



# Memorandum

February 07, 2024

<b>To</b>	David Loya, Director of Community Development, City of Arcata		
<b>Cc</b>	Netra Khatri, City Engineer, City of Arcata		
<b>From</b>	Andrea Hilton, Environmental Planning Lead	<b>Tel</b>	+1 707 443 8326
<b>Subject</b>	City of Arcata US 101 Sunset Avenue Interchange Project - Review for CEQA Exemption	<b>Project no.</b>	12577015

## 1. Introduction

GHD has performed a California Environmental Quality Act (CEQA) compliance review for the City of Arcata's Sunset Avenue Interchange Project (Project). This memorandum provides a brief description of the Project, summarizes the CEQA exemptions for which the Project qualifies, and reports the findings of supporting documentation.

## 2. Project Background and Overview

The Project is intended to improve traffic, pedestrian, and bicycle operations and safety at the Sunset Avenue interchange with US 101 in Arcata, California. US 101 serves as a primary regional roadway in Humboldt County and is critically important to the residents and economy of Arcata. The US 101 / Sunset Avenue interchange is one of the major access points for both pedestrians and vehicles to enter the California State Polytechnic University, Humboldt campus. The existing intersection controls, roadway geometry, and the high volumes of local and regional traffic at the US 101 / Sunset Avenue interchange result in poor traffic operation at and near the intersections, including substandard bicycle/pedestrian facilities with long unprotected crossings.

The Project will replace the three existing stop-controlled intersections with two roundabout controlled intersections, one on either side of US 101. A five-leg roundabout will be constructed at the intersection of Sunset Avenue with LK Wood Boulevard and the northbound US 101 ramps. A four-leg roundabout will be constructed at the intersection of Sunset Avenue with G Street/H Street and the southbound US 101 ramps. The Project will also include improved bicycle and pedestrian facilities at the highway bridge overcrossing and intersections. The Project will simplify and improve navigation and traffic operations on and around the US 101 / Sunset Avenue interchange.

The Project will accommodate the expected volume and diversity of users and mobility modes. The Project includes ramp and road realignments, pavement resurfacing/replacement, shared use paths, sidewalks, curb and bike ramps, refuge islands, crosswalks, bike lanes, on-street parking, two roundabouts, lighting, landscaping, signage, and utility improvements.

The Project is located along an urban portion of Sunset Avenue and US 101 between mileposts 86.7 and 87.1 in Arcata, Humboldt County, California. The Project is in sections 28 and 29 of township T6N and range R1E, and on the Arcata North U.S. Geological Survey (USGS) 7.5" quadrangle.

Funding for the Project construction remains unidentified, which makes it challenging to anticipate the future construction date. However, construction before 2026 is not anticipated. Up to 18 months will be needed to construct the Project. Staging is expected to occur within the evaluated Project Area. If required, additional staging in nearby developed areas, such as parking lots, may also occur. Access to the Project and staging areas will be via paved roads.

The Project does not include the removal of regulated vegetation or habitats such as wetlands or Sensitive Natural Communities. If possible, vegetation affected by construction will be removed outside of nesting bird season. If vegetation removal outside of nesting bird season is infeasible, pre-construction nesting bird seasons will be conducted. If nests are identified, appropriate buffers will be established in coordination with the California Department of Fish and Wildlife.

The existing highway on and off ramps at Sunset Avenue may require periodic closures during off-peak hours (nighttime). Construction activities would include implementation of a Construction Zone Enhanced Enforcement Program and traffic controls such as flaggers to set up traffic shifts, temporary striping, temporary barriers, channelizers, and barricades access to California State Polytechnic University, Humboldt campus and the Arcata Skate Park. In accordance with Caltrans standards, a Traffic Control Plan will be prepared that includes coordination of construction with other projects in the area and is planned to avoid overlapping construction schedules or, if not practical, to minimize impacts to congestion, emergency access, and alternative modes of transportation.

Construction would involve the use of conventional construction equipment and ground disturbing activities. Most vertical excavation will extend less than three feet below the existing ground with a deeper excavation depth of five to 20 feet to install a retaining wall along the southwest side of the interchange. Noise control measures will be implemented during construction, including temporary noise barriers, screening of stationary equipment, locating staging areas away from noise-sensitive receptors, and prohibiting unnecessary idling of internal combustion engines

### **3. Review for CEQA Exemption**

The Project was reviewed relative to the CEQA Guidelines to determine if it qualifies under a class of projects that has been determined not to have a significant effect on the environment and which may be exempted. The Project meets the criteria under Section 15301 (c) (Existing Facilities), Section 15302 (c) (Replacement or Reconstruction), and Section 15303 (d) (New Construction or Conversion of Small Structures), which are described below.

