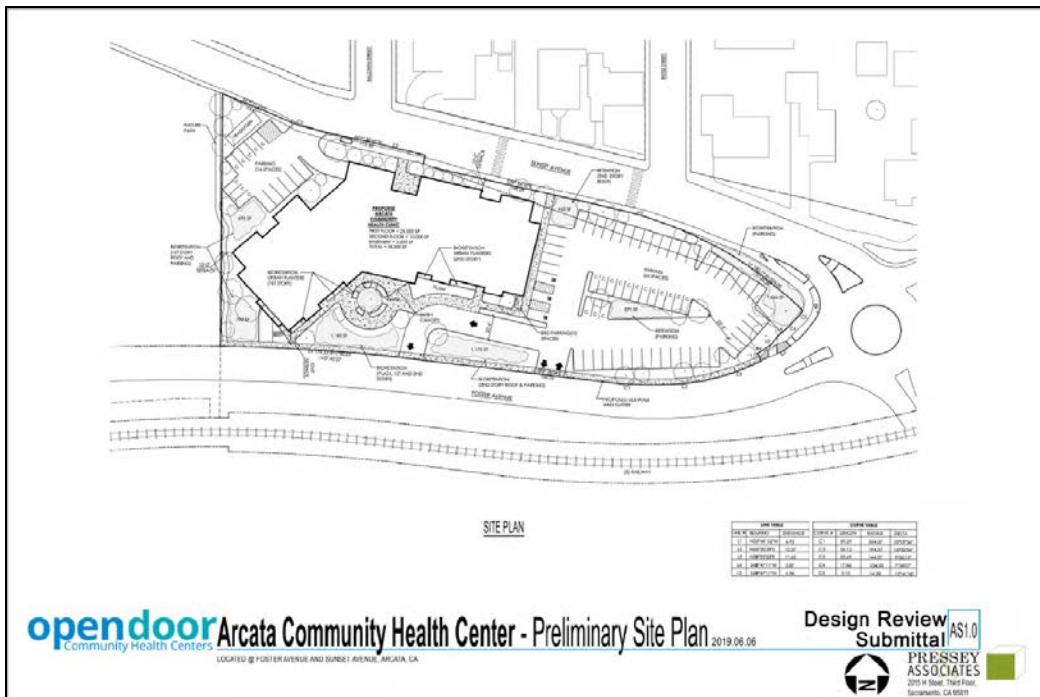




Arcata Community Health Center (Open Door)



Draft

Environmental Impact Report

Lead Agency:

City of Arcata - Community Development Department

State Clearinghouse # 2019080313

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- Appendix F - Preliminary Drainage Report (May 2019, SHN)
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- Appendix K - Notice of Preparation of Draft Environmental Impact Report (August 2019, City of Arcata)
- Appendix L - Initial Study (November 2019, City of Arcata)

Note: Appendices are bound separately, are available online at <https://www.cityofarcata.org/860/Open-Door> and at the City of Arcata Community Development Department, 736 F Street, Arcata, CA 95521.

Executive Summary

Introduction

This summary is provided in accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15123. As stated in the State CEQA Guidelines Section 15123(a), “an environmental impact report (EIR) shall contain a summary of the proposed actions and its consequences. The language of the summary should be as clear and simple as reasonably practical.” As required by the Guidelines, this section includes: (1) a summary description of the proposed project; (2) a synopsis of environmental impacts and recommended mitigation measures; (3) identification of the alternatives evaluated; and (4) a discussion of known areas of controversy associated with the project.

Project Summary

The proposed project being examined in this draft EIR is development of a new consolidated health center (the “Arcata Community Health Center”) west of the intersection of Foster and Sunset Avenues in Arcata (Figure 1). This previously disturbed, currently vacant, 1.8 acre site is in close proximity to public transportation, highway access, and downtown Arcata.

Open Door Community Health Centers (ODCHC) currently operates two facilities in central Arcata. The proposed Arcata Community Health Center will replace and consolidate two existing medical health center sites in Arcata that both would require significant modernization to be brought up to current standards: the Humboldt Open Door Clinic (HODC) located at 770 10th Street and the North Country Clinic (NCC), located at 785 18th Street. Neither building was originally designed to function as a medical health center and both are suffering from deteriorating infrastructure. The proposed facility will allow Open Door to provide services in a modern and efficient building, designed specifically for providing medical health services. The primary project objectives include:

- Increase efficiency by merging two health center facilities (Humboldt Open Door Clinic and North Country Clinic) into a single, centrally located, easily accessible location
- Improve health center environment for clients and staff
- Build a state-of-the-art facility that will serve as a “medical home”
- Set the stage for Open Door to continue to serve the local community

The proposed facility will include two stories of occupied space (approximately 31,000 square feet) with an unoccupied basement/utility level (approximately 3,000 square feet) where the buildings mechanical equipment/systems will be located. Main vehicular access for staff and clients will be from Foster Avenue. The project includes on-site parking (vehicle and bicycle), landscaping, and pedestrian improvements. A detailed description of project components is provided in Chapter 2.

Potential Impacts and Proposed Mitigation Measures

Table ES-1 below provides a summary of the environmental impacts of the project, the level of significance of the impact before mitigation, recommended mitigation measures, and the level of significance of the impact after the implementation of the mitigation measures. Detailed environmental analysis is provided in Chapter 3. Since the project will result in the closure of two existing facilities and their consolidation onto one site, and since the existing facilities are in the vicinity of the proposed project, the majority of the operational impacts associated with the project are baseline conditions for the purposes of environmental review.

Although the City has identified the improvements needed to mitigate the identified traffic impacts and the project is willing to pay the recommended traffic impact fee, the City has not adopted a formal traffic mitigation program that would allow the mitigation to be implemented prior to the project being developed and operational. Therefore, a Development Agreement is incorporated into the project review and approval process to allow a formal mechanism to establish, collect, and disburse proportional traffic mitigation fees for future traffic improvements. While impacts to Transportation remain potentially significant even after mitigation, the project will combine two nearby existing but outdated facilities into one modern centrally located facility, which will improve the quality of and accessibility to medical services within the local community and ease congestion the downtown and northtown neighborhoods. In addition, the project incorporates other improvements to assist with the City's balanced transportation system. Future traffic improvements require coordination with CA Department of Transportation and Humboldt State University as well as separate environmental review. Because the EIR identifies traffic as an impact that cannot be reduced to a less than significant level until the identified transportation improvements are constructed, a Statement of Overriding Considerations may be adopted by the City of Arcata for the proposed project.

Project Alternatives Summary

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)). The alternatives analyzed in draft EIR Chapter 5 are the following:

Alternative 1 – No Project

The No Project Alternative is the scenario of not implementing the project. As such, no site changes would occur, and the lot would remain vacant.

Alternative 2 – Reduced Project Size

The Reduce Project Alternative would reduce the size of the project by 50% (to approximately 15,500 square feet). This would allow for one of Open Door's existing Arcata facilities to be relocated but could not accommodate the needs of both North Country Clinic and Humboldt Open Door Clinic.

Alternative 3 – Alternate Location

The Alternate Location Project Alternative would develop the proposed project on a site in McKinleyville. While this Alternative would accomplish some of the objectives goals, Open Door does not currently own the site and it would not be centrally located or easily accessible in relation to downtown Arcata.

Areas of Controversy and Issues to be Resolved

There are no known areas of controversy or issues to be resolved associated with the Arcata Community Health Center project.

Notice of Preparation: During review of the Notice of Preparation, the California Department of Toxic Substances Control (DTSC) provided comments related to hazards and hazardous materials. Amendments to the Initial Study are incorporated as a response to DTSC comments. The City and applicant conducted an on-site meeting with the Army Corps of Engineers, CA Fish and Wildlife, and the Regional Water Quality

Control Board to review the wetland impacts and mitigation measures. No other responsible or trustee agency provided any other responses to the Notice of Preparation.

Table ES-1: Potential Impacts and Proposed Mitigation

Impact	Proposed Mitigation	Significance After Mitigation
<p>BIO-1: Loss of Wetlands. The proposed project will result in the permanent fill of 1,163 ft² of 3-parameter wetlands.</p> <p>Significance Before Mitigation: Potentially Significant</p>	<p>Mitigation BIO-1: The applicant shall develop and ensure implementation of a wetland mitigation plan that involves creating new wetlands. The mitigation will provide off-site replacement wetlands in Shay Park. The mitigation plan shall be submitted to the City of Arcata Environmental Services Department, the U.S. Army Corps of Engineers (ACOE), CA Fish and Wildlife, and the North Coast Regional Water Quality Control Board and approved by these entities prior to start of work. The program will: (1) have a created-to-fill ratio of at least 2:1 for the permanently impacted wetlands; (2) include a planting plan that complements the existing native plant species adjacent to the mitigation site; and (3) include monitoring and maintenance for at least 5 years, including the replanting of any dead or dying plants within the mitigation area.</p>	Less than Significant
<p>TRAN-1: The proposed project could result in peak hour traffic delays that exceed the City's operational thresholds for certain intersections until construction of identified future transportation improvements.</p> <p>Significance Before Mitigation: Potentially Significant</p>	<p>Mitigation TRANS-1: To minimize the traffic impacts of the proposed project, the applicant shall pay the recommended traffic impact fee detailed in the Central Arcata Areawide Traffic Study for improvements to the Foster Avenue/Alliance Road and Sunset Avenue/ U.S. 101/LK Wood Boulevard intersections. In this case the proposed project would contribute up to \$146,000 to the City of Arcata to be deposited into a specified traffic mitigation account in order to fund future upgrades to identified intersections. Detailed information about the traffic impact mitigation fees is included on Pgs. 67-69 and in Appendix E of the W-Trans Central Arcata Areawide Traffic Study (Appendix G).</p>	Potentially Significant

1.0 Introduction

This Draft Environmental Impact Report (Draft EIR) evaluates the potential environmental impacts of the proposed Open Door Arcata Community Health Center project. This document has been prepared in accordance with requirements of the California Environmental Quality Act (CEQA) [Public Resources Code (PRC) Sections 21000 – 21177], the California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 – 15387 (CEQA Guidelines) and the City of Arcata Municipal Code. The City of Arcata is the CEQA lead agency.

1.1 Purposes and Intended Use of Draft EIR

CEQA requires public agencies to consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (PRC Section 21000 et seq.). CEQA also requires that each public agency avoid or mitigate to less than significant levels, wherever feasible, the significant adverse environmental effects of projects the agency approves or implements. If a project would result in significant and unavoidable environmental impacts (i.e., significant effects that cannot be feasibly mitigated to less than significant levels), the project can still be approved, but the lead agency's decision-maker, in this case the City of Arcata, must prepare findings and issue a "statement of overriding considerations" explaining in writing the specific economic, social, or other considerations that it believes, based on substantial evidence, make those significant effects acceptable (PRC Section 21002, CEQA Guidelines Section 15093).

According to CEQA Guidelines Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental impact. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

In accordance with CEQA Guidelines Section 15161, this document is a project EIR that examines the environmental impacts of a specific project. This type of EIR focuses on the changes in the environment that would result from a specific project. In accordance with CEQA Guidelines Section 15161, a project EIR must examine the environmental effects of all phases of the project, including construction and operation.

1.2 Scope of Environmental Analysis

Pursuant to CEQA and the CEQA Guidelines, a lead agency shall focus an EIR discussion on significant environmental effects and may limit discussion on other effects to brief explanations about why they are not significant (PRC Section 21002.1, CEQA Guidelines Section 15128). A determination of which impacts would be potentially significant was made for this project based on review of the information presented in the initial study (IS) prepared for the project (Appendix L) and comments received as part of the public scoping process, as well as additional research and analysis of relevant project data during preparation of this Draft EIR. 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.

The City has determined that the project has the potential to result in significant environmental impacts to transportation and biological resources. Therefore, the following resources are addressed in detail in this Draft EIR:

- Biological Resources
- Transportation

1.3 Effects Found Not to be Significant

CEQA allows a lead agency to limit the detail of discussion of the environmental effects that are not considered potentially significant [PRC Section 21100, CEQA Guidelines Sections 15126.2(a) and 15128]. Effects dismissed in an Initial Study as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless the lead agency subsequently receives information inconsistent with the finding in the Initial Study (CEQA Guidelines Section 15143).

Based on a review of the information presented in the initial study prepared for the project and comments received as part of the public scoping process as well as additional research and analysis of relevant project data during preparation of this Draft EIR, the following were identified as resources that would not experience any significant environmental impacts from the project. Accordingly, these resources are not addressed further in this Draft EIR but are identified below with a brief explanation as to why impacts to each resource are not anticipated, as required by CEQA.

- | | |
|--|--|
| <ul style="list-style-type: none"> • Aesthetics • Air Quality • Energy • Hazards and Hazardous Materials • Land Use and Planning • Noise • Public Services • Tribal Cultural Resources • Wildfire | <ul style="list-style-type: none"> • Agriculture and Forest Resources • Cultural Resources • Geology and Soils • Greenhouse Gas Emissions • Hydrology and Water Quality • Mineral Resources • Population and Housing • Recreation • Utilities and Service Systems |
|--|--|

AESTHETICS

While the project will change the visual streetscape of the intersection of Sunset and Foster and will be in the immediate view of residences from Sunset Avenue; the site is in an urbanized environment, is zoned for development, and will be subject to design review. Views looking south and southwest from the project site are of the high school sports field in the foreground and a forested hillside in the background, and views looking north and east are of urban uses including city streets and residences. The project has been designed in compliance with City development and design standards put in place to guide new development in a manner compatible with the surrounding community such as facade materials, massing, height restrictions, landscaping, and screening. For these reasons, no significant impacts related to aesthetics would occur, and this issue is not discussed further in this Draft EIR.

AGRICULTURE AND FORESTRY RESOURCES

The project site is in central Arcata on land zoned for public facility development that is not used for agricultural or timber production purposes. The site is surrounded by residential uses to the north and west, and public facility uses to the south and east. The site neither contains nor is adjacent to designated Prime Farmland, Unique Farmland, or Farmland of Statewide importance and is not zoned for agricultural uses. The site is not used for or zoned forest land or timberland. The proposed project would develop a site zoned for public facilities to a community health center use and would not result in any changes to the existing environment which would result in the conversion of agricultural lands or timber lands to non-agricultural or non-timber uses. For these reasons, no significant impacts related to agriculture and forestry resources would occur, and this issue is not discussed further in this Draft EIR.

AIR QUALITY

The proposed project involves infill development located near main transportation corridors, incorporates appropriate control measures, and would not conflict with or obstruct implementation of the NCUAQMD PM₁₀ Attainment Plan. The project site is zoned for public facility type use and the proposed project meets all development standards. Because construction activities would be of limited duration, the project site is zoned for public facility development, and project operational emissions would be minimal, no significant impacts related to air quality would occur, and this issue is not discussed further in this Draft EIR.

CULTURAL RESOURCES

There are no previously recorded or newly discovered archaeological resources and no resources were identified or located by record searches. In addition, no prehistoric artifacts or sites were located during the field survey or appeared in any of the on-site soil borings. Referral consultation with local Wiyot Tribal Historic (Heritage) Preservation Officers did not identify any concerns regarding the proposed project. Based on these findings, the proposed project would not cause a substantial adverse change in the significance of known historical or archaeological resources. With implementation of the standard inadvertent discovery conditions of approval, no significant impacts related to cultural resources would occur, and this issue is not discussed further in this Draft EIR.

