

ATTACHMENT 3

**CEQA ADDENDUM TO THE
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR THE NEW HEART COMMUNITY CHURCH
PROJECT FOR THE LAUREL TREE CHARTER SCHOOL PROJECT**

*New Heart Community Church Initial Study/Mitigated Negative Declaration (IS/MND)
(State Clearinghouse #2008092066), December 2008.*

*APN 511-401-039, 899 Murray Road
McKinleyville, County of Humboldt*

**Prepared By
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Background

Project History – The originally approved project for New Heart Community Church included development of a church and private school in three (3) phases (CDP-07-067). Project buildout included approximately 42,000 square feet of structures consisting of the church facility, large auditorium, and seminar and classroom building, as well as an extensive parking lot (approximately 60,000 square feet) consisting of approximately 248 parking spaces. The project also included an amendment to the Local Coastal Plan (HUM-MAJ-2-09) allowing for a change of the land use designation and zoning of the property from Commercial Recreation to Public Facilities – Urban. The Coastal Development Permit (CDP-07-067) was originally approved by the Board of Supervisors on December 9, 2008 but did not become effective until the Coastal Commission approved the project on January 14, 2011. Four extensions have been applied for and approved and the current expiration date of the permit is January 14, 2022. The Initial Study and Mitigated Negative Declaration (IS/MND) adopted for the project specified that there were no potentially significant impacts that could not be mitigated to a less than significant level.

Project Description: Modification of a previously approved Coastal Development Permit to accommodate a proposal to develop a vacant parcel with a school to be operated by Laurel Tree Charter School serving children from Kindergarten through High School. The school is expected to serve between 180 and 200 children with approximately 24 employees. Drop off and pick up times are staggered to reduce traffic congestion.

The whole school facility will be fenced. The main buildings include: seven (7) 36 feet by 48 feet passive solar design classroom pods with two 980 square feet classrooms per pod with 6 restrooms and outdoor storage in central location, kitchen/office/janitorial building with classroom, and 16 foot by 24 foot barn with 4 single occupancy restrooms at north end of building with electrical and hose bib. Outdoor features include: a 16 foot by 50 foot outdoor kitchen, a children's stage with 40 foot conex box for storage/backstage space, 30 foot by 80 foot hoop house with hose bib, a 20 feet by 30 feet covered bike/skateboard/scooter storage, trash enclosure, impervious basketball court, tree fort area, 30 foot by 30 foot outdoor workspaces to have wind or solar power, 233 cubic yard capacity pond, access path to the Hammond Trail, entry fence with 2 automatic rolling gates, 8,400 square feet of pervious surface, gated walking path from Hammond Trail, gated entry to fire pit, and a sidewalk along Ledru Ave. The proposed permeable parking lot with 52 spaces includes 5 electric vehicle spaces and 3 accessible spaces, and a drive aisle for pick up and drop off. The outdoor stage/play area will host student presentations and creative plays. The space will also serve as venue for periodic small theatrical productions of student work. These types of events are expected to occur in the evening from 6-8pm, approximately 3-4 times a year. Events ordinarily include a potluck and attendance by approximately 80 parents is anticipated. The parcel to be developed is approximately 4.5 acres in size and is served by public water and sewer.

The impacts of the proposed modification are equal to or less than those resource sections analyzed in the IS/MND adopted on December 9, 2008 (SCH#2008092066). The MND identified potentially significant impacts to Aesthetics, Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, and Noise.

Purpose - Section 15164 of the California Environmental Quality Act (CEQA) provides that the lead agency shall prepare an addendum to a previously certified Final Environmental Impact Report (EIR) if some changes or additions are necessary but none of the conditions described in Section 15162 calling for a subsequent EIR or Negative Declaration have occurred. Section 15162 states that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the

whole record, one or more of the following:

1. Substantial changes are proposed in the project which require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final EIR was certified as complete, shows any of the following: A) the project will have one or more significant effects not discussed in the previous Final EIR; B) significant effect previously examined will be substantially more severe than shown in the Final EIR; C) mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or D) mitigation measures or alternatives which are considerably different from those analyzed in the Final EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Summary of Significant Project Effects and Mitigation Recommended

No changes are proposed for the MND recommended mitigations. The proposal to authorize a school and associated parking lot, fencing, accessory structures, and stormwater features are fully consistent with the impacts identified and adequately mitigated in the originally approved IS/MND. The project is conditioned to implement responsible agency recommendations, and results in no significant adverse environmental effects beyond those identified in the IS/MND.

