



THE MCKINLEY STATUE REMOVAL PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT

Lead Agency:

City of Arcata

State Clearinghouse # 2018052032

October 5, 2018



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Summary

Chapter 1 Introduction contains a summary of the project description, which is in essence the removal of the statue of the former President William McKinley that has been at its location on the Arcata Plaza since 1906 and, as such, has been identified a contributor to the Plaza historic resource. The statue, once removed, would remain in storage at a City of Arcata facility until and unless a suitable relocation site is identified. This decision of the City of Arcata City Council was as a result of public hearings and a desire to “provide a design for the plaza that is inclusive and welcoming to people of all race, ethnicity, national heritage, backgrounds, and orientation.”

This EIR found that the impact to Cultural (historic) Resources, from the removal of the statue, remained significant and unavoidable. A mitigation measure has been added that requires *“A comprehensive interpretive report will be developed by the City of Arcata, in collaboration with the area [Tribes], the Historic Sites Society of Arcata and the Humboldt County Historical Society. The report shall include text and photographs with information about the statue itself, the artist, the patron, its relationship to the San Francisco earthquake of 1906, why it was erected, its lifetime on the Plaza, and why it was removed. The interpretation will include the pre-history of the site as Wiyot land before Anglo discovery.”*

In addition to the proposed project, two alternatives to the proposed project were analyzed that kept the statue in place, one which required interpretative signage; the other was the No Project Alternative. Another two alternatives considered relocation of the statue to places other than to storage.

A primary issue to be resolved by the City Council, based on this EIR, will be whether “specific economic, social or other benefits outweigh the unavoidable adverse environmental effects” resulting from this project (CEQA Guidelines 15093).

Chapter 1. Introduction

Purpose and Intended Uses of this Environmental Impact Report

The City Council (Council) of the City of Arcata (City) voted on February 21, 2018, in favor of removing the statue of President William McKinley that has been located at the center of Arcata's Plaza since it was donated by Arcata resident George Zehndner in 1906. The statue has periodically been the focus of concern by citizens who question the appropriateness of having a commemorative work of a former President in the center of the town Plaza who is associated with a controversial period in America's history, namely the western expansionist period of the late 19th Century. This period is further associated with the poor treatment of the indigenous peoples whose lands were the focus of the expansionist policies of the US government at the time. Through this correlation to the treatment of indigenous peoples, attention has come forward that the statue, and all of Arcata and the Humboldt Bay area, is sitting on the ancestral lands of the Wiyot. A movement to remove the statue in honor of the Wiyot Tribe and all indigenous people has resulted in several supportive demonstrations on the Plaza and public meetings before the City Council.

The removal of commemorative works has become a national issue. In March of this year, the Advisory Council on Historic Preservation (ACHP), an independent federal agency created by the National Historic Preservation Act (NHPA) of 1966, to promote the preservation, enhancement, and sustainable use of our nation's diverse historic resources, and to advise the President and the Congress on national historic preservation policy, issued a policy statement to help communities address controversial commemorative works. The policy statement is included as Appendix B. In short, the ACHP statement provides guiding principles to assist local governments when facing decisions regarding the disposition of controversial public commemorative works and acknowledges that communities' values change over time and that appropriate stewardship should *balance stewardship responsibilities for publicly-owned commemorative works with recognition of the sensibilities, cultural responses, and emotions over memorialization and remembrance of difficult chapters in the nation's history*. (ACHP, March 2018) This guidance supports the City Council's decision to remove the statue for the reasons stated herein. The statue is proposed to be stored at a City-owned offsite location until its permanent relocation site is determined.

The McKinley Statue is identified in Policy H-3g of the Historic Preservation Element of the General Plan as one of several principal features of the Plaza which defines its historical character and which shall be preserved. In order to remove the statue, a focal point of the Arcata Plaza Historic District (District) and one of the principal features of the Plaza's historic character, the Council has found that a General Plan amendment will be required. While, a Design Review permit for alterations to a structure within the District is required pursuant to §§ 9.72.040.B.2 and B.3 of the City's Land Use Code (Code) for private projects, the City is not subject to Design Review.

The project requires discretionary approval and as such is subject to the California Environmental Quality Act (CEQA). The City, as the lead agency, must identify and document the potential environmental impacts of the project in accordance with CEQA (Public Resources Code § 21000 et seq.), and the CEQA Guidelines (California Administrative Code Section 15000 et seq.). The City determined that the impact to the historic resources that are the McKinley Statue and the District is potentially

significant. To fulfill CEQA's environmental review requirement, the City of Arcata determined that an Environmental Impact Report (EIR) be prepared for the project. The EIR will be focused on potential impacts to Cultural Resources, with a very cursory analysis of the other CEQA impact categories.

The purpose of the EIR is to:

- Provide public disclosure of the potentially significant environmental effects of the project;
- Indicate means by which to avoid, minimize, or mitigate potentially adverse environmental effects;
- Analyze a range of alternatives to the project that may reduce or avoid one or more significant environmental effects; and
- Consider cumulative effects and other environmental effects.

Processing The EIR

The environmental review process in accordance with CEQA contains many steps identified below. The first step was the Notice of Preparation. The scoping meeting followed shortly thereafter. This Draft EIR will initiate the public review and comment period described below. Several additional steps, outlined below, must be completed before any action on the Statue may be taken by the City.

Notice of Preparation

On May 9, 2018, a Notice of Preparation (NOP) was prepared and distributed to the State Clearinghouse (SCH #2018052032) in accordance to §15082 of the CEQA Guidelines. The NOP determined that an EIR would be prepared for the Removal of the McKinley Statue from the Arcata Plaza. The NOP and responses to the NOP are contained in the appendices to the EIR (Appendix B).

Scoping Meeting

On May 17, 2018, a public Scoping Meeting was held at the D Street Neighborhood Center for citizens to provide comment on the project and EIR alternatives. On May 18th, an agency scoping meeting was held at Arcata City Hall with City staff. The three Wiyot area Tribal Historic Preservation Officers (THPOs), the State Historic Preservation Officer (SHPO) via phone, and a representative from the Historical Sites Society of Arcata (HSSA), which has been recognized as a non-profit membership organization interested in historic preservation and local history per § 9.53.030.B of the Land Use Code, were invited. Those present provided comments concerning issues that should be addressed within the EIR being prepared for the project. Following the meeting, City of Arcata Community Development Staff provided a memorandum containing a list of the meeting participants and the comments received from the various agency staff. The Scoping Meeting memorandum is contained in the appendices of the EIR (Appendix C).

Public Review and Comment Period

The Draft EIR will be circulated for 30 days to allow public agencies and interested individuals to review and comment on the document. The Draft EIR will be available for review during this period at the following locations:

- 1) Arcata City Hall, 736 F Street, Arcata, California;
- 2) Arcata Public Library, 500 7th Street, Arcata, California;
- 3) Humboldt State University Library – Humboldt Room, Arcata, California; and
- 4) City of Arcata website (www.cityofarcata.org)

Public agencies and interested individuals are encouraged to submit written comments on the Draft EIR for consideration and inclusion in the Final EIR. (Note to Commenters: To facilitate the response to comments, please list each comment separately and reference the EIR chapter and page number of the item to which you are commenting.) Comments must be sent by the end of the review period to:

David Loya, Community Development Director
City of Arcata Community Development Department
736 F Street
Arcata, CA 95521

Public Hearings

Duly noticed public hearings will be held by both the Planning Commission and City Council for various aspects of the project which could occur during or subsequent to the public review and comment period for the EIR. These meetings will occur during regularly scheduled or special meetings of the City of Arcata Planning Commission and City Council. Several meetings may be held if requested by the Planning Commission or City Council. These meetings will provide opportunity for the public to comment on the project and the EIR. The City Council will be the review authority for all permits needed for the project and the EIR.

Final EIR

At the end of the public review period of the Draft EIR, written responses will be prepared for substantive comments (both oral and written) received during the public review and comment period. The comments and responses will then be included in the Final EIR and will be considered by the City prior to EIR certification. The City Council will be the review authority for all permits and the EIR.

EIR Certification

Prior to approval of the project, the City of Arcata must certify that the EIR has been completed in compliance with CEQA and must make one or more of the following findings for each potentially significant impact identified:

- That changes or alterations that avoid or substantially lessen the significant effects have been required or incorporated into the project; or
- That specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR.
- That specific economic, social, or other benefits outweigh the unavoidable adverse environmental effects.

These findings must be supported by substantial evidence in the administrative record, which includes the NOP, comments on the NOP, Draft EIR, comments on the Draft EIR, Final EIR, comments received during public testimony, as well as all documents enumerated in Public Resources Code § 21167.6.

Each public agency is required to avoid or minimize the significant environmental effects of projects it approves or carries out whenever it is feasible to do so. If the significant effects cannot be avoided or mitigated, the public agency must make findings of overriding considerations prior to approving the project.

Notice of Determination

If the City (the lead agency) approves the proposed project, within five days it will file a Notice of Determination (NOD) with the Humboldt County Clerk who must then post it within 24 hours of receipt. The NOD will also be sent to the State Clearinghouse, and to anyone previously requesting notice. Posting the NOD begins a 30-day statute of limitations period for challenges to the City's decision under CEQA.

Organization of the EIR

The EIR for the McKinley Statue Removal Project describes the proposed project and three project alternatives, and evaluates their anticipated environmental effects, including growth-inducing and cumulative impacts. The EIR also identifies mitigation measures that would avoid or minimize environmental effects that have been identified (in the EIR) as potentially significant.

Background Information Used In EIR Preparation

The following documents were referenced for background information during preparation of the EIR. Copies of these documents are available for review at the City of Arcata.

- City of Arcata. 2000. *Arcata General Plan*;
- City of Arcata. 2000. Final Program EIR on Arcata General Plan;
- City of Arcata. 2008. *Arcata General Plan*, Amended Oct. 2008;
- City of Arcata. 2008. *City of Arcata Municipal Code – Title 9 – Land Use Code*. Oct. 2008;
- JRP Historical Consulting, LLC, June 2018. *Historical Resource Report – Arcata Plaza McKinley Statue Removal Project*
- Van Kirk, Susie. 1979. *Reflections of Arcata's History: eighty years of architecture*; and
- Newspaper and magazine clippings from the *Arcata Union Press* and *Humboldt Historian*, and other historical information from the Humboldt Room archives (Humboldt State Library).

As part of the analysis of the potential environmental impacts of the Project, the City obtained the services of a qualified historian to prepare a Historic Resources Report that meets the objectives of the Secretary of the Interior's Guidelines for Historical Documentation. Given the extremely limited focus of the environmental review for the removal of the McKinley Statue, no other special studies or technical reports were prepared for the Project. For additional background information on the City's environmental setting and land use policies, the reader is directed to the City of Arcata Final Program EIR on Arcata General Plan, 2000.

Environmental Setting Summary

Regional Setting

The project site (the Arcata Plaza) is located in the central core of the City of Arcata, west of US Highway 101, north of State Highway 255. The City of Arcata has an estimated population of 18,398 persons (CA Department of Finance, 2018). 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. 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 and are some of its most important aesthetic resources. The project's location, relative to the City, is shown in Fig. 1A (Location Map).

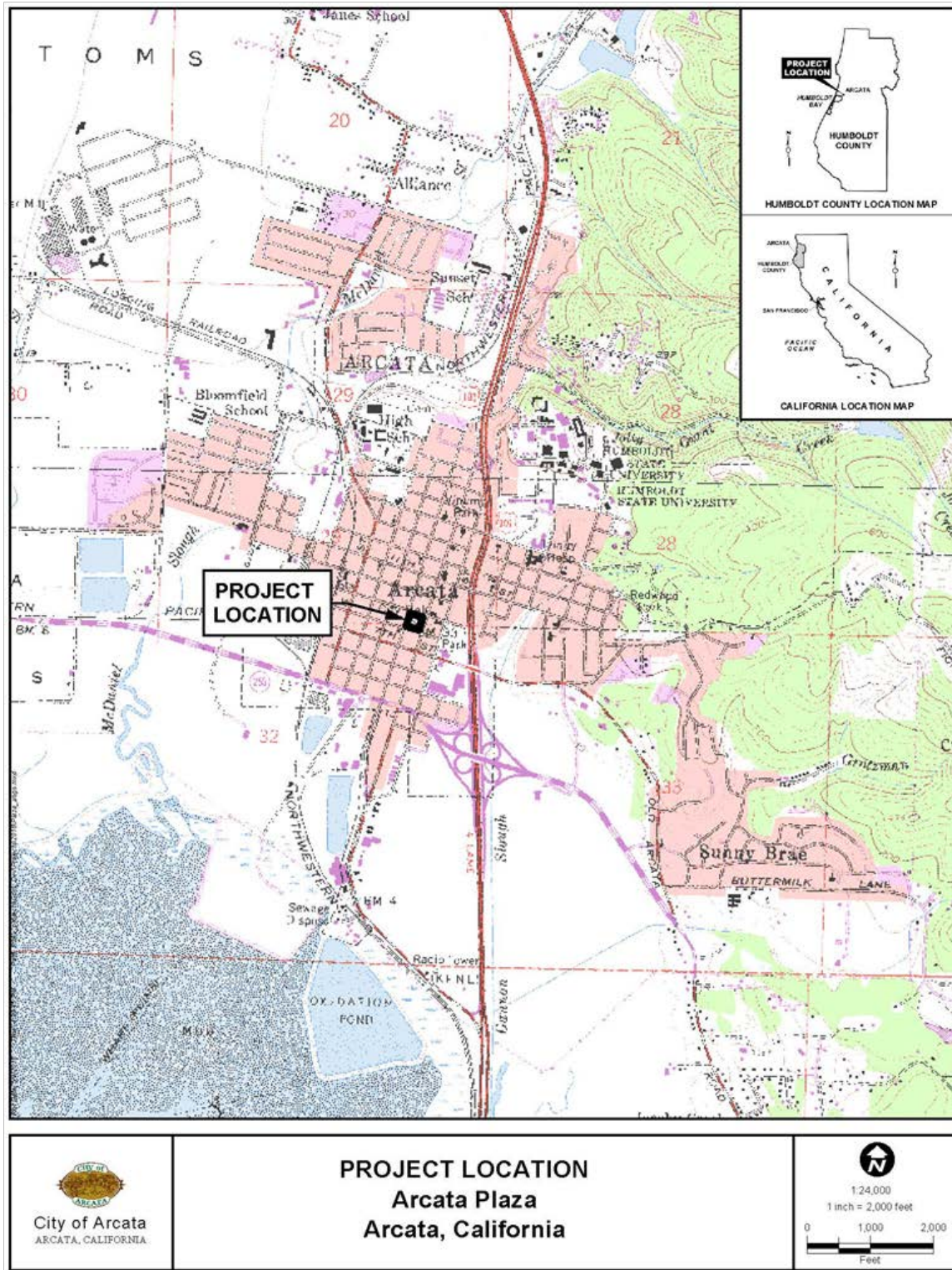


Figure 1A Location Map

Arcata's Environmental Setting—Cultural & Archaeological Resources

The first known inhabitants of the Humboldt Bay Region were Wiyot Indians, a member of the Algonquin linguistic group. The Wiyot population prior to 1850 is estimated to have been between 1,000 and 3,300 individuals (E. Taylor & J. Roscoe, October 1998). Wiyot settlements were located primarily along the lower Mad River, and around Humboldt Bay and the lower Eel River. Village sites were located at the water's edge, ocean, bay, or creek, with trails leading to grassy openings and from one village to another. A small part of the population lived in an area from the Mad River to the northern portion of Humboldt Bay; they lived in settlements of one to three families. Within what is now referred to as the Arcata planning area, they lived in semi-permanent settlements and often traveled seasonally for hunting and gathering. The estimated population for the Arcata planning area, in or about the year 1848, is 600 inhabitants (City of Arcata General Plan).

After the start of the California Gold Rush, from 1850 to 1860, Wiyot territory became the center of the largest concentrations of European settlers in California north of San Francisco. The past settlers utilized Humboldt Bay as a major shipping point for supplies to the previous gold mines on the Trinity, Klamath, and Upper Sacramento Rivers. In addition, the establishment of the Redwood timber industry, and homesteading of the Eel River and Arcata Bottom for ranching and farming purposes, brought more people into the area. The influx of new settlers unfortunately led to violence, including the Indian Island Massacre of February 26, 1860, which nearly destroyed the entire Wiyot population.

There are currently 32 recorded archeological sites in the Arcata planning area. Most sites are situated along the margins of Humboldt Bay, along the edges of marshes and sloughs, and in the Arcata Bottom area. Sites also tend to be located at the base of hills and on mid-slope terraces near sources of water.

Data collected by L. L. Loud (1918) identified a number of Wiyot habitation and resource procurement sites in the general vicinity of the project site. One site is Camp Curtis, located on LK Wood Blvd., approximately one mile east of the project area (E. Taylor & J Roscoe, 1998). Taylor & Roscoe (1998) also state that there are reported locations of several other prehistoric village sites near Camp Curtis.

According to the Arcata General Plan, the most likely location for additional (unrecorded) archeological sites is an area approximately 1,000 meters wide along the Humboldt Bay shoreline and the Mad River. There is also the possibility of encountering archeological resources elsewhere in the Arcata planning area.

Table 1 Contributing Historic Structures Within The District

Name of Resource	Location	Registry	Period of Significance
Hotel Arcata	915 G Street (708 9 th Street) (APN 021-106-004)	National: #84000775 State: N1261 Local: LHP-83-01	c. 1925
Union Building	898 G Street (APN 021-041-001)	Local: LHP-81-04	c. 1890
Moonrise Herbs Bldg. (former KXGO, Western Auto Bldg.)	826 G Street (APN 021-041-010)	Local: LHP-82-03	c. 1901
Old Post Office	735 8 th Street (APN 021-108-004)	Local: LHP-89-06	c. 1884
Jacoby (Storehouse) Building	791 8 th Street (APN 021-108-002)	National: #82002179 State Landmark: #783	c. 1866 - 1900

Project Site Description

The Plaza is a City public park, one square block in size, in the center of downtown Arcata. The Plaza is one block bounded by “G” and “H” and 8th and 9th Streets and is the center of the downtown business district. It is bounded on all four sides by sidewalks, and the central paved area has the William McKinley Statue facing west. The radiating sidewalks stretch from the central area to each corner and to the middle edge of each side. The other distinctive features include the flagpole in the sidewalk running north from the central area, the Women’s Christian Temperance Union drinking fountain in middle of the west edge, and brick and concrete flowerbed borders with wood benches around central area. Notably, there are two palm trees on either side of northeast corner sidewalk, as well as evergreens, flowering trees, and flowers in season.