ENERGY

The project will consume energy in both construction and operation phases; however, adherence with State and Local plans related to energy consumption (including the Zero Waste Action Plan, Local Greenhouse Gas Reduction Plan) as well as applicant-led energy reduction measures ensure that the project's energy usage is as efficient as possible. The project will consolidate two existing Open Door clinics that are currently located in buildings with aging infrastructure that were not designed for medical use. The proposed project lighting will exceed Title 24 standards for watts used and will include occupancy sensors and lighting controls with timers where possible. As such, the project will not result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. No significant impacts related to energy resources would occur, and this issue is not discussed further in this Draft EIR.

GEOLOGY AND SOILS

While there are several active faults in the region, the project site is not located within an Alquist-Priolo active fault zone. Buildings would be constructed in compliance with California Building Code Title 24, which identifies specific design requirements to reduce damage resulting from strong seismic ground

shaking, ground failure, landslide, soil erosion, and expansive soils. According to the Geological Hazards and Geotechnical Investigation Report – Revision 1 (Appendix C, October 2019, SHN) prepared for site, the site is relatively flat as a result of past grading and fill. Portions of the site comprise of unconsolidated fill, however the project is designed with recommendations to minimize settling. Project design proposes covering disturbed areas with landscaping and paved surfaces that would reduce potential for erosive stormwater flows. Because existing requirements are in place to minimize risks of seismic damage, erosion, and unstable soils, no significant impacts related to geology and soils would occur, and this issue is not discussed further in this Draft EIR.

GREENHOUSE GAS EMISSIONS

The proposed project consolidates two existing health centers into one new facility. GHG emissions associated with project development would occur over the short-term from construction activities, consisting primarily of emissions from equipment exhaust and worker and vendor trips. There would also be long-term operation emissions associated with health center uses including vehicular traffic, energy and water usage, and solid waste disposal. Generally small infill development projects would not generate substantial GHG emissions that would result in a significant impact. Due to the nature of the proposed project (centrally located, infill project), its relatively small size, the near-net zero energy project design, and proposed project features related to energy efficiency and supporting alternative modes of transportation, the proposed project would not be expected to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. For these reasons, the project would not result in any significant impacts related to greenhouse gas emissions and this issue is not discussed further in this Draft EIR.

HAZARDS AND HAZARDOUS MATERIALS

A Phase II Environmental Site Assessment (ESA) (Appendix E, May 2008, LACO) collected and evaluated soil and groundwater samples on the site at locations based on historical Phase I and Phase II ESAs and found shallow soils with low levels of TPHd and TPHmo. According to the Phase I Environmental Site Assessment prepared for the project (Appendix D, October 2019, SHN), the concentrations levels are below environmental screening levels for commercial/industrial use and leachable metal concentrations were below the thresholds for hazardous material characterization. In accordance with Phase II ESA (Appendix E) recommendations and in anticipation of grading activities during construction that will disturb such soils, a soils and groundwater management plan is being prepared and will be incorporated into storm water pollution and prevention, dust, and health and safety plans to ensure protection of workers and the surrounding community.

The CA Department of Toxic Substances Control (DTSC) (Appendix H) provided the City with comments associated with the Notice of Preparation of an Environmental Impact Report. The Initial Study was revised to address the DTSC comments. The City provided copies of the Phase I (Appendix I) and II ESA's (Appendix E) to the DTSC commenter and uploaded them on the City website.

Other temporary construction activities and long-term operational use would not include the manufacturing, use, transport, or disposal of large quantities of hazardous materials. However, they would involve the routine use of some common hazardous materials including of oils, diesel, asphalt, paints, batteries, and other materials typical of construction and medical office uses. In addition, small quantities of bio-hazard, which include syringes and bandages, would be generated by long-term operations; Open Door would contract with Eco-Medical of Fortuna Ca. to remove this waste in accordance with standard regulations. For these reasons, the project would not result in any significant

impacts related to hazards and hazardous materials, and this issue is not discussed further in this Draft EIR.

HYDROLOGY AND WATER QUALITY

All development in the City of Arcata is required to conform to the stormwater regulations in the Municipal Code as well as the City's Statewide MS4 Permit authorized and regulated by the RWQCB. Site development will include adherence to General Construction Permit, Storm Water Pollution Prevention Plan, and Soil and Groundwater Management Plan. A preliminary drainage plan (Attachment F, May 2019, SHN) concludes the site provides adequate stormwater design features. The design features include Low Impact Development (LID), landscaping and open space features including, but not limited to, bioretention areas, grassy swales, rain gardens, etc. These plans and features contribute to increased infiltration and reduced offsite runoff impacts. The project is not projected to create significant amounts of pollution that could result in polluted runoff. During project construction, heavy equipment could deposit contaminates (fuel, oil, etc.) on the ground that could be carried to surface waters in stormwater runoff. However, City of Arcata regulations and requirements would be complied with in order to protect water quality and ensure accidents would not present a significant environmental hazard. For these reasons, the project would not result in any significant impacts related to hydrology and water quality, and this issue is not discussed further in this Draft EIR.

LAND USE AND PLANNING

The site is designated by the City of Arcata General Plan as Public Facility (PF) and is zoned Public Facility: Planned Development with a Special Considerations overlay (PF:PD, SPC). "Medical Clinic" is listed as a permitted uses in the Public Facility (PF) zone with a Minor Use Permit. The applicant requests a Type "B" Planned Development Permit which is the functional equivalent of a Minor Use Permit. As written in the Arcata Land Use Code, the PF zone is designed for Public Serving Facilities that may be privately owned but institutional in character. The PF zone district is consistent with the PF Land Use classification outlined in Arcata's General Plan. Therefore, the proposed project adheres to the intent and accompanying policies of the adopted Land Use Plan and Zoning Code, and the development of a health center at this site will not 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 the General Plan, Land Use Plan, Local Coastal Program, and zoning ordinance. For these reasons, the project would not result in any significant impacts related to land use and planning, and this issue is not discussed further in this Draft EIR.

MINERAL RESOURCES

The site has no known history of mineral extraction and no mineral extraction is anticipated to take place within any part of the proposed development area. The proposed project would not affect the availability of a known mineral resource that would be of value to the region, nor would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a specific, general plan or other land use plan. For these reasons, the project would not result in any significant impacts related to mineral resources, and this issue is not discussed further in this Draft EIR.

NOISE

Construction activities would temporarily increase ambient noise levels, mainly from heavy equipment and construction-related truck traffic, hydraulic or pneumatic-powered equipment. The temporary use of heavy equipment for earth moving, grading and compaction, paving, and hauling can be expected. The construction phase would increase localized truck trips to transport materials and equipment to and from the site. The proposed project would comply with all applicable City policies to abate construction-related

noise impacts. General Plan Policy N-5d which requires limiting construction activity to the hours of 8 a.m. and 7 p.m. Monday through Friday, and between 9 a.m. and 7 p.m. on Saturdays, and Policy N-5e which requires that all construction equipment be maintained in good working order and fitted with factory approved mufflers.

Project operational activities could result in increased on-site noise above levels existing without the project from day-to-day activities of the health center (e.g. noise from vehicles and/or human activities). In the case of a power failure, an additional source of noise will be from the backup generator. However, noise attenuation is required by the Arcata Land Use Code for any noise associated with the land use activity. The generator will be partially surrounded by a structure to reduce potential impacts and other operational noise increases would be minimal and are not expected to measurably exceed existing background noise levels (e.g. traffic on Highway 101) or accepted noise standards due to the intermittent nature of vehicle trips to and from the site. The site is located in a 60 decibel noise contour for transportation related noise sources according to the City of Arcata Noise Element. The proposed health care facility is not considered a sensitive noise receptor as no overnight stay is associated with the project. Therefore standard commercial construction will attenuate noise levels to an acceptable level for interior areas. For these reasons, the project would not result in any significant impacts related to noise, and this issue is not discussed further in this Draft EIR.

POPULATION AND HOUSING

The site is currently vacant but is not zoned for residential development and will not require the demolition of existing housing. The project will consolidate two existing health centers in Arcata and is not anticipated to create a substantial number of new jobs, which may in turn require new housing units to be constructed. No housing is proposed, and the proposed project would not directly or indirectly induce substantial population growth, would not displace existing housing or people, and would not necessitate the construction of replacement housing. For these reasons, the project would not result in any significant impacts related to population and housing, and this issue is not discussed further in this Draft EIR.

PUBLIC SERVICES

Emergency response and evacuation in the area is the responsibility of the Arcata Police Department (APD) located at 736 F Street, and the Arcata Fire District (AFD) located at 631 9th Street and 3235 Janes Road. Both the APD and AFD are part of the multiagency Standardized Emergency Management System emergency response network. In addition, a California Highway Patrol (CHP) office is located at 255 East Samoa Boulevard and regularly provides back-up services to APD within city limits and serves as the primary emergency responders along the Highway 101 corridor. The Humboldt County Sheriff's Office also serves the Highway 101 Corridor and HSU Police offer partner law enforcement services as well. It is not anticipated the Project will lead to new users or significantly altered travel patterns. The project would not result in significant adverse effects on service ratios for the police or fire departments or lead to significantly delayed response times. The project site is less than 500 ft from Arcata High School and less than ½ mile from Arcata Elementary School. No new residential units would be created as a result of the project, hence, no new students are expected as a result of the project. For these reasons, the project would not result in any significant impacts related to public services, and this issue is not discussed further in this Draft EIR.

RECREATION

The City of Arcata provides park and recreational facilities in the close vicinity of the project site, including Shay Park, Larson Park, and the City of Arcata Skate Park. Other public trail systems and park areas are

also in the surrounding area. The project includes a pedestrian footpath along the western boundary and will provide onsite outdoor spaces for staff and patients; however, the project will not create a significant number of new users to the city facilities. Open Door employees and patients may use adjacent City park and recreation facilities as a result of the project, but this is not expected to result in substantial additional use of such facilities. Nonetheless, the project is required to pay Recreation fees for new construction according to Land Use Code §9.70.050. For these reasons, the project would not result in any significant impacts related to recreation, and this issue is not discussed further in this Draft EIR.

TRIBAL CULTURAL RESOURCES

Archaeological surveys undertaken at the site by Eidsness and Roscoe from 2008-10 found no previously recorded or newly discovered archaeological resources. No prehistoric artifacts or sites were located during the field surveys or appeared in any of the on-site soil borings. In addition, no resources were identified or located by the NCIC and Sacred Lands File record searches or through notification of local Tribal Historic Preservation Officers (THPOs). In addition, no tribal cultural resources were identified during construction of Foster Ave. or adjacent site development. As part of the Notice of Preparation, the Native American Heritage Commission (NAHC) submitted comments regarding the consultation process for the protection of tribal cultural resources (located at City of Arcata Community Development Department File No. 189-068). However, the NAHC comments were not specific to any concerns regarding the proposed project. The three local Wiyot tribes declined formal consultation as part of AB 52 referral. However, as standard protocol, the City will include a Condition of Approval requiring protection of tribal cultural resources in the event of inadvertent discovery. For these reasons, the project would not result in any significant impacts related to tribal cultural resources, and this issue is not discussed further in this Draft EIR.

UTILITIES AND SERVICE SYSTEMS

The project site will be served by the City of Arcata water, sewer, and stormwater systems. Both sanitary sewer and water main are located in Sunset Avenue, north of the project site. There are two existing onsite drop inlets that connect to the City's stormwater system. Electric power and natural gas are provided by PG&E; telecommunications are provided by AT&T and Suddenlink. The project site is an infill site adjacent to existing electrical power, natural gas, and telecommunication facilities. Additionally, the project is designed to be near net-zero energy, and therefore is not expected to require or result in the construction or expansion of such facilities. Based on the utility evaluation prepared for the proposed project, the existing infrastructure in the vicinity of the project site appears to have adequate capacity to support the proposed development without significant modifications (SHN, 2019 - located at City of Arcata Community Development Department File No. 189-068). The proposed project would not interfere with the waste water treatment plant complying with RWQCB regulations because: (1) the project would create only a small incremental increase in wastewater requiring treatment and disposal, (2) the wastewater generated would be mostly typical domestic wastewater associated with office facilities rather than industrial wastewater and the health center does not plan to have any water pre-treatment needs; and (3) the project would pay applicable connection fees and monthly service charges. For these reasons, the project would not result in any significant impacts related to utilities and service systems, and this issue is not discussed further in this Draft EIR.

WILDFIRE

The project site is in a local responsibility area (LRA) currently served by the Arcata Fire District. The closest state responsibility area (SRA) is approximately one mile east of the project site. The project area is not in a designated severe fire hazard area due to its environmental conditions and a general lack of significant naturally occurring combustible organic material. According to 2007 CalFire "Fire Hazard Severity Zones"

maps, the project area falls into the “LRA Unzoned” category. For these reasons, the project would not result in any significant impacts related to wildfire, and this issue is not discussed further in this Draft EIR.

1.4 Agency Roles and Responsibilities

Lead Agency

For this Draft EIR, the City of Arcata is the lead agency under CEQA, as defined in Section 15367 of the State CEQA Guidelines.

Responsible and Trustee Agencies

Under CEQA, a responsible agency is a public agency, other than the lead agency, that has responsibility to carry out or approve a project (PRC Section 21069). A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California (PRC Section 21070). The following agencies may serve as responsible and trustee agencies for the project:

- California Department of Fish and Wildlife (CDFW)
- North Coast Regional Water Quality Control Board (NCRWQCB)
- U.S. Army Corps of Engineers (USACE)
- California Department of Transportation (Caltrans)

1.5 CEQA Public Review Process

Notice of Preparation and Initial Study

The City issued a Notice of Preparation (NOP) (Appendix K) and Initial Study (IS) (Appendix L) on August 15, 2019 to inform agencies and the general public that an EIR was being prepared and to invite comments on the scope and content of the document. The NOP and IS were submitted to the State Clearinghouse (SCH# 2019080313); posted on the City’s website (<https://www.cityofarcata.org/860/> Open-Door); and made available at the City of Arcata Community Development Department. In addition, the NOP was distributed to public agencies (including potential responsible and trustee agencies), interested parties, and the project proponent. The NOP was circulated for a 30-day review period, with comments accepted between August 15, 2019, and September 20, 2019.

The purpose of an NOP is to provide sufficient information about the project and its potential environmental impacts to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the EIR, including mitigation measures that should be considered and alternatives that should be addressed (CEQA Guidelines Section 15082[b]). Comments on environmental issues received during the NOP public comment period are considered and addressed in this Draft EIR. The NOP and responses to the NOP are incorporated in the IS and Draft EIR.

Public Review and Comment Period

The Draft EIR will be circulated for 45 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; and
- 3) City of Arcata website (<https://www.cityofarcata.org/860/> Open-Door)

While the Guidelines do not require a public hearing on the Draft EIR, to facilitate public process, a public meeting will be held on December 10, 2019 at Arcata City Hall to receive input on the Draft EIR.

The Draft EIR will be available for public review on November 26, 2019. The Notice of Completion will be filed with the County Recorder and the Office of Planning and Research on November 22, 2019. The Notice of Availability will be published on November 27, 2019. The 45-day review period will be extended slightly to accommodate noticing and holiday schedules. Public agencies and interested individuals are encouraged to submit written comments on the Draft EIR's accuracy and completeness. Comments must be sent by the end of the extended 45-day review period, January 13, 2020, to:

Joe Mateer, Senior Planner
City of Arcata Community Development Department
736 F Street, Arcata, CA 95521
Phone: (707) 825-2139
Email: jmateer@cityofarcata.org

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.

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. Before taking action on the project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

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.

1.6 Organization of this Draft EIR

This Draft EIR is organized as follows:

Executive Summary: This chapter introduces the proposed Arcata Community Health Center Project; provides a summary of the environmental review process, effects found not to be significant, and key environmental issues; and lists significant environmental impacts and mitigation measures to reduce significant impacts to a less-than-significant level.

