

3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

This ~~Draft~~ Final EIR evaluates and discloses the environmental impacts associated with the Student Housing Project, in accordance with CEQA Section 21000 et seq. and the State CEQA Guidelines (CCR, Title 14, Chapter 3, Section 15000 et seq.). It has been determined that buildout of the project would not significantly affect several environmental resource topics. Under the CEQA statute and the State CEQA Guidelines, a lead agency may limit an EIR's discussion of environmental effects when such effects are not considered potentially significant (PRC Section 21002.1[e]; State CEQA Guidelines Sections 15128, 15143). Information used to determine which impacts would be potentially significant was derived from review of the proposed project, review of applicable planning documents and CEQA documentation, fieldwork, feedback from public and agency consultation, and comments received on the Notice of Preparation (NOP) (see Appendix A of this ~~Draft~~ Final EIR). Summary discussions of the project effects found not to be significant are presented in this chapter, under "Effects Found Not to Be Significant."

Sections 3.1 through 3.12 of this ~~Draft~~ Final EIR present a discussion of regulatory background, existing conditions, environmental impacts associated with construction and operation of the project, mitigation measures to reduce the level of impact, and residual level of significance (i.e., after application of mitigation, including impacts that would remain significant and unavoidable after application of all feasible mitigation measures). Issues evaluated in these sections consist of environmental topics identified for review in the NOP prepared for the project (see Appendix A of this ~~Draft~~ Final EIR). Chapter 4, "Cumulative Impacts," presents an analysis of the project's impacts considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the State CEQA Guidelines. Chapter 5, "Alternatives," presents a reasonable range of alternatives and evaluates the environmental effects of those alternatives relative to the proposed project, as required by Section 15126.6 of the State CEQA Guidelines. Chapter 6, "Other CEQA Sections," includes an analysis of the project's growth-inducing impacts, as required by PRC Section 21100(b)(5) and Section 15126 of the CEQA Guidelines.

Sections 3.1 through 3.12 of this ~~Draft~~ Final EIR each include the following components:

Regulatory Setting: This subsection presents information on the laws, regulations, plans, and policies that relate to the issue area being discussed. Regulations originating from the federal, State, and local levels are each discussed as appropriate.

Environmental Setting: This subsection presents the existing environmental conditions on the project site and in the surrounding area as appropriate, in accordance with State CEQA Guidelines Section 15125. The discussions of the environmental setting focus on information relevant to the issue under evaluation. The extent of the environmental setting area evaluated (the project study area) differs among resources, depending on the locations where impacts would be expected. For example, air quality impacts are assessed for the air basin (macroscale), as well as the site vicinity (microscale), whereas aesthetic impacts are assessed for the project site vicinity only.

Environmental Impacts and Mitigation Measures: This subsection presents thresholds of significance and discusses potentially significant effects of the project on the existing environment, including the environment beyond the project boundaries, in accordance with State CEQA Guidelines Section 15126.2. The methodology for impact analysis is described in each section, including technical studies upon which the analyses rely. The thresholds of significance are defined, and thresholds for which the project would have no impact are disclosed and dismissed from further evaluation. Project impacts and mitigation measures are numbered sequentially in each subsection (e.g., Impact 3.2-1, Impact 3.2-2, Impact 3.2-3, etc.). A summary impact statement precedes a more detailed discussion of the environmental impact. The discussion includes the analysis, rationale, and substantial evidence upon which conclusions are drawn. The determination of level of significance of the impact is defined in bold text. A "less-than-significant" impact is one that would not result in a substantial adverse change in the physical environment. A "potentially significant" impact or "significant" impact is one that would result in a substantial adverse change in the physical environment; both are treated the same under CEQA in terms of procedural requirements and the need to identify feasible mitigation. Mitigation measures are identified, as feasible, to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section

15126.4. Unless otherwise noted, the mitigation measures presented are recommended in the EIR for consideration by Cal Poly Humboldt to adopt as conditions of approval.