The Plaza has changed considerably in the time since its development as a “common” in the 1850s at the time of the settlement of Union, which later became known as Arcata. The Plaza is the center of the District and is surrounded on all four sides by an eclectic collection of historic and newer commercial structures.

Figure 1B shows the Plaza in an aerial view taken in 2017.



Figure 1B Aerial Photograph of Project Site. Source: Google Earth

Proposed Project Description

The City proposes to remove the McKinley Statue and the concrete pedestal and any underlying steps or structural elements on which the statue is mounted from Arcata Plaza. The JRP Report noted that the *“concrete pedestal is surrounded by a circular concrete planter box filled with soil and landscaping. This*

planter box and any potential concrete elements of the statue's base currently buried and obscured from view by the planter box and its contents would remain..." The project reviewed under this EIR was expanded to include, as part of this project, removal of the stairs that are currently covered up with a 20-foot diameter wall and landscape area, and any structural elements that may lie under it. Based on the JRP report these elements would also be considered historic and have similar impacts as discussed in the JRP Report. While the entire associated structure is included for removal under this EIR, portions of the project, such as the landscape area, the steps, and/or the pedestal, could remain, depending on how this area may be used in the future. It is conceivable that only the statue may be removed at this time and new plans developed years later that require the pedestal and steps to be removed. However it is just as likely that all elements associated with the statue may be removed at one time. Once removed, the statue and concrete pedestal would be placed in storage at a City facility until a final determination is made as to what to do with it. The City could also implement a new project for the center of the plaza without further affecting the historic significance of the center of the plaza, once the statue and associated elements are removed. The City Council directed the initiation of the project at its February 21, 2018, special meeting on the topic. This special meeting was scheduled after several impromptu and scheduled hearings on the topic of the statue's removal. The public testimony spanned a broad range of reasons for the project, including notably, McKinley's involvement in the United States of America's expansionist policies during his presidency, which resulted in wars that subjugated, killed, displaced, and interned people of color, especially Indians (Native Americans). The statue is viewed as honoring the historical mistreatment of indigenous people resulting from the policies of manifest destiny.

While this was a dominant theme of the public testimony, it was not the only perspective. Many stated that the Statue had personal nostalgic meaning and represented a connection with Arcata's past and their personal journeys through Arcata's recent history. Several speakers commented on the importance of the Statue as a current relevant cultural icon in its relationship to events on the plaza. Notably, dressing McKinley up for Halloween was referred to by many people. Finally, several comments spoke to McKinley's role in the Civil War and his personal stance against slavery. These comments identified McKinley's role in the expansionist policies of the United States as a product of the times rather than a heartfelt objective of the former President.

The Council identified through the public record that the Statue's location at the center of the Plaza no longer represented the culture and values of the City.

Project Objectives

The project objectives identified by the City Council and the City's ability to meet these objectives is analyzed in the EIR.

- Provide a design for the plaza that is inclusive and welcoming to people of all race, ethnicity, national heritage, backgrounds, and orientation;
- Preserve Arcata's history while recognizing the changing values of its citizens;
- Minimize impacts to the Arcata District, while recontextualizing the important features on the plaza;
- Preserve the McKinley Statue.

Figure 1-C depicts the current environmental setting, which includes the statue, from the west side of the Plaza. Figure 1-D depicts the 'Project Description', the removed statue, from the same viewpoint.

Figure 1C View of McKinley Statue and Plaza from the West side of Plaza



Figure 1D View of the Proposed Project from the West side of Plaza



Project Requirements

The project would require a General Plan Amendment to remove the McKinley Statue reference from Policy H-3g(1) of the Historic Preservation Element and provide a short explanation why the statue was removed.

Summary of Alternatives

The California Environmental Quality Act (CEQA) requires that the EIR shall describe a range of reasonable alternatives to the project that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Section 15126.6(a)). The CEQA guidelines also note in Section 15126.6(a) that an EIR “need not consider every conceivable alternative to a project” and that “An EIR is not required to consider alternatives which are infeasible.” The development of alternatives is a means to provide ways of “avoiding or substantially lessening any significant effects of the project” (CEQA Section 15126.6(b)). Refer to Chapter 3 of the EIR for a detailed discussion of alternatives.

Several alternatives were identified but were eliminated from further review because they do not meet several of the basic requirements of CEQA; Section 15126.6(c) states “The EIR should also identify any alternatives that were considered... but were rejected as infeasible during the scoping process Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

The alternatives analyzed in the EIR are the following:

Alternative #1 – No Project. As the name implies, the *No Project Alternative* is an alternative in which there is no project. As such, no changes would occur, and the statue would remain in its current state. This alternative does not meet the basic project objectives. It would also result in no environmental impact.

Alternative #2 – Interpretive Signage. Similar to the No Project Alternative, this alternative would leave the statue in place. This alternative would place interpretive signage at the Plaza describing the circumstances and reasoning behind the statue’s stigma. While this alternative meets some, but not all, of the project objectives, this alternative further addresses the objectives than the No Project Alternative in that it would provide historical context and education around the history of the City, the statue, and the impact of settlement on the Wiyot and other indigenous people.

Alternative #3 – Relocation to Other City Facility. This would consist of removing the statue from the Plaza and reinstalling it at Redwood Park (or similar facility) with interpretive signage at either or both the Plaza and the Park, describing the circumstances and reasoning behind the statue’s relocation. This alternative meets the project objectives, and is a feasible alternative that would provide historical context and education around the history of the City, the statue, and the impact of settlement on the Wiyot and other indigenous people. Relocating the statue from the Plaza to an alternate City owned site would have the same potentially significant impacts to Cultural Resources on the District that the Proposed Project would have, but could allow for more in-depth interpretive signage at the new location, such as a kiosk. The potential impacts to these resources may be partially mitigated through the inclusion of the measures recommended in the JRP Report (Appendix A).

Alternative #4 – Relocation to Another Qualified Entity. This alternative would remove the statue from the Plaza and convey it to another qualified entity. This alternative meets most of the project objectives. This alternative would have the same environmental impacts with regard to Cultural Resources. While this is included as an alternative, the City has not finalized a plan to consider willing qualified entities as of this writing.

Based on CEQA Guidelines Section 15126.6 (e)(2),” ... If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Since there were no ‘CEQA’ defined ‘substantial adverse impacts to the physical environment’ for both alternatives #1 and #2 and some of the objectives were met by alternative #2, this would be defined by CEQA as the environmentally superior alternative. This alternative meets some but not all of the project objectives, but would go further than the No Project Alternative in that it would provide historical context, and education around the history of the City, the statue, and the impact of settlement on the Wiyot and other indigenous people. While this alternative would meet the CEQA definition of the ‘environmentally superior alternative per CEQA Guidelines Section 15126.6 (e)(2) in that no historic resource would be impacted, this alternative does not meet the basic objective or the social implications and stigma associated with providing a design for the Plaza that is inclusive and welcoming to people of all race, ethnicity, national heritage, background, and orientation.

Summary of Impacts and Mitigation Measures

The vast majority of responses to CEQA Environmental Checklist Form (Appendix D) were ‘No Impact’ or ‘Less than Significant Impact’ (See Appendix D). The analysis that follows in Chapter 2 provides support for these findings. Only one response was found to be “Potentially Significant” and that was the removal of an historic resource under the Cultural Resource Section. A mitigation measure was added to reduce impacts but the impact remained significant and unavoidable. The following lists the impact and the proposed mitigation measure.

Impact

V.a. Cultural Resources. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Mitigation Measure CU-1

A comprehensive interpretive report will be developed by the City of Arcata, in collaboration with the area Tribes, the Historic Sites Society of Arcata, and the Humboldt County Historical Society. The report shall include text and photographs with information about the statue itself, the artist, the patron, its relationship to the San Francisco earthquake of 1906, why it was erected, its lifetime on the Plaza, and why it was removed. The interpretation will include the pre-history of the site as Wiyot land before Anglo discovery.

Significance After Mitigation

Potentially Significant

The JRP Report (Appendix A) identified a number of ways the information that is gathered under the proposed mitigation measure could be utilized for the public's benefit. These included the following measures: a pamphlet, interpretive panels, website posting, and/or a documentary video. Information will be collected under the mitigation measure in a manner that it could be used for these later products.

Chapter 2. Analysis of Impacts and Mitigation Measures

The following are responses and findings to questions listed in CEQA Appendix G: Environmental Checklist Form (Appendix D).

I. AESTHETICS. Would the project:

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

The Program EIR for Arcata's General Plan (City of Arcata 2000b) describes Arcata's Vistas and Scenic Resources. "Arcata's 'natural' visual resources at the 'viewshed' level, as part of the landscape setting of the City. 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, forested coastal dunes, bayfront and tidelands to the west and south. The City is bordered by the Mad River to the north, Arcata Bay to the south, the Pacific Ocean to the west, and Fickle Ridge to the east. These features not only form distinctive natural edges for the planning area, but are some of its most important aesthetic resources."

Views toward the center of the Plaza or from the center of the Plaza are primarily urban in nature, as the public park portion of the Plaza is surrounded by commercial structures which, in its entirety, make up the District. Views of the tops of the hills to the east are only slightly visible from the Plaza over the rooftops of the commercial structures, most of which are two- and three-stories in height. There are no substantial views of the Coastal agricultural plains to the west, or Humboldt Bay or the Pacific Ocean to the west and south, from the center of the Plaza. The Plaza itself was not considered a 'scenic vista.' The postcard below, which includes the former City Hall building to the left of the statue, shows the view to the east toward the hills which are not visible. As the scenic vistas or viewsheds of the hills or the coastal plains will not be affected by the project, the project will have No Impact on this resource.

Mitigation: None required



Fig. 2A - An undated postcard of the McKinley Statue on the Arcata Plaza from **The Humboldt Project** collection.

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

The statue's location at the center of the Arcata Plaza is not adjacent to or near a state or locally-designated scenic highway (City of Arcata, 2000b) and, therefore will have *No Impact* on trees, rock outcroppings, and historic buildings within a state scenic highway.

Mitigation: None required

c) Substantially degrade the existing visual character or quality of the site and its surroundings? Less Than Significant Impact.

The project could result in an impact to the existing quality or character of the site if it substantially changed, covered or removed important elements that give the Plaza its character.

In Policy H-3g of the Historic Preservation Element of the City's General Plan, the McKinley Statue is listed as one of five principal features of the Plaza which define its historic character and are to be preserved. Since its installation in 1906 at the center of the public park portion of the Plaza which is, in itself, a central feature of the District, the McKinley Statue has long presided over important social and civic festivals and events including the 4th of July celebrations, the Oyster Festival, Farmer's Markets, and Arcata High School homecoming parades, among many others. The center of the Plaza has also been the stage for civil disobedience in the form of political protests, most recently relating to the movement to remove the statue based on the 'former President's participation in imperialist empire-building activities that were common worldwide during the era of his presidency (March 1897-September 1901)."

Because the statue is listed as a feature to be retained in the General Plan, its removal will require an amendment to Policy H-3g. The General Plan amendment will be conducted in compliance with § 9.92.030 of the Land Use Code. The City has undertaken the process of discretionary review prompting environmental review under CEQA for which this initial study has been prepared.

Design Review is not required for this project. While, the figure meets the definition of a "structure" in Article 10 (Glossary) of the Code, and its removal or relocation would be considered "demolition", which generally triggers the Design Review requirements under § 9.72.040.B.2 and B.3, the City is not subject to Design Review. All demolition and exterior modifications to privately held historic structures and private structures within historic districts require a Design Review permit pursuant to these Code sections. The Code requires Design Review and a 180 waiting period prior to demolition. The waiting period is required to ensure all attempts at preservation have been made (Code Section 9.53.060.B). The project is designed to preserve the statue in storage until a suitable relocation can be arranged. The Plaza Historic District, and its remaining historical features, will be retained.

The statue has been in place for 112 years, and the other important historic features of the Plaza (the Women's Christian Temperance Fountain (1912), the palm trees, the general symmetry of the sidewalks and the open nature of the Plaza and absence of the buildings within it) that are also listed in the General Plan that are situated around it, complete the visual character and quality of the site and its surroundings. The removal of this statue will change the visual character and quality of the site and the District within which it is located, but the action will not result in a substantial degradation of the visual character and quality of the Plaza itself or its immediate vicinity. For instance, removal of the statue would allow unobstructed views of the historic buildings that are now obscured by the statue and pedestal (as can be seen when comparing Figures 1C and 1D); the Plaza will still offer a central gathering place, albeit without the McKinley statue residing over those gatherings, for the public to gather for

various celebrations and events. Aesthetically speaking, there would be an unnoticeable change to the visitor who visits the Plaza and knows nothing of the previous statue residing there.

The removal of the statue, unlike the development of a new building or other structure that would block views of the coastal range to the east or to Humboldt Bay to the south, will simply leave a space where once there was a statue. The statue is an approximately 8.5' tall bronze sculpture mounted on an approximately 8' tall pedestal; it is of a relatively small size in the context of the District. It is not visible on the skyline nor are there known vista points outside of the Plaza area where the McKinley statue is visible as a landmark. Given its relatively small stature as a structure, its removal will not significantly degrade the existing visual character or quality of the site and its surroundings. The setting will remain the same. The more dominant features of the Plaza (the open nature of the Plaza and absence of the buildings within it) will remain.

Once the statue and pedestal are removed, the landscape circle could be restored and replanted, or it could be that if the steps are removed that a hardscape feature, such as pavers or concrete, could replace the disturbed area. These options are both consistent with the visual character of the Plaza and would not result in an adverse impact.

Mitigation: None required



Fig. 2B - An undated postcard of the McKinley Statue on the Arcata Plaza looking northeast. The former City Hall is in center view.
Source: **The Humboldt Project** collection

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

The statue is not currently illuminated; its removal and relocation to a City-owned storage facility will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The project will not result in a significant impact in terms of light or glare.

Mitigation: None required

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 Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:

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

The Plaza is a public park, zoned Public Facility (PF), with a variety of pervious and non-pervious surfaces, and has been heavily modified over the past century. The statue and its immediate surroundings are within a paved area. The downtown area is not mapped as consisting of Prime Farmland, Unique Farmland, or Farmland of statewide Importance; these areas have been mapped as Agriculture Exclusive in the City's General Plan Land Use Plan Map (Fig. LU-b). The proposed alteration will result in *No Impact* to any farmland resources.

Mitigation: None required

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

The Plaza parcel is not under a Williamson Act contract (City of Arcata, 2000b). It is planned and zoned Public Facility (PF) and no change to these designations is proposed. The project will have *No Impact* on zoning for agricultural use or Williamson Act contracts.

Mitigation: None required

- 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 Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? No Impact.**

As mentioned in Section II.b above, the Plaza is planned and zoned Public Facility (PF) and does not include forest land or zoning for timberland, forestry activities or Timberland Production (TPZ) (City of Arcata, 2000b). The proposed action will have *No Impact* on forest resources.

Mitigation: None required

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

The Plaza is an improved public park with several ornamental trees, in a downtown setting and does not contain any forest land or forest resources. The project will have *No Impact* on the conversion of forest land to non-forest use.

Mitigation: None required

- 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 removal of the statue 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 (City of Arcata, 2000b). The project will not result in any impacts or changes to agricultural or forestry uses on the parcel as none currently exist. The project will have *No Impact* on agricultural or forest resources.

Mitigation: None required

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- a) **Conflict with or obstruct implementation of the applicable air quality plan? No Impact.**
- b) **Violate any air quality standard or contribute substantially to an existing or projected air quality violation? No Impact.**

The project site is located within the North Coast Air Basin which is regulated by the North Coast Unified Air Quality Management District (NCUAQMD). The Air District's primary responsibility is to achieve and maintain federal and state air quality standards, subject to the powers and duties of the California Air Resources Board (CARB). The Air District is currently listed as being in "*attainment*" or is "*unclassified*" for all federal health protective standards for air pollution (ambient air quality standards). However, under state ambient air quality standards, the Air District has been designated "*nonattainment*" for particulate matter less than ten microns in size (PM₁₀) (NCUAQMD Website, 2016). PM₁₀ air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns. PM₁₀ emissions include, but are not limited to, smoke from wood stoves, dust from traffic on unpaved roads, vehicular exhaust emissions, and airborne salts and other particulate matter naturally generated by ocean surf. (City of Arcata, 2017) Air quality is further described in the City of Arcata Program EIR for the General Plan (City of Arcata, 2000b).

The City Engineer estimates that the removal of the statue, including staging and transportation to the storage facility, will take less than two business days (approximately 16 hours). Equipment needed will be one crane and a truck that can transport the statue. These two heavy vehicles will likely be diesel-fueled. The periodic operation of these two vehicles over two days will not conflict with the NCUAQMD guidelines. The project will have *No Impact* on the implementation of an air quality plan or contribute substantially to an existing or projected air quality violation.

Mitigation: None required

- c) **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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? No Impact.**

Given the minor and temporary nature of the proposed work, the operations required to remove the statue 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors). The resultant vacancy in the center of the Plaza will have *No Impact* on air quality (City of Arcata, 2000b).

Mitigation: None required

- d) **Expose sensitive receptors to substantial pollutant concentrations? Less Than Significant Impact.**

The operation of the heavy equipment on the Plaza for a short period of time will create some exhaust fumes that could be objectionable to sensitive receptors (e.g., children, senior citizens, and acutely or chronically ill people). There are no schools, hospitals, or care centers within close proximity to the Plaza, but there is a senior-restricted housing facility one block to the southwest. Given that Arcata is in attainment for carbon monoxide, this minor and temporary impact will be *Less Than Significant*.

Mitigation: None required

- e) **Create objectionable odors affecting a substantial number of people? No Impact.**

Similar to Section III.d above, the short timeframe and minor nature of the removal operations in not expected to create objectionable odors that would affect a substantial number of people. The project will have *No Impact* on the environment regarding objectionable odors affecting a substantial number of people.

