- 2010*. California Geologic Survey – Geologic Map of California.*
- 2020*. California Important Farmland Finder.*

California Department of Education (CDE). 2018. *Arcata High Dashboard Report.*

California Department of Finance (DOF). 2020. *E-5 County/City Population and Housing Estimates - 1/1/20.*

California Department of Forestry & Fire Protection (CALFIRE). 2007a. *Humboldt County– Draft Fire Hazard Severity Zones in LRA.*

- 2007b*. Humboldt County– Fire Hazard Severity Zones in SRA.*

California Department of Toxic Substances Control (DTSC). 2020. *Envirostor – Viewer.*

California Department of Transportation (CalTrans). 2017. *California State Scenic Highway List.*

California Department of Water Resources (DWR). 2004*. California's Groundwater Bulletin 118 - Mad River Groundwater Basin, Mad River Lowland Subbasin.*

- 2019*. Sustainable Groundwater Management Act 2019 Basin Prioritization – Process and Results.*

California Emergency Planning Agency (CAL EMA). 2009. *Tsunami Inundation Map for Emergency Planning – Humboldt Bay.*

California Geological Survey (CGS). 1995. *Planning Scenario in Humboldt and Del Norte Counties, California, for a Great Earthquake on the Cascadia Subduction Zone*. Special Publication 115.

City of Arcata. 2008. *Arcata General Plan.* Amended Oct. 2008.

- 2016. *2015 Urban Water Management Plan*. Updated February 2018.
- 2018. *City of Arcata Sewer System Management Plan.*
- 2020. *City of Arcata GIS Parcel Finder.*

Federal Emergency Management Agency (FEMA). 2016. *Flood Insurance Rate Map (FIRM) Map Number: 06023C0689F.*

Humboldt County. 2020. *Humboldt County Web GIS.*

Mendocino County Air Quality Management District (MCAQMD). 2010. *Adopted Air Quality CEQA Thresholds of Significance.*

National Weather Service (NWS). 2019. *Climate Station Precipitation Summary.*

Natural Resource Conservation Service (NRCS). 2020. *Web Soil Survey - Custom Soils Report.*

North Coast Unified Air Quality Management District (NCUAQMD). 1995. *Draft Particulate Matter (PM_{10}) Attainment Plan.*

- 2020. *Website – Air Quality Planning & CEQA*, *District Rules & Regulations, and Asbestos Regulations.*

Pacific Gas & Electric (PG&E). 2020. *Website – Learn the History of the Humboldt Bay Power Plant.*

Redwood Coast Energy Authority (RCEA). 2020. *Website – Community Choice Energy Program*.

Sacramento Metropolitan Air Quality Management District (SMAQMD). 2018. *CEQA Guide: Chapter 6 – Greenhouse Gas Emissions.*

Schatz Energy Research Center Humboldt State University. 2005. *Humboldt County Energy Element Background Technical Report, Administrative Draft*. July.

State Water Resources Control Board (SWRCB). 2020. *Geotracker – Viewer.*

SHN. 2018. *Geotechnical Investigation - Athletic Improvements Project.*

- 2019a. *Biological Report - Arcata High School Athletic Facilities Improvement Project.*
- 2019b. *Geotechnical Investigation Addendum - Athletic Improvements Project.*
- 2019c. *Wetland Delineation Report - Arcata High School Athletic Facilities.*
- 2019d. *Geologic Hazards and Geotechnical Investigation Report–Revision 1 – Open Door Community Health Center.*
- 2020a. *Arcata High School—Athletic Facilities Improvements Stormwater Control Plan for Regulated Projects.*
- 2020b. *Howell's Montia Mitigation Monitoring and Reporting Plan.*
- 2020c. *Sound Analysis Results for Arcata High Sports Facilities Improvements Project.*

U.S. Environmental Protection Agency (USEPA). 2018. *Learn About Asbestos.*

U.S. Geological Survey (USGS). 2011. *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California.*

William Rich and Associates (WRA). 2020. Cultural Resources Investigation for the Athletic Improvements Project at Arcata High School. Arcata, Humboldt County, California. May.

W-Trans. 2017. *Central Arcata Areawide Traffic Impact Study*. March 13.

W-Trans. 2020. *Focused Traffic Study for the Arcata High School Project.* April 24.