Where an existing law, regulation, or permit specifies mandatory and prescriptive actions about how to fulfill the regulatory requirement as part of the project definition, leaving little discretion in its implementation, and would avoid an impact or maintain it at a less-than-significant level, the environmental protection afforded by the regulation is considered before determining impact significance. Where existing laws or regulations specify a mandatory permit process for future projects, performance standards without prescriptive actions to accomplish them, or other requirements that allow substantial discretion in how they are accomplished, or have a substantial compensatory component, the level of significance is determined before applying the influence of the regulatory requirements. In this circumstance, the impact would be potentially significant or significant, and the regulatory requirements would be included as a mitigation measure.

This subsection also describes whether mitigation measures would reduce project impacts to a less-than-significant level. Significant and unavoidable impacts are identified as appropriate in accordance with State CEQA Guidelines Section 15126.2(b). Significant and unavoidable impacts are also summarized in Chapter 6, "Other CEQA Sections."

References: The full references associated with the references cited throughout Sections 3.1 through 3.12 can be found in Chapter 8, "References," organized by section number.

CALIFORNIA STATE UNIVERSITY AUTONOMY

Cal Poly Humboldt is part of the CSU, which is a constitutionally created State entity and is therefore not subject to local government planning and land use plans, policies, or regulations. Although there is no formal mechanism for joint planning or the exchange of ideas, Cal Poly Humboldt may consider, for coordination purposes, aspects of local plans and policies for the communities surrounding the campus when it is appropriate. The proposed project (Student Housing Project) would be subject to State and federal agency plans and regulations described herein but would not be bound by local or regional plans and regulations, such as the City's General Plan or municipal code.

Cal Poly Humboldt seeks to maintain an ongoing exchange of ideas and information and to pursue mutually acceptable solutions for issues that confront both the campus and its surrounding community. To foster this process, Cal Poly Humboldt participates in, and communicates with, City, Humboldt County (County), and community organizations and sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning effort and consider community input.

EFFECTS FOUND NOT TO BE SIGNIFICANT

Agricultural and Forestry Resources

The project site is located in a developed area of the City, was previously developed as a lumber mill, and is now underutilized/vacant in several areas. Surrounding land uses include an industrial (lumber mill) facility, single-family residential neighborhoods, and public roadways. The project site is not included as part of the State of California's Farmland Mapping and Monitoring Program (DOC 2019), nor has it been used for agricultural purposes for at least 50 years. Although the project site was historically used as a lumber mill, no forestry resources or lands designated for forestry purposes are located within the project area. Development of the project site with new student housing and associated internal roadways, parking, and landscaping would occur within the boundaries of the project site, as identified in Figure 2-3 of Chapter 2, "Project Description." The project would have no impact on agricultural or forestry resources, and this topic is not discussed further in this EIR.

Geology and Soils

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, and no mapped active or potentially active fault traces are known to traverse or project toward the site (Geocon 2022; City of Arcata 1998). Although the area is known to be a seismically active fault region, the project site is not located on any known faults or traces of active faults. The potential for surface fault rupture, therefore, is low. Although the City did identify an area within the southern portion of the project site as being potentially subject to liquefaction, more recent site-specific studies identified a low potential for liquefaction and other geologic hazards (Geocon 2022). Construction and operation of new buildings and infrastructure would meet current building standards, including the 2019 (or as updated) Building Energy Efficiency Standards and LEED v4 Silver certification and would not exacerbate earthquake potential in the project vicinity. Additionally, as a construction project that would disturb at least 1 acre of land, the project would require coverage under the Construction Stormwater General Permit State Water Resources Control Board (SWRCB) Water Quality Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002. Compliance with the NPDES General Permit requires applicants to submit a notice of intent to SWRCB and to prepare a stormwater pollution prevention plan (SWPPP). The SWPPP identifies best management practices (BMPs) that must be implemented to reduce construction effects on receiving water quality. The BMPs identified are directed at implementing both sediment and erosion control measures and other measures to control potential chemical contaminants. The permit also requires dischargers to consider the use of postconstruction permanent BMPs that remain in service to protect water quality throughout the life of the project. All NPDES permits also have inspection, monitoring, and reporting requirements. As demonstrated above, no potentially significant impacts (either through regulatory compliance or otherwise) would occur with respect to geology and soils; therefore, these issues are not discussed further in this EIR.