Mitigation: None required

IV. BIOLOGICAL RESOURCES. Would the project:

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? No Impact.**

According to the California Department of Fish and Wildlife BIOS mapping system, there are 58 plant and animal species that fall under a variety of state and federal protections within the Arcata USGS quad. However none of these are likely to be on the Plaza or present when construction activities occur (City of Arcata, 2000b). The Arcata Plaza is a one-square block public park that consists of impervious paving, lawn, and landscaping. The McKinley Statue has been mounted on a solid concrete pedestal and steps for 112 years. There is no wildlife habitat within or immediately adjacent to the Plaza that would be modified by the project in such a way as to result in a significant impact to any species identified as a candidate, sensitive, or special status species. The project would not conflict with the Biological Resources policies of the City's General Plan or the Resource Conservation standards in § 9.54 of the City's Land Use Code (City of Arcata, 2000a, 2008b). The project will have *No Impact* on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations.

Mitigation: None required

- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? No Impact.**

There are no riparian habitats or other sensitive natural communities within or adjacent to the Plaza. (City of Arcata, 2000b). The removal of the McKinley Statue will have *No Impact* on these resources.

Mitigation: None required

- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? No Impact.**

The project will not remove, fill, interrupt, or otherwise impact any protected wetlands, either directly or indirectly, as there are none within or adjacent to the Plaza (City of Arcata, 2000b).. The project will have *No Impact* on wetland resources.

Mitigation: None required

- 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? No Impact.**

The north coast of California, the Humboldt Bay area, and Arcata are within the Pacific Flyway of a variety of migratory bird species ((City of Arcata, 2000b). The removal of a statue in the middle of an urban public park in downtown Arcata will not create substantial interference with the movement of any native resident or migratory fish or wildlife species. Likewise, downtown Arcata is not known to possess migratory wildlife corridors or native wildlife nursery sites that would be affected by the project (City of Arcata, 2000b). The proposed project will have *No Impact* on these resources.

Mitigation: None required

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? No Impact.**

The City has Environmental Impact Assessment standards (§ 9.78, Code) and Biological Resource Conservation policies within the Biological Resources Element of the General Plan that are intended to protect sensitive species and habitats, neither of which occur on the Plaza. The project site is outside of areas mapped as Resource Protection Areas on the Open Space Plan Map of the General Plan, and as discussed in the General Plan PEIR (City of Arcata, 2000b). As such, the project will have *No Impact* in terms of conflicting with these policies and ordinances.

Mitigation: None required

- 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.**

There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan for downtown Arcata (City of Arcata, 2000b), therefore, the project will have *No Impact* on such policies and ordinances.

Mitigation: None required

V. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5? Potentially Significant Impact.

The Arcata Plaza is the central core of the District which was designated by Policy H-3b of the General Plan and implemented through the adoption of the Land Use Code by Ordinance 1377 in September, 2008. Ordinance 1377 also established the Plaza as a Landmark. The General Plan policy further established the standard that all structures within the District shall receive the same protections as are provided to individually-designated Historic Landmarks.

The Plaza is further identified in General Plan Policy H-3g as a “historic site” with the following principal features contributing to its historic significance:

1. The McKinley Statue at the center of the Plaza.
2. The generally symmetrical pattern of walkways.
3. The open nature of the Plaza and the absence of buildings within it.
4. The Women's Christian Temperance Union drinking fountain on "H" Street.
5. The existing Plaza palm trees.

As described on Pg. 8 of the Historic Resources Report (JRP, Inc., 2018), Appendix A, *the project to remove the McKinley Statue has the potential to cause a substantial adverse change to two historical resources under CEQA: Arcata and Arcata Plaza Historic Landmark*. In addition to local historic significance, the District also qualifies as a historic resource as defined in § 15064.5 of the CEQA Guidelines. Although the Report identifies two separate resources, the potential impact to the District would itself be less than significant with mitigation measures incorporated, but the impact of the removal of the statue itself would be significant. The statue itself will not be damaged in the process of its removal and storage. It is the context in which it has been located over the past 112 years that will be adversely affected.

The mitigation measure listed below would not be adequate to reduce the impact to a level of less than significant. The following mitigation measure requires documentation about the statue itself and will assist in mitigating the environmental impact from the removal of the McKinley Statue, as an historical resource. Content of the report will be prepared by the City of Arcata in a manner that its contents could be used in the future in a pamphlet, interpretive panels, a documentary video, all of which could be also be made available on the City's (or other's) website. The JRP Report provided further details how this report could be utilized as follows.

Table 2 Potential Implementation of Mitigation Measure CU-1

Product	Discussion/Description
Pamphlet	A pamphlet could be prepared for consumption by the general public about the statue's history and the removal of the statue from the Plaza. It could be distributed to local repositories and museums, businesses, HSU, online through at City website.
Interpretive Panels	An interpretive panel could be installed on the Plaza and at the relocation site if the statue's relocation is to a public place. The panels could include text and photographs, information of the statue itself, the artist, why it was erected, and why it was removed. The interpretation could include the pre-history of the site as Wiyot land before Anglo discovery.
Documentary Video	A short video could be created that presents the history of the statue and the issues related to its removal. The video could be available for broadcast on public television, for use at local museums and HSU.
Website	The aforementioned documentary video and report/pamphlet could be added to and maintained on the City's website and made available to the local Tribes, HSU or other entities that might be interested.
Local Historical Society Exhibit	The Historic Sites Society of Arcata, the Humboldt County Historical Society and others, if interested, could develop an off-site exhibit using the aforementioned materials.

Removal of the statue from its original location is therefore considered an unavoidable impact and remains *Potentially Significant, even with mitigation.*

Mitigation Measure CU-1: *A comprehensive interpretive report will be developed by the City of Arcata, in collaboration with the area Tribes, the Historic Sites Society of Arcata, and the Humboldt County Historical Society. The report shall include text and photographs with information about the statue itself, the artist, the patron, its relationship to the San Francisco earthquake of 1906, why it was erected, its lifetime on the Plaza, and why it was removed. The interpretation will include the pre-history of the site as Wiyot land before Anglo discovery.*

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? Less Than Significant Impact

The following describes the State Regulatory Framework:

Assembly Bill 52 (AB 52) establishes a consultation process with California Native American Tribes that involves Tribes in the early coordination and development of projects under the jurisdiction of state and local agencies that have discretionary approval authority for projects. AB 52 recognizes that California Native American Tribes have unique expertise regarding their tribal history, culture, and land use practices, and that this information may be useful during the environmental analysis process. The intent of AB 52 is to establish an early consultation process that hopefully will delay and avoid conflicts during the CEQA process and allow for the identification of Tribal Cultural Resources (TCR) that may exist or be affected by a project.

Senate Bill 18 (SB 18) requires local governments to consult with California Native American Tribes, identified by the California Native American Heritage Commission (NAHC), prior to the adoption of amendment of a general plan or specific plan. The purpose of this consultation is to preserve or mitigate impacts to cultural places.

Assembly Bill 2881 (AB 2881) established the California Register of Historical Resources (CRHR). The CRHR is an authoritative guide in California used by state and local agencies, and private groups to identify the State's historical resources (similar to the NRHP for federal resources). The criteria for eligibility and listing on the CRHR are based on the requirements of the National Register. The California Office of Historic Preservation (OHP) has authority under federal and state law for historic preservation programs in the State, and the OHP can make determinations of eligibility for listing resources on both the National Register and the CRHR. Resources can be listed singly as a California Resource or on both the National and California Registers.

In California, in addition to meeting one or more of the listed criteria for inclusion on the CRHR, eligibility for the California Register requires that a resource retains sufficient integrity to convey a sense of its significance or importance. Seven elements are considered key in considering a property's integrity, which are (1) location, (2) design, (3) setting, (4) materials, (5) workmanship, (6) feeling, and (7) association. Additionally, the OHP advocates that all historical resources over 45 years old be recorded for inclusion in the OHP filing system, although the use of professional judgment is urged in determining whether a resource warrants documentation.

As part of discretionary review for the required approvals, the three area Tribal Historic Preservation Officers (THPOs) were formally consulted pursuant to SB 18 relating to the general plan amendment and AB 52 in conjunction with required environmental review. An agency scoping meeting was held on May 18, 2018, at which the THPOs were either in attendance (Wiyot Tribe and Bear River Band of the Rohnerville Rancheria) or had declined consultation (Blue Lake Rancheria). A memorandum reflecting attendance and outcomes of the agency scoping meeting is included as Appendix C. In summary the represented Tribes supported the statue's removal but did not note the area to be a site where archeological resources would be expected to be impacted by the project. City staff also hosted a public scoping meeting on May 17th at the D Street Neighborhood Center to receive public input and recommendations on the project description, potential impacts to the Plaza, and project alternatives. In summary the public was divided on whether the statue should remain or be removed. Approximately 40 members of the public attended. Appendix C is comprised of a summary report of attendance and outcomes from the public scoping meeting.

Although there are no known archaeological resources at the center of the Plaza, the City of Arcata includes the following inadvertent discovery protocol in the conditions of approval for all projects that may include ground disturbance:

If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and with a 50-foot buffer of the discovery location. A qualified archaeologist will be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with Native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers (THPOs) for the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, and Wiyot Tribe are also to be contacted immediately to evaluate the discovery and, in consultation with the project proponent, and City of Arcata, 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.

With the proposed condition of approval, the project will have a *Less Than Significant Impact* on the significance of an archaeological resource.

Mitigation: None required.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? Less Than Significant Impact

The project area has already been substantially disturbed by agricultural, recreational, and commercial activities in the past, and there are no known paleontological resources, or geological features on or near the site, as discussed in the General Plan PEIR (City of Arcata, 2000b). Regional uplifting and other seismic activity in the area have limited the potential for discovery of paleontological resources. Arcata General Plan Policy H-7f (*Discovery of Archaeological Resources*) and Item V.b above also addresses the inadvertent discovery of paleontological resources and will be required as a condition of approval by the City of Arcata for the proposed project. The project will have a *Less than Significant Impact* on unique paleontological or geologic features.

Mitigation: None required

d) Disturb any human remains, including those interred outside of formal cemeteries? Less Than Significant Impact

Responses from the local area THPOs, through the scoping and consultation process, indicate that it is unlikely that the Plaza area may contain human remains, even those interred outside of formal cemeteries. Nonetheless, the standard inadvertent discovery protocol described in V.b above will be included in the project's conditions of approval. With the proposed conditions of approval, the project will not disturb any human remains, including those interred outside of formal cemeteries.

Mitigation: None required

VI. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? No Impact

ii) Strong seismic ground shaking? No Impact

iii) Seismic-related ground failure, including liquefaction? No Impact

iv) Landslides? No Impact

- i) The center of the Plaza where the removal activity will occur is located approximately 300' from the nearest mapped fault which is the Fickle Hill fault within the Mad River fault zone. The Plaza is outside the Alquist-Priolo Fault Hazard Zone, as discussed in the General Plan PEIR (City of Arcata, 2000b);
- ii) Arcata is located within a seismic complex consisting of the Mendocino Triple Junction and the Cascadia Subduction Zone. Coastal Humboldt County is the most seismically active region in the continental US with over sixty earthquakes that have produced discernible damage in the region since the mid-1800s (Dengler et al., 1992). The removal of the statue will not expose people or structures to substantial adverse effects involving seismic related ground-shaking (City of Arcata, 2000b);
- iii) The Plaza is located in an area of moderate liquefaction. Concerns arise when new structures are placed within such areas. However, the removal of a statue will not result in exposing people or structures to substantial adverse effects involving liquefaction (City of Arcata, 2000b); and
- iv) The area surrounding the Plaza is relatively flat and more than 3,000 feet from the eastern hillside; there are no landslide hazards associated with the project (City of Arcata, 2000b).

Mitigation: None required

b) Result in substantial soil erosion or the loss of topsoil? No Impact

As mentioned in Section a) iv. above, the site is flat (City of Arcata, 2000b). Any ground disturbance will be required, as a standard City condition of approval, to have soil erosion controls in place. Therefore, the removal of the statue will not expose people or structures to substantial adverse effects involving soil erosion or loss of topsoil.

Mitigation: None required

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? No Impact

The removal of the statue will not create a situation of soil instability that could result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse (City of Arcata, 2000b).

Mitigation: None required

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? No Impact

The removal of the statue will not create substantial risks to life or property as a result of being located on expansive soils (City of Arcata, 2000b).

Mitigation: None required

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

No septic systems or alternative waste water disposal systems currently exist or are needed for the removal of the statue.

Mitigation: None required

VII. GREENHOUSE GAS EMISSIONS.

The City of Arcata developed a Community Greenhouse Gas Reduction Plan in 2006 which set a greenhouse gas (GHG) emissions target of 20% below 2000 GHG levels by 2010. The Plan was developed in part by analyzing an inventory of community-wide greenhouse gas emissions that was conducted in 2000. The plan focuses on six action areas:

- 1) Energy efficiency
- 2) Renewable energy
- 3) Sustainable transportation
- 4) Waste and consumption reduction
- 5) Sequestration and other methods
- 6) Cross-cutting approaches

In addition to reducing greenhouse gas emissions it is expected that the implementation of this

Plan will offer many other community benefits. These include: energy cost savings with subsequent benefits to the local economy, cleaner air, less reliance on fossil fuels and imported energy sources, and a move toward a more sustainable energy economy. Based on an updated community-wide GHG emissions inventory conducted in 2007, City of Arcata staff estimates that the City's GHG reduction target has not been achieved within the residential, commercial, and industrial sectors.

Would the project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? No Impact**

The physical removal of the statue is expected to take two-three days including staging and clean-up. Equipment that might be used during this activity period may consist of a crane and a large semi-truck for transportation of the statue to a City-owned storage facility within City limits (less than two miles away). Both of these vehicles will likely be diesel powered. Smaller hand-held tools will also be used. The limited and very short duration of activity will not result, either directly or indirectly, in excessive greenhouse gas emissions that may have a significant effect on the environment. The activity will not exceed a level of significance as established in the City's *Community Greenhouse Gas Reduction Plan, 2006*.

Mitigation: None required

- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? No Impact**

The statue has not been contributing to GHG emissions and its removal will not result in an increase in emissions other than for the 2-3 days of mechanical equipment operation mentioned above. The activity will not exceed thresholds established in the City's *Community Greenhouse Gas Reduction Plan, 2006*.

Mitigation: None required

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? No Impact**
- 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? No Impact**

Any transportation using mechanized vehicles with gasoline or other petroleum-based fluids that may be spilled in the event of an accident has the remote possibility for inappropriate release or spill. However, the activities associated with the removal and transport of the statue from the Plaza to storage will not include the transport, use, or disposal of hazardous materials and will, therefore, not result in a significant hazard to the public or the environment regarding hazards or hazardous materials. Likewise, the removal and transport of the statue, pedestal to storage, and recycling the concrete steps will not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Mitigation: None required

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? No Impact**

The center of the Plaza is not within ¼ mile of an existing or proposed school and the project does not include the emission or handling of hazardous materials, substances, or waste. The removal of the statue, therefore, will have no impact on hazards or hazardous materials.

Mitigation: None required

- 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 Plaza (Project Site) is not included in the GeoTracker or Envirostor databases (mapping systems of both the Regional Water Quality Control Board and Dept of Toxic Substances Control to indicate sites subject to CGC §65962.5 requirements). Therefore, the project will not create a significant hazard to the public or the environment in this regard.

Mitigation: None required

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

The Plaza is not located within two miles of a public airport or public use airport nor is it located within an airport land use plan. The closest public airport is located 6.5 miles to the north. The closest public use airport is 4.5 miles to the south. The project site is not within the vicinity of a private airstrip. Removal of the statue will not result in a safety hazard for people residing or working in the project area.

Mitigation: None required

- g) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? No Impact**

The City adopted an Emergency Plan in October 2007 (City of Arcata, 2007). The activities associated with the removal of the McKinley Statue does not interfere with this plan.

Mitigation: None required

- h) **Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? No Impact**

The Plaza is the City's central core and is urban in its development pattern. There are no wildland fire hazards within 0.60 miles; the closest wooded area is the City's Redwood Park (City of Arcata, 2000b). The Humboldt Bay area's cool coastal climate results in a moderate fire hazard rating according to the Cal Fire *Fire Hazard Severity Mapping* (Cal Fire, 2017). The project does not consist of wildlands that are adjacent to urbanized areas or where residences are intermixed with wildlands.

Mitigation: None required

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- a) **Violate any water quality standards or waste discharge requirements? No Impact**

City GIS mapping indicates that there are only water laterals into the park from the main lines in 8th, 9th, and H Streets for landscape maintenance purposes. There are no sewer facilities within the park property. Based on the lack of other water or wastewater facilities, the removal of the McKinley Statue will not violate any water quality standards or waste discharge requirements.

Mitigation: None required

- b) **Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a**

level which would not support existing land uses or planned uses for which permits have been granted)? No Impact

The statue does not currently utilize groundwater; its removal, therefore, would not impact aquifer volume or a lowering of the local groundwater table level.

Mitigation: None required

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? No Impact

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? No Impact

The statue and its pedestal are installed within an elevated landscaping bed, bordered by a low concrete wall. The walled landscape area is approximately 20 feet in diameter and was built on top of existing steps associated with the statue. There are no plans for changing existing drainage patterns. There are no streams, rivers or creeks nearby. Existing City regulations will require adequate erosion control during and after construction. As a result the project will not alter the existing drainage pattern of the site in such a way that would result in any erosion or siltation or flooding on- or off-site.

Mitigation: None required

e) 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? No Impact

The concrete steps that remain in place beneath the pedestal from prior to the development of the existing planter box signify that there is little opportunity for stormwater infiltration within the planter box. Although the City Park is surrounded on all four sides by City streets within which are located stormwater drainage systems, there are no drainage facilities within the Park property itself. The removal of the statue will neither alter nor contribute to runoff quantities or quality.

Mitigation: None required

f) Otherwise substantially degrade water quality? No Impact

There are no other features that would result in degrading water quality from removal of the statue, pedestal, or steps.

Mitigation: None required

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? No Impact

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? No Impact

The Plaza is located on Flood Insurance Rate Map (FIRM) Panel 06023C0852G, effective June 21, 2017, and is outside the 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. The Plaza is also outside the Matthews Dam Failure zone as mapped in 2000. Therefore, the project will not place any structures which would impede or redirect flood flows.

Mitigation: None required

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? No Impact

Arcata is located on the south side of the Mad River, downstream from the Matthews Dam (Ruth Lake), a reservoir that provides the majority of the Humboldt Bay Municipal Water District's service area with municipal water, including the Cities of Eureka and Arcata. There are no levees that would affect the project site should they fail. The Plaza is outside both the maximum recorded flood (1964) and failure of the Matthews Dam combined and the sunny day summer flow conditions with piping failure, as mapped on the City's GIS. (R.W. Matthews Dam Failure, Downstream Inundation Mapping," Winzler & Kelly Consulting Engineers, January 2001).