Chapter 1, Introduction: This chapter provides a description of the lead and responsible agencies, the legal authority and purpose of the EIR, the scope of the environmental analysis, effects found not to be significant, agency roles and responsibilities, the CEQA public review process, and organization of the EIR.

Chapter 2, Project Description: This chapter describes the project background, objectives, and location, and provides a detailed description of the characteristics associated with the proposed Arcata Community Health Center Project.

Chapter 3, Environmental Analysis: The resource sections within this chapter evaluate the expected environmental impacts generated by the project which are considered potentially significant – Biological Resources and Transportation. Within each subsection of Chapter 3, the regulatory background, existing environmental setting, significance criteria, and analysis methodology and assumptions are described. The anticipated changes to the existing environmental conditions after development of the project are then evaluated for each resource. For any significant or potentially significant impact that would result from project implementation, mitigation measures are presented along with the remaining level of significance.

Chapter 4, Cumulative Impacts and Other CEQA Considerations: This chapter provides information regarding the potential cumulative impacts that would result from implementation of the project together with other past, present, and probable future projects. This chapter also provides a discussion of potential significant and unavoidable impacts, significant and irreversible commitment of resources, and growth-inducing impacts.

Chapter 5, Project Alternatives: This chapter provides a discussion of alternatives to the project, including the No Project Alternative; alternatives considered but removed from further consideration; and the environmentally superior alternative.

Chapter 6, Persons and Organizations Contacted: This chapter identifies the lead agency contacts as well as the organizations and persons consulted during preparation of this Draft EIR.

Chapter 7, References: This Chapter identifies the documents used as sources for the analysis.

2.0 Project Description

2.1 Project Overview

Open Door Community Health Centers (Open Door) is proposing to construct a new consolidated health center (the “Arcata Community Health Center”) west of the intersection of Foster and Sunset Avenues in Arcata (Figure 1). The approximately 1.8 acres property, Assessor’s Parcel Number 505-121-031, is currently vacant. The City of Arcata General Plan land use designation is PF: PD, or Public Facility with a Planned Development, Wetland Protection Area, and Special Considerations combining zones.

The project includes ancillary development off-site, which is analyzed in this Draft EIR, as well. The project requires the construction of mitigation wetlands off-site on the City-owned Shay Park Parcel at Foster and Alliance (APN 505-131-019). The project includes a trail that borders the adjacent parcel to the west (APN 505-121-034). The project also includes a traffic mitigation payment for improvements to various intersections in the region identified in the Central Arcata Area-wide Traffic Study (Traffic Study) (Appendix G). The Traffic Study considered several developments in the Sunset neighborhood and recommended numerous traffic improvements to minimize impacts to Arcata’s transportation system. The Traffic Study recommended traffic impact fees be collected on a prorated basis for the individual projects based on their impacts to traffic.

The project also includes entering a Development Agreement. The Traffic Study evaluated the impact of the Open Door project along with several other proposed projects in the project vicinity. The Traffic Study determined that there would be significant impacts related to the project’s direct and cumulative impacts. Since the City does not have a traffic mitigation fee program, the EIR determined that there would be significant unavoidable traffic impacts. The Development Agreement is the legal framework for the project’s traffic mitigation payment in-lieu of fully mitigating this impact.

Open Door is a 501(c) (3) not-for-profit corporation incorporated in 1971 that provides a robust scope of medical and dental health services to the Humboldt and Del Norte County communities at twelve physical locations including- new health centers in Eureka and Fortuna, and at three mobile dental and medical vans.

The Arcata Community Health Center will replace and consolidate two existing medical health center sites in Arcata that both would require significant modernization to be brought up to current standards: the Humboldt Open Door Clinic (HODC) located at 770 10th Street and the North Country Clinic (NCC), located at 785 18th Street. HODC was Open Door’s first health center; neither building was originally designed to function as a medical health center and both have aging infrastructure. The proposed facility will allow Open Door to provide services in a modern and efficient building, designed specifically for providing medical health services.

Primary Project Objectives

- Increase efficiency by merging two health center facilities (Humboldt Open Door Clinic and North Country Clinic) into a single, centrally located, easily accessible location
- Improve health center environment for clients and staff
- Build a state-of-the-art facility that will serve as a “medical home”
- Set the stage for Open Door to continue to serve the local community

2.2 Environmental Setting

The current environmental setting includes existing environmental conditions and land uses. These are discussed below to provide baseline conditions to which the proposed project and alternatives can be compared.

Environmental Conditions

The site is located approximately one mile from Arcata Bay at approximately 45 feet above mean sea level. The proposed project location is a vacant lot north of downtown Arcata that was historically used as a log deck in support of mill operations. The lot was previously filled and leveled for this purpose which created a highly disturbed environment. Soils are predominantly imported fill material including silts, sands, and gravels. The lot is currently vegetated by non-native grasses and forbs known to colonize previously disturbed lands. A seep has been identified on the western edge of the lot which supports a perennial wetland characterized by willows and alders. Additional information on existing conditions is provided under each resource category.

Surrounding Land Use and Setting

The surrounding land uses are predominantly residential (zoned RL, RM, RH) and educational (zoned PF). The site is located within 500 feet of the Arcata High School lower fields, 1,000 feet of Arcata Elementary School, and one mile from Humboldt State University. The parcel is directly north of the Arcata High School lower sports fields and a railroad alignment (no longer in operation), south of Sunset Avenue and the Sunset residential neighborhood, west of the Arcata Skate Park and the Sunset Avenue/ Highway 101 on- and off-ramps, and east of a residential medium density designated parcel that is currently being developed with 142 one-bedroom apartment type units (Sunset Terrace). The project site is near Shay Park, which includes multi-use trails that connect to the larger City of Arcata trail system. Jolly Giant Creek daylighting on the Arcata High School property southwest of the project site and continues to flow towards Humboldt Bay through Shay Park.

The project is one of six development projects either in planning or implementation stages within a three-quarter mile radius of one another. All of the other projects are single- or multi-family residential developments.

2.3 Project Details

After considering other local options, Open Door purchased the vacant 1.8-acre (78,408 sq ft) lot located at the intersection of Foster and Sunset Avenues in Arcata, California in 2014 with the intention of constructing a community health center. The proposed facility will be two stories of occupied space (about 31,000 square feet) with an unoccupied basement/utility level (about 3,000 square feet) where the building's mechanical equipment/systems will be located; see Table 1 below for building and site coverage details. Main vehicular access for staff and clients will be from one driveway on Foster Avenue with an exit only driveway at the end of the proposed drop-off drive lane to re-enter Foster Avenue. Solid waste, recycling and organics collection, shipping and receiving, and limited staff parking will have access at the back of the building from a driveway on Sunset Avenue (Figure 2). The site is expected to consist of the following:

Proposed Facilities and Operations

The facility is designed specifically for providing medical health services (Figures 3 and 4). The first level will include: main entrance, patient care, waiting areas, laboratory, and medication dispensing. The Second Level will include: behavioral health, conference rooms, administrative and staff areas. The facility will include 35 medical examination rooms, 4 medical consultation rooms, 5 behavioral health offices, a patient support group/education room, 3 conference rooms, a laboratory, medication dispensing area, and administrative management and support offices. Once completed, the new health center at Foster and Sunset Avenues will provide primary medical services and behavioral health counseling.

Table 1. Site Coverage and Building Area

SITE COVERAGE	Approximate Area square feet (sf)
Building (site coverage area)	21,000
Landscaped/ Permeable Areas	23,100
Parking/ Paved Areas	34,300
Site Coverage Total	78,400
BUILDING COMPONENTS	
First floor Medical, including Waiting Area, Entry, and Circulation	21,000
Second Floor Behavioral health, Site Administration, Staff Areas, and Circulation	10,000
<i>Subtotal of Occupied Area</i>	31,000
Utility Basement (Unconditioned/ unoccupied space)	3,000
Building Total	34,000

It is projected that the Arcata Community Health Center will serve approximately 14,000 annual patients, with up to 150 patient visits each day. This is a slight increase in the numbers of patients and visits the two clinics combined currently serve (see Table 2 below). The new health center is proposed to be open six days per week, Monday through Saturday, and will be closed on Sundays. Hours of operation will be Monday through Friday, 8:00AM to 5:00PM, and Saturdays from 9:00AM to 1:00PM. Staffing will consist of approximately 65 to 70 employees per shift.

Table 2. Existing vs. Proposed Facilities & Services

	Current			Proposed
	Humboldt Open Clinic	North Country Door Clinic	Current Combined	Consolidated Arcata Community Health Center
Square Feet	12,200	9,600	21,800	34,000
Exam Rooms	15	18	33	35
Patients	6,323	7,073	13,396	14,000
Visits	21,901	21,405	43,306	44,000
FTE Employees	46	45	91	74

The first floor of the building will support four medical care teams, each team to include three full time equivalent medical providers, one registered nurse, four to five medical assistants and one behavior health provider. Each of the four teams will have co-located office space adjacent to a designated patient services area that will include medical examination rooms (including one oversized room), intake and vitals station, reception area, consultation room and restroom. Also located on the first floor of the new facility will be reception and waiting areas with bathrooms, triage nurse office, office management, sterilization, immunization, laboratory, medication dispensing, and a group meeting room. The second floor will support a behavioral health suite with four counseling offices and a support/education group room. Other spaces on the second floor include large and small conference rooms, center administration offices, and office space for referral personnel, call center personnel and other support staff. A kitchen will also allow catering for the conference rooms and after-hours access to the large conference room will be accommodated by a building access control system. Additional rooms include, a staff break room, lactation room, and exercise space including showers and changing facilities. The basement will house the building utility and mechanical systems.

2.4 Other Project Elements

The building will have energy efficient design elements including a likely solar array and lighting above Title 24 standards with occupancy sensors and lighting controls with timers where possible. Open Door is currently exploring potential opportunities to minimize natural gas use. An emergency generator will allow all health center functions to be powered for extended periods in the event of power grid outages. The generator will be located in the northwest corner of the project site, at least partially enclosed.

The project includes on-site bike parking and an electric vehicle charging station. Proposed signage includes a monument style entrance sign and signage denoting parking, drop-off, deliveries, etc. (see attached Sign Plan). The project also includes sidewalks, curb, and gutter along both Foster and Sunset Avenues connecting to existing sidewalks. A pedestrian footpath or trail is proposed along the western project site boundary to provide a connection from the Sunset neighborhood to the sidewalk and trail along Foster Avenue. Improvements to an off-site west bound bus stop at the Skate Park will be included in the project. The project will contribute funding into a City-held account towards future intersection improvements at Foster/Alliance and Sunset/ LK Wood as identified in the Central Arcata Areawide Traffic Study (Appendix G). The project requires the City of Arcata to vacate some easements and rights of way near the Sunset Ave and Foster Ave roundabout to accommodate the development.

Landscape and Stormwater Design Summary

The site landscape plan includes trees, shrubs and other vegetation to enhance project features such as bioretention areas and to provide onsite green screens and natural areas. The landscape plan incorporates low maintenance and native species that were selected based on specific site conditions and desired function (i.e. wet/dry conditions, visual buffers, etc.). The site entry and parking lot landscape areas soften views into the parking lot from the adjacent neighborhood and perimeter streets. The south facing plaza at the main building entrance is a pedestrian focused area that will include gathering/resting space and plants selected for seasonal interest. The north side of the building has shady, moist conditions and plants were selected for low maintenance and for softening building views from the neighborhood. Bioretention areas are integrated into perimeter and parking lot planting features. Based on the Preliminary Drainage Report, the proposed site plan provides adequate stormwater features to satisfy the requirements of a hydromodification project in accordance with the Humboldt LID Stormwater Manual v2.0.

Wetland Impacts and Mitigation Summary

The proposed project will impact 100 percent of the project site and would directly fill the approximately 0.0267 acres (1,163 square feet) of a potential 3-parameter wetlands. This total acreage occurs over two areas in the western portion of the site, separated by approximately 25 feet. The northern feature is approximately 0.0143 acres in size, and the southern feature is 0.0124 acres (Figure 5). There is not sufficient area on-site to mitigate for the wetland loss caused by the project. Open Door will implement mitigation at the adjacent Shay Park by creating replacement wetlands. The wetland mitigation program will: (1) have a created-to-fill ratio of at least 2:1 for the permanently impacted wetlands; (2) include a planting plan that complements the existing native plant species adjacent to the mitigation site; and (3) include monitoring and maintenance for at least 5 years, including the replanting of any dead or dying plants within the created wetlands. The mitigation will exchange isolated, low quality habitat with connected, moderate quality habitat. Mitigation will be coordinated with the City and permitting agencies (U.S. Army Corps of Engineers, CA Dept of Fish and Wildlife, and Regional Water Quality Control Board). Additional analysis and mitigation are discussed in the Biological Resources section of this document.

Special Studies

Several special studies have been conducted in the project area and/or for the proposed project including historical, archeological, traffic, biological, geotechnical, environmental assessment and drainage. Analyses was also completed for other projects in the immediate vicinity and for a previous proposed use on this site. This draft EIR and the project's Initial Study (Appendix L) utilize data and recommendations from the project specific studies in addition to previous studies and environmental documents as applicable.

Construction Best Management Practices

The following actions and practices are included as part of the project to reduce or avoid adverse effects that could result from construction or operation of the improvements. Additional resource specific mitigation measures are presented in the analysis sections (Section 3.0).

Erosion Control – Erosion control measures will be implemented during construction to address how the contractor will manage erosion and sediment control actions, general site and materials management, and inspection and maintenance. Below are examples of actions to prevent soil erosion and sedimentation during construction and protect water quality.

1. Erosion and sediment control actions will be in effect and maintained by the contractor on a year-round basis until all disturbed areas are stabilized.
2. Fiber rolls or similar products will be utilized to reduce sediment runoff from disturbed soils.
3. A stabilized construction entrance will be maintained to minimize tracking of mud and dirt from construction vehicles onto public roads.
4. Storm drain inlets receiving stormwater runoff will be equipped with inlet protection.
5. A concrete washout area will be designated to clean concrete trucks and tools, if necessary.

Stormwater Pollution Prevention Plan (SWPPP) – The proposed project would result in over one acre of disturbance and would be subject to the provisions of the SWRCB Construction General Permit (CGP); which requires the preparation and implementation of a SWPPP designed to reduce potential adverse impacts on surface water quality through the project construction period. The SWPPP will address pollutant sources, non-stormwater discharges resulting from construction, best management practices (BMPs), and other Water Board requirements. The BMPs will include any measures included in the

Project's erosion control plans. The SWPPP will also include dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A qualified SWPPP practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.