Hazards and Hazardous Materials

The SWRCB GeoTracker website does not identify any active hazards related to underground storage tanks (USTs) and other types of contamination within the project site or surrounding area (SWRCB 2022). A Phase I Environmental Site Assessment (ESA) and a Phase II ESA were prepared for the site in 2015. While several recognized environmental conditions were identified in the Phase I ESA, including two properly disposed underground storage tanks, further testing indicated that there are no recognized environmental conditions or hazardous materials on the project site (Blue Rock Environmental 2015a and 2015b). Historically, two USTs were located on-site and were disposed of appropriately. As a result, they are not considered current recognized environmental conditions at the project site (Blue Rock 2015). Further, the California Department of Toxic Substances Control's (DTSC's) EnviroStor website also does not identify any hazards related to any cleanup sites within the project site (DTSC 2022). For these reasons, the project site is not included on a list of hazardous-materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List) (CalEPA 2022). Transportation of hazardous materials on area roadways is regulated by the California Highway Patrol and California Department of Transportation, whereas use of these materials is regulated by DTSC, as outlined in CCR Title 22. Cal Poly Humboldt would be required to use, store, and transport hazardous materials in compliance with local, State, and federal regulations during facility construction and operation. Any disposal of hazardous materials would occur in a manner consistent with applicable regulations and at an appropriate off-site disposal facility. Therefore, adverse impacts related to the handling of potentially hazardous materials as a result of the project are not anticipated.

Arcata Elementary School is located approximately 340 feet south of the project site; however, no direct access to or from the elementary school would occur during project construction/operation. Furthermore, operation of the proposed on-site uses (student residences and associated amenities), as noted above, would not involve the handling of hazardous or acutely hazardous materials, substances, or waste. Therefore, no potentially hazardous emissions or other hazards to the school would occur.

Implementation of the project would not involve modifying existing emergency routes or amending the City's Emergency Operations Plan. As noted in Section 3.11, "Transportation," primary site access would be maintained via St. Louis Road, and emergency access along Eye Street would also be maintained. Therefore, no impacts related to impairment or interference of an adopted emergency response or evacuation plan would occur.

Regarding wildland fire risk, and as noted in further detail below, the eastern edge of the project site is not located designated as within a High or Moderate Fire Hazard Severity Zone within the Local Responsibility Area (CalFire 2007). The area is not located within a high or very high fire hazard severity zone. The project would involve development on an infill site that is surrounded by urban/suburban development within the City. The project would not expose people or structures to increased risks related to wildland fires. Therefore, no impacts related to risk, loss, or injury involving wildfires would occur. As demonstrated above, no potentially significant impacts (either through regulatory compliance or otherwise) would occur with respect to hazards and hazardous materials; therefore, these issues are not discussed further in this EIR.

Hydrology and Water Quality

The existing project site is largely vacant with some buildings and structures, including the Craftsman's Mall collection of warehouses, located in the northeastern and southwestern portions of the site. The majority of the project site is unpaved with some paved areas located at and near St. Louis Road and around on-site buildings. Stormwater flows at the site currently pond or sheet flow to the northwest before discharging to Janes Creek. Project implementation would increase the area of impervious surfaces on the site and would include new drainage features and infrastructure. As stated above under "Geology and Soils," as a construction project that would disturb at least 1 acre of land, the project would require coverage under the Construction Stormwater General Permit SWRCB Water Quality Order No. 2009-0009-DWQ, NPDES General Permit No. CAS000002. Compliance with the NPDES General Permit requires applicants to submit a notice of intent to SWRCB and to prepare a SWPPP. The SWPPP identifies BMPs that must be implemented to reduce construction effects on receiving water quality. The BMPs identified are directed at implementing both sediment and erosion control measures and other measures to control potential chemical contaminants. The permit also requires dischargers to consider the use of postconstruction permanent BMPs that remain in service to protect water quality throughout the life of the project. All NPDES permits also have inspection, monitoring, and reporting requirements.