Mitigation: None required

j) Inundation by seiche, tsunami, or mudflow? No Impact

The Plaza is outside the California Geologic Society's mapped Tsunami Inundation Zone (2009). There is no potential for impacts from a mudflow in the project area, based on surrounding geology and topography. 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 approximately ten miles from the Project site, 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 [NRP] by the City of Arcata, which does not allow residential, commercial, or industrial development. (City of Arcata, 2000b) Therefore, the proposed project will not result in impacts due to inundation by seiche, tsunami, or mudflow.

Mitigation: None required

X. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community? No Impact

This category typically refers to the construction of freeways, border walls or other physical barriers erected in such a way as to create a physical obstruction that impedes passage between two

communities. As such the removal of the statue of President McKinley from the center of the Plaza will not physically divide an established community. (City of Arcata, 2000b)

Mitigation: None required

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? Less Than Significant Impact

Because the statue is included as one of several “principal features of the Plaza which define its historical character” and “shall be preserved” (Policy H-3g, Arcata General Plan), its removal is in direct conflict with this section of the General Plan’s Historic Preservation Element. The project includes a General Plan amendment, pursuant to § 9.92 of the City’s Land Use Code, to remove the language referencing the statue in conjunction with the statue’s physical removal. Section 9.92.050 – *Findings*, requires that the activity: be in compliance with all other provisions of the Code; that it not be detrimental to the public interest, health, safety, convenience, or welfare of the City; and that the affected site(s) is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for proposed or anticipated uses and/or development.

The removal of the statue will have no effect on any other provisions of the General Plan, will not be detrimental to public health, safety and welfare, nor will its removal from the center of the Plaza result in a site that becomes unsuitable for other uses.

In addition, the proposed project would not otherwise conflict with any applicable goals, objectives, and policies of the Arcata General Plan and Land Use Code, other than those relating specifically to the historic integrity of the Plaza in Policy H-3g of the General Plan. As discussed throughout the EIR, there are no potentially significant impacts that have been identified, except in the Cultural Resources (Item V.a) section, where mitigation has been provided to reduce the impact of removal of the McKinley Statue.

The analysis contained in the EIR addressed the potential conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect including, but not limited to, Arcata General Plan (2000) and Land Use Code (2008). This finding is supported by information contained in the City’s PEIR on the current General Plan (City of Arcata, 2000b)

Therefore, based on the analysis conducted throughout this EIR and the PEIR, the project was not in conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation: None required

c) Conflict with any applicable habitat conservation plan or natural community conservation plan? No Impact

There are no habitat conservation plans (HCPs) or other natural community conservation plans (NCCPs) in the area of the statue, the Plaza, or the District according to the CDFW October 2017 map of NCCPs and HCPs (CDFW, 2017)

Mitigation: None required

XI. MINERAL RESOURCES. Would the project:

- 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 Plaza is not a source of minerals that would be of value to the region and the residents of the State. The City's General Plan Policy RC-9 – *Soils and Mineral Resources*, refers to the management of mineral resource extraction, processing, and transport of aggregate mineral resources as well as guidance for limiting erosion and slope stability impacts. These conditions are not present on the Plaza. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b)

Mitigation: None required

- 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 Plaza is not delineated in the General Plan or in any other known plan as a locally-important mineral resource recovery site. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

XII. NOISE. Would the project result in:

- a) **Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? No Impact**
- b) **Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? Less Than Significant Impact**

During the operation of the heavy equipment (typical construction equipment) needed to remove the statue (power tools, a crane, and a large truck), there will be a temporary short-term increase in groundborne vibration and/or groundborne noise levels. Decibel levels are expected to be approximately 85-90 dBA at 50 feet. These operations are expected to take approximately two days. With the closure of the Plaza during construction activities, noise levels would be reduced to 79-84 dBA at the closest public access, which is at a similar level as adjacent traffic. Other lesser noise generated by removal preparations and site rehabilitation post-removal will consist of standard equipment similar to the mechanized landscaping equipment that is frequently used on the Plaza. The removal of the statue will not result in the long-term exposure of persons to the generation of noise levels in excess of standards established in the local general plan or noise ordinance. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b). The statue does not generate noise, nor will there be noise remaining after the removal of the statue from the Plaza.

Mitigation: None required

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? No Impact

Since the project is limited to removal of the statue and associated improvements, there will not be a permanent increase in ambient noise levels above levels existing prior to the removal of the statue.

Mitigation: None required

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? Less Than Significant Impact

There will not be a substantial temporary or periodic increase in ambient noise levels above levels existing prior to the removal of the statue. During the operation of the heavy equipment (typical construction equipment) needed to remove the statue (power tools, a crane, and a large truck), there will be a temporary short-term increase in groundborne vibration and/or groundborne noise levels. Decibel levels are expected to be approximately 85-90 dBA at 50 feet. These operations are expected to take approximately two days. With the closure of the Plaza during construction activities, noise levels would be reduced to 79-84 dBA at the closest public access, which is at a similar level as adjacent traffic. Other lesser noise generated by removal preparations and site rehabilitation post-removal will consist of standard equipment similar to the mechanized landscaping equipment that is frequently used on the Plaza.

Mitigation: None required

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 expose people residing or working in the project area to excessive noise levels? No Impact

The Plaza is located neither within an airport land use plan nor within two miles of a public airport or public use airport. Therefore, the project would not expose people residing or working in the project area to excessive noise levels associated with an airport.

Mitigation: None required

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? No Impact

There are no private airstrips within eight miles of the Plaza. Therefore, the project site is not within the vicinity of a private airstrip, exposing people residing or working in the project area to excessive noise levels.

Mitigation: None required

XIII. POPULATION AND HOUSING. Would the project:

a) Induce substantial 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 removal of the McKinley Statue is not the type of project that will neither directly nor indirectly induce substantial population growth in Arcata or elsewhere in the County. A discussion of growth-inducing impacts is in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

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

The removal of the statue does not include the removal of any housing units or people and, therefore, is not the type of project that will result in a substantial displacement of housing units or people necessitating the construction of replacement housing elsewhere.

Mitigation: None required

IV. PUBLIC SERVICES

a-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 any of the public services:

Fire protection? No Impact

Police protection? No Impact

Schools? No Impact

Parks? No Impact

Other public facilities? No Impact

The removal of the statue will not result in a need to provide additional fire, police, school, park, or other public facilities, the construction of which could cause significant environmental effects. This is not the type of project that will have an impact on the provision of acceptable service ratios, response times, and performance objectives of the above-mentioned public services. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

XV. RECREATION

- 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? No Impact**

The removal of the statue is not the type of project that will cause an increase in 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 removal of the statue and associated improvements will not affect the public's ability to continue to use the Plaza for normal public activities after it is removed.

Mitigation: None required

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? No Impact

The removal of the statue is not the type of project that generates the need for the construction of recreational facilities or the expansion of existing recreational facilities in a way that might create an adverse physical effect on the environment. The removal of the statue and associated improvements will not affect the public's ability to continue to use the Plaza for normal public activities after it is removed.

Mitigation: None required

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? No Impact

The project will not conflict with any policies, standards or plans relating to the City's transportation system including non-motorized and transit systems. There will be a temporary closure of the Plaza while construction activities (heavy equipment, power tools, a crane, and a large truck) are needed to remove the statue and associated improvements. Other activities generated by removal preparations and site rehabilitation post-removal will consist of standard equipment similar to the mechanized landscaping equipment that is frequently used on the Plaza. These activities may temporarily affect pedestrian use of the Plaza but there are alternative routes adjacent to the Plaza for pedestrian access. Motorized vehicular, transit and bicycle transportation will not be adversely affected by the project.

Mitigation: None required

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? No Impact

The statue removal will not impact level of service standards or travel demand measures or other standards established by the City. Arcata does not have an adopted congestion management program with which the project might conflict. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

d) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? No Impact

As mentioned in Section XII. above, there are no aviation facilities nearby; the closest being the County's Murray Field, a public use airport, approximately 6 miles to the south. The City is not subject to an Airport Land Use Plan. The removal of the statue is not the type of project that will have an effect on air traffic patterns through either an increase in traffic levels or other change that could result in substantial safety risks. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

e) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? No Impact

No other change to the Plaza or the District is proposed that might increase hazards or create incompatible uses relating to traffic safety.

Mitigation: None required

f) Result in inadequate emergency access? No Impact

The removal of the statue will not change the existing emergency access capabilities on the Plaza or within the District. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

g) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? No Impact

There are no adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities with which the removal of the McKinley Statue would conflict nor will the project decrease the performance or safety of such facilities. This finding is supported by information contained in the City's PEIR on the current General Plan (City of Arcata, 2000b).

Mitigation: None required

XVII. TRIBAL CULTURAL RESOURCES. Would the project:

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:

- i) **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**

Although the District and the McKinley Statue may be listed as an historical resource in the California Register, CEQA Section 21074 defines a tribal cultural resource as “sites, features, places, cultural landscapes, sacred places and objects **with cultural value to a California Native American tribe**” (emphasis added), and then references Public Resources Code Section 5024.1. Given the criteria in Public Resources Code Section 5024.1(c) below, and the City’s AB 52 and SB 18 consultation with the local area Tribes, the McKinley Statue can be found to have no cultural value to a California Native American tribe and therefore, did not result in a finding of significance to a tribal cultural resource.

PRC. § 5024.1(c) A resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Mitigation: None required

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. Less Than Significant Impact**

The public park property is in the center of the District, a locally designated historic resource. The statue, among other features, has been identified in the City’s General Plan as a significant feature to be preserved as it contributes directly to the historic resource of the Plaza District, and the historical analysis provided in the Historic Resources Report (JRP, LLC, June 2018) concurs with this finding. The City’s Community Development Department requested formal consultation, via certified mail, with the three (3) local area Tribal Historic Preservation Officers (THPOs) on May 7, 2018, to ascertain whether or not the project would result in a significant adverse impact to a tribal cultural resource or 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. The Blue Lake Rancheria THPO declined consultation, but the Wiyot Tribe and the Bear River Band of the Rohnerville Rancheria accepted the consultation request. The Bear River and Wiyot Tribe participated in the agency scoping meeting on May 18, 2018 and in the development of project alternatives. Although the formal consultation period closed on June 7, 2018, the City will continue to work closely with the local THPOs to ensure that the project has a less than significant impact on tribal cultural resources.

In addition to AB 52 consultation, as a general plan amendment, the project is also subject to Senate Bill (SB) 18 requirements for consultation with California Native American tribes in an effort to ensure that such an action would not negatively affect specified Native American places, features, and objects. This consultation was completed in concert with that required under AB 52.

Lastly, on May 11, 2018, the Notice of Preparation (NOP) for the Draft EIR was received by the Office of Planning & Research (OPR) State Clearinghouse for circulation to a variety of State agencies including the Native American Heritage Commission (NAHC). The NAHC did not provide any comments prior to the close of the thirty-day NOP circulation period on June 11, 2018. Given the criteria in Public Resources Code Section 5024.1(c) above, and the City's AB 52 and SB 18 consultation with the local area Tribes the McKinley Statue can be found to have no cultural value to a California Native American tribe and therefore, did not result in a finding of significance to a tribal cultural resource.

Mitigation: None required

XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? No Impact

The removal of the statue will have no effect on wastewater treatment capabilities or facilities because the removal of the statue is not the type of project that will require permitting or any other authorization of the Regional Water Quality Control Board.

Mitigation: None required

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? No Impact

The statue is not currently connected to water or wastewater facilities and because the removal of the statue is not the type of project that will require the construction of any facilities the project will not result in a significant environmental effect.

Mitigation: None required

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? No Impact

The statue is not currently connected to stormwater or other drainage facilities and because the removal of the statue is not the type of project that will require the construction of stormwater or other drainage facilities, the project will not result in a significant environmental effect. See also discussion under IX Hydrology and Water Quality.

Mitigation: None required

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? No Impact

The project does not require a water supply, and because the removal of the statue is not the type of project that will require the need for water supplies, the project will not require new or expanded entitlements, resulting in a significant environmental effect.

Mitigation: None required

e) 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? No Impact

As mentioned in Section XVIII. a)-d) above, the statue is not currently served by water or wastewater facilities. Its removal, therefore, will not result in inadequate capacity at the wastewater treatment facility.

Mitigation: None required

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? No Impact

There will be no substantial solid waste disposal associated with the removal of the statue and its pedestal, as these are proposed to be retained in storage. The concrete steps or other related elements of the project may be disposed or recycled, but this is a limited quantity (approximately 25 cubic yards). Therefore, the capacity at the landfill will not be adversely affected.

Mitigation: None required

g) Comply with federal, state, and local statutes and regulations related to solid waste? No Impact

As mentioned above, the project does not include a substantial solid waste component and will, therefore, have no effect on the environment in terms of federal, state, and local statutes and regulations related to solid waste. City policies include recycling or reusing construction debris to the degree feasible, as would be applicable for this project.

Mitigation: None required

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

Section 15065 of the CEQA Guidelines states that when a lead agency determines that a significant impact may occur to one of the resources listed below in Section XIX. a), such as the elimination of an important example of the major periods of California history, and decides to prepare an EIR, the determination shall apply to:

- (1) The identification of effects to be analyzed in depth in the environmental impact report or the functional equivalent thereof,
- (2) The requirement to make detailed findings on the feasibility of alternatives or mitigation measures to substantially lessen or avoid the significant effects on the environment,
- (3) When found to be feasible, the making of changes in the project to substantially lessen or avoid the significant effects on the environment, and

(4) Where necessary, the requirement to adopt a statement of overriding considerations.

- a) **Does the project have the potential to 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?**

Although the McKinley Statue does not directly represent a major period of California history or prehistory, President McKinley's tenure is represented by, among other things, a western expansionist movement which a segment of the local community considers representative of the general mistreatment and genocide of thousands of indigenous people across the continental United States and into the Pacific Islands. The analysis of the project's potential effects is included in Sections I, V.a), and XVII of this document. Project alternatives and measures intended to mitigate the potential environmental impacts relating to a substantial adverse change in the significance of a historical resource as defined in §15064.5 are included within the body of this document and will be adopted as part of the certification of the EIR. Because the project will have a potentially significant impact that can be mitigated through the measures suggested, but not completely avoided, the City Council, in its certification of the EIR, must adopt a Statement of Overriding Considerations pursuant to § 23081 of the CEQA Guidelines.

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? No Impact**

The statue removal will not result in a cumulatively considerable impact as there are no other public monument removals or modifications underway either within City limits or elsewhere in the larger community. There are no plans for other changes to the Plaza that would occur at or near the time the statue is removed that would contribute towards a potential significant impact.

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? No Impact**

The removal of the statue is not the type of project that would result in adverse effects on human beings. Effects that often are considered, including those to air quality, geologic instability, flooding, or others, that may result in a risk to human health and safety, will not occur from this project, as explained in those relevant sections of this EIR. The potential environmental effects to Cultural Resources are not expected to cause any substantial adverse effects on human beings, either directly or indirectly.

Mitigation Monitoring & Reporting Program (MMRP)

Impact: Item V.a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5

Discussion: The impact of the removal of the statue, an historic resource, would be significant. The statue itself will not be damaged in the process of its removal and storage. It is the context in which it has been located over the past 112 years that will be adversely affected.

Mitigation Measure CU-1: A comprehensive interpretive report will be developed by the City of Arcata, in collaboration with the area Tribes, the Historic Sites Society of Arcata, and the Humboldt County Historical Society. The report shall include text and photographs with information about the statue itself, the artist, the patron, its relationship to the San Francisco earthquake of 1906, why it was erected, its lifetime on the Plaza, and why it was removed. The interpretation will include the pre-history of the site as Wiyot land before Anglo discovery.

Responsible Party: The City of Arcata Community Development Director will collaborate with specified parties and approve the adequacy of the comprehensive interpretive report prior to removal activities.

Schedule: Implementation of CU-1 will occur prior to any removal activities.

Significance after Mitigation: Removal of the statue from its original location is considered an unavoidable impact and remains *Potentially Significant, even with mitigation*.

Content of the report will be prepared by the City of Arcata in a manner that its contents could be used in the future in a pamphlet, interpretive panels, a documentary video, all of which could be also be made available on the City's (or other's) website. The JRP Report provided further details how this report could be utilized as follows.

Table 3 Potential Implementation of Mitigation Measure CU-1

Product	Discussion/Description
Pamphlet	A pamphlet could be prepared for consumption by the general public about the statue's history and the removal of the statue from the Plaza. It could be distributed to local repositories and museums, businesses, HSU, online through at City website.
Interpretive Panels	An interpretive panel could be installed on the Plaza and at the relocation site if the statue's relocation is to a public place. The panels could include text and photographs, information of the statue itself, the artist, why it was erected, and why it was removed. The interpretation could include the pre-history of the site as Wiyot land before Anglo discovery.
Documentary Video	A short video could be created that presents the history of the statue and the issues related to its removal. The video could be available for broadcast on public television, for use at local museums and HSU.
Website	The aforementioned documentary video and report/pamphlet could be added to and maintained on the City's website and made available to the local Tribes, HSU or other entities that might be interested.
Local Historical Society Exhibit	The Historic Sites Society of Arcata, the Humboldt County Historical Society and others, if interested, could develop an off-site exhibit using the aforementioned materials.

Chapter 3. Alternatives Analysis

The California Environmental Quality Act (CEQA) requires that the EIR shall describe a range of reasonable alternatives to the project that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Section 15126.6(a)). The CEQA guidelines also note in Section 15126.6(a) that an EIR “need not consider every conceivable alternative to a project” and that “An EIR is not required to consider alternatives which are infeasible.” The development of alternatives is a means to provide ways of “avoiding or substantially lessening any significant effects of the project” (CEQA Section 15126.6(b)).

Several alternatives were identified but were eliminated from further review because they do not meet several of the basic requirements of CEQA; Section 15126.6(c) states “The EIR should also identify any alternatives that were considered . . . but were rejected as infeasible during the scoping process . . . Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

Description and Evaluation of Alternatives

Introduction

This chapter presents the alternatives analysis for the project. CEQA requires that the EIR shall describe a range of reasonable alternatives to the project that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Section 15126.6(a)). The CEQA guidelines also note in Section 15126.6(a) that an EIR “need not consider every conceivable alternative to a project” and that “An EIR is not required to consider alternatives which are infeasible.” The development of alternatives is a means to provide ways of “avoiding or substantially lessening any significant effects of the project” (CEQA Section 15126.6(b)).