#### **Section 15301 (c): Existing Facilities**

Class 1 - Section 15301(c) consists of operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. Section 15301 (c) specifically applies to existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities. This includes grading for the purpose of public safety. The Project includes alteration to the existing interchange facility. The upgraded facility will not add new automobile lanes or substantially increase the capacity of the roadways. The Project will result in a negligible expansion of use, if any, and will benefit public safety. The Project includes alterations to structures in the form of relocation of existing storm drainage, lighting, and utility infrastructure as well as pedestrian and bicycle facilities. This is a negligible expansion of use and is not growth inducing, therefore meeting this criterion.

## Section 15302 (c): Replacement or Reconstruction

Class 2 - Section 15302 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced. Section 15302 (c) specifically applies to replacement of existing utility systems and/or facilities involving negligible or no expansion of capacity. The Project includes reconstruction of the existing interchange and will have the same purpose and capacity. This is a negligible expansion of use and is not growth inducing, therefore meeting this criterion.

## Section 15303 (d): New Construction or Conversion of Small Structures

Class 3 - Section 15303 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. Section 15303 (d) specifically includes water mains, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction. Utilities within the Project Area will be upgraded and/or realigned to be compatible with Project improvements, consistent with Section 15303 (d).

### 3.1 CEQA Guidelines Section 15300.2 Exceptions

Section 15300.2 of the CEQA Guidelines includes a list of circumstances in which a categorical exemption cannot be used. As part of a review for exemption, GHD evaluated the Project against each of the applicable exceptions, including project location, cumulative impacts, significant effects due to unusual circumstances, scenic highways, hazardous waste sites, and historical resources.

- a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- b) Cumulative Impact. All exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place over time is significant.
- c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.
- e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As part of this review for exemption, GHD evaluated the Project against each of the applicable exceptions, summarized below.

## 15300.2 (a) - Location

CEQA Guidelines Section 15300.2 (a) specifies that certain classes of exemptions are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. For this Project, Section 15300.2 (a) applies to the exemptions used under Section 15303 (Class 3). The Project will be located within a developed area, and Project activities are localized and temporary and are not anticipated to result in any long-term or significant impacts. Additionally, the activities are focused within the existing interchange and roadway footprint.

The facility is already developed, and natural habitat is limited as a result. The Project site is an anthropogenic highway interchange including associated ruderal habitat that is regularly mowed and maintained. The Project will require a small amount of vegetation removal including mature trees. A biological review of the Project Area was completed to confirm that Sensitive Natural Communities, special status plants or wildlife, and wetlands will not be impacted. Critical habitat pursuant to the federal Endangered Species Act is not present. Aquatic habitat is also absent (City of Arcata 2023, GHD 2023a).

The Project Area is located near an Alquist-Priolo Earthquake Fault Zone; however, the Project does not include construction or operational activities that will increase the risk of fault instability or seismic-related hazards. Additionally, a Federal Emergency Management Agency (FEMA) flood hazard zone is not present in the Project area (GHD 2023a). The cultural resources investigation prepared for the Project did not identify archaeological or historical resources within the Project Area (Roscoe and Associates 2024).

The improved lighting will support public safety in accordance with City and Caltrans requirements. The lighting system will be designed and utilized in a manner that minimizes light spill and glare. A visual resources evaluation completed for the Project confirmed there will be no adverse impacts related to aesthetic resources (GHD 2023b).

Based on the review, the location exception under CEQA Guidelines Section 15300.2(a) does not apply to the Project.

## 15300.2 (b) - Cumulative Impact

CEQA Guidelines Section 15300.2(b) specifies that a Categorical Exemption shall not be used when the cumulative impact of successive projects of the same type in the same place over time is significant. Potentially cumulative projects were identified during the Project's biological review and are summarized below in Table 1. This includes a list of past, present, and probable future projects.

**Table 1: Summary of Cumulative Projects**

Project Name and Location	Project Description	Estimated Construction Schedule	Relevancy to the Project's Potential Cumulative Impacts
Annie & Mary Trail Connectivity Project	Closes gaps in walking and biking connectivity for neighborhoods within north Arcata.	2024 or 2025	The Project intersects with the trailhead of the Annie and Mary Trail near the Arcata Skate Park.
Arcata High School Sports Complex Upgrade (located directly adjacent to the Project Area, off Sunset Avenue near Arcata Skate Park)	Expansion and upgrade of sports facilities, amenities, and access.	Complete	Could contribute to pedestrian, bicycle, and vehicular traffic through the interchange.
30 <sup>th</sup> Street Housing Project with Yurok Indian Housing Authority (located approximately	Approximately 36 units of affordable housing, safe and accessible walkways and bike lanes, and a pedestrian bridge to	Complete	Marginal relevance, housing is located approximately 0.6 mile from the Sunset Interchange; however, additional housing