Anticipated Permits and Approvals

The site is designated in the City of Arcata General Plan as Public Facility (PF) and is zoned Public Facility, with Planned Development, Wetland Protection Area, and Special Considerations combining zones (PF; :PD; WPA; :SC). This special consideration overlay allows for various types of public facility uses and associated incidental uses. A Community Health Clinic is permitted in the PF zone with a Minor Use Permit. However the "Type B" Planned Development Permit is the functional equivalent to a Minor Use Permit. In addition design review is required based on the size of the proposed development. Other permits/approvals from the following agencies may also be required:

- North Coast Regional Water Quality Control Board (NCRWQCB)
- U.S. Army Corps of Engineers (USACE)
- California Department of Transportation (Caltrans)
- California Department of Fish and Wildlife

Figure 1. Project Location



Figure 2. Site Plan

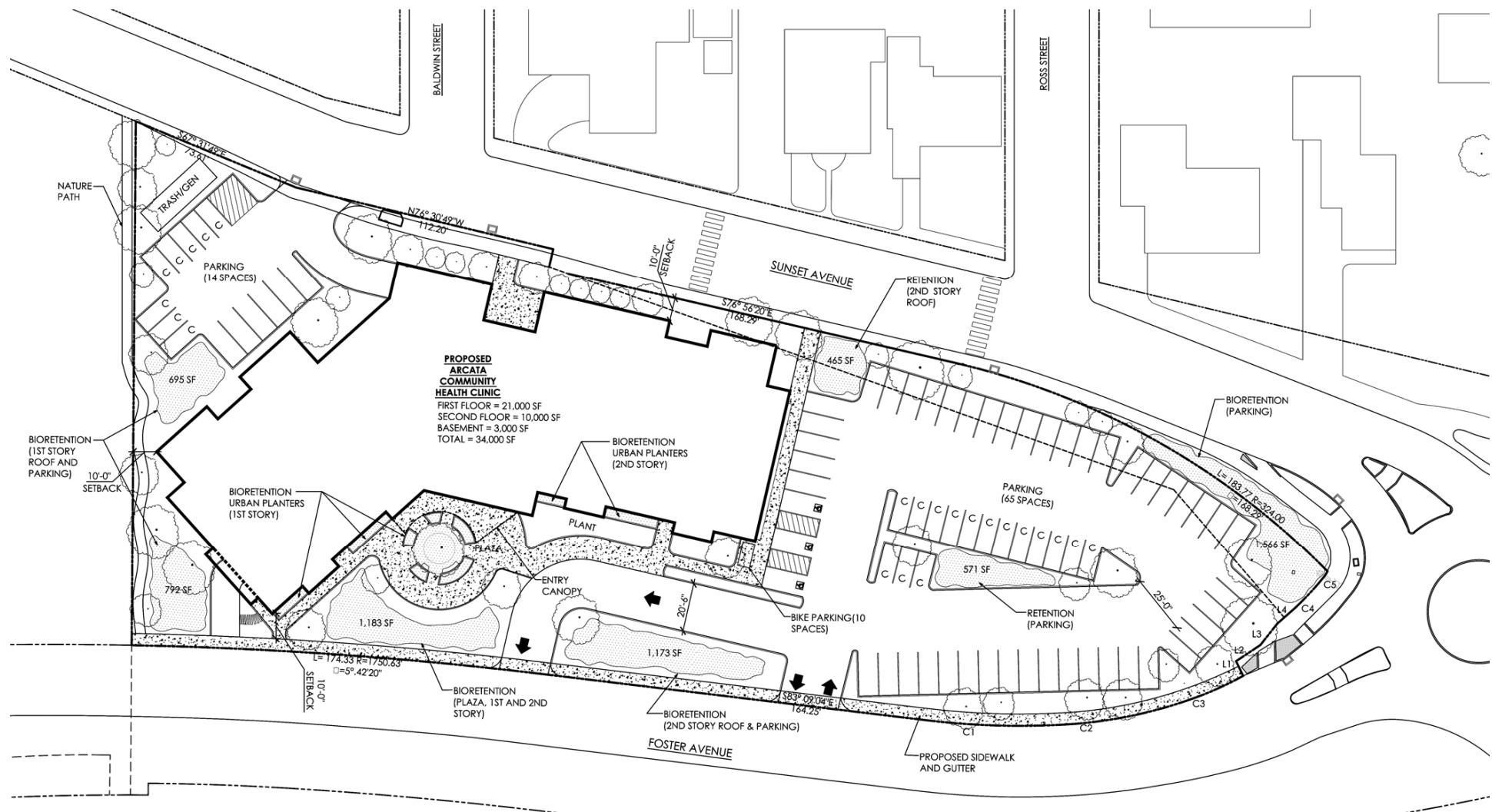


Figure 3 Floorplan

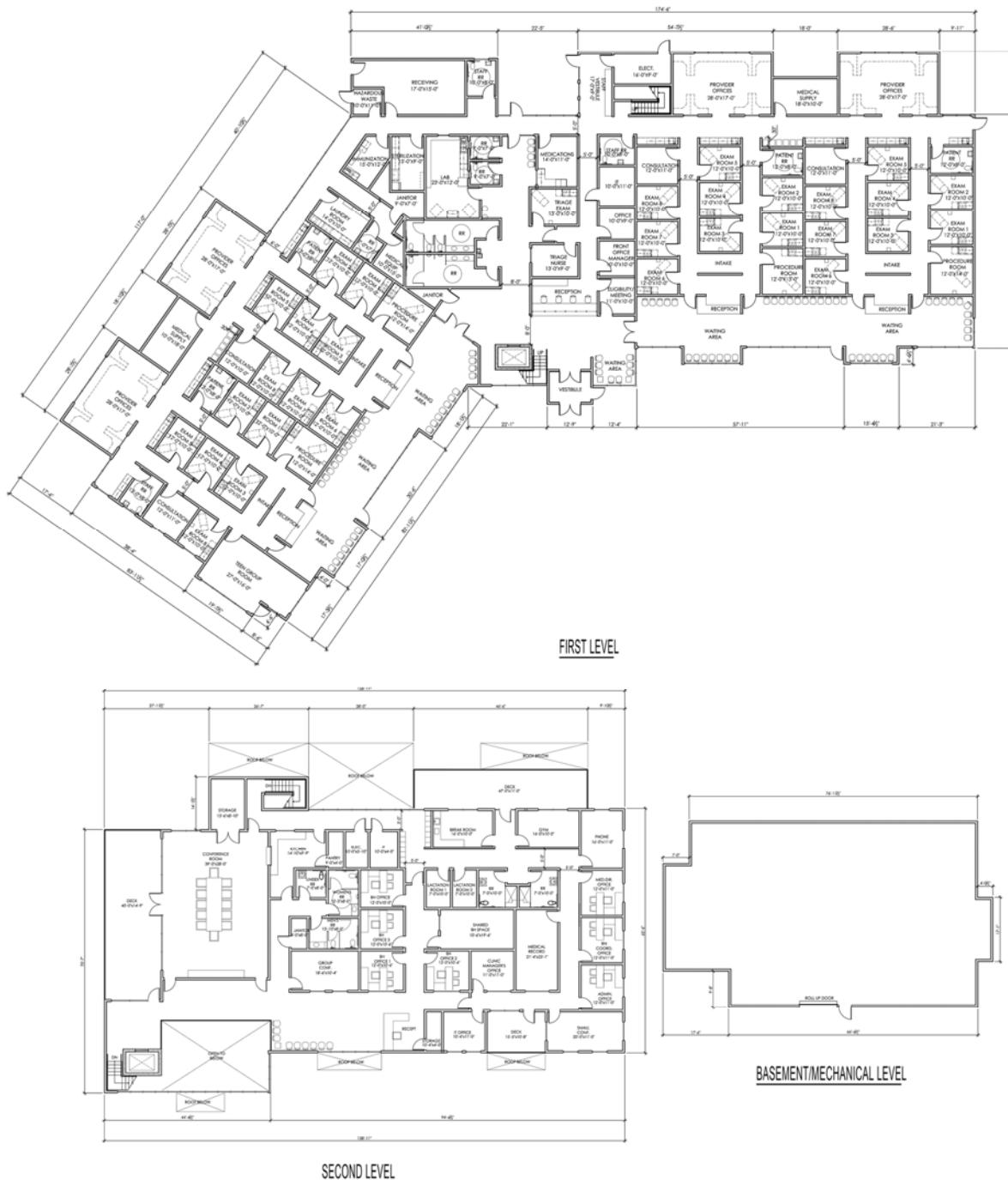


Figure 4 Preliminary Building Elevations



3.0 Environmental Impacts and Mitigation Measures

3.1 Approach to the Environmental Analysis

In accordance with Section 15126.2 of the State CEQA Guidelines, this Draft EIR identifies and focuses on the significant direct and indirect environmental effects of the project, giving due consideration to both its short-term and its long-term effects. Short-term effects are generally those associated with construction, and long-term effects are generally those associated with facility operations. As described in Chapter 1, “Introduction,” this analysis focuses on a limited number of environmental resource topics because other topics have already been addressed in the Initial Study (Appendix L). The remainder of this chapter addresses the following resource topics:

- Biological Resources
- Transportation

These sections follow the same general format:

Regulatory Setting presents the laws, regulations, plans, and policies that are relevant to each issue area. Regulations originating from the federal, state, and local levels are each discussed as appropriate.

Environmental Setting presents the existing environmental conditions on the project site and surrounding area as appropriate, in accordance with the State CEQA Guidelines (California Code of Regulations [CCR] Section 15125). This setting generally serves as the baseline against which environmental impacts are evaluated, which is also discussed in Chapter 2 “Project Description”.

Environmental Impacts and Mitigation Measures identifies the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic, in accordance with the State CEQA Guidelines (CCR Sections 15126, 15126.2, and 15143). The thresholds of significance used in this Draft EIR are based on the checklist presented in Appendix G of the State CEQA Guidelines; best available data; and regulatory standards of federal, state, and local agencies. The level of each impact is determined by comparing the effects of the project to the environmental setting. Key methods and assumptions used to frame and conduct the impact analysis as well as issues or potential impacts not discussed further (such issues for which the project would have no impact) are also described. A summary of each impact, and its level of significance precedes the discussion of each impact. The discussion that follows the impact summary includes the substantial evidence supporting the impact significance conclusion.

The Draft EIR must describe any feasible measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse impacts, and the measures are to be fully enforceable through incorporation into the project (Public Resources Code Section 21081.6[b]). Mitigation measures are not required for effects that are found to be less than significant. Where feasible mitigation for a significant impact is available, it is described following the impact along with its effectiveness at addressing the impact. Each identified mitigation measure is labeled numerically to correspond with the number of the impact that would be mitigated by the measure. Where sufficient feasible mitigation is not available to reduce impacts to a less-than-significant level, or where the City lacks the authority to ensure that the mitigation is implemented when needed, the impacts are identified as remaining “significant and

unavoidable.” Where possible, mitigation measures have been added to reduce impacts to less than significant levels.

3.2 Biological Resources

REGULATORY SETTING

Federal Endangered Species Act

Pursuant to the federal Endangered Species Act (ESA) (16 U.S.C. Section 1531 *et seq.*), the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration’s National Marine Fisheries Service (NMFS) regulate the taking of species listed in the ESA as threatened or endangered. In general, persons subject to the ESA (including private parties) are prohibited from “taking” endangered or threatened fish and wildlife species on private property, and from “taking” endangered or threatened plants in areas under federal jurisdiction or in violation of state law. Under Section 9 of the ESA, the definition of “take” is to “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” USFWS has also interpreted the definition of “harm” to include significant habitat modification that could result in take.

Clean Water Act

Section 404 of the Clean Water Act (CWA) requires project proponents to obtain a permit from the U.S. Army Corps of Engineers (USACE) before performing any activity that involves any discharge of dredged or fill material into waters of the United States, including wetlands. Many surface waters and wetlands in California meet the criteria for waters of the United States. In accordance with Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredged or fill material must obtain water quality certification from the appropriate regional water quality control board (RWQCB) indicating that the action would uphold state water quality standards.

Wetlands and waters of the U.S. are protected at the federal, state, and local levels. At the state level wetlands and waters are regulated primarily by the California Department of Fish & Wildlife (CDFW) and the Regional Water Quality Control Board (RWQCB). The Army Corps of Engineers (ACOE) has jurisdiction over wetlands which meet the three-parameter wetland criteria (hydrology, soils, and vegetation). The ACOE does not regulate wetland buffers, development adjacent to wetlands, or environmentally sensitive habitat areas (ESHAs).

Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Act, waters of the state fall under the jurisdiction of the appropriate RWQCB. The RWQCB must prepare and periodically update water quality control plans (basin plans). Each basin plan sets forth water quality standards for surface water and groundwater, as well as actions to control point and nonpoint sources of pollution to achieve and maintain these standards. The RWQCB’s jurisdiction includes federally protected waters as well as areas that meet the definition of “waters of the state.” Waters of the state are defined as any surface water or groundwater, including saline waters, within the boundaries of the state. The RWQCB has the discretion to take jurisdiction over areas not federally protected under Section 401 of CWA provided they meet the definition of waters of the state. Actions that affect waters of the state, including wetlands, must meet the RWQCB’s waste discharge requirements.

California Endangered Species Act

Pursuant to the California Endangered Species Act (CESA), a permit from California Department of Fish and Wildlife (CDFW) is required for projects that could result in the “take” of a plant or animal species that is listed by the state as threatened or endangered. Under CESA, “take” is defined as an activity that would directly or indirectly kill an individual of a species, but the CESA definition of take does not include “harm” or “harass,” like the ESA definition does. As a result, the threshold for take is higher under CESA than under ESA. Authorization for take of state-listed species can be obtained through a California Fish and Game Code Section 2081 incidental take permit.

City of Arcata General Plan and Land Use Code

The City of Arcata’s General Plan Resource and Conservation Element strives to protect, maintain and enhance natural ecosystem processes and functions in the region, in order to maintain their natural ecological diversity. A significant part of this goal is recognizing and protecting wetlands as highly productive complex ecosystems that provide vital habitat and cleansing systems. Therefore, the Resource and Conservation Element includes policies that apply to biological resource protection, including RC-1: Natural Biological Diversity/Ecosystem Function and RC-3: Wetlands Management. These policies include:

- RC-1a Maintain Biological and ecological integrity.
- RC-1b Non-native plant and animal species.
- RC-1c Habitat value protection.
- RC-1d Sensitive habitat definition.
- RC-3a Requirement for wetland delineation and study.
- RC-3b Filling of wetlands.
- RC-3j Minimum mitigation requirements for wetland impacts.

In addition to the policies above, the City’s Land Use Code would apply to the proposed project (Municipal Code, Title 9, Article 5) including applicable policies on ESHA and Wetland Conservation and Management (§9.59.060) which protect existing wetland areas and maintains a standard of ‘no net loss’ in area, function, and value. Regulations dictate the preparation of a biological assessment and accompanying impact analysis for all projects that have the potential to impact wetlands, outlining each component of proposed activities and feasible mitigation measures.

ENVIRONMENTAL SETTING

The subject parcel is located on a former mill site primarily surrounded by urban uses. The area directly north and west of the site are densely developed, mostly with single or multiple family residences. To the south lies Foster Avenue, sports fields associated with Arcata High School, and Shay Park. A 2019 Geologic Hazards and Geotechnical Investigation Report (Appendix C) prepared by SHN found that the project area was historically leveled via the placement of a significant amount of fill, and the site was heavily used as a log deck and loading area supporting a lumber mill along the old rail line along the southern boundary. The historic landform, prior to filling, was found to be a south-facing low gradient slope above the Jolly Giant Creek drainage. Fill consisting of sand, clays, gravels, and river cobble was placed over most of the site. The fill depth varies from 2 feet at the northern border to over 10 feet at the southern border, with a high concentration of gravels and river cobbles in the upper 2 to 4 feet.

Plant life consists primarily of ruderal species known to first colonize previously disturbed lands and includes upland grasses and shrubs. The majority of the project site is vegetated by non-native weedy grasses and forbs. The north, south and east perimeters of the site, where soils are apparently less

compacted, are vegetated by ruderal scrub vegetation. The western portion of the site slopes down to a low point at the southwest corner. This area is dominated by an overstory of Sitka willow, coastal willow and red alder. A dense thicket of elm-leaf blackberry creates an understory to these trees, but also dominates the slope transition up to the main portion of the site (Appendix A_NRM, 2019a).