CEQA Guidelines

CEQA guidelines state that the EIR must describe a range of reasonable alternatives to the project, but provide no clear direction for determining the nature or scope of those alternatives. The guidelines state that there is no rule that governs “the scope of the alternatives to be discussed other than the rule of reason” (CEQA Guidelines Section 15126.6(a) and (f)). Alternatives are limited to those that would avoid or substantially lessen any of the significant effects of the project.

The guidelines also provide that an EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effect of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the proposed project, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

The specific No Project alternative, along with its impacts shall also be evaluated (CEQA Guidelines 15126.6(e)), with the purpose of the No Project alternative being the evaluation of conditions should the project not be approved. The No Project is not the baseline for determining a project's environmental impacts, unless it is identical to the existing environmental setting. Through evaluation of the project alternatives, if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Rule of Reason

CEQA specifically addresses the Rule of Reason (Section 15126.6(f)) and provides some clarity on the scope of the alternatives, if not their nature. The focus of the discussions in this section of CEQA revolve around the ability of alternatives to lessen any significant effects of the project, and provides that the only alternatives the Lead Agency needs to examine are those that could feasibly attain most of the basic objectives of the project. CEQA specifically addresses the following three items: (1) Feasibility, (2) Alternative Locations, and (3) Reasonable Effects (Section 15126.6(f) (1 to 3)).

(1) Feasibility

As provided for in CEQA, factors that may be taken into account in evaluating alternatives include "site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent." (Section 15126.6(f)(1)).

(2) Alternative Locations

Two primary points of the CEQA Guidelines related to alternative locations are relevant to the proposed Project being evaluated in the EIR, which are: (1) the key question as to any significant effects being avoided by an alternative, and (2) if there is no feasible alternative location to the proposed project. Another important point relates to previous documents that sufficiently evaluate the reasonable range of alternatives and impacts, which is not the case here.

The key question CEQA asks as the first step in alternative locations is whether "any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location" (Section 15126.6(f)(2)(A)). Only those locations that would avoid or substantially lessen any of the significant effects of the project need to be considered.

The second question that CEQA poses is related to no feasible alternative location for the project. CEQA Guideline Section 15126.6(f)(2)(B), states: "If the Lead Agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR." The rationale is that in some cases, there may be no alternative to the location of the project other than on the site proposed by the Project. In those cases no other site need to be evaluated, but the rationale for the conclusion must be disclosed.

(3) Reasonable Effects

Lastly, Section 15126.6(f)(2)(C) provides that “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” As noted here, this limits alternatives to what can be reasonably determined, and does not require alternatives to be created for the sake of creating alternatives, especially when their implementation is “remote and speculative.”

Project Objectives

The following project objectives aided in developing a focused project description and reasonable range of alternatives, and in the analysis of the project’s potential environmental impacts. The project objectives are:

Project Objectives (from Project Description)

- Provide a design for the plaza that is inclusive and welcoming to people of all race, ethnicity, national heritage, backgrounds, and orientation;
- Preserve Arcata’s history while recognizing the changing values of its citizens;
- Minimize impacts to the Arcata District, while recontextualizing the important features on the Plaza;
- Preserve the McKinley Statue.

Description and Evaluation of Alternatives

In addition to the Proposed Project (the removal of the statue and pedestal to be stored indefinitely at an offsite City-owned location), the alternatives analyzed in the EIR are the following:

- Alternative #1—No Project
- Alternative #2—Interpretive Signage
- Alternative #3—Relocate the Statue to Other City Facility
- Alternative #4—Relocation to Another Entity

Alternative offsite locations for the project are not applicable for consideration because the Plaza is the only site containing the McKinley Statue. Nothing done offsite would result in a project meeting the basic objectives of the project. Likewise, relocating the statue to another area of the Plaza or placing some covering over the statue, either temporarily or permanently, would not remove the stigma associated with the presence of the statue. These were not considered within the reasonable range of alternatives discussed.

The following alternative was eliminated from further review per CEQA Section 15126.6(c) which states “The EIR should also identify any alternatives that were considered . . . but were rejected as infeasible during the scoping process . . . Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (i) failure to meet most of the basic project objectives, (ii)

infeasibility, or (iii) inability to avoid significant environmental impacts.” The proposed alternative, below which has been rejected, were reviewed and “vetted” at the public scoping meeting held by the City at the D Street Neighborhood Center on May 17, 2018:

- Melting the bronze into a commodity for sale with proceeds going to the Wiyot Tribe

Impact Evaluation

There were no project alternatives identified that would meet all of the stated project objectives and not have significant unavoidable impacts. The four alternatives described either kept the statue in its present context, but did not provide a design for the Plaza that was ‘inclusive and welcoming to all’ (Alternatives #1 and #2), or removed the social stigma of the statue, resulting in a significant unavoidable impact to Cultural resources (Alternatives #3 and #4). The proposed mitigation measure under Cultural Resources would still be required in order to minimize historic resource impacts resulting from Alternatives #3 and #4.

Alternative #1 – No Project. As the name implies, the *No Project Alternative* is an alternative in which there is no project. As such, no changes would occur and the statue would remain in its current state and location. This alternative does not meet the basic project objectives. However, it would result in no environmental impacts.

Alternative #2 – Interpretive Signage. Similar to the No Project Alternative, this alternative would leave the statue in place. This alternative would place interpretive signage at the Plaza describing the circumstances and reasoning behind the statue’s stigma. This alternative meets some but not all of the project objectives, but would go further than the No Project Alternative in that it would provide historical context, and education around the history of the City, the statue, and the impact of settlement on the Wiyot and other indigenous people. While this alternative would meet the CEQA definition of the ‘environmentally superior alternative per CEQA Guidelines Section 15126.6 (e)(2) in that no historic resource would be impacted, this alternative does not meet the basic objective or the social implications and stigma associated with providing a design for the Plaza that is inclusive and welcoming to people of all race, ethnicity, national heritage, background, and orientation.

Alternative #3 – Relocation to Other City Facility. This would consist of removing the statue from the Plaza and reinstalling it at Redwood Park (or similar facility) with interpretive signage at either or both the Plaza and the Park describing the circumstances and reasoning behind the statue’s relocation. This alternative meets the project objectives, and is a feasible alternative that would provide historical context and education around the history of the City, the statue, and the impact of settlement on the Wiyot and other indigenous people. Relocating the statue from the Plaza to Redwood Park or other location would have the same potentially significant impacts to Cultural Resources on the District that the Proposed Project would have, but could allow for more in-depth interpretive signage at the new location, such as a kiosk, which would go beyond what may be appropriately placed at the Plaza. The potential impacts to these resources may be partially mitigated through the inclusion of measures recommended in the JRP Report (Appendix A). This alternative, however, still eliminates the context of a significant historical resource.

Alternative #4 – Relocation to Another Qualified Entity. This alternative would remove the statue from the Plaza and convey it to another qualified entity. This alternative meets most of the project objectives. This alternative would have the same environmental impacts with regard to Cultural Resources. While

this is included as an alternative; the City has not finalized a plan to consider willing receiving qualified entities as of this writing. It is similar to the proposed project and to Alternative #3, except that this alternative would not require onsite or offsite interpretation.

Chapter 4. Other CEQA Considerations

Cumulative Impact Analysis

CEQA Guidelines Section 15130 requires an EIR to "...discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in Section 15065 (a)(3)." The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone.

CEQA defines cumulative impacts as two or more individual effects, when considered together, are considerable or which compound or increase other environmental impacts (Section 15130). Conversely, when the cumulative impacts are determined to not to be significant, CEQA only requires that the rationale be briefly discussed. Additionally, CEQA defines the following elements that are necessary for an adequate discussion of significant cumulative impacts (Section 15130(b)):

Significant cumulative effects may be discussed in an EIR with either:

- A. A list of past, present, and probable future projects producing related or cumulative impacts;
or*
- B. A summary of projections contained in an adopted general plan, or a related planning document, or in a prior certified environmental document which addressed conditions contributing to the cumulative impact.*

Discussion

There are no known other past, present, or probable projects involving the removal of a public monument or other significant historic resource on or near the Plaza that would produce related or cumulative impacts in association with the proposed McKinley Statue removal. Neither the General Plan and its PEIR, nor any other certified environmental document for projects on or near the Plaza would contribute to a cumulative environmental impact to the resources stated herein. There are no proposed projects, for which an application has been submitted, on or adjacent to the Plaza or which otherwise impact the Plaza.

Growth Inducing Impacts

A proposed project's growth inducing impacts are analyzed in accordance with the following

CEQA Guideline:

15126.2 (d) Growth Inducing Impacts of the Proposed Project. Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant, might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristics of some projects which may

encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Discussion

The removal of the McKinley Statue, pedestal, and related improvements from the center of the Arcata Plaza will have no effect on economic or population growth, nor will it require or result in the development of additional housing. There are no obstacles to population growth that the removal of the statue would alleviate thereby requiring the construction of additional facilities which may directly or indirectly result in a significant impact to the environment, either individually or cumulatively. The City already owns adequate offsite storage facilities that could accommodate the statue for any period of time that it's needed. For the reasons stated herein, the project will not be growth-inducing. This is supported by information contained in the City's General Plan PEIR (City of Arcata, 2000b).

Significant Irreversible Environmental Changes

A proposed project's significant irreversible effects are analyzed in accordance with the following CEQA Guideline:

15126.2 (c) Significant Irreversible Environmental Changes Which Would be

Caused by the Proposed Project Should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Discussion

The physical removal of the statue and pedestal will likely require the use of nominal amounts nonrenewable petroleum product in the form of diesel and gasoline fuel associated with the truck(s) and/or crane and associated hand tools that may either be gas or electric powered. The City's facilities, including the Plaza power sources, are 100% renewable through the regional Community Choice Energy (CCE) program implemented through the Redwood Coast Energy Authority (RCEA), a joint powers agency, developed in 2003 to *develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources available in the region for the benefit of the Member agencies and their constituents.* (RCEA website) These potential environmental changes are expected to be less than significant.

The removal of a historic resource identified in the General Plan may have a significant irreversible effect on Cultural Resources as indicated in Chapter 2.

Significant Environmental Effects Which Cannot Be Avoided

A proposed project's significant environmental effects which cannot be avoided are analyzed in accordance with the following CEQA Guideline:

15126.2 (b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented. Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Discussion

Under the Proposed Project, most of the project related actions will result in either "No Impact" or "Less Than Significant Impact" to the various resource areas investigated. A mitigation measure has been identified in Section V.a (Cultural Resources) of the EIR and is intended to mitigate project effects to the extent feasible. This mitigation measure is identified in Table 1 of Chapter 1 (Introduction) of the EIR.

Even with the mitigation measure included in the Cultural Resources section (based on the Historical Resource Report (JRP, 2018)), the removal of the statue will have significant environmental effects which cannot be avoided. A primary issue to be resolved by the City Council, based on this EIR, will be whether "specific economic, social or other benefits outweigh the unavoidable adverse environmental effects" resulting from this project (CEQA Guidelines 15093).

Appendices

- A. Historic Resources Report, JRP, Inc., June 2018
- B. Advisory Council on Historic Preservation Commemorative Works Policy Statement
- C. Notice of Preparation and Scoping Document
- D. CEQA Appendix G: Environmental Checklist Form
- E. California Natural Diversity Data Base Sensitive Species List

Document Preparers

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SHN

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Appendix A

Historical Resource Report - Arcata Plaza McKinley Statue Removal Project

**Historical Resource Report
Arcata Plaza McKinley Statue Removal Project
Arcata, California**



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APPENDIX:

City of Arcata General Plan, Chapter 5.4, Historical Preservation Element

All photographs in this report by JRP Historical Consulting, LLC, May 29, 2018.
 Cover Photograph: McKinley Statue, May 29, 2018.

1. EXECUTIVE SUMMARY

In February 2018, the Arcata City Council voted to remove the statue of President McKinley from Arcata Plaza in downtown Arcata. Removal of the McKinley Statue from Arcata Plaza qualifies as a discretionary action by the City and thus provisions of California Environmental Quality Act (CEQA) apply, specifically CEQA Guidelines Section 15064.5 and California Public Resources Code (PRC) Section 21084.1. Arcata Plaza, a one-block central square bounded by 8th, G, 9th, and H streets, is a locally designated historic landmark. Arcata Plaza is also within the locally designated Arcata Plaza Historic District, bounded by 7th, F, 10th, and I streets.¹ Therefore, both Arcata Plaza and Arcata Plaza Historic District are historical resources under the CEQA, as per CEQA Guidelines Section 15064.5(a)(2). The McKinley Statue is at the center of Arcata Plaza and removal of the statue has the potential for a substantial adverse change to both the Arcata Plaza Historic Landmark and Arcata Plaza Historic District.² This report has been prepared in support of the Environmental Impact Report (EIR) that the City is preparing in compliance with CEQA for the statue removal project.

The City hired JRP Historical Consulting, LLC (JRP) to prepare this Historical Resource Report to identify the status of the McKinley Statue as a historical resource, provide analysis regarding the impact of the statue's removal on Arcata Plaza Historic Landmark and Arcata Plaza Historic District, and recommend possible measures to mitigate the impact of the statue's removal.

JRP concludes in this report that the proposed project to remove the McKinley Statue from Arcata Plaza will cause a substantial adverse change to both Arcata Plaza Historic Landmark and Arcata Plaza Historic District because removal of the statue would materially impair these two historical resources as per CEQA Guidelines Section 15064.5(b).

¹ City of Arcata, Arcata General Plan, October 4, 2000, amended October 2008, Historical Preservation Element, Chapter 5.4, pp. 5-25—5-27, 5-35, Figures HP-a, Figure HP-b. The General Plan uses the terms “historic landmark” and “historical site” interchangeably. For the purposes of this report, only “historic landmark” will be used.

² City of Arcata, Arcata General Plan, Historical Preservation Element, Chapter 5.4, 5-27.

2. PROJECT DESCRIPTION AND ALTERNATIVES

2.1. PROJECT DESCRIPTION

The McKinley Statue is located in the center of Arcata Plaza, a one-block square plaza bounded by 8th, G, 9th, and H streets in the heart of downtown Arcata. The City proposes to remove the McKinley Statue and the concrete pedestal on which it is mounted from Arcata Plaza. The concrete pedestal is surrounded by a circular concrete planter box filled with soil and landscaping. This planter box and any potential concrete elements of the statue's base currently buried and obscured from view by the planter box and its contents would remain. Under the current project proposal, the statue and concrete pedestal would be placed in storage at a City facility.

2.2. ALTERNATIVES

The City is considering three alternatives to the above project proposal:

- 1) Remove the statue and pedestal, store it in a City facility, and seek out parties who might want the statue.
- 2) Remove the statue and pedestal and relocate it to Redwood Park, a City-owned park on the east side of Arcata. This alternative also calls for the installation of an interpretive signage at the former site of the statue in Arcata Plaza, and interpretive signage next to the statue in Redwood Park.
- 3) No project alternative. Under this alternative, no action would be taken and the statue would remain in place.

3. HISTORIC BACKGROUND

The beginning of Arcata Plaza dates back to the original Euro-American settlement of the area in 1850 by a party of miners who sailed to Humboldt Bay seeking a route to the inland gold mining region along the Trinity River. L.K. Wood of the Union Company, as this group was known, laid out the town of Union (later Arcata) into blocks and lots in 1850, including the central town square now known as Arcata Plaza. From the outset, the plaza functioned as the center of Euro-American commercial, civic, and social gatherings for the town. Initially, tents and crude buildings surrounded the plaza, but as time passed, permanent buildings were built. Fire, too, played a role in the evolution of the plaza area, as several conflagrations in the last half of the nineteenth century destroyed many buildings in the city, including an 1875 fire that razed the entire block on the north side of the plaza. Activity at the plaza and its status as the commercial heart of the settlers' community was enhanced by the construction of the Arcata and Mad River Railroad depot in 1855 at the southwest corner of 8th and H streets. The railroad, with a wharf on Humboldt Bay, carried passengers and freight to and from the depot. August Jacoby built a large mercantile building across the street from the depot, which became a main supply storehouse for miners and farmers. In the early years, several livery stables surrounded the plaza and the adjacent streets served as a terminus and embarkation point for mining country pack trains. The main road between Arcata and Eureka also came into the plaza area. In 1897, the construction of Arcata City Hall at the corner of G and 9th streets gave another boost to activity in the plaza area. While construction of buildings on the streets surrounding the plaza continued throughout the nineteenth century, the plaza itself was an open space void of buildings and structures, save a flagpole in the center, and during this early settlement period nearby residents commonly grazed livestock in the plaza.³

A major transformation of the plaza started in 1895, inspired by local resident Charles Murdock who advocated for the beautification of the plaza. Murdock wrote in the *Arcata Union*: "The Plaza should be a thing of beauty and a center of life and interest. No building should rest upon it, but green sword, and well-kept walks, a fountain, shrubs, and trees should be so attractive that it would be the pride of every citizen." Local residents followed Murdock's vision and formed the Plaza Improvement Committee with the mission to enhance the beauty of the plaza. The first improvements came in 1901 with passage of an ordinance banning livestock grazing on the plaza, and the construction of a covered bandstand at the center. Over the next decade rose bushes, boxwoods, and two palm trees were planted; benches installed; a radial pattern of sidewalks built; and a drinking fountain donated by the Women's Christian Temperance Union was installed.⁴

Early twentieth century changes to the plaza included the installation of the McKinley Statue. The statue came to be in Arcata Plaza because of the efforts of Arcata resident George Zehndner who

³ Susie Van Kirk, "Portraits of the Plaza," in the *Humboldt Historian* (September-October 1990), 3-6; Guerra & McBane, City of Arcata Historic Context Statement, March 2012, 6-7.