<b>Project Name and Location</b>	<b>Project Description</b>	<b>Estimated Construction Schedule</b>	<b>Relevancy to the Project's Potential Cumulative Impacts</b>
0.6-mile northwest of the Project Area)	connect residents to surrounding neighborhoods and amenities.		could contribute to increased pedestrian, bicycle, and vehicular traffic through the interchange.
Cal Poly Student Expansion and Additional Housing on and off-campus (Cal Poly Humboldt is located immediately east, and Craftsman's Mall site is located 0.3 mile north of the Project Area)	Approximately 2,000 new units of student and multi-family residential housing.	Craftman's Mall development is underway. Other improvements are planned for the future, timeline to be determined.	Could contribute to pedestrian, bicycle, and vehicular traffic through the interchange.
Upzones/Zoning Modifications at Craftsman's Mall located 0.3 mile north of the Project Area	Land use planning projects to allow for greater density of development in select locations.	Approx. 2022, no construction will be required.	Could contribute to pedestrian, bicycle, and vehicular traffic through the interchange.
St. Louis Road Trail Extension (located near St. Louis Road and Sunset Avenue)	Future trail access.	Future, timeline unknown	This Project will provide a new access point to the Arcata Annie & Mary Trail and could contribute to increased pedestrian traffic.
Sunset Terrace (located at 1301 Sunset Avenue; between Sunset Avenue and Foster Avenue)	Multi-family residential facility with approximately 142 one-bedroom residential units.	Complete	Residents are nearby and could contribute to pedestrian, bicycle, and vehicular traffic through the interchange.
Canyon Creek Apartments (located at Todd Court, adjacent to Larson Park)	Multi-family residential.	Future, timeline unknown	Residents are nearby and could contribute to pedestrian, bicycle, and vehicular traffic through the interchange.
Westwood Garden Apartments (located near Westwood Court; approximately 0.45-mile from the Project Area.)	Approximately 102 residential units.	2023 or later	Marginal relevance, housing will be located approximately 0.4 mile from the Sunset Interchange; however, additional housing could contribute to pedestrian, bicycle, and vehicular traffic through the interchange.
Arcata Elementary Safe Routes to School Active Transportation Project (located within the Sunset and Westwood Neighborhoods from Alliance Road to Arcata Elementary School and Stromberg Avenue to Foster Avenue)	Pedestrian and bicycle safety education programs, sidewalk and intersection improvements.	2019, Complete	Projects have synergistic goals to provide safe alternative transportation routes to important locations such as schools and residences.
Humboldt Bay Trail North (located along the GRTA ROW, a portion of US 101 corridor, City-owned ROW, and private	Multi-use trail.	Complete	Humboldt Bay Trail South will also be completed in approximately 2023, contributing to pedestrian and

Project Name and Location	Project Description	Estimated Construction Schedule	Relevancy to the Project's Potential Cumulative Impacts
property. The trail alignment occurs from the US 101 and Bracut intersection to Larson Park, adjacent to the Project Area)			bicycle traffic in the Project Area.
Caltrans – Three Hum Bridges (located near HUM-101-PM 86.77, immediately south of Project Area)	Bridge seismic retrofit.	2021, Complete	Bridge is directly connected to the Sunset Interchange. No additional cumulative impacts are expected.

The Project's biological review concluded that the Project will not contribute to a cumulative impact to biological resources (City of Arcata 2023). The Project will enhance multi-modal facilities specifically to enhance connectivity between current and future housing, existing and future trails, downtown Arcata, and the university campus. This emphasis on multi-modal transit will reduce climate-related impacts otherwise associated with motorized-focused transportation. Thus, other planned projects, when combined with the proposed Project, will not have the potential to create a significant cumulative impact on an environmental resource.

Given construction funding for the Project has not yet been secured, the construction start date is not yet known. It is likely the Project will be constructed in 2026 or later. However, all but two of the projects noted in the Table 1 summary of potentially cumulative projects have already been completed or will be completed before 2025. Cumulative effects related to construction resulting from projects implemented before 2026 will not occur, as construction for potentially cumulative projects and the proposed Project does not overlap. Significant cumulative operational impacts also will not occur, as the proposed Project will enhance pedestrian and bicycle transit and safety while improving intersection function and safety for the interchange overall.

The St. Louis Road Trail Extension, start date unknown, has a small footprint to connect the future Annie and Mary Trail to the residential neighborhoods near St. Louis Road, improving non-motorized connectivity in the City. A significant cumulative impact will not result from the St. Louis Road Trail Extension Project.