There are no watercourses on the project site, but a seep (or spring) was identified at the toe of the slope between the project site and the adjacent parcel. This seep causes a perennial wetland. The nearest USGS blueline stream is Janes Creek, which lies approximately 1,000 feet to the north and west of the project area. However, Jolly Giant Creek flows underground below Foster Ave, directly along the southern border of the project area. The site drains to the ditch alongside the railroad alignment and existing wetlands on the south side of Foster Avenue via storm drains and joins Jolly Giant Creek, which daylights nearby within Shay Park, and then flows south through the City of Arcata in a patchwork of above and below ground reaches before emptying into Humboldt Bay. No National Wetland Inventory Wetland or Deepwater Habitat were identified within the project area (Appendix B_NRM, 2019b).

Wildlife

Prior to initiating field surveys, a query of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Data Base (CNDDB 2019) for wildlife species occurrences within a nine-quad topographical map area of the project area was conducted. This provides a comprehensive target species list from which to determine habitat, presence, or sign of species, as well as any known locations for special status species in the general area (Appendix A). Preconstruction surveys to determine use of the area by State or Federally listed species, migratory birds, or any other wildlife species were conducted on Thursday, March 21, 2019.

During these surveys, no State or Federally listed species were detected, and no habitat capable of supporting listed species was observed. In addition, this highly disturbed area, immediately adjacent to a current construction site, is proximate to more optimal habitat for migratory songbirds in the Jolly Giant creek watercourse. Non-listed birds were observed moving between the riparian vegetation along Jolly Giant creek and vegetation remaining on the perimeter of the parcel. These birds were exhibiting foraging behavior and none were observed singing, a sign of a territorial or nesting male. A single tree frog was heard calling from the cut berry bramble area, approximately two feet in the parcel from Foster Avenue.

Vegetation and Sensitive Plant Species

The current inventories of the California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants of California (CNPS 2019a), and the California Natural Diversity Database (CNDDB) were consulted to determine which special status plant species may occur within the project area and to compile a target species list. A nine-quad query of CNDDB and CNPS Inventory records resulted in 66 listed vascular and nonvascular plant species (Appendix A). A site visit to assess the proposed project area for the presence of sensitive plant species and sensitive natural communities was conducted on March 18, 2019. This survey was floristic in nature and followed the 2018 California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. The timing of the survey was such as to capture appropriate phenology (for positive identification and detection) of target species with potential to occur at the site elevation and within habitat types present. This target list includes Howell's montia, which is known to occur in highly modified habitats which retain surface moisture and low vegetative cover in the spring, but the severity of alteration at this site limits potential for other sensitive species to occur.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The information presented in this analysis is based on the Biological Investigation Report and Aquatic Resources Investigation Report prepared by Natural Resources Management Corporation (NRM) in 2019 (Appendices A and B).

Thresholds of Significance

Based on Appendix G of the State CEQA Guidelines, an impact to biological resources is considered significant if implementation of the project would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Dept. of Fish and Wildlife or U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- 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;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Resource Areas Not Discussed Further

Through analysis conducted for the Initial Study (Appendix L), it was determined that several biological resource areas would have less than significant or no impacts.

The Biological Resources Report reviewed the project area to determine potential impacts to wildlife species currently listed or formally proposed for listing as endangered or threatened under the federal Endangered Species Act (ESA) or designated as sensitive by the California Department of Fish and Wildlife (CDFW); these species are hereinafter referred to as special status species. The Report also reviewed: potential impacts to any plant species that are listed, candidates for listing, or proposed for listing under the ESA, CESA and the California Native Plant Protection Act and or meet the definition of rare or endangered under CEQA, hereinafter referred to as special status plants; and existing or potential impacts to sensitive natural communities.

No State or Federally listed species were detected, and no habitat capable of supporting listed species was observed. No sensitive plant species were found within the survey area. The project site is located within an urbanized area of the City and is not part of a known wildlife corridor. The proposed project would not fragment known habitat or interfere with known migration routes or wildlife corridors. The proposed project would not conflict with applicable Arcata General Plan Policies or other local, regional, or state habitat conservation plans.

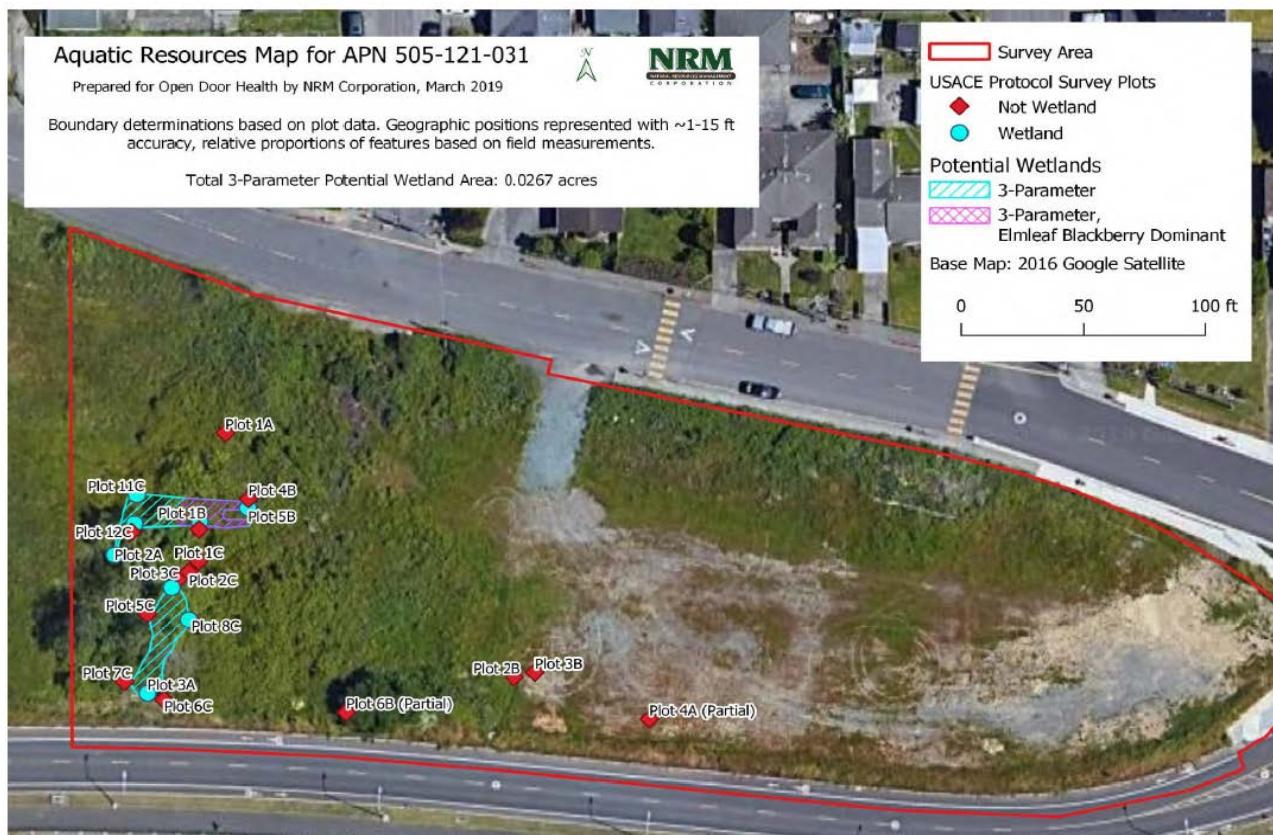
These areas were discussed in detail in the Initial Study and are therefore not discussed further in this EIR. One resource area, wetlands, has potentially significant impacts and is discussed further below.

Potential Impacts

Impact BIO-1: Loss of Wetlands. The proposed project will result in the permanent fill of 3 parameter wetlands. With implementation of Mitigation Measure BIO-1, which will create similar wetland habitat, this impact is considered **less than significant**.

As mentioned above, the vegetation in the project vicinity is dominated by disturbance oriented herbaceous communities. The primary source of water on the site is overland drainage from surface runoff. There are no watercourses on the project site, but a seep (or spring) was identified at the toe of the slope near the western boundary of the site. This seep causes a perennial wetland that flows to a ditch along the railroad alignment to wetlands within Shay Park and Jolly Giant Creek. The site was surveyed for the potential presence of both 3-parameter jurisdictional Waters of the United States on the parcel and 2-parameter wetlands protected under City of Arcata Land Use Code. A primary investigation was conducted in full accordance with the 1987 Corps of Engineers Wetland Delineation Manual and the 2010 Regional Supplement: Western Mountains, Valleys and Coast Region (Version 2.0). A survey of potential two-parameter wetlands was also conducted, including an assessment of the prevalence of wetland indicator vegetation (hydrophytic vegetation) and visual hydrological evidence (such as the presence of surface water or soil saturation).

Figure 5 Potential Wetland Areas



Source: Appendix B - NRM, 2019. Aquatic Resources Investigation Report: Humboldt County APN 505-121-031.

The 2019 wetland assessment discovered 0.0267 acres, or 1,163 square feet, of potential three-parameter wetland on the western portion of the site. This total acreage occurs over two areas, separated by approximately 25 feet. The northern feature is approximately 0.0143 acres in size, and the southern feature is 0.0124 acres (Figure 5). The site does not currently contain 2-parameter wetlands that fall under the City of Arcata's local jurisdiction. NRM is in the process of developing a Wetland Mitigation and Monitoring Plan that will conform to ACOE and City of Arcata requirements.

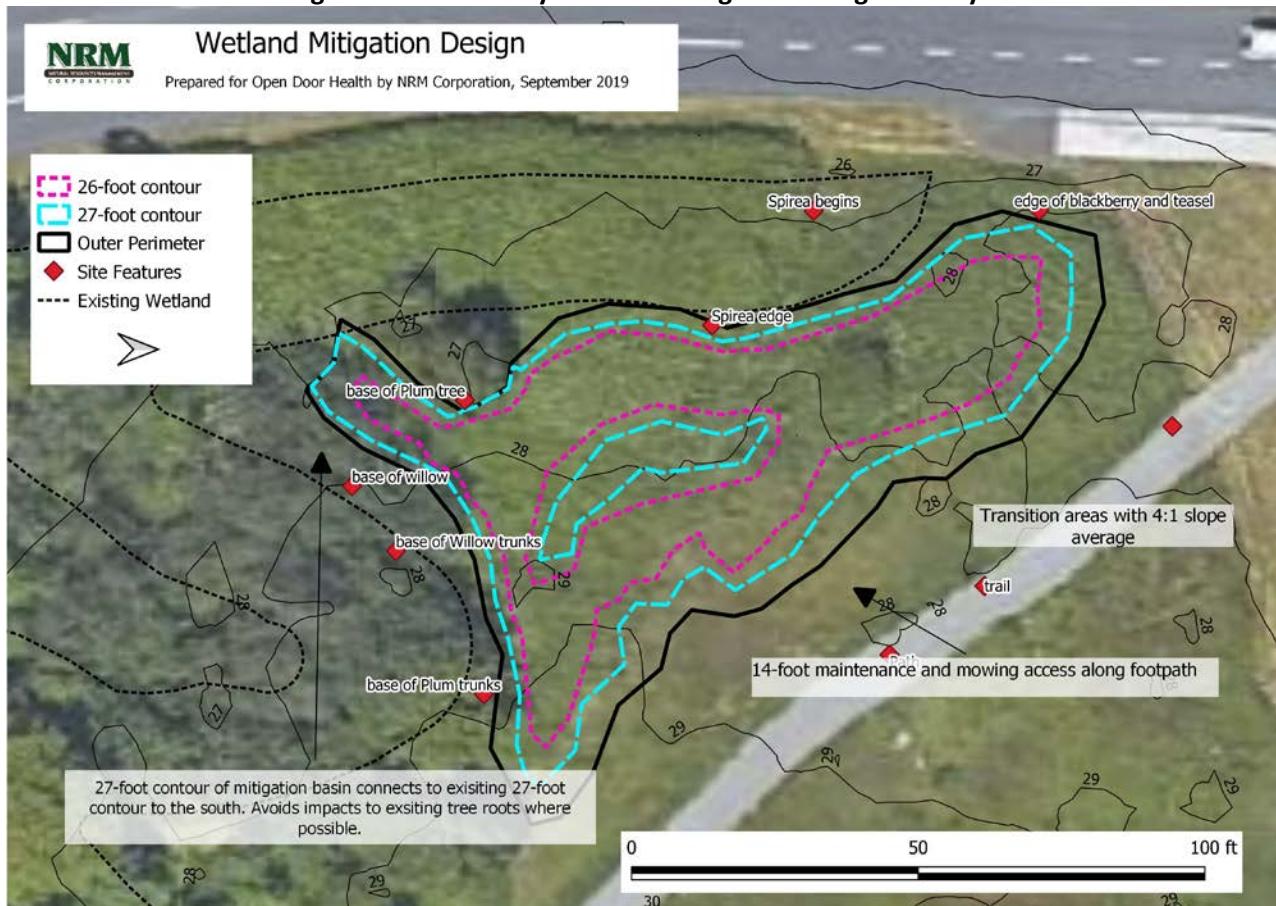
The proposed project will impact 100 percent of the project site and would directly fill the approximately 0.0267 acres (1,163 square feet) of potential 3-parameter, ACOE jurisdictional wetland. There is not sufficient area on-site to mitigate for the wetland loss caused by the project. Open Door will implement mitigation at nearby Shay Park to provide off-site replacement wetlands. The program will: (1) have a created-to-fill ratio of at least 2:1 for the permanently impacted wetlands; (2) include a planting plan that complements the existing native plant species adjacent to the mitigation site; and (3) include monitoring and maintenance for at least 5 years until the created wetland is fully established, including the replanting of any dead or dying plants within the mitigation area. The mitigated wetlands/habitat enhancement would exchange isolated, low quality wetlands with connected, moderate quality, perennial wetlands. With implementation of Mitigation Measure BIO-1, which will create similar wetland habitat, this impact is considered less than significant.

Figure 5a Existing Wetlands and Proposed Wetland Mitigation Site



Mitigation Site Location Map. Wetlands to be impacted in blue.

Figure 5b Preliminary Wetland Mitigation Design at Shay Park



Mitigation BIO-1 – Create Wetlands

The applicant shall develop and ensure implementation of a wetland mitigation plan that involves creating new wetlands. The mitigation will provide off-site replacement wetlands in Shay Park. The mitigation plan shall be submitted to the City of Arcata Environmental Services Department, the U.S. Army Corps of Engineers (ACOE), CA Department of Fish and Wildlife, and the North Coast Regional Water Quality Control Board and approved by these entities prior to start of work. The program will:

- (1) have a created-to-fill ratio of at least 2:1 (or as specified in the mitigation plan prepared for the project) for the permanently impacted wetlands;
- (2) include a planting plan that complements the existing native plant species adjacent to the mitigation site; and
- (3) include monitoring and maintenance for at least 5 years, including the replanting of any dead or dying plants within the mitigation area.

3.3 Transportation

REGULATORY SETTING

In January 2019, the Governor's Office of Planning and Research released comprehensive updates to the CEQA Guidelines, including updates to the Transportation Section, changing the title of the section from "Transportation and Traffic" to simply "Transportation", and adding a new section regarding determining the significance of a project's transportation impacts (CEQA Guidelines Section 15064.3). A lead agency may elect to be governed by the provisions of this section immediately; however, they apply statewide July 1, 2020. The updated guidelines exhibit a clear intent to prioritize infill projects and shift away from congestion-based Level of Service (LOS) standards to Vehicle Miles Traveled (VMT), which more efficiently analyzes a project's energy usage and overall environmental impact. Using VMT also ensures that infill projects, which may cause traffic congestion but also decrease energy inefficiencies, are not penalized.

CEQA Guidelines Section 15064.3. Determining the Significance of Transportation Impacts

(a) Purpose. This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact.