In reviewing the application for consistency with the adopted IS/MND, the County considered the following information and studies, among other documents:

- Laurel Tree Charter Site Plan received February 16, 2022.
- Plan of Operation received May 5, 2021
- Student and employee home locations received July 20, 2021.
- VMT Analysis prepared by County of Humboldt dated March 2022 (located at end of this document)

EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT

See **Purpose** statement above.

The discussion below each impact category summarizes the analysis of why the proposed project does not create any additional impacts that have not been analyzed in the IS/MND. In the areas where the IS/MND found significant impacts requiring mitigation, the analysis below shows the project does not have impacts that would be substantially more significant than those identified in the IS/MND. The areas Agriculture and Forest Resources, Biology, Mineral Resources, Geology and Soils, Population and Housing, Recreation, and Land Use and Planning are not further discussed as no impact was identified for these categories in the MND, and in reviewing these

categories with the submitted materials for Laurel Tree Charter School, it can be determined that there is no evidence to suggest further environmental review is need for these categories.

Aesthetics

Original Finding: There were two potentially significant impacts unless mitigations are incorporated: 1) degradation of the existing visual character or quality of the site and its surroundings, and 2) create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Original Discussion: There is a possibility that the church could create a source of substantial light or glare which would adversely affect day or nighttime views in the area. Most facilities with large parking lots choose to install lighting standards for both security purposes and for the convenience of their customers. Given that the proposed use is adjacent to a residential neighborhood, these lighting impacts shall be minimized to a degree that they will not negatively impact the neighbors.

Mitigation Measure #1 - The owner/applicant shall develop the most minimal number of lighting standards of the lowest wattage possible. All lighting shall be established within the interior of the parcel, closest to the church buildings, down shielded and directed into the property so as to not create nighttime adverse impacts on residential neighbors. There shall be no lighting (other than low-wattage motion sensor-triggered security lighting) on the north and west sides of the subject parcel.

The eastern portion of the site, along the newly constructed Hammond Trail has a chain-link fence. A landscaping plan, utilizing native vegetation as Mitigation Measure #2, will reduce impacts to visual resources from the street and neighbor's view. The intent of this is to screen visual impacts from adjacent parcels. The ocean is located approximately ¾-mile from the site and cannot be seen from the project parcel or neighboring houses. Due to the position of the parcel, with Highway 101 directly east and Murray Road to the south, the project will not block any scenic views to the coast.

Mitigation Measure #2 - The Landscaping Plan approved by the Planning Commission shall be implemented and in place prior to occupancy of the church. This measure shall be verified by the Building Inspections Division (BID).

These Mitigation Measures shall be noted on the Development Plan. With this measure in place, Staff is confident that the project's potential impacts to nighttime views will be less than significant.

Addendum Discussion: The project is for a charter school on a vacant lot adjacent to a residential neighborhood and community trail, the Hammond Trail. The project has the potential to affect the visual character of the existing landscape by introducing light glare from installation of lighting to the site and on buildings. The proposed buildings are designed to be low impact and sustainable structures to reduce energy and construction materials, compared to the approved church. Mitigation Measures 1 and 2 will be implemented as identified in the MND and will reduce the impact to less than significant.

Agricultural Resources

Original finding: There were no potentially significant impacts identified in the agricultural resources section of the IS/MND.

Addendum Discussion:

There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering

agricultural resources. The parcel does not have a planning or zoning designation for agricultural use. The surrounding parcels are developed with residences. The Public Facilities designations do not support agricultural uses.

Air Quality

Original finding: There were no identified impacts in the air quality section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering air quality. The proposed project involves less construction and fugitive dust than those of the construction of New Heart Church due to less paved parking area, less construction activities, and less total developed area than New Heart Church.

Biological Resources

Original finding: There were no potentially significant impacts identified in the biological resources section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering biological resources. The entire project area was subject to a biological and botanical study which found no sensitive species would be impacted by development of the property and there are no project elements that are outside of the original study area.

Cultural Resources

Original finding: There was one potentially significant impact unless mitigation incorporated in the cultural resources section of the IS/MND: This project may cause a substantial adverse change in the significance of an archeological resource pursuant to Section 15064.5. The mitigation measure to mitigate to a less than significant impact:

Mitigation Measure #3: Should any inadvertent discovery of cultural resources or human remains occur during construction activities, all work shall cease and the proper protocols set into place. Work shall immediately cease and the County Coroner shall be called to the site in the event that human remains are discovered or a professional archeologist should work unearthen cultural resources.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering cultural resources. The project was referred to Blue Lake Rancheria, the Wiyot Tribe, and the Northwest Information Center (NWIC). NWIC recommended consultation with the tribes. The tribes recommended inadvertent archeological discovery protocol.

Energy

Energy was not a required section in 2008 when the IS/MND was adopted.