⁴ Susie Van Kirk, "Portraits of the Plaza," in the *Humboldt Historian* (September-October 1990), 3-6; Susie Van Kirk, *The Plaza: Arcata, California* (Arcata: White Publishing, 1986), n.p.; Guerra & McBane, City of Arcata Historic Context Statement, March 2012, 14-15.

in 1905 hired San Francisco sculptor Haig Patigian to create the piece. Zehndner, an admirer of McKinley, wanted a statue to commemorate the President who was assassinated in 1901. Patigian completed the bronze eight and a half foot tall statue in early 1906. In waiting for shipment to Arcata, the McKinley Statue survived the 1906 San Francisco earthquake and fire before being sent to Arcata in May 1906. Zehndner donated the statue to the City of Arcata and an official dedication ceremony occurred on July 4, 1906. The statue stood on a granite pedestal in the center of the plaza, supplanting the short-lived bandstand which was torn down (**Plate 1** and **Plate 2**).⁵

Throughout the twentieth century and into the twenty-first century, Arcata Plaza has remained at the core of downtown Arcata's commercial and social life. The plaza has been the site of band concerts, picnics, parades, social events, community celebrations, and festivals. Up until World War II, the area adjacent the plaza district continued to be the commercial and civic center of the town. This hub of activity was home to many of the leading businesses in town, and the most desirable properties were those on the streets facing the plaza. In the post World War II era, activity in downtown generally declined as people and businesses moved to suburban areas. Construction of the US 101 freeway through Arcata further contributed to this trend as it took away traffic that formerly passed through downtown. Another blow to the plaza area was the construction of a new City Hall at 7th and F streets in 1967 and abandonment of the old City Hall at the northeast corner of 8th and G streets on the plaza. The plaza area has persisted, however, as a town center and focal point of downtown (**Plate 3**). Recently, like many other downtowns throughout the country, Arcata is experiencing an upswing around the plaza which is vibrant with trendy shops and restaurants. Through all of this, the McKinley Statue has remained a well-known downtown landmark.⁶

⁵ Susie Van Kirk, "Portraits of the Plaza," in the *Humboldt Historian* (September-October 1990), 3-6; Susie Van Kirk, *The Plaza: Arcata, California* (Arcata: White Publishing, 1986), n.p.; Peter Garland, "McKinley Statue and Arcata," *Humboldt Historian* (September-October 1987), 4-10.

⁶ Susie Van Kirk, "Portraits of the Plaza," in the *Humboldt Historian* (September-October 1990), 3-6; Susie Van Kirk, *The Plaza: Arcata, California* (Arcata: White Publishing, 1986), n.p.; Guerra & McBane, City of Arcata Historic Context Statement, March 2012, 45.



Plate 1. Gathering in Arcata Plaza in 1914 to celebrate the completion of the Northwest Pacific Railroad.⁷



Plate 2. View of Arcata Plaza ca. 1920 looking northeast.⁸

⁷ Seely Brothers, "Railroad Celebration, Arcata, Cal.," Photo No. 2003.01.2436, Palmquist Photograph Collection, Humboldt Room, Humboldt State University Library.

⁸ "Arcata Plaza Looking Northeast From Top of Brizard Building," Photo No. 1999.02.0383, Ericson Photograph Collection, Humboldt Room, Humboldt State University Library.



Plate 3. View of Arcata Plaza in 1970 looking northeast.⁹

⁹ "Bird's-Eye View of Arcata Plaza Looking Northeast," Photo No. 1999.07.0106, Humboldt County Collection, Humboldt Room, Humboldt State University Library.

4. IDENTIFICATION OF HISTORICAL RESOURCES

In consultation with the City of Arcata Community Development Department, JRP identified the historical resources for this project as Arcata Plaza Historic Landmark and Arcata Plaza Historic District (**Figure 1**). Both Arcata Plaza Historic Landmark and Arcata Plaza Historic District are locally designated historic resources, designated in the City of Arcata General Plan by Ordinance No. 1377 on September 3, 2008.¹⁰ Based on this designation, the Arcata Plaza Historic Landmark and Arcata Plaza Historic District are considered historical resources, as per CEQA Guidelines Section 15064.5(a)(2).

Arcata Plaza Historic District is a nine-block area bounded by 7th, F, 10th, and I streets. It was designated as local historic resource “for the unique historical, architectural, aesthetic, and economic values that it represents to the city” and for its “unique historical, aesthetic and cultural interest and significance to the residents and businesses of Arcata. Reflecting its central place in Arcata’s heritage and identity.” Arcata Plaza Historic District includes all of the “older structures that border the adjacent streets and help define the Plaza’s character.” There are presently dozens of buildings and structures within the nine-block area of the historic district, comprised of commercial and residential properties, and dating from the early European settlement era up to recent years. Among the buildings in the historic district are nine buildings that are locally designated historic landmarks in addition to the Arcata Plaza Historic Landmark. The General Plan does not include any further historic significance justification than what is quoted above, nor does it include an identification of contributors and non-contributors to the historic district (those buildings and structures that contribute to the historic district’s historic significance), a list character-defining features (the features of the historic district and its contributors that define its character), definition of a period of significance (the period of time in which the historic district was historically significant), or discussion of historic integrity (the ability of the historic district to convey its historic significance). The above terms are derived from National Register of Historic Places guidelines and are widely used as a methodology for defining, evaluating, and analyzing historic districts, and are useful in assessing impacts to historical resources for CEQA compliance.¹¹

In the center of Arcata Plaza Historic District is Arcata Plaza Historic Landmark. The General Plan identifies five “principal features” of Arcata Plaza Historic Landmark: 1) the McKinley Statue, 2) the generally symmetrical pattern of walkways, 3) open nature of the Plaza and absence of buildings, 4) the Women’s Christian Temperance Union drinking fountain, and 5) the existing palm trees.¹² The McKinley Statue is the center piece of Arcata Plaza and the eight radial sidewalks all lead to the statue. The bronze statue is about eight and a half feet tall and stands on a granite

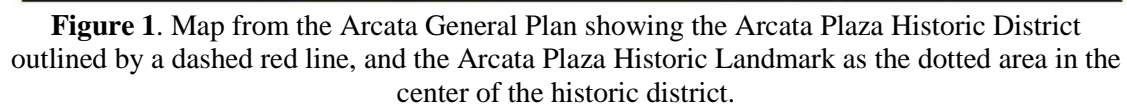
¹⁰ City of Arcata, Arcata General Plan, Historical Preservation Element, Chapter 5.4, pp. 5-25—5-27, 5-35, Figures HP-a, Figure HP-b.

¹¹ City of Arcata, Arcata General Plan, Historical Preservation Element, Chapter 5.4, pp. 5-25—5-27, 5-35, Figures HP-a, Figure HP-b.

¹² City of Arcata, Arcata General Plan, Historical Preservation Element, Chapter 5.4, pp. 5-25, 5-27.

pedestal about eight feet tall and four feet wide. On the west side of the pedestal is inscribed “WILLIAM MCKINLEY” and on the east side, “PRESENTED TO THE CITY OF ARCATA BY GEORGE ZEHNDNER MCMVI.” Also on the east side, high on the pedestal just below McKinley’s feet is inscribed “HAIG PATIGIAN SC. 1906.” Historic photographs show a circular base of concrete steps below the pedestal, but the planter box is obscuring this element of the statue. The project to remove the McKinley Statue has the potential to cause a substantial adverse change to two historical resources under CEQA: Arcata Plaza Historic District and Arcata Plaza Historic Landmark. See **Photographs 1-19**.

JRP Staff Historian Steven J. “Mel” Melvin conducted fieldwork for this project on May 29, 2018, to examine the existing condition of the McKinley Statue and observe the statue in the context of Arcata Plaza Historic District. Mr. Melvin took photographs of the statue, plaza, and surrounding elements of the historic district. On May 30, 2018, Mr. Melvin met with City Community Development Department staff to discuss the project, identification of historical resources, and project impacts to historical resources.





Photograph 1. McKinley Statue, camera facing northeast, May 29, 2018.



Photograph 2. McKinley Statue, camera facing east, May 29, 2018.



Photograph 3. McKinley Statue pedestal, camera facing southwest, May 29, 2018.



Photograph 4. Women's Christian Temperance Union drinking fountain, camera facing northeast, May 29, 2018.



Photograph 5. Arcata Plaza, from corner of 8th and H streets showing the symmetry and pattern of sidewalks, camera facing east, May 29, 2018.



Photograph 6. Arcata Plaza, from corner of 9th and G streets showing the two palm trees, camera facing southwest, May 29, 2018.



Photograph 7. Arcata Plaza from 8th Street with McKinley Statue in distance and one of the radial sidewalks, camera facing north, May 29, 2018.



Photograph 8. This Google Earth aerial image illustrates the radial pattern of the sidewalks.



Photograph 9. Arcata Plaza from H Street showing the open nature of the plaza, camera facing southeast, May 29, 2018.



Photograph 10. Buildings on 9th Street facing the plaza, camera facing northwest, May 29, 2018.



Photograph 11. Buildings on 8th Street from the center of Arcata Plaza, camera facing southwest, May 29, 2018.



Photograph 12. Buildings on 8th Street facing the plaza, camera facing southwest, May 29, 2018.



Photograph 13. Buildings on the G Street facing the plaza, camera facing southeast, May 29, 2018.



Photograph 14. Buildings on the H Street facing the plaza, camera facing southwest, May 29, 2018.



Photograph 15. Residence in the Arcata Plaza Historic District on the corner of 10th and F streets, camera facing southwest, May 29, 2018.



Photograph 16. Row of residences in the Arcata Plaza Historic District on 9th Street near F Street, camera facing northwest, May 29, 2018.



Photograph 17. Commercial buildings in the Arcata Plaza Historic District on H Street near 10th Street, camera facing northwest, May 29, 2018.



Photograph 18. Commercial building in the Arcata Plaza Historic District at the corner of 8th and I streets, camera facing southwest, May 29, 2018.



Photograph 19. Commercial building in the Arcata Plaza Historic District on the corner of 10th and I streets, camera facing southeast, May 29, 2018.

5. IMPACTS ANALYSIS AND IDENTIFICATION OF APPROPRIATE MITIGATION MEASURES

5.1. CEQA EFFECTS ANALYSIS

The analysis of project impacts under CEQA is related to the effect of a proposed project on the integrity of a historical resource and its ability to convey its significance. CEQA Guidelines Section 15064.5(b) state that “a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” This section of the CEQA guidelines further details the standards for impacts to historical resources and includes the following [Section 15064.5 (b)(1)-(2)]:

- Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.
- The significance of an historical resource is materially impaired when a project:
 - Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant...

The project proposes to remove the McKinley Statue and the granite pedestal on which it is mounted from Arcata Plaza and place it in a City storage facility. Because the McKinley Statue is a component of two distinct historical resources under CEQA—Arcata Plaza Historic Landmark and Arcata Plaza Historic District—the below analysis is provided to assess the impacts on each historical resource separately.

5.1.1. Impacts to the Arcata Plaza Historic Landmark

The proposed project would constitute a substantial adverse change to Arcata Plaza Historic Landmark. The McKinley Statue is identified in the General Plan as one of five “principal features” of the Arcata Plaza Historic Landmark and is the centerpiece of the plaza. The relative importance of the statue is raised by there being only four other principal features of this historical resource: two palm trees, the symmetrical pattern of sidewalks, a drinking fountain, and the open nature of the plaza. Furthermore, the statue is the most noticeable of the principal features and all eight radial sidewalks in the plaza lead to the statue. Therefore, the Arcata Plaza Historic Landmark would be materially impaired, as defined in CEQA Guidelines Section 15064.5(b)(1)-(2), and the proposed project would substantially alter this historical resource under CEQA.

5.1.2. Impacts to the Arcata Plaza Historic District

The proposed project would also constitute a substantial adverse change to Arcata Plaza Historic District. As noted above, the General Plan does not identify contributors and non-contributors, or “principal features” of the historic district. This analysis shall assume, therefore, that the McKinley Statue is a contributor/principal feature of Arcata Plaza Historic District. As with Arcata Plaza Historic Landmark, the McKinley Statue is in the center of Arcata Plaza Historic District, and the radial pattern of the sidewalks further contributes to the statue being the focal point of the historic district by allowing clear sight lines to the statue and encouraging pedestrian traffic from eight directions. The main commercial businesses in the historic district are located on the streets adjacent to the plaza, and the plaza’s openness makes the statue highly visible from any of these streets, sidewalks, and businesses. Historically, the plaza has maintained this relative openness and the statue has remained highly visible. As the centerpiece of the city center, the statue has been throughout its history a well-known downtown landmark. Furthermore, the McKinley Statue is a unique element of the Arcata Plaza Historic District. The statue is the only statue in a historic district overwhelmingly comprised of buildings. It is also a statue commemorating a US President, rather than a person directly important to Arcata history, and therefore serves the function of transcending local affairs as represented by the buildings in the historic district and instilling the district with a national affect and character. Therefore, the Arcata Plaza Historic District would be materially impaired, as defined in CEQA Guidelines Section 15064.5(b)(1)-(2), and the proposed project would substantially alter this historical resource under CEQA.

5.2. IDENTIFICATION OF APPROPRIATE MITIGATION MEASURES

As part of compliance under CEQA Guidelines Section 15064.5(b)(4), the City is required to identify feasible measures to mitigate and lessen the significant adverse changes associated with the project. As the project calls for the removal of the McKinley Statue and its granite base, there is no means to fully mitigate the impacts, but measures can be taken that would lessen the impacts.

CEQA Guidelines state that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. Additionally, there needs to be a connection between mitigation measures and legitimate government interests, and the mitigation measures must be “roughly proportional” to the impacts of the project.¹³ The CEQA Guidelines do not prescribe what mitigation measures may be appropriate, but they do provide some parameters regarding adequacy of such measures.¹⁴

The following proposed mitigation measures are intended to address the CEQA provisions in relation to the McKinley Statue being removed from Arcata Plaza Historic Landmark and Arcata Plaza Historic District. The proposed measures also take into account their relative appropriateness in relationship to the project impacts on the historic district. The recommended measures include

¹³ CEQA Guidelines Section 15126.4(a)(4)

¹⁴ CEQA Guidelines Section 15126.4(b)(1)-(2)

1) interpretive panels, 2) public report / pamphlet, 3) documentary video, 4) website, and 5) tie-in with local historical society or museum programming / exhibit.

5.2.1. Mitigation Measure 1: Interpretive Panels

Interpretation is a very common mitigation measure to address impacts to historical resources. Presentation of information through signage, panels, or exhibits is often the main means of interpretation to the general public. Interpretive panels usually include text and photographs, including historic photographs. Interpretation is meant to inform the public about the past. Interpretation explains not just what, but the why of history. Through interpretation of the past, people understand the impact of past events and values upon their lives today and are informed of the choices before them. Guidance for developing themes and materials for interpretation is available from several sources. These include the National Register Bulletin: *Telling the Stories: Planning Effective Interpretive Programs for Properties Listed in the National Register of Historic Places* and *Great Tours!*¹⁵

It is recommended that the mitigation measure for interpretive panels establish specifications for standards of its construction, i.e. materials and size. For example, the interpretive panels would be sufficiently durable to withstand typical Arcata weather conditions for at least 10 years, like fiber-glass embedment panels, that meet National Park Service signage standards.¹⁶ The mitigation measure for the interpretive panels would need to address how the content would be prepared, who prepares the content, and who gets to review and comment on the interpretive panels. It is recommended that the mitigation measure also specify that the content be based on cited historical documentation.

5.2.2. Mitigation Measure 2: Public Report / Pamphlet

A report or pamphlet could be prepared for consumption by the general public on the statue's history and the removal of the statue from Arcata Plaza. This report or pamphlet would be distributed to local repositories and museums. It could also be made available to any local businesses and could be made available online through the City website. As with the interpretive panels, the mitigation measure would need to address how the report / pamphlet would be prepared, who prepares that content, and who gets to review and approve the report / pamphlet.

5.2.3. Mitigation Measure 3: Documentary Video

A short video could be created that presents the history of the statue and the issues related to its removal. Videos, such as these, are sometimes prepared to sufficient quality that they can be broadcast on public television. It is possible that such a video would also be made available through

¹⁵ Ron Thompson and Marilyn Harper, *Telling the Stories: Planning Effective Interpretive Programs for Properties Listed in the National Register of Historic Places* (National Park Service, National Register History and Education, 2000).

¹⁶ National Park Service, "Wayside Exhibits: A Guide to Developing Outdoor Interpretive Exhibits, October 2009," Harpers Ferry Center Wayside Exhibits, <http://www.nps.gov/hfc/pdf/waysides/wayside-guide-first-edition.pdf> (accessed June 2018).

a local museum, or it could be used as part of a display in the museum. Again, this mitigation measure to address how the video would be prepared, who prepares its content, and who gets to review and approve the video.

5.2.4. Mitigation Measure 4: Website

There are opportunities to place appropriate material on a City website, or local museum's website, about the statue's history and removal. This mitigation measure, too, would need to specify what would be placed on a website or websites, parties involved in content preparation, and content review and approval.

5.2.5. Mitigation Measure 5: Local Historical Society Exhibit Tie-in

This mitigation measure would be regarding the history of the statue and its removal, and it would be formulated around an existing program / exhibit at a local historical society or local museum, if any such programming / exhibit exists. Potential entities are Humboldt State University, Humboldt County Historical Society, Historical Sites Society of Arcata, and Clarke Historical Museum. Other entities could include local Native American tribes.

6. PREPARERS' QUALIFICATIONS

JRP Partner Christopher McMorris (M.S., Historic Preservation, Columbia University) oversaw and contributed to this Historical Resource Report. Mr. McMorris has 19 years of experience and specializes in conducting historic resource studies for compliance with Section 106 of the National Historic Preservation Act and CEQA, as well as other historic preservation projects. Based on his level of education and experience, Mr. McMorris meets and exceeds the United States Secretary of the Interior's Professional Qualification Standards under History and Architectural History (as defined in 36 CFR Part 61).

JRP Staff Historian/Architectural Historian Steven J. "Mel" Melvin (M.A., Public History, California State University, Sacramento) was the primary author of this report. Mr. Melvin has over 12 years of experience conducting a wide variety of historical research, fieldwork, and cultural resource management projects for compliance with Section 106 and CEQA, including historic resource inventory and evaluation, and effects and impacts analysis. Mr. Melvin meets and exceeds the Secretary of the Interior's Professional Qualification Standards under History and Architectural History (as defined in 36 CFR Part 61).

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Appendix

City of Arcata General Plan, Chapter 5.4, Historical Preservation Element

Appendix B

ACHP POLICY STATEMENT ON CONTROVERSIAL COMMEMORATIVE WORKS



Preserving America's Heritage

ACHP POLICY STATEMENT ON CONTROVERSIAL COMMEMORATIVE WORKS

The National Historic Preservation Act (NHPA) of 1966 states as policy that “the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people.” Achieving this balance of past, present, and future can be challenging in the case of commemorative works—memorials, statues, markers, or other landscape features erected to honor, recognize, or memorialize individuals, groups, or events that played a prominent role in U.S. history.