The City of Arcata's General Plan Transportation Element contains the goal of creating and maintaining an internal street system consistent with Arcata's small-town, nonmetropolitan character and which maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays (Policy T-4). Additionally, the Transportation Element includes specific policies that encourage infill, redevelopment, and reuse of underutilized property at higher densities with the objective of reducing the percentage of automobile trips and reducing annual vehicle miles traveled through land use and development patterns that encourage walking, bicycling and transit use (Policy T-2). The City has no adopted minimum standard for intersection LOS, but also recognizes an acceptable LOS for one jurisdiction may not be acceptable to another.

City of Arcata General Plan: Transportation Element

Policy T-1 Balanced Transportation System with Choice of Modes

Objective: Create and maintain a balanced transportation system with choice of bus transit, bicycle, and pedestrian as well as private automobile modes. Reduce the percentage of trips that are made by automobile and provide the opportunity and facilities to divert trips from automobiles to other modes.

T-1a Investment in alternative modes. In order to provide a realistic and cost-effective balance between travel modes, the City shall emphasize investment in alternative modes (bikeways, etc.) as a priority over increasing vehicular capacities of streets.

Policy T-2 Travel Demand Management

Objective: Reduce the percentage of automobiles and reduce the annual vehicle-miles of travel.

T-2a Land use development patterns. The City encourages and supports travel demand management efforts. The City shall promote land use and development patterns that encourage walking, bicycling and transit use. In recognition of the link between land use and transportation, the land use plan shall discourage low density, homogenous land-use patterns that foster automobile travel and are impractical to serve with transit. Land use planning shall emphasize high density and mixed land use patterns which translate into higher transit and pedestrian travel in the downtown and neighborhood commercial areas. Infill, redevelopment, and reuse of underutilized property at higher densities shall be encouraged prior to outward expansion of City boundaries...

Policy T-4 Streets and Highways Plan and Policy

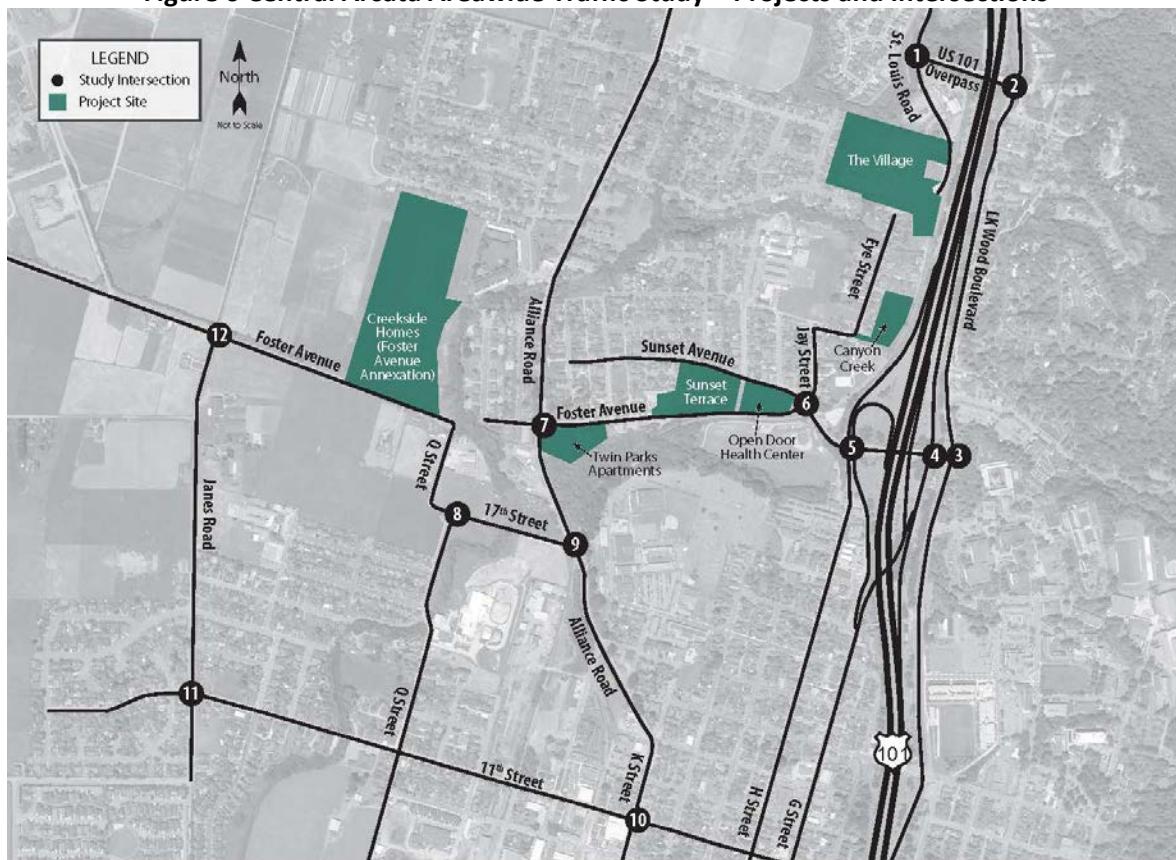
Objectives: Plan an internal street system consistent with Arcata's small-town, nonmetropolitan character and which: 1) efficiently utilizes existing facilities and reduces need for investment in new or expanded street and highway facilities or capacities; 2) improves connectivity of streets to provide for direct routes between origins and destinations; 3) has a high quality of regular maintenance and repair; and 4) maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays.

ENVIRONMENTAL SETTING

The project site is located directly north of Foster Avenue and south of Sunset Avenue, approximately 600 feet west of the Highway 101/ Sunset Avenue interchange (southbound ramps at G/H Streets). In 2014 the Foster Avenue extension project was completed creating a new arterial roadway directly south of the project site. The extension project was a designated prioritized planning project in the City's Transportation Element, to function as a new major arterial road to extend Foster Avenue east of Alliance Road to connect with Sunset Avenue near the Highway 101 interchange to create an east-west facility between Spear Avenue and 14th Street. This roadway extension was intended to provide a direct arterial connection from Alliance Road to Highway 101 that bypassed the Sunset residential neighborhood, and to improve and facilitate bus routing. Foster Avenue is now a 20' wide arterial with 4' and 6' bike lanes on either side of the travel lanes. The Arcata Rail with Trail, a 10' wide Class I separated multi-use path, is located immediately adjacent to the south side of Foster Avenue and provides a separated non-motorized link from Sunset Avenue to Samoa Blvd, through to the Arcata Marsh & Wildlife Sanctuary to the south, and linking to the Humboldt Bay Trail. The City is currently planning for the next section of multi-use trail in Arcata, which will connect the Sunset Avenue/Larson Park area to Valley West, West End Road, Aldergrove Industrial Park, and to the future Annie and Mary Trail.

The project site is one of six current proposed development sites within a three-quarter mile radius of one another (development on two of these sites -Sunset Terrace and Twin Parks- has been approved and are under construction) (Figure 6). All five other projects are single- or multi-family residential developments. The potential impacts to Level of Service (LOS) as a result of these six projects at 12 intersections are considered both individually and cumulatively in the Central Arcata Areawide Traffic Study (Traffic Study) (Appendix G). This traffic study also considered access for pedestrian, bicyclists, and transit. In addition, Vehicle miles traveled (VMT) modeling for the proposed projects was also conducted for the six projects in a *Technical Memorandum on VMT Procedure and Computations* (Appendix J, W&S Solutions, LLC, 2016).

Figure 6 Central Arcata Areawide Traffic Study – Projects and Intersections



Source: Appendix G - W-Trans, 2017. Central Arcata Areawide Traffic Study.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, the project would have a significant impact on transportation if it;

- Conflicts with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflicts or is inconsistent with CEQA Guidelines section 15064.3 subdivision (b);
- Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- Results in inadequate emergency access.

Resource Areas Not Discussed Further

Through analysis conducted for the Initial Study (Appendix L), it was determined that several transportation resource areas would have less than significant or no impacts. The proposed project will consolidate two existing health center locations, which will increase efficiency of deliveries, patients, and workers. The new site is also in closer proximity to the Highway 101 on/off ramps than either of the two existing Arcata Open Door Clinic locations. Vehicle miles traveled (VMT) modeling for the proposed project concluded that all project sites generate average VMT less than the CEQA thresholds for both AM and PM. Project access driveways will be designed to City visibility standards to avoid any substantial increase in hazards; and the project's location and design would not adversely affect the fire or police department's ability to efficiently respond to emergencies.

These areas were discussed in detail in the Initial Study and are therefore not discussed further in this EIR. One resource area, conflict with programs, plans, ordinances, or policies, has potentially significant impacts and is discussed further below.

Potential Impacts

TRAN-1: *The proposed project could result in peak hour traffic delays that exceed the City's operational thresholds for certain intersections until construction of identified future transportation improvements, which would be considered a potentially significant impact.*

The proposed project would develop an existing vacant site with a community health center that consolidates and replaces two existing health facilities. The consolidation is expected to increase overall transportation efficiencies including a reduction in the total number of staff and efficiencies from deliveries going to one location instead of multiple, which will reduce congestion and the need for parking downtown. Primary vehicular site access would be off Foster Avenue to reduce through traffic on Sunset Avenue; a service vehicle (i.e. delivery and garbage) and limited staff parking area would be accessed off Sunset Avenue near Baldwin Street (Figure 2). Although the project would result in an increase in the total number of trips going to and from the proposed site, a majority of these trips are currently going to the two existing health centers and would be directed to the project site instead, which is closer to the Hwy 101 interchange.

The project provides pedestrian facilities and will develop on-site sidewalks connecting to existing sidewalks along Sunset and Foster Avenues. A path is also proposed along the western project boundary that would connect the Sunset residential neighborhood through the project site to Foster Avenue, where existing crosswalks connect to the City's existing multi-use trail and Shay Park. This will provide a shorter route and allow neighborhood residents to access existing trail facilities without having to navigate the Sunset/Foster roundabout. In addition, the project includes travel demand management techniques and will encourage staff and clients to use alternative forms of transportation as a means of reducing total number of vehicles driving to and from the project site. These include:

- installation of an off-site west bound bus stop at the Arcata Skate Park
- incentives for employees to carpool such as priority parking for those that do
- the provision of bus pass subsidies for employees
- on-site bike parking, and a Zagster bike share station (similar to those in other locations in Arcata)

According to the Traffic Study (Appendix G) the proposed project could generate an average of 1,084 daily trips; 72 trips would be expected during the morning peak hour and 107 during the evening peak hour. These projections were based on standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 9th Edition, 2012. The proposed project was treated as a "Medical-Dental Office" based on rates for ITE LU#720. These vehicle trips have the potential to impact several nearby intersections, both a stand-alone project and as one of a larger series of projects currently underway in the area. Although the City does not have adopted LOS thresholds, an operational threshold of LOS C was identified as being the desired minimum to be used for Traffic Study analysis purposes, with this threshold to be applied to the operation of the intersection as whole and not that of any one movement or approach. The potential impacts are discussed in detail in the Traffic Study referenced above and summarized below.

Existing Conditions

Under existing conditions, all but one of the study intersections are operating acceptably at LOS C or better during both peak periods evaluated. Sunset Avenue/LK Wood Boulevard is currently operating at LOS E during the p.m. peak period, which is below the threshold applied though still considered acceptable for this location because potential improvements identified as being feasible to improve vehicular operation would have a negative impact on pedestrian and bicycle access.

Future Conditions Without Projects

Future traffic volumes were developed using an assumed growth rate of 1.5 percent per year to a horizon year of 2036, or 20 years out. No changes to the infrastructure or transportation system were assumed for this scenario. Under the estimated Future volumes, three of the study intersections are expected to operate below LOS C during one or both peak periods. Sunset Avenue/LK Wood Boulevard, which was identified as operating unacceptably during the p.m. peak hour under current traffic volumes, would experience increased delay, and Sunset Avenue/US 101 North Ramps is expected to deteriorate to LOS D overall during this time period. The intersection of Foster Avenue/Alliance Road is expected to operate unacceptably during both peak periods and 11th Street/K Street during the p.m. peak hour with the increased volumes. Since the two intersections at LK Wood Boulevard/Sunset Avenue and Sunset Avenue/US 101 North Ramps are in close proximity, it is recommended that any long-term improvements to one of the intersections include the other. In addition to the roundabout on Sunset Avenue at US 101 North and LK Wood Boulevard, additional capacity will be needed at Foster Avenue/Alliance Road. To achieve LOS C operation, a roundabout would be needed at this location as well. There is limited right-of-way available at this intersection, so use of a mini-roundabout could be used. Finally, under the projected future volumes, the intersection at 11th Street/K Street would need increased vehicular capacity to operate at LOS C. However, because no feasible modifications were identified that would improve vehicular operation without deteriorating conditions for pedestrians and bicycles, no improvements are recommended, nor are they needed under the criteria applied in the Traffic Study (Appendix G).

Proposed Project

For the purposes of the proposed project, the intersection with the most significant potential traffic impact is Alliance Road and Foster Avenue, which is currently a four-way stop. Five of the seven study intersections would continue operating acceptably upon the addition of traffic from the proposed project. Sunset Avenue/LK Wood Boulevard is considered as operating acceptably, as discussed above. The project could result in deterioration of operation during the p.m. peak hour at Foster Avenue/ Alliance Road (Figure 7). The Traffic Study recommends re-striping in the short-term to provide left-turn and through/right turn lanes southbound and a right-turn lane and left/through lane on the northbound approach; this restriping was already completed as part of another project.

Figure 7 Existing Plus Project Peak Hour Intersection Level of Service

Table 11 – Existing plus Open Door Health Center Peak Hour Intersection Levels of Service				
Study Intersection <i>Approach</i>	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
1. St. Louis Rd/US 101 Overpass	3.4	A	5.4	A
	<i>Northbound St. Louis Rd Approach</i>	9.8	A	A
	<i>Westbound Overpass Approach</i>	9.0	A	A
2. LK Wood Blvd/US 101 Overpass	3.2	A	2.5	A
	<i>Southbound LK Wood Approach</i>	11.4	B	B
3. Sunset Ave/LK Wood Blvd	13.3	B	35.9	E
4. Sunset Ave/US 101 N Ramps	6.0	A	10.0	B
	<i>Northbound US 101 N Off-ramp Approach</i>	27.5	D	D
5. Sunset Ave/US 101 S Ramps-G/H Streets	14.4	B	11.5	B
6. Sunset Ave/Foster Ave-Jay St	5.2	A	4.6	B
7. Foster Ave/Alliance Rd	19.1	C	26.7	D
	<i>Restripe Alliance Road Approaches</i>	13.8	B	17.6

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*; **Bold** text = operation below desired threshold; Shaded cells = conditions with recommended improvements

Finding – Five of the seven study intersections would continue operating acceptably upon the addition of traffic from the Open Door Health project. Sunset Avenue/LK Wood Boulevard is considered as operating acceptably, as discussed previously. The project results in deterioration of operation during the p.m. peak hour at Foster Avenue/ Alliance Road to LOS D.

Recommendation – As shown in Figure 9, Foster Avenue/Alliance Road should be restriped to provide left-turn and through/right-turn lanes southbound and a right-turn lane and left-turn/through lane on the northbound approach as part of the project, if not already completed as part of another project.

Source: Appendix G - W-Trans, 2017. Central Arcata Areawide Traffic Study.