The construction timeline for the Canyon Creek Apartments also remains unknown. The complex will be located near Todd Court off Eye Street and does not share an overlapping footprint or access with the proposed Project. If the two projects were to be constructed concurrently, a cumulative impact will not occur due to the physical difference between the two projects. Future occupants of the Canyon Creek Apartment housing would have direct and easy access to the future Annie and Mary Trail as well as the multi-modal and other interchange improvements resulting from the proposed Project. A potentially cumulative construction or operational impact will not result from the Canyon Creek Apartment project.

Based on the review, the Project when combined with the cumulative projects, is not anticipated to create a significant cumulative impact on an environmental resource. Therefore, no cumulative impacts will result. Therefore, the cumulative impact exception under Section 15300.2(b) does not apply to the Project.

### 15300.2 (c) - Significant Effect from Unusual Circumstances

CEQA Guidelines Section 15300.2(c) specifies that a Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. The environment within and adjacent to the Project Area is not unusually sensitive. Construction impacts will be temporary. The future use of the Project Area will be consistent with the existing use.

No permanent impacts to designated critical habitat or sensitive species are expected. No adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat

conservation plan exists for the Project Area. The proposed improvements are consistent with exempt classes of projects and the Project does not have a feature that distinguishes it from others in the exempt classes, such as size or location. The Project will not impact an environmental resource of hazardous or critical concern. No unusual circumstances have been identified, and no potentially significant impacts that could occur due to the Project have been identified. Therefore, the exception under Section 15300.2(c) is not applicable.

### 15300.2 (d) - Scenic Highways

CEQA Guidelines Section 15300.2(d) specifies that a Categorical Exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. Highway US 101 in the Project area is not an officially-designated State scenic highways and no other State-designated scenic highways are located adjacent to or in view of the Project (Caltrans 2023). Therefore, the exception under Section 15300.2(d) is not applicable to the Project.

### 15300.2 (e) - Hazardous Waste Sites

CEQA Guidelines Section 15300.2(e) specifies that a Categorical Exemption shall not be used for a project located on a site which is included on a list compiled pursuant to Section 65962.5 of the Government Code. To determine if any portion of the Project conflict with Section 65962.5 of the Government Code and to complete environmental due diligence related to hazardous resources, an Initial Site Assessment was completed for the Project (GHD 2023c). The objective of the Initial Site Assessment is to identify areas of potentially impacted soil and/or groundwater limited to a 1/4-mile (1,320 feet) radial study area that may require special handling and disposal during construction or will potentially pose a health exposure risk to construction workers. The Initial Site Assessment concluded that there are no recognized environmental conditions or known contamination within the Project Area.

The Project site is not included on any of the hazardous waste lists pursuant to Section 65962.5 of the Government Code (GHD 2023c), and no adjacent sites were identified where contamination may have extended onto the Project Area. Therefore, the exception under Section 15300.2(e) does not apply to the Project.

### 15300.2 (f) - Historical Resource

CEQA Guidelines Section 15300.2(f) specifies that a Categorical Exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource. A cultural resources investigation was completed for the Project and concluded there are no historic properties, inclusive of considerations for archaeological resources, identified within the Project Area (Roscoe and Associates 2024). Therefore, the Project will not impact any known historical resources. Therefore, the exception under Section 15300.2(f) does not apply to the Project.

## 4. Conclusion

The Project qualifies for a combination of Class 1, Class 2, and Class 3 Categorical Exemptions from CEQA under Sections 15301 (c), 15302 (c), and 15303 (d) of the CEQA Guidelines. The environmental review and documentation reported above did not identify any significant effects that will occur from the Project, and the exceptions listed in Section 15300.2 of the CEQA Guidelines were found not to apply to the Project.

## 5. References

- Caltrans. 2023. Scenic Highway System Lists. Available online: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-live-i-scenic-highways> Accessed on December 1, 2023.
- City of Arcata. 2023. Natural Environment Study for the Sunset Avenue and Highway 101 Interchange Project, Arcata, Humboldt County, California. Prepared by GHD Inc.
- GHD. 2023a. Wetland Delineation Report for the Arcata US 101 Sunset Avenue Interchange Project. Prepared for the City of Arcata.
- GHD. 2023b. Visual resources Technical Memorandum for the Sunset Avenue and Highway 101 Interchange Project. Prepared for the City of Arcata.
- GHD. 2023c. Sunset Avenue an LK Wod Boulevard Improvements Project Initial Site Assessment. Prepared for the City of Arcata.
- Roscoe and Associates. 2024. Archaeological Survey Report for the Proposed US 101 Sunset Avenue Interchange Project, City of Arcata, Humboldt County, California.