In recent years, increasing numbers of Americans have raised concerns or objections regarding the display of various commemorative works in public spaces in their communities. Monuments commemorating the Confederacy, including prominent generals and leaders of the Confederate States of America, have been opposed for their associations with Civil War era and post-war institutional support for slavery, segregation, and white supremacy. Controversy has also arisen regarding memorials to early European explorers, colonists, and religious leaders, who are viewed by many Native Americans and others as representing the subjugation and genocide of indigenous peoples in the New World. These and other examples of commemorative works associated with controversial periods, events, and individuals raise complex issues for governments, communities, and preservationists.

The Advisory Council on Historic Preservation (ACHP), an independent federal agency created by the NHPA, has as its mission to promote the preservation, enhancement, and sustainable use of our nation’s diverse historic resources, and to advise the President and the Congress on national historic preservation policy. Through this policy statement, the ACHP seeks to promote informed decision making and responsible stewardship of potentially controversial but nevertheless historically significant commemorative works. In doing so, the ACHP acknowledges it is essential for decision makers to: directly confront history’s difficult chapters; consult broadly with the public to ascertain contemporary community views; consider a range of management alternatives; and promote public education regarding all aspects (positive and negative) of the nation’s history.

GUIDING PRINCIPLES

The following guiding principles have been adopted by the ACHP to assist federal, state, and local government entities facing decisions about the management or disposition of controversial commemorative works. This includes federal agencies complying with the review requirements of Section 106 of the NHPA (54 U.S.C § 306108).

1. **Stewardship.** The fundamental goal of decision making about historically significant commemorative works should be to balance stewardship responsibilities for publicly-owned

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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commemorative works with recognition of the sensibilities, cultural responses, and emotions over memorialization and remembrance of difficult chapters in the nation's history.

2. **Changing values.** It is essential to acknowledge that societal values are fluid, and such values, particularly those associated with a memorial or monument, may be very different today from when it was created. Management decisions must necessarily take into account the views and needs of the contemporary community. For example, when the Congress created Custer Battlefield National Monument in 1946, it honored only the U.S. Army soldiers who died there. However, 45 years later, Congress renamed the site (which is within or adjacent to two large Indian reservations) as the Little Bighorn Battlefield National Monument, and memorials commemorating the Native American combatants began to be added to the battlefield landscape.
3. **Historical context.** The historical context shaping the original decision to erect a commemorative work needs to be carefully considered in evaluating its significance and deciding its future. For instance, late-19th century monuments on Civil War battlefields commemorating Confederate soldiers' battle actions generally have a different context than memorials to the Confederacy constructed in local public squares during the early 20th century when Jim Crow segregation laws flourished. Decision makers should bear in mind the extent to which the historical context for the placement of the commemorative work is—or is not—understood and supported within the contemporary community.
4. **Historic significance.** It is important to determine whether a commemorative work is “historic” in order to properly assess the overall public interest when making management decisions. The fact that a commemorative work celebrates a historic event or the historic accomplishments of an individual does not necessarily render the commemorative work itself historic. For instance, a Confederate memorial erected during the recent 150th anniversary of the Civil War is likely far too new to be considered historic on its own merit. Likewise, not every older commemorative work is historic. It may have lost its physical integrity over time, be located away from the site of any historic events being commemorated, or simply not be sufficiently significant in terms of its artistic design or the event/person(s) that it is memorializing. Establishing the historic significance of a commemorative work is also essential to determine whether various federal, state, and local environmental review laws would apply during decision making. For example, in the context of Section 106 of the NHPA, a property must be listed in or eligible for listing in the National Register of Historic Places in order to be considered historic, or be a contributing element to a historic district or historic landscape, such as a battlefield or cemetery.
5. **Consultation.** Consulting with affected parties and actively seeking broad public input is critical to reach a responsible stewardship decision. Such consultation is required under many historic preservation laws, including the NHPA, and the public should be made aware of what legal protections apply in those instances. However, regardless of whether historic preservation laws apply, consultation and public involvement in deciding a course of action are essential to a successful outcome. Broad civic involvement and public engagement should be pursued. Parties on all sides, especially those with historic ties to the issue, should be given the opportunity to participate in discussions, provide information, express concerns, and propose alternatives for consideration. Such input should be considered as objectively as possible by decision makers (although admittedly maintaining objectivity can be difficult when discussions are highly charged).
6. **Inclusion.** It is important to be inclusive, to hear the views of all interested groups and individuals, and consider the relationship of their history, heritage, and values to the commemorative work in the decision-making process. For example, decision makers considering the future of a statue to Christopher Columbus need to hear from both Native Americans—who generally view Columbus as a

symbol of European conquest—and Italian Americans—who frequently view him as a hero and symbol of Italian American contributions to American history.

7. **Treatment alternatives.** A broad range of alternatives should be considered in determining the future of a historically significant commemorative work that is publicly owned. Generally, commemorative works should not be destroyed since they have lessons to teach about difficult issues in the country's history. Reviewing the experiences of other agencies and communities can provide important examples of other possible outcomes. Some typical alternatives to consider include the following:
 - a. Retaining the commemorative work unchanged on its site. This alternative might be warranted where the work is of such exceptional historical significance that alteration or relocation is inappropriate, in which case off-site interpretation might be pursued.
 - b. Retaining the commemorative work on its site and providing context through on-site interpretation. One example is the interpretive plaque placed at the Confederate monument on the campus of the University of Mississippi in 2016. Such interpretation must be handled sensitively given the painful or emotional chapters of history being addressed. Context might also be achieved by adding an accompanying commemorative work to balance the story told by the original memorial. This was done when Congress passed legislation to add the Vietnam Women's Memorial to the Vietnam Veterans Memorial on the National Mall after objections that the original memorial did not acknowledge the service and sacrifices of women who served during the war. Similarly, concerns from disability rights advocates led Congress to approve adding a statue of Franklin Delano Roosevelt in a wheelchair to the Franklin Delano Roosevelt Memorial in Washington, D.C.
 - c. Modifying the commemorative work to address community concerns while maintaining the overall integrity of it or its historic environs. Illustrative of this approach, the City of San Francisco is considering removing one of five statues that comprise its Pioneer Monument, since the statue depicts a Native American in a demeaning manner.
 - d. Preserving the commemorative work, but removing it from prominent display in a public space. Relocated commemorative works can be preserved through appropriate curation, display, and interpretation in a museum setting, or re-erection in a non-public venue. One example is the relocation of a statue of Confederate President Jefferson Davis from the grounds of the University of Texas to the university's Briscoe Center for American History.
8. **Public education.** Controversy over a commemorative work offers significant opportunities to increase public understanding of American history and the complexities of its more difficult aspects. This can be important given the sometimes limited public knowledge of and appreciation for U.S. history and its lessons. The public involvement process is a platform for providing information on the history of the commemorative work in question and for having advocates and opponents hear their differing perspectives. More informed public participation will pay dividends for decision makers in exploring various alternatives. Likewise, any interpretation proposed for commemorative works is a chance for further public education.

Adopted March 22, 2018

Appendix C

NOTICE OF PREPARATION



736 F Street
Arcata CA 95521

City Manager
707-822-5953

Environmental Services
707-822-8184

Police
707-822-2428

Appendix C
707-822-7091

Community Development
707-822-5955

Finance
707-822-5951

Public Works
707-822-5957

Transportation
707-822-3775

Public/Agency EIR Scoping for the McKinley Statue Removal Project
May 17, 2018 (public) and May 18, 2018 (agency)

Memo to File Re: Public/Agency Scoping Meetings - McKinley Statue Removal EIR, May 29, 2018

In support of the public process required by the California Environmental Quality Act (CEQA), the City sent a Notice of Preparation of a Draft EIR (NOP) to the Governor's Office of Planning & Research (OPR) on May 9, 2018 (SCH# 2018052032). In addition to circulating an NOP, the City of Arcata held a public scoping meeting at the D Street Neighborhood Center from 6:00-7:00 pm on Thursday, May 17th. Approximately 30 people attended. City Staff made a short presentation on the purpose of the meeting, the CEQA/EIR process and why this process is required for the removal of the statue from the center of the Arcata Plaza.

The purpose of the meeting was to let those gathered know what the project description is and what the draft project alternatives are and the steps and milestones that can be expected throughout the focused EIR process. Staff asked participants to add comments to large posters that each had one of the alternatives, the project description and another poster for "other ideas". Staff received a very wide range of comments ranging from a preference for the "No Project" alternative to an alternative that includes melting the statue and using proceeds from the sale of the bronze as a donation to the Wiyot People.

The following day, May 18th, Planning staff met with agencies from 10:00-11:00 AM at City Hall to discuss the project description, proposed alternatives and other potential environmental impacts. The three Wiyot area Tribal Historic Preservation Officers (THPOs), the Office of Historic Preservation (SHPO) and the Historic Sites Society of Arcata (HSSA) were invited to attend. Of those invited, the Bear River Band of the Rohnerville Rancheria's THPO, Erika Cooper, attended and Edie Butler, Board member of HSSA. The HSSA was invited because the City's Land Use Code recognizes the non-profit as a quasi-public entity upon which the City relies for input on Landmark, demolition and other historic preservation projects. The Blue Lake THPO, Janet Eidsness, declined to attend the meeting and also declined formal consultation under Assembly Bill 52 for the project. The Wiyot THPO and Tribal Chair, Ted Hernandez, was unable to attend the meeting but, like Ms. Cooper, has not declined formal consultation.

The HSSA's official recommendation is that the removal of the statue will have a significant and unavoidable impact on the historic resource that is the Plaza Historic District as well as to the statue itself, which should be considered a historic resource on its own. The HSSA supports the No Project alternative.

The Bear River THPO stated that she would take the decision to her Tribal Council regarding the alternative to relocate the statue to Redwood Park with interpretive signage added at both the Plaza and at the new location in Redwood Park explaining the circumstances surrounding the statue's relocation away from the center of town. The addition of interpretive signage is included in Alternative 2 (below):

- Preferred Alternative (#1) – remove the statue from the Plaza and store offsite on City-owned property
- Alternative #2 - Remove the statue from the Plaza and reinstall at Redwood Park with interpretive signage at both the Plaza and the Park describing the circumstances and reasoning behind the statues relocation – This alternative meets the project objectives, but may be less appealing to a certain constituency in the community and would add cost to the project
- Alternative #3 - Remove the statue from the Plaza and sell or donate it to another entity – This alternative meets the project objective, but may add cost to the project
- Alternative #4 - No Project. As the name implies, the No Project Alternative is an alternative in which there is no project. As such, no changes would occur and the statue would remain in its current state. This alternative does not meet the project objective

The input received from the public scoping meeting will be catalogued and evaluated for alternatives and impacts and made part of the project record.

With the input from both scoping meetings, Staff will continue to prepare an Initial Study and Focused Draft EIR for the project as was directed by the City Council through its unanimous vote on February 21, 2018. Staff will obtain the services of a qualified historian to prepare a focused technical report identifying the status of the McKinley Statue as a historical resource and providing an analysis regarding the impact of the statue's removal on the Arcata Plaza Historic District. The report will include possible measures to mitigate the impact of the statue's removal. This information will be very useful in the preparation of the Initial Study and DEIR.



OPR Home > CEQAnet Home > CEQAnet Query > Search Results > Document Description

Removal of the Statue of President McKinley from the Center of the Arcata Plaza

SCH Number: 2018052032

Document Type: NOP - Notice of Preparation

Project Lead Agency: Arcata, City of

Project Description

On February 21, 2018, the Arcata City Council voted to remove the statue of former President McKinley from the center of the Arcata Plaza where it has been standing since its installation in 1906. The Plaza is a one-square block public park in downtown Arcata. The Plaza and the statue are historic resources as defined in 15064.5 of the CEQA Guidelines and by local historic designation. Due to the project's significant and unavoidable impacts to historic resources, the City Council has authorized the preparation of a Focused EIR.

Contact Information

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Alyson Hunter
City of Arcata
707-825-2040
736 F Street
Arcata, CA 95521

Project Location

County: Humboldt
City: Arcata
Region:
Cross Streets:
Latitude/Longitude: 40.868531° / 124.086448° [Map](#)
Parcel No:
Township: 6N
Range: 1E
Section: 29
Base:
Other Location Info:

Proximity To

Highways:
Airports:
Railways:
Waterways:
Schools:
Land Use: Zoning: public facility; GPLU: PF

Development Type

Local Action

Project Issues

Reviewing Agencies (Agencies in **Bold Type** submitted comment letters to the State Clearinghouse)

Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 1E; Native American Heritage Commission; Caltrans, District 1; Regional Water Quality Control Board, Region 1

Date Received: 5/11/2018 **Start of Review:** 5/11/2018 **End of Review:** 6/11/2018

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Notice of Preparation

To: State Clearinghouse

P.O. Box 3044

Sacramento, CA 95812-3044

From: City of Arcata

736 F Street

Arcata, CA 95521

Subject: Notice of Preparation of a Draft Environmental Impact Report

City of Arcata will be the Lead Agency and will prepare an environmental impact report for the project identified below. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

The project description, location, and the potential environmental effects are contained in the attached materials. A copy of the Initial Study (☐ is ☒ is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Alyson Hunter at the address shown above. We will need the name for a contact person in your agency.

Project Title: See attached project descriptionProject Applicant, if any: City of ArcataDate May 9, 2018Signature Alyson HunterTitle Senior PlannerTelephone 707-825-2040

Project Description for the Notice of Preparation of an EIR for the Removal of the Statue of President McKinley from the Center of the Arcata Plaza, May 2018

On February 21, 2018, the Arcata City Council voted to remove the statue of former President McKinley from the center of the Arcata Plaza where it has been standing since its installation in 1906. The Plaza is a one-square block public park in downtown Arcata. The Plaza and the statue are historic resources as defined in § 15064.5 of the CEQA Guidelines and by local historic designation. Due to the project's significant and unavoidable impacts to historic resources, the City Council has authorized the preparation of a Focused EIR.

Property Report - Assessor's Parcel Number: 021-107-001



City of Arcata Community Development Department
736 F Street, Arcata, Ca. 95521
(707) 822-5955

Humboldt County Assessor's Office

Parcel information date: 12/6/2017

Owner Name: Arcata City Of
Mailing Address: 736 F St, Arcata CA, 95521
Site Address/City/Zip: ,
Land Value: \$0.00
Improvement Value: \$0.00
Other Value: \$0.00
Recorded Document:
Assessor Parcel Map Link: <http://co.humboldt.ca.us/assessor/maps/021-10.pdf>
Use Code: 80
Tax Rate Area: 1035
Census Block: 501 Census Tract: 10

For parcel owner information please call:
Humboldt County Assessor
825 5th Street, Eureka, Ca 95501
(707) 445-7663

City of Arcata Property Details

Property Details

Latitude/Longitude: 40.868531 -124.086448
Section/Township/Range: SECTION 29 T6N, R1E
Parcel Size in Sq Ft (GIS Computed): 44,011.8
Parcel Size in Acres (GIS Computed): 1
Google Map Link:
<http://maps.google.com/maps?f=q&hl=en&geocode=&q=40.8685305469,-124.086448454&ie=UTF8&h=h&z=16&iwloc=addr>
Sewer Lateral Certificate(as of 1/3/2018): N

Zoning

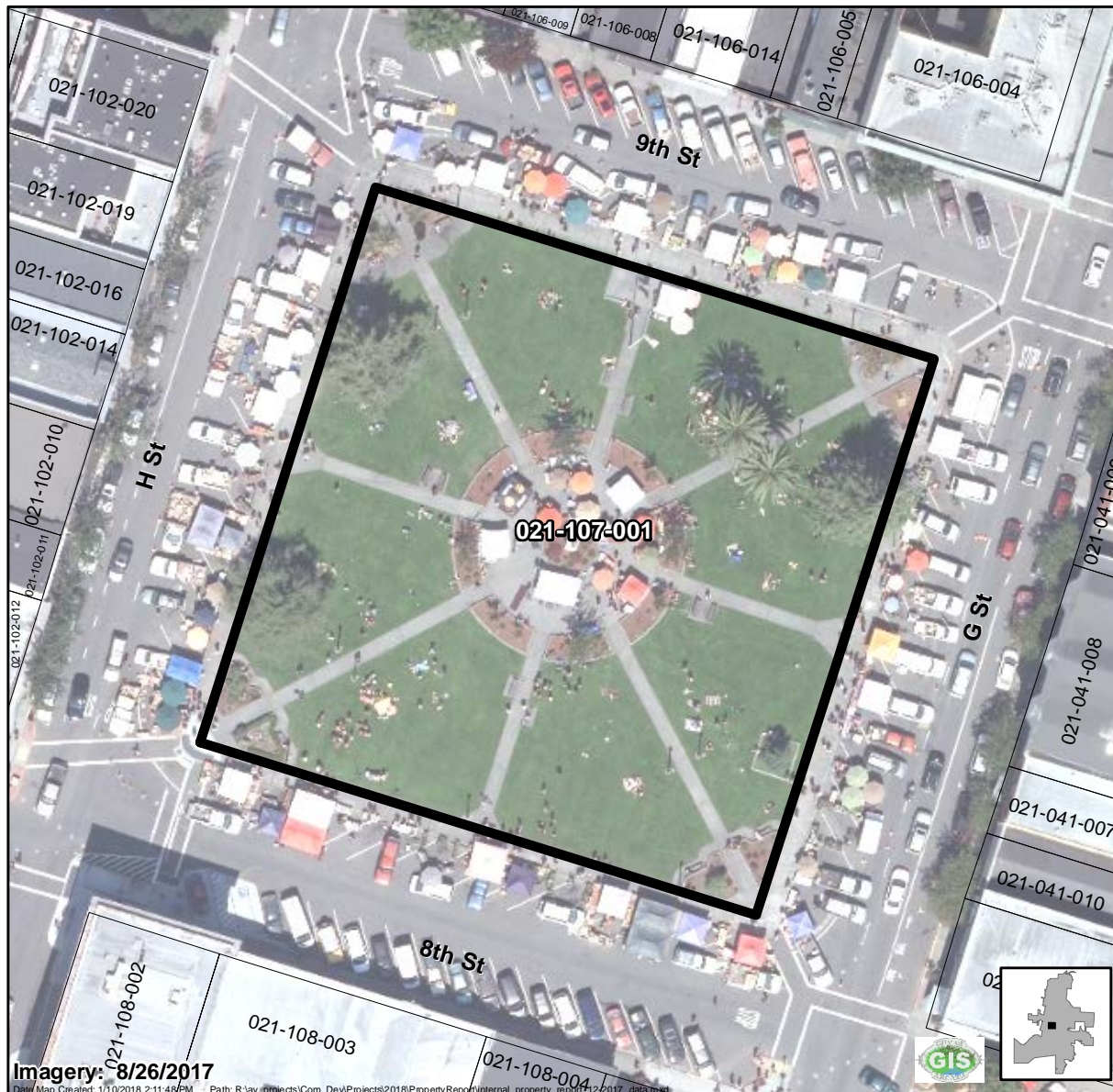
Inland - Arcata Land Use Code (LUC):
Public Facility
Coastal - Arcata Coastal Land Use & Development Guide (CLUDG):
N/A

General Plan Land Use

Inland - Arcata General Plan: Public Facility
Coastal - Arcata General Plan: N/A

Special Resources/Hazards/Constraints Areas

Creamery District (:CD) Combining Zone: Out
Historical Landmark (:HL) Combining Zone: See Admin
Homeless for Housing (:HH) Combining Zone:
MMIZ (:MMIZ) Combining Zone: Out
Neighborhood Conservation Area (:NCA): Arcata Plaza Historic District
Planned Development (:PD) Combining Zone: No
Plaza Area (:PD) Combining Zone: Yes
Special Consideration (:SC) Combining Zone: No
Wetland/Stream (:WP/:SP) Combining Zone: None
Alquist/Priolo Fault Zone: Out
Coastal Zone Boundary: Out
Categorical Exclusion Area: Out
Creek Zone(Within 25' of creek): No
Coastal Jurisdiction: Out
FEMA Flood Zone (2017):
Hillside Development: None
Liquefaction: Moderate Liquefaction
Matthews Dam Failure: Out
Noise Contour: Yes
Redevelopment Area: In
Urban Services Boundary: In
USFWS Wetlands: No
Within 50' of Fault Zone: Out



This map is for informational purposes only.
The City of Arcata, including any employees and sub-contractors, makes no
warranties, express or implied, as to the accuracy of the information contained in this
map. The City of Arcata, including any employees and sub-contractors, disclaims
liability for any and all damages which may arise due to errors in the map and the
user's reliance thereon.