Figure 8 Future Plus Project Peak Hour Intersection Level of Service

Table 20 – Future plus Open Door Health Center Peak Hour Intersection Levels of Service

Study Intersection Approach	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
1. St. Louis Rd/US 101 Overpass	3.5	A	5.6	A
	<i>Northbound St. Louis Rd Approach</i>	<i>B</i>	<i>9.9</i>	<i>A</i>
	<i>Westbound Overpass Approach</i>	<i>A</i>	<i>9.4</i>	<i>A</i>
2. LK Wood Blvd/US 101 Overpass	3.5	A	2.8	A
	<i>Southbound LK Wood Approach</i>	<i>B</i>	<i>13.1</i>	<i>B</i>
3. Sunset Ave/LK Wood Blvd	17.2	C	88.7	F
Roundabout – Intersections 3 and 4	10.7	B	20.6	C
4. Sunset Ave/US 101 N Ramps	12.7	C	33.3	D
<i>Northbound US 101 N Off-ramp Approach</i>	<i>62.6</i>	<i>F</i>	<i>110.8</i>	<i>F</i>
5. Sunset Ave/US 101 S Ramps-G/H Streets	20.5	C	13.1	B
6. Sunset Ave/Foster Ave-Jay St	5.9	A	5.4	A
7. Foster Ave/Alliance Rd	40.9	E	74.2	F
	8.7	A	9.3	A

Notes: Delay is measured in average seconds per vehicle; LOS = Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*; ** = delay greater than 120 seconds; **Bold** text = operation below desired threshold; Shaded cells = conditions with recommended improvements

Findings – Four of the seven study intersections would continue operating acceptably upon adding traffic from the Open Door Health project to future volumes. Trips generated by the Open Door Health project could be accommodated while maintaining acceptable operation with these proposed improvements.

Recommendation – Proportional share fees should be paid by the Open Door Health applicant to fund both roundabout projects. The Open Door Health project's proportional shares are 3.5 percent for the Sunset Avenue/US 101 North Ramps and LK Wood Boulevard intersections and 9.2 percent for Foster Avenue/Alliance Road.

Source: Appendix G - W-Trans, 2017. Central Arcata Areawide Traffic Study.

Four of the seven study intersections are expected to operate acceptably upon adding proposed project trips to anticipated future volumes. Sunset Avenue/LK Wood Boulevard, Sunset Avenue/US 101 101 North Ramps, and Foster Avenue/Alliance Road would operate at a service level below LOS C in their current configurations. The future plus project operating conditions are summarized in Figure 8. According to the Traffic Study, the trips generated by the proposed project could be accommodated while maintaining acceptable operation with the following proposed improvements: proportional share fees should be paid to fund both roundabout projects (Foster Avenue/Alliance Road and Sunset Avenue/US 101 North/LK Wood Boulevard). The Open Door's proportional shares were calculated in the Traffic Study as 9.2% of installation cost for the Foster Avenue/Alliance Road Intersection and 3.5% of installation cost for the Sunset Avenue/US 101 North Ramps and LK Wood Boulevard intersections.

Cumulative Considerations

Upon adding traffic for the six projects to the future volumes, and with recommendations previously identified as being needed to accommodate future volumes without any of the six projects, three of the study locations are still projected to operate below LOS C. With the roundabout previously indicated as

being needed between Sunset Avenue/LK Wood Boulevard and Sunset Avenue/US 101 North Ramps, these intersections would operate acceptably during the a.m. peak hour, but at LOS D during the p.m. peak hour. The intersection of 11th Street/K Street, which is expected to operate at LOS F without the project, would experience further increases in delay with project traffic added; because any improvements that could feasibly be made at this location would result in negative impacts on pedestrian and bicycle access, the lower service level was deemed acceptable.

It is noted that the assumed 1.5 percent growth per year used to project the future volumes should be considered conservative. Additionally, the project-generated trips were added to the future volumes; this is also conservative since the projected growth would typically include the growth associated with the proposed projects. A review of volumes at the proposed Sunset Avenue/US 101 North-LK Wood Boulevard roundabout indicates that, in order for operation to deteriorate below LOS C for the proposed roundabout, approximately 1,500 new residential units would need to be constructed that use the interchange for primary access (Appendix G).

The Traffic Study (Appendix G) recommendation related to future traffic plus all six projects is that while it is anticipated that the proposed roundabout at Sunset Avenue/US 101 North-LK Wood Boulevard will be adequate to accommodate all future growth in the City of Arcata, the City should monitor growth, and use 1,500 new residential units as a trigger indicating the need to evaluate operation and determine if further capacity enhancements are needed. As an alternative, the City could elect to use LOS D operation as the acceptable threshold for this location.

The improvements recommended for “without project” conditions are adequate to achieve acceptable operation upon the addition of all six projects to Future volumes, with one exception as noted below, and the proportional share that each project should contribute to help pay for these improvements was calculated and is noted in the Traffic Study (Appendix G). The exception is Sunset Avenue/US 101 North ramps-LK Wood Boulevard, which is projected to operate at LOS D during the p.m. peak hour with all projects added to future volumes. The Traffic Study (Appendix G) notes that the intersection of Sunset Avenue/LK Wood Boulevard is owned and operated by Humboldt State University. “It is understood from the University that their emphasis is placed on pedestrian and bicycle access and safety, with operation for vehicular traffic given a lesser priority. Improvements at this intersection were therefore considered for operation of LOS D or lower, though lower service levels were deemed acceptable if improvements necessary to achieve a higher service level would negatively impact pedestrian and/or bicycle access” (Appendix G).

Conclusion

The City’s General Plan Transportation Element contains the goal of creating and maintaining “an internal street system consistent with Arcata’s small-town, nonmetropolitan character and which maintains a level of service which minimizes delays, but allows for higher levels of congestion during the short peak periods on weekdays” (Policy T-4 Streets and Highways Plan and Policy). This suggests short periods of congestion are not contrary to the goal of the overall circulation system and General Plan policies. Although traffic congestion will fall below LOS C with this project in addition to the six other nearby projects at certain intersections, since the City does not have adopted LOS thresholds, the project would not conflict with this or other programs, plans, ordinances or policies addressing the circulation system. Additionally, the General Plan includes specific policies that encourage infill, redevelopment, and reuse of underutilized property at higher densities with the objective of reducing the percentage of automobile trips and reducing annual vehicle miles traveled through land use and development patterns that encourage walking, bicycling and transit use (Policy T-2 Travel Demand Management). The proposed project contains

features in support of Policy T-2 as described herein. The Traffic Study (Appendix G) also notes that due to the conservative nature of the Study, it is likely the calculated volumes will not be achieved, and capacity improvements should be limited to what can reasonably be expected to be needed. Excess capacity is undesirable in that it generally results in higher travel speeds and comes at the expense of pedestrians and cyclists.

The project includes travel demand management techniques and will encourage staff and clients to use alternative forms of transportation as a means of reducing total number of vehicles driving to and from the project site. These include: the installation of an off-site west bound bus stop at the Arcata Skate Park; incentives for employees to carpool such as priority parking for those that do; the provision of bus pass subsidies for employees; on-site bike parking; and a Zagster bike share station (similar to those in other locations in Arcata). The project also provides pedestrian facilities and will develop on-site sidewalks connecting to existing sidewalks along Sunset and Foster Avenues. A path is also proposed along the western project boundary that would connect the Sunset residential neighborhood through the project site, to Foster Avenue, where existing crosswalks connect to the City's existing multi-use trail and Shay Park. This will provide a shorter route and allow neighborhood residents to access existing trail facilities without having to navigate the Sunset/Foster roundabout.

The Traffic Study (Appendix G) recommended "near-term" improvements were completed in Summer 2017. The "future" transportation improvements may not be constructed for several years since the design of some of these improvements need to be coordinated with Caltrans and/or Humboldt State University. The two relevant Traffic Study recommended transportation improvements that may not be constructed for several years include the roundabout at the Sunset Ave/ U.S. 101 North Ramps/LK Wood Blvd. intersection and the roundabout at the Foster Ave/Alliance Road intersection.

With the project design and contribute to future transportation improvements, the proposed project will not 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. However, until construction of the future intersection improvements identified above, there is the potential for significant traffic impacts to occur from the proposed project. Since the City of Arcata does not have an adopted transportation mitigation program, the effect remains potentially significant. If this scenario were to happen, there is the potential for significant cumulative traffic impacts to occur until the two roundabouts are installed. For this reason, the City may adopt a Statement of Overriding Considerations for the proposed project related to traffic impacts.

Mitigation TRANS-1 – Contribution to transportation improvements

To minimize the traffic impacts of the proposed project, the applicant shall pay the recommended traffic impact fee detailed in the Central Arcata Areawide Traffic Study for improvements to the Foster Avenue/Alliance Road and Sunset Avenue/ U.S. 101/LK Wood Boulevard intersections. In this case the proposed project would contribute up to \$146,370 to the City of Arcata to be deposited into a specified traffic mitigation account in order to fund future upgrades to identified intersections. Detailed information about the traffic impact mitigation fees is included on Pgs. 67-69 and in Appendix E of the W-Trans Central Arcata Areawide Traffic Study (Appendix G).

4.0 Other CEQA Considerations

4.1 Cumulative Impacts

CEQA Guidelines Section 15130(a) requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines Section 15130 identifies two basic methods for establishing the cumulative environment in which a project is considered: the use of a list of past, present, and probable future projects or the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. The list of past, present, and probable future projects used for this cumulative analysis is restricted to those projects that have occurred or are planned to occur (i.e., pending applications at the time of the NOP release) within the vicinity of the project site. These projects are described in Table 3. The project site is one of six current proposed development sites within a three-quarter mile radius of one another (development on two of these sites, Sunset Terrace and Twin Parks, has been approved and these projects are under construction). All five other projects are single- or multi-family residential developments.

Table 3. List of Sunset Area Projects

Project Name	Location	Description	Project Status
Sunset Terrace	Foster Avenue (adjacent to project site)	142-unit multi-family residential development (1-bedroom units)	Construction completed in 2019
Canyon Creek Apartments	2545 Todd Court	89-unit multi-family residential development (mix of 1-bedroom, 2-bedroom, and studio units)	Application on file with City
Twin Parks	Southeast corner of Foster Ave. and Alliance Rd.	40-unit multi-family residential development (mix of 1-bedroom and studio units)	Under construction
The Village Housing Project	Saint Louis Rd.	222-unit mixed-residency multi-family development (mix of 1-, 2-, 3-, and 4-bedroom units)	Under City review
Creek Side	Foster Avenue (west of Alliance Rd.)	Mixed-residency residential development (32 single-family with accessory dwelling units, 25 cottage units, 100-bed assisted living facility)	Under City review

An analysis of cumulative impacts considers potential project impacts combined with incremental effects of other approved, proposed or reasonably foreseeable similar projects in the vicinity. Many of the items reviewed as part of this initial study (Appendix L) would result in no impact or were considered to have less than significant impacts, and where appropriate, references were made to the Arcata General Plan and specific studies prepared for the proposed project. Significance criteria, unless otherwise specified, are the same for cumulative impacts as project impacts for each environmental topic area. The project's individual impacts would not add appreciably to existing or foreseeable future significant cumulative impacts, with the exception of one resource area - Transportation - that has the potential for significant cumulative environmental impacts, see discussion below.

Biological Resources

The Sunset Area projects listed above have the potential to impact protected species, degrade plant and animal habitat, fill wetlands, remove native vegetation, and introduce non-native plant species. Several of these projects are proposed to occur on properties that were used for industrial activities in the past and are therefore in a disturbed condition with limited remaining habitat area. However, some of the project sites are located along Janes Creek or have wetlands, which are identified by the City as Environmentally Sensitive Habitat Areas (ESHAs).

Project sites with these sensitive habitat areas will be required to comply the Arcata General Plan and Land Use Code which contains policies and standards for the protection of biological resources including, but not limited to, setback requirements, a "no net loss" policy for impacts to wetlands, and mitigation requirements for impacts to riparian areas and wetlands. These projects will be required to delineate ESHAs in special studies and on the project plans and comply with the City's creek and wetland setbacks or mitigation requirements if physical impacts will occur to these areas. Biological surveys will also be required to determine whether protected plant and wildlife species exist on the project sites. If protected species are detected on any of the sites, operational restrictions, buffers, etc. will be required to ensure they are not significantly impacted by construction activities. Some of the projects may include mitigation measures requiring biological surveys to be conducted at a seasonally appropriate time or prior to construction activities. Compliance with the requirements of the City's General Plan and Land Use Code, as well the existing regulatory requirements of other State and federal agencies, will ensure that less than significant impacts to biological resources occur from the Sunset Area projects.

The majority of the project site is a disturbed former mill site. As indicated in the Biological Resources section of this draft EIR (Chapter 3.2) there are two wetland areas in the southwestern portion of the project site. The project design, mitigation measures, and City requirements will ensure that the project mitigates the impacted wetland areas on the site, avoids impacts to protected wildlife species, and protects sensitive habitat. Based on the above discussion, cumulative impacts related to biological resources are considered less than significant.

Transportation

The potential impacts to traffic/transportation are considered both individually and cumulatively in the Transportation section of this Draft EIR (Chapter 3.3) and were considered in the *Central Arcata Areawide Traffic Impact Study* (Traffic Study) (Appendix G). The City of Arcata commissioned a comprehensive traffic study to address cumulative impacts associated with the potential development of approved/planned projects in the Sunset Area. The Traffic Study concluded with recommendations for several near-term and future transportation infrastructure improvements that would reduce the impacts of the projects to a less than significant level. The Traffic Study also identifies each Sunset Area project's fair share proportion of the recommended transportation improvements. Mitigation has been included in

draft EIR Chapter 3.3 (Transportation) requiring the applicant to pay a fair share proportion of the transportation improvements as recommended in the Traffic Study.

The Traffic Study recommended “near-term” improvements were completed in Summer 2017 by other projects. The “future” transportation improvements may not be constructed for several years since the design of some of these improvements need to be coordinated with Caltrans and/or Humboldt State University. As discussed in draft EIR Chapter 3.3, two of the Traffic Study recommended transportation improvements that may not be constructed for several years include the roundabout at the Sunset Ave/ Highway 101/LK Wood Blvd intersection and the roundabout at the Foster Ave/Alliance Road intersection. During this time, there is the potential that several of the Sunset Area projects may be constructed and become operational. Since the City of Arcata does not have an adopted transportation mitigation program, the effect remains potentially significant. If this scenario were to happen, there is the potential for significant cumulative traffic impacts to occur until the two roundabouts are installed. For this reason, the City may adopt a Statement of Overriding Considerations for the proposed project related to traffic impacts.

The Traffic Study also reviewed potential impacts to pedestrian, bicycle, and transit facilities. The Study concluded that existing facilities are not adequate to accommodate several of the Sunset Area projects. Recommendations were made for improvements that would ensure that these projects will not decrease the performance or safety of public transit, bicycle, and pedestrian facilities (Appendix G). These projects will be required to construct the improvements recommended in the Traffic Study, or as required by the City of Arcata, to minimize potential impacts on alternative modes of transportation. The recommendations for onsite pedestrian/bicycle improvements and an off-site transit stop have been included as part of the proposed project. As such, cumulative impacts related to transportation will be less than significant upon construction of the future transportation improvements identified in the Traffic Study.

4.2 Significant Unavoidable Adverse Effects

The following discussion is intended to fulfill the requirements of State CEQA Guidelines §15126.2(b) that states:

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.

Under the proposed project, most project related actions will result in either “No Impact” or “Less Than Significant Impacts” to the various resource areas investigated. Detailed mitigation measures have been identified in Chapter 3 (Environmental Analysis) of this draft EIR and are intended to mitigate project effects to the extent feasible. These mitigation measures are also identified in the Executive Summary.