To reduce the volume and rates of increased runoff following project implementation, Cal Poly Humboldt would adhere to applicable NPDES requirements governing the retention of stormwater flows on-site. As described in Section 3.12, "Utilities and Service Systems," Cal Poly Humboldt would provide a direct connection to existing City stormwater infrastructure in the area, but on-site flows would be limited so as to prevent an increase in stormwater flow rates discharged to an off-site location, consistent with NPDES requirements. New drainage features would include on-site impoundment, including landscaped retention areas capable of providing 24-hour impoundment/retention of stormwater. As shown in Figure 2-9, these features would be located within the oval-shaped courtyard areas in the western half of the project site. Other low-impact development methods, including design features associated with roads, parking lots, buildings, and landscaping, would be implemented to maintain pre-project runoff levels. The proposed on-site design would provide adequate stormwater storage capacity for a 100-year storm and control stormwater discharge rates in accordance with regional water quality control board requirements.

The Federal Emergency Management Agency designates the majority of the project site, including all proposed areas of development, as being located within Zone X, an area outside the 500-year floodplain (FEMA 2016). Within the northwestern portion of the site, Janes Creek and a portion of the undeveloped area located adjacent to the existing single-family residences are identified as being located within the 100-year flood zone. However, as noted previously, no project-related development would occur within these areas. As a result, implementation of the project would not place new structures, including housing, in a flood hazard area or impede or redirect flood flows. Therefore, the project would have no impact related to flood hazards.

The project site is not within an area subject to seiche or tsunami (Geocon 2022). As demonstrated above, no potentially significant impacts would occur with respect to hydrology and water quality as a result of regulatory compliance; therefore, these issues are not discussed further in this EIR.

Mineral Resources

Based on a site-specific geotechnical investigation that was conducted in 2015, the project site consists primarily of imported fill with a mixture of silts and clays, as well as undocumented fill. No mineral resources were discovered or are known to occur at the project site (Geocon 2022). As a result, project implementation would not result in the loss of any known mineral resources, and no impact would occur. This issue is not discussed further in this EIR.

Wildfire

The project site and surrounding land uses are not defined/designated as a High Fire Hazard Severity Zone and are not located within a State Responsibility Area (CAL FIRE 2022). Due to the site's location within an urban/suburban setting that is served by the Arcata Fire Department (see Section 3.10, "Public Services and Recreation"), the risk of wildfire is low, and this issue not discussed further in this EIR.

INTRODUCTION TO THE ANALYSIS

As required by the State CEQA Guidelines (CCR Section 15126.2), this ~~Draft~~ Final EIR identifies and focuses on the significant direct and indirect environmental effects of the project. Short-term effects are generally those associated with construction, and long-term effects are generally those associated with operation of the project. This chapter addresses the environmental setting, environmental impacts, and mitigation measures associated with the project in relation to the following resource topics:

- ▶ Section 3.1, "Aesthetics";
- ▶ Section 3.2, "Air Quality";
- ▶ Section 3.3, "Archaeological, Historical, and Tribal Cultural Resources";
- ▶ Section 3.4, "Biological Resources";
- ▶ Section 3.5, "Energy";
- ▶ Section 3.6, "Greenhouse Gas Emissions";
- ▶ Section 3.7, "Land Use and Planning";
- ▶ Section 3.8, "Noise";
- ▶ Section 3.9, "Population and Housing";
- ▶ Section 3.10, "Public Services and Recreation";
- ▶ Section 3.11, "Transportation"; and
- ▶ Section 3.12, "Utilities and Service Systems."

STANDARD TERMINOLOGY

This ~~Draft~~ Final EIR uses the following standard terminology:

"No impact" means no change from existing conditions (no mitigation is needed).

"Less-than-significant impact" means no substantial adverse change in the physical environment (no mitigation is needed).

"Potentially significant impact" means an impact that might cause a substantial adverse change in the environment (mitigation is recommended because potentially significant impacts are treated as significant).

“Significant impact” means an impact that would cause a substantial adverse change in the physical environment (mitigation is recommended).

“Significant and unavoidable impact” means an impact that would cause a substantial adverse change in the physical environment and that cannot be avoided, even with the implementation of all feasible mitigation.

“CSU” refers to the California State University system as a whole.

“Trustees” refers to the CSU Board of Trustees, the CEQA lead agency for this ~~Draft~~ Final EIR.

“Cal Poly Humboldt” refers to California State Polytechnic University, Humboldt.

“Student Housing Project” or **“project”** refers to the proposed Cal Poly Humboldt Student Housing Project. The proposed project and anticipated environmental effects of development that would occur under the project are evaluated in this EIR.