Parcel attribute descriptions: https://gis01.cityofarcata.org/data/property_report/Property_report_metadata9-7-2017.pdf

Appendix D

CEQA Environmental Checklist Form

CEQA ENVIRONMENTAL CHECKLIST FORM

NOTE: The following is a sample form and may be tailored to satisfy individual agencies' needs and project circumstances. It may be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

1. Project Title:
2. Lead agency name and address:
3. Contact person and phone number:
4. Project location:
5. Project sponsor's name and address:
6. General plan designation:
7. Zoning:
8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)
9. Surrounding land uses and setting: Briefly describe the project's surroundings:

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project. Please see the CEQA Environmental Checklist that follows for additional information.

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

DETERMINATION:

On the basis of this initial evaluation:

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

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

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

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

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

Signature

Date

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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I. AESTHETICS. Would the project:

- a) Have a substantial adverse effect on a scenic vista
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- c) Substantially degrade the existing visual character or quality of the site and its surroundings?
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- d) Result in the loss of forest land or conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the applicable air quality plan?
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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- c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- d) Expose sensitive receptors to substantial pollutant concentrations?
- e) Create objectionable odors affecting a substantial number of people?

IV. BIOLOGICAL RESOURCES. Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?
- c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

V. CULTURAL RESOURCES. Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- d) Disturb any human remains, including those interred outside of formal cemeteries?

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO SIGNIFICANT IMPACT
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VI. GEOLOGY AND SOILS. Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction?
 - iv) Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?
- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- a) Violate any water quality standards or waste discharge requirements?
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
- e) 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?
- f) Otherwise substantially degrade water quality?
- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

j) Inundation by seiche, tsunami, or mudflow

X. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

XI. MINERAL RESOURCES. Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

XII. NOISE. Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

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 expose people residing or working in the project area to excessive noise levels?

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

XIII. POPULATION AND HOUSING. Would the project:

- a) Induce substantial 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)?
- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

XIV. PUBLIC SERVICES.

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 any of the public services:

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

XV. RECREATION.

- 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?
- 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?

POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
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XVI. TRANSPORTATION/TRAFFIC. Would the project:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

XVII. TRIBAL CULTURAL RESOURCES. Would the project:

- 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:
 - i) 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
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

XVIII. UTILITIES AND SERVICE SYSTEMS. Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

	LESS THAN		
POTENTIALLY	SIGNIFICANT	LESS THAN	
SIGNIFICANT	WITH	SIGNIFICANT	NO
IMPACT	MITIGATION	IMPACT	IMPACT

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?
- e) 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?
- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?

XIX. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?
- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Note: Authority cited: Sections 21083 and 21083.05, 21083.09 Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21073, 21074 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2, 21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151, Public Resources Code; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors*, (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

Appendix E

CNDDDB Sensitive Species List for the Arcata South 7.5' Quadrangle

CNDDDB Quad Species List 59 records.

Element Type	Scientific Name	Common Name	Element Code	Federal Status	State Status	CDFW Status	CA Rare Plant Rank	Quad Code	Quad Name	Data Status	Taxonomic Sort
Animals - Amphibians	Ascaphus truei	Pacific tailed frog	AAABA01010	None	None	SSC	-	4012471	Arcata South	Mapped	Animals - Amphibians - Ascaphidae - Ascaphus truei
Animals - Amphibians	Rana aurora	northern red-legged frog	AAABH01021	None	None	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Amphibians - Ranidae - Rana aurora
Animals - Amphibians	Rana boylei	foothill yellow-legged frog	AAABH01050	None	Candidate Threatened	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Amphibians - Ranidae - Rana boylei
Animals - Amphibians	Rhyacotriton variegatus	southern torrent salamander	AAAAJ01020	None	None	SSC	-	4012471	Arcata South	Mapped	Animals - Amphibians - Rhyacotritonidae - Rhyacotriton variegatus
Animals - Birds	Pandion haliaetus	osprey	ABNKC01010	None	None	WL	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Birds - Accipitridae - Pandion haliaetus
Animals - Birds	Ardea herodias	great blue heron	ABNGA04010	None	None	-	-	4012471	Arcata South	Mapped	Animals - Birds - Ardeidae - Ardea herodias
Animals - Birds	Botaurus lentiginosus	American bittern	ABNGA01020	None	None	-	-	4012471	Arcata South	Unprocessed	Animals - Birds - Ardeidae - Botaurus lentiginosus
Animals - Birds	Nycticorax nycticorax	black-crowned night heron	ABNGA11010	None	None	-	-	4012471	Arcata South	Mapped	Animals - Birds - Ardeidae - Nycticorax nycticorax
Animals - Birds	Charadrius montanus	mountain plover	ABNNB03100	None	None	SSC	-	4012471	Arcata South	Mapped	Animals - Birds - Charadriidae - Charadrius montanus
Animals - Birds	Passerculus sandwichensis alaudinus	Bryant's savannah sparrow	ABPBX99011	None	None	SSC	-	4012471	Arcata South	Unprocessed	Animals - Birds - Emberizidae - Passerculus sandwichensis alaudinus
Animals - Birds	Falco peregrinus anatum	American peregrine falcon	ABNKD06071	Delisted	Delisted	FP	-	4012471	Arcata South	Unprocessed	Animals - Birds - Falconidae - Falco peregrinus anatum
Animals - Birds	Pelecanus occidentalis californicus	California brown pelican	ABNFC01021	Delisted	Delisted	FP	-	4012471	Arcata South	Unprocessed	Animals - Birds - Pelecanidae - Pelecanus occidentalis californicus
Animals - Birds	Phalacrocorax auritus	double-crested cormorant	ABNFD01020	None	None	WL	-	4012471	Arcata South	Mapped	Animals - Birds - Phalacrocoracidae - Phalacrocorax auritus
Animals - Birds	Coturnicops noveboracensis	yellow rail	ABNME01010	None	None	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Birds - Rallidae - Coturnicops noveboracensis
Animals - Birds	Numenius americanus	long-billed curlew	ABNNF07070	None	None	WL	-	4012471	Arcata South	Unprocessed	Animals - Birds - Scolopacidae - Numenius americanus
Animals - Fish	Acipenser medirostris	green sturgeon	AFCAA01030	Threatened	None	SSC	-	4012471	Arcata South	Mapped	Animals - Fish - Acipenseridae - Acipenser medirostris
Animals - Fish	Eucyclogobius newberryi	tidewater goby	AFCQN04010	Endangered	None	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Fish - Gobiidae - Eucyclogobius newberryi
Animals - Fish	Spirinchus thaleichthys	longfin smelt	AFCHB03010	Candidate	Threatened	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Fish - Osmeridae - Spirinchus thaleichthys
Animals - Fish	Thaleichthys pacificus	eulachon	AFCHB04010	Threatened	None	-	-	4012471	Arcata South	Mapped	Animals - Fish - Osmeridae - Thaleichthys pacificus

Appendix E

Animals - Fish	Entosphenus tridentatus	Pacific lamprey	AFBAA02100	None	None	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Fish - Petromyzontidae - Entosphenus tridentatus
Animals - Fish	Oncorhynchus clarkii clarkii	coast cutthroat trout	AFCHA0208A	None	None	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus clarkii clarkii
Animals - Fish	Oncorhynchus kisutch pop. 2	coho salmon - southern Oregon / northern California ESU	AFCHA02032	Threatened	Threatened	-	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus kisutch pop. 2
Animals - Fish	Oncorhynchus mykiss irideus pop. 16	steelhead - northern California DPS	AFCHA0209Q	Threatened	None	-	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus mykiss irideus pop. 16
Animals - Fish	Oncorhynchus tshawytscha pop. 17	chinook salmon - California coastal ESU	AFCHA0205S	Threatened	None	-	-	4012471	Arcata South	Unprocessed	Animals - Fish - Salmonidae - Oncorhynchus tshawytscha pop. 17
Animals - Insects	Bombus caliginosus	obscure bumble bee	IIHYM24380	None	None	-	-	4012471	Arcata South	Mapped	Animals - Insects - Apidae - Bombus caliginosus
Animals - Insects	Bombus occidentalis	western bumble bee	IIHYM24250	None	None	-	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Insects - Apidae - Bombus occidentalis
Animals - Insects	Cicindela hirticollis gravida	sandy beach tiger beetle	IICOL02101	None	None	-	-	4012471	Arcata South	Mapped	Animals - Insects - Carabidae - Cicindela hirticollis gravida
Animals - Mammals	Aplodontia rufa humboldtiana	Humboldt mountain beaver	AMAF01017	None	None	-	-	4012471	Arcata South	Mapped	Animals - Mammals - Aplodontiidae - Aplodontia rufa humboldtiana
Animals - Mammals	Erethizon dorsatum	North American porcupine	AMAFJ01010	None	None	-	-	4012471	Arcata South	Mapped	Animals - Mammals - Erethizontidae - Erethizon dorsatum
Animals - Mammals	Arborimus pomo	Sonoma tree vole	AMAFF23030	None	None	SSC	-	4012471	Arcata South	Mapped	Animals - Mammals - Muridae - Arborimus pomo
Animals - Mammals	Pekania pennanti	fisher - West Coast DPS	AMAJF01021	None	Threatened	SSC	-	4012471	Arcata South	Unprocessed	Animals - Mammals - Mustelidae - Pekania pennanti
Animals - Mammals	Corynorhinus townsendii	Townsend's big-eared bat	AMACC08010	None	None	SSC	-	4012471	Arcata South	Mapped	Animals - Mammals - Vespertilionidae - Corynorhinus townsendii
Animals - Mammals	Myotis evotis	long-eared myotis	AMACC01070	None	None	-	-	4012471	Arcata South	Mapped	Animals - Mammals - Vespertilionidae - Myotis evotis
Animals - Reptiles	Emys marmorata	western pond turtle	ARAAD02030	None	None	SSC	-	4012471	Arcata South	Mapped and Unprocessed	Animals - Reptiles - Emydidae - Emys marmorata
Community - Terrestrial	Northern Coastal Salt Marsh	Northern Coastal Salt Marsh	CTT52110CA	None	None	-	-	4012471	Arcata South	Mapped	Community - Terrestrial - Northern Coastal Salt Marsh
Plants - Bryophytes	Fissidens pauperculus	minute pocket moss	NBMUS2W0U0	None	None	-	1B.2	4012471	Arcata South	Mapped	Plants - Bryophytes - Fissidentaceae - Fissidens pauperculus
Plants - Lichens	Usnea longissima	Methuselah's beard lichen	NLLEC5P420	None	None	-	4.2	4012471	Arcata South	Mapped	Plants - Lichens - Parmeliaceae - Usnea longissima
Plants - Vascular	Angelica lucida	sea-watch	PDAP1070G0	None	None	-	4.2	4012471	Arcata South	Unprocessed	Plants - Vascular - Apiaceae - Angelica lucida
Plants - Vascular	Cardamine angulata	seaside bittercress	PDBRA0K010	None	None	-	2B.1	4012471	Arcata South	Mapped	Plants - Vascular - Brassicaceae - Cardamine angulata

Appendix E

Plants - Vascular	<i>Spergularia canadensis</i> var. <i>occidentalis</i>	western sand-spurrey	PDCAR0W032	None	None	-	2B.1	4012471	Arcata South	Mapped	Plants - Vascular - Caryophyllaceae - <i>Spergularia canadensis</i> var. <i>occidentalis</i>
Plants - Vascular	<i>Carex lyngbyei</i>	Lyngbye's sedge	PMCYP037Y0	None	None	-	2B.2	4012471	Arcata South	Mapped	Plants - Vascular - Cyperaceae - <i>Carex lyngbyei</i>
Plants - Vascular	<i>Carex praticola</i>	northern meadow sedge	PMCYP03B20	None	None	-	2B.2	4012471	Arcata South	Mapped	Plants - Vascular - Cyperaceae - <i>Carex praticola</i>
Plants - Vascular	<i>Eleocharis parvula</i>	small spikerush	PMCYP091G0	None	None	-	4.3	4012471	Arcata South	Unprocessed	Plants - Vascular - Cyperaceae - <i>Eleocharis parvula</i>
Plants - Vascular	<i>Hosackia gracilis</i>	harlequin lotus	PDFAB2A0D0	None	None	-	4.2	4012471	Arcata South	Unprocessed	Plants - Vascular - Fabaceae - <i>Hosackia gracilis</i>
Plants - Vascular	<i>Lathyrus glandulosus</i>	sticky pea	PDFAB251A0	None	None	-	4.3	4012471	Arcata South	Unprocessed	Plants - Vascular - Fabaceae - <i>Lathyrus glandulosus</i>
Plants - Vascular	<i>Ribes laxiflorum</i>	trailing black currant	PDGRO020V0	None	None	-	4.3	4012471	Arcata South	Unprocessed	Plants - Vascular - Grossulariaceae - <i>Ribes laxiflorum</i>
Plants - Vascular	<i>Lilium kelloggii</i>	Kellogg's lily	PMLIL1A0A0	None	None	-	4.3	4012471	Arcata South	Unprocessed	Plants - Vascular - Liliaceae - <i>Lilium kelloggii</i>
Plants - Vascular	<i>Lilium occidentale</i>	western lily	PMLIL1A0G0	Endangered	Endangered	-	1B.1	4012471	Arcata South	Mapped	Plants - Vascular - Liliaceae - <i>Lilium occidentale</i>
Plants - Vascular	<i>Lycopodium clavatum</i>	running-pine	PPLYC01080	None	None	-	4.1	4012471	Arcata South	Mapped and Unprocessed	Plants - Vascular - Lycopodiaceae - <i>Lycopodium clavatum</i>
Plants - Vascular	<i>Sidalcea malachroides</i>	maple-leaved checkerbloom	PDMAL110E0	None	None	-	4.2	4012471	Arcata South	Mapped and Unprocessed	Plants - Vascular - Malvaceae - <i>Sidalcea malachroides</i>
Plants - Vascular	<i>Monotropa uniflora</i>	ghost-pipe	PDMON03030	None	None	-	2B.2	4012471	Arcata South	Mapped	Plants - Vascular - Monotropaceae - <i>Monotropa uniflora</i>
Plants - Vascular	<i>Montia howellii</i>	Howell's montia	PDPOR05070	None	None	-	2B.2	4012471	Arcata South	Mapped	Plants - Vascular - Montiaceae - <i>Montia howellii</i>
Plants - Vascular	<i>Listera cordata</i>	heart-leaved twayblade	PMORC1N060	None	None	-	4.2	4012471	Arcata South	Unprocessed	Plants - Vascular - Orchidaceae - <i>Listera cordata</i>
Plants - Vascular	<i>Castilleja ambigua</i> var. <i>humboldtiensis</i>	Humboldt Bay owl's-clover	PDSCR0D402	None	None	-	1B.2	4012471	Arcata South	Mapped	Plants - Vascular - Orobanchaceae - <i>Castilleja ambigua</i> var. <i>humboldtiensis</i>
Plants - Vascular	<i>Chloropyron maritimum</i> ssp. <i>palustre</i>	Point Reyes salty bird's-beak	PDSCR0J0C3	None	None	-	1B.2	4012471	Arcata South	Mapped	Plants - Vascular - Orobanchaceae - <i>Chloropyron maritimum</i> ssp. <i>palustre</i>
Plants - Vascular	<i>Pleuropogon refractus</i>	nodding semaphore grass	PMPOA4Y080	None	None	-	4.2	4012471	Arcata South	Unprocessed	Plants - Vascular - Poaceae - <i>Pleuropogon refractus</i>
Plants - Vascular	<i>Chrysosplenium glechomifolium</i>	Pacific golden saxifrage	PDSAX07020	None	None	-	4.3	4012471	Arcata South	Unprocessed	Plants - Vascular - Saxifragaceae - <i>Chrysosplenium glechomifolium</i>
Plants - Vascular	<i>Mitellastra caulescens</i>	leafy-stemmed mitrewort	PDSAX0N020	None	None	-	4.2	4012471	Arcata South	Mapped and Unprocessed	Plants - Vascular - Saxifragaceae - <i>Mitellastra caulescens</i>
Plants - Vascular	<i>Viola palustris</i>	alpine marsh violet	PDVIO041G0	None	None	-	2B.2	4012471	Arcata South	Mapped	Plants - Vascular - Violaceae - <i>Viola palustris</i>