The City of Arcata commissioned W-Trans to conduct a comprehensive Traffic Study (Appendix G) to address the cumulative impacts associated with the potential development of the Sunset Area approved/planned projects. The Traffic Study concluded with recommendations for several near-term and future transportation infrastructure improvements that would reduce the impacts of the projects to a less than significant level. Mitigation has been included in this draft EIR Chapter 3.3 (Transportation) requiring the applicant to pay a fair share proportion of the transportation improvements. The future transportation

improvements recommended in the Traffic Study may not be constructed prior to the operation of several of the Sunset Area projects. Some of the projects may be delayed in obtaining all necessary entitlement for several years. Nonetheless, there is the potential that significant traffic impacts may occur until these transportation improvements are in place. Since the City of Arcata does not have an adopted transportation mitigation program, the effect remains potentially significant.

While impacts to Transportation remain potentially significant even after mitigation, the project will combine two nearby existing but outdated facilities into one modern centrally located facility, which will improve the quality of and accessibility to medical services within the local community. Because the Draft EIR identifies traffic as an impact that cannot be reduced to a less than significant level until the transportation improvements recommended in the Traffic Study (Appendix G) are constructed, a Statement of Overriding Considerations may be adopted by the City of Arcata for the proposed project.

4.3 Significant Irreversible Environmental Changes

The following discussion is intended to fulfill the requirements of CEQA Guidelines §15126.2(c) that states:

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.

Implementation of the project will commit non-renewable resources during construction and operation. During construction, the use of building materials (e.g., lumber and forest products, sand and gravel, asphalt, cement, steel, glass, etc.) and energy resources (e.g., gasoline, diesel fuel, electricity) largely would be irreversible and irretrievable. Energy will be consumed in processing building materials and for transporting these materials and construction workers to the project site. Resources consumed during construction of the project, (such as fuel and building materials) will be used in quantities comparable to similar sized development in the region and State and are not considered a wasteful use of resources.

With respect to operational activities, compliance with all applicable building codes, as well as project mitigation measures or project requirements, would ensure that natural resources are conserved or recycled to the maximum extent feasible. As discussed in the Initial Study (Appendix L), the project would not involve a wasteful or unjustifiable use of energy or other resources, and energy conservation and generation efforts would also occur with the proposed construction and operation of the project. Therefore, the use of energy on site would occur in an efficient manner.

The proposed project will utilize 100 percent of the proposed site which will result in removal of approximately 1,163 square feet of potential three parameter wetlands. As discussed in the draft EIR Biological Resources Section 3.2, the project includes wetland mitigation that complies with the City's no net loss policies and is considered less than significant. As the project will result in a permanent structure, parking areas, and landscaped areas, this is considered to be an irreversible environmental change.

4.4 Growth-Inducing Impacts

The following growth inducing impacts discussion is intended to fulfill the requirements of CEQA Guidelines §15126.2(d) that states:

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 wastewater treatment plant might, for example, allow for more construction in service areas). Increases in population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic 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.

The proposed project will consolidate two existing health care facilities that currently serve the community. The project is intended to provide more efficient services and may result in a slight increase in the number of patients and visits over what the two existing clinics combined currently serve; however, any increase is not expected to be substantial (see Project Description Table 2). In addition, the number of employees will decrease slightly as a result of the project. The proposed project does not involve the development of any additional housing units or services that would promote growth in the area. There are no features of the project that would be expected to cause secondary or growth-inducing impacts. Infill development is an important component of the City's commitment to reduce impacts on the environment. Therefore, it is assumed the current health care facilities will be occupied with permitted land uses according to the commercial zoning district. Therefore, the proposed project would not be growth-inducing.

4.5 Economic and Social Effects

According to §15131 of the CEQA Guidelines, economic or social information may be included in an EIR or may be presented in whatever form the agency desires. §15131 of the CEQA Guidelines also states:

- a) *Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed to any detail greater than necessary to trace the cause and effect. The focus of the analysis shall be on the physical changes.*
- b) *Economic or social effects of a project may be used to determine the significance of a physical change caused by a project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant. As an additional example, if the construction of a road and the resulting increase in noise in an area disturbed existing religious practices, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment. The religious practices would need to be analyzed only to the extent to show that the increase in traffic and noise would conflict with the religious practices. Where an EIR uses economic or social effects to determine that a physical change is significant, the EIR shall explain the reason for determining that the effect is significant.*

- c) *Economic, social and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information from these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project.*

The proposed project would have a positive social effect on the surrounding community. The proposed project will provide quality health care services to residents of rural Del Norte and Humboldt Counties. The project will further Open Door's mission to provide essential affordable primary health care in a state-of-the-art facility. Open Door has clinics throughout this area with the focus of reaching the entire community. The north coast region often faces shortages of health care professionals; a lack of local specialty care; disproportionate numbers of elderly, poor and under-insured patients; and, patients with complex medical conditions and high rates of chronic disease and illness. By design, Open Door provides comprehensive services including primary medical care by physicians, nurse practitioners, physician assistants, and certified nurse midwives all supported by registered nurses, care managers, behavioral health clinicians medical assistants and others who help monitor treatment progress and health maintenance and provide education, counseling, encouragement and assistance navigating the health care landscape, typically at levels far beyond that which a private practice can provide.

Open Door attempts to create a positive social effect on the surrounding community. It is a significant contributor to the economy of the area, with more than 750 employees corporate-wide and nearly 200 in the Arcata area. Their services address patients' need for housing, food, financial assistance, transportation and behavioral health care. Open Door provides primary medical care and related support services without discrimination for people experiencing homelessness, addiction and mental illness. Other programs are offered for: patients testing positive for HIV/AID, Hepatitis B and Hepatitis C infection; women's and men's sexual and reproductive health; comprehensive perinatal care; LGBTQ and Transsexual individuals. Some Open Door clinics provide primary dental care; others provide specific pediatric care for children with basic as well as complex needs. Open Door has a department dedicated to assisting patients access available insurance and other benefits, such as food stamps. Working in collaboration with other community agencies, Open Door assists patients access resources available to address basic needs and insecurities such as housing, food, income and social supports.

Currently, Open Door operates two separate facilities located in close proximity to one another in downtown Arcata. These facilities are currently located in buildings not originally designed as medical facilities that are suffering from deteriorating infrastructure. By consolidating these two facilities into one modern facility specifically designed for medical needs, Open Door can provide more efficient and comfortable care to its patients and an improved working environment for medical providers. The proposed project is also situated in a location that is easy to access due to its close proximity to Highway 101 and the proposed bus stop approximately 500 feet from the facility. The potential for improved medical care and improved access may have a positive social effect on the community despite the potentially significant Transportation impact discussed earlier.

In addition, when Open Door purchased the property in 2014 they provided a portion of their property to facilitate the Foster Avenue extension. The Foster Avenue extension improves access between Alliance Road and Highway 101, and alleviates traffic that previously had to use Sunset Avenue, and adversely impacted the Sunset neighborhood. The completion of the Foster Avenue extension also enabled the continued development of nearby housing projects to the benefit of the community. The current project includes a vacation of portions of remnant Caltrans easement associated with US Highway 101 near the Sunset/Foster roundabout (Figure 2- dashed line across the northeast portion of the property). In addition

portions of the City's street rights of way will be vacated for proposed landscape and bioretention areas (Figure 2- area outside east property line). The City Engineering Division is preparing necessary documents for these vacations that require City Council approval.

5.0 Alternatives to Proposed Project

5.1 Introduction to Alternatives

Section 15126.6 of the State CEQA Guidelines requires all EIR's to consider and discuss alternatives to the proposed project. That section states:

- a) *Alternatives to the Proposed Project. An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.*
- b) *Purpose. Because an EIR must identify ways to mitigate or avoid significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*
- c) *Selection of a range of reasonable alternatives. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or significantly lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.*
- d) *Evaluation of alternatives. The 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 effects 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 project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.*
- e) *"No Project" Alternative.*

The specific alternative of "no project" shall also be evaluated along with the impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's

environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (see Section 15125 CEQA Guidelines).

The “no project” analysis shall discuss the existing conditions at the time of the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

- f) *Rule of Reason. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.*

5.2 Consideration for Selection of Alternatives

Attainment of Project Objectives

The purpose of the proposed project is to consolidate two aging medical facilities operated by Open Door Community Health Centers (Open Door) into one up to date and easily accessible facility. By consolidating and relocating the two facilities, the current locations will be available for re-use. As stated in the project description in Chapter 2, the objectives of the project are as follows:

- Increase efficiency by merging two health center facilities (Humboldt Open Door Clinic and North Country Clinic) into a single, centrally located, easily accessible location
- Improve health center environment for clients and staff
- Build a state-of-the-art facility that will serve as a “medical home”
- Set the stage for Open Door to continue to serve the local community

The following alternatives will be discussed in terms of how well they meet the objectives of the project and how they would impact the current environmental setting.

Summary of Project Impacts

As discussed in the environmental analysis in Chapter 3 and the Initial Study (Appendix L), the proposed project will have less than significant impacts in most resource areas. However, there is the potential for significant impacts to Biological Resources and Transportation. Potentially feasible alternatives were developed with consideration of avoiding or lessening the significant, and potentially significant, adverse impacts of the project, as identified in Chapter 3 of this Draft EIR and summarized below.

Biological Resources

The proposed project will impact 100 percent of the project site which would result in the loss of approximately 1,163 square feet of three parameter wetlands. This would be an irreversible environmental change as the site will be converted to include permanent structures, parking areas, and low-impact design (LID) landscaping. These impacts are proposed to be mitigated by creating near-by

wetland habitat at a not less than 2:1 ratio (created: impacted). With implementation of this mitigation measure the biological impacts would be considered less than significant.

Transportation

The proposed project has the potential to increase traffic at several nearby intersections. Based on the *Central Arcata Areawide Traffic Impact Study* (Appendix G), the intersections at Alliance Road/Foster Avenue and Sunset Avenue/US 101 North Ramps and LK Wood Boulevard may experience LOS that exceed the City's operational thresholds should the proposed project be implemented. In an effort to mitigate this impact, the proposed project has included incentives to reduce vehicle traffic including contribution to construction of a new bus stop, bicycle parking, and ride share incentives. Additionally, Open Door would contribute funding for future intersection improvements. Although the City has identified the improvements needed to mitigate the identified traffic impacts and the project will pay the recommended traffic impact fee, the City has not adopted a formal traffic mitigation program to implement the mitigation prior to the project being developed and operational. As a result, the proposed project could result in peak hour traffic delays that exceed the City's current thresholds for certain intersections and therefore a significant impact would occur.

Alternative Considered but Not Evaluated Further

As described above, State CEQA Guidelines Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project purpose need not be addressed in detail in an EIR. In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). The following renovation alternative was not considered feasible and is not evaluated further in this EIR for the reasons discussed below.

The renovation alternative would involve assessment and upgrading of the current Open Door facilities located in Arcata including both Humboldt Open Door Clinic and North Country Clinic. This alternative would not accomplish the basic project objects as it would not: increase efficiency by merging the two facilities, substantially improve the health center environment, build and operate a single state-of-the-art facility that will serve as a "medical home" for clients and staff, and would not set the stage for Open Door to continue to serve the local community into the future. Both existing facilities are operating in aging buildings that were not designed for medical uses. The original design of the buildings limits the ability to fully upgrade them to meet current medical facility standards. This alternative was determined to not meet the project objectives and is not considered feasible, and thus is not evaluated further.

5.3 Project Alternatives and Analysis

In order to satisfy CEQA guidelines as outlined above, the following is a discussion of alternatives to the proposed project and evaluation of potential impacts. For purposes of comparison, conclusions for alternatives are characterized as impacts that are greater, similar, or less; to describe conditions that are worse than, similar to, or better than those of the project. Details on these alternatives and an evaluation of environmental effects relative to the proposed project, are provided below.

ALTERNATIVE 1 – No Project

The No Project Alternative is the scenario of not implementing the project. As such, no site changes would occur, and the lot would remain vacant. While this alternative would result in no impacts, leaving the on-site wetlands intact and reducing potential traffic concerns, it would not meet the project objectives.

Biological Resources

Alternative 1 would not result in impacts to biological resources because there would be no site development or disturbance. While impacts on biological resources under the project were determined to be less than significant with implementation of mitigation, it would be "no impact" under Alternative 1.

Transportation

Alternative 1 would leave the site in its current unused state and would not generate any vehicle trips. Under this alternative near-by residential development would continue to occur resulting in similar traffic impacts as the proposed project. Impacts under Alternative 1 would be slightly less than the project.

ALTERNATIVE 2 – Reduced Project Size

The Reduce Project Alternative would reduce the size of the project by 50% (to approximately 15,500 square feet). This would allow for one of Open Door's existing Arcata facilities to be relocated, but could not accommodate the needs of both North Country Clinic and Humboldt Open Door Clinic. This Alternative would result in similar impacts to the proposed project site during construction and operation. Alternative 2 would meet some, but not all of the project objectives as it would not allow for the complete consolidation of the two existing clinics.

Biological Resources

Alternative 2 would develop a smaller facility on the project site, which could potentially avoid some wetland impacts. However, because the wetlands are located on two separate areas on the site, it is unlikely that all wetland impacts could be avoided with this alternative. Impacts on biological resources under the project were determined to be less than significant with implementation of mitigation and impacts under Alternative 2 would be similar to the project.

Transportation

The Reduce Project Size Alternative has the potential to reduce the number of vehicle trips to the proposed facility which may slightly decrease the transportation effects of the project. However, due to other projects planned for the area, it is still expected that impacted intersections would reach a level of service that exceeds City thresholds and any additional traffic at these intersections was determined a potentially significant impact by the City. As such, impacts under Alternative 2 would be similar to the project.

ALTERNATIVE 3 – Alternate Location

The Alternate Location Project Alternative would develop the proposed project on a site in McKinleyville. While the Alternate Location Alternative would accomplish some of the project goals, it would not be centrally located or easily accessible in relation to downtown Arcata. This Alternative would result in no impacts to the currently proposed site, but would result in similar impacts when developing a currently vacant alternate location. Further environmental analysis would be required for the alternative site to fully assess the potential impacts. Additionally, Open Door does not currently own the Alternate site and would have to invest further in land acquisition to build at an alternate location.

Biological Resources

Alternative 3 would avoid impacts to biological resources at the current site by the proposed project. Specific site conditions (i.e. presence of wetlands or other sensitive biological resources) at the alternative location are unknown at this time. However, impacts on biological resources under the project were determined to be less than significant with implementation of mitigation; and impacts under Alternative 3 are anticipated to be similar to the project.

Transportation

Alternative 3 would leave the project site in its current unused state and would not generate any vehicle trips near the identified intersections of concern. Under this alternative near-by residential development would continue to occur resulting in similar traffic impacts as the proposed project. The alternate location would be located further from Highway 101 and downtown Arcata which would result in greater vehicle miles traveled (VMT) to and from the site than the project. Therefore, transportation impacts under Alternative 3 would be less than the project at near-by intersections, but greater in terms of VMTs.

5.4 Environmentally Superior Alternative

Because the No Project Alternative (described above) would avoid all adverse impacts resulting from construction and operation of the Arcata Community Health Center analyzed in Chapter 3, it is the environmentally superior alternative. However, the No Project Alternative would not meet the project objectives as presented above. When the environmentally superior alternative is the No Project Alternative, the State CEQA Guidelines (Section 15126[d][2]) require selection of an environmentally superior alternative from among the other action alternatives evaluated. As described in the discussion above, both Alternatives 2 and 3 would result in similar impacts as the proposed project. Alternative 3 could be considered the environmentally superior alternative because it would eliminate biological resource impacts on the project site and would not impact the intersections of concern within the City of Arcata. As discussed above, Alternative 3 would not meet all project objectives because it would not be centrally located or easily accessible in relation to downtown Arcata.

6.0 List of Preparers

LEAD AGENCY

City of Arcata - Community Development Department

APPLICANT

Open Door Community Health Centers

INFORMATION SUPPORTING ENVIRONMENTAL DOCUMENT PREPARED BY

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7.0 References

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