Addendum discussion: The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. The project would not conflict or obstruct any state or local plan for renewable energy or energy efficiency. The proposed project will utilize passive solar design that may reduce energy consumption compared with conventionally designed buildings.

Geology and Soils

Original finding: There were no potentially significant impacts identified in the geology and soils section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering geology and soils. An R-1 Engineering/Geologic Report was reviewed and approved by the Building Division. Grading and site development are required to adhere to the recommendations of the approved R-1 report. There is no development that is outside of the scope of the originally approved R-1 report.

Greenhouse Gas Emissions

Greenhouse gas emissions was not a required section in 2008 when the IS/MND was adopted.

Addendum discussion: The project would not generate greenhouse gas emissions, neither directly nor indirectly, that may have a significant impact on the environment. The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The VMT analysis showed that the project is presumed to not have a significant impact due to it being a locally serving public charter school. Because the biggest contributor of GHGs is transportation, it can be presumed that there will not be a significant impact on GHGs due to the VMT analysis showing no significant impact on VMT. Active transportation features are incorporated into the project design, such as the location along the Hammond Trail, bike/scooter/skateboard storage, and electric vehicle parking in the parking lot.

Hazards and Hazardous Materials

Original finding: There was one potentially significant impact unless mitigation incorporated in the hazards and hazardous materials section of the IS/MND:

-The project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials unless mitigation is incorporated. The proposed project does not involve routine transport, use, or disposal of hazardous materials. Even so, the construction contractor is responsible for developing and implementing a Stormwater Pollution Prevention Plan (SWPPP), which will also include a Spill Prevention Control and Countermeasure Plan (SPCCP). As part of the SPCCP, absorbent materials will be stored on site and all jobsite employees will be properly trained to deal with hazardous material spills in the event of an accidental release. By implementing Mitigation Measure 4, the potential for a less than significant impact resulting from the accidental resource of a hazardous substance is mitigated further to reduce the potential impacts of the project:

Mitigation Measure #4: Minimize impacts from hazardous spills. The applicant/owner is required to submit a Stormwater Pollution Prevention Plan (SWPPP) which will also include a Spill Prevention Control Countermeasure Plan (SPCCP) for the LUD's review and approval per the attached LUD's Conditions of Approval.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering hazards and hazardous materials. There are no proposals for the handling, storage, or transport of hazardous materials.

The project is not included on a list of hazardous material sites. The project is located in a low fire risk area, and is in the Arcata Fire Protection District. It is not within the State Responsibility Area for fires. It is not adjacent to wildlands.

The site is within 1 mile of the Arcata-Eureka Airport, a public airport. The site is subject to the Airport Land Use Compatibility Zone C, and conditions of approval require adherence to the requirements of the Airport Land Use Compatibility Plan. There are no private airstrips within 25 miles of the site. The project will not result in a safety hazard for people residing or working in the

project area in terms of the nearby public airport.

Access is provided by a driveway on Murray Road, which is paved to a width of 30 feet. Public Works approved the proposed improved driveway on Murray Road, which was designed to enable fire trucks to enter and exit safely.

Hydrology and Water Quality

Original finding: There were two potentially significant impacts unless mitigation incorporated in the hydrology and water quality section of the IS/MND:

The project will not violate any water quality standards or waste discharge requirements. Unless mitigated, the project would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The construction contractor is responsible for developing and implementing a Stormwater Pollution Prevention Plan (SWPPP), which will also include a Spill Prevention Control and Countermeasure Plan (SPCCP). As part of the SPCCP, absorbent materials will be stored on site and all jobsite employees will be properly trained to deal with hazardous material spills in the event of an accidental release. By implementing Mitigation Measure #4, the potential for a significant impact resulting from the accidental release of a hazardous substance is mitigated to a less than significant level. One of the requirements to meet the County's standards regarding run-off and drainage will be met by implementation of the LUD's conditions. These improvements and maintenance requirements will help filter polluted run-off before it can enter any natural drainage courses or the County's storm drain system which, in this neighborhood, drains into Norton Creek.

Mitigation Measure #4: The contractor shall be responsible for developing and implementing an SWPPP for each phase of project construction, which will also include an SPCCP (in the event of an accidental release of pollutants) to the satisfaction of the County of Humboldt.

Mitigation Measure #5: The applicant/owner is required to submit and implement recommendations of the approved drainage plan per the LUD's Conditions of Approval.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering hydrology and water quality. The amount of paved and developed surface of the proposed school is less than that of the proposed church.

Public Works is requiring the following, which are conditions of approval: The applicant is required to comply with MS4 requirements for stormwater discharge. Storm water runoff from the commercial parking lot and building site shall not be channeled or directed to flow across the sidewalk or traveled section of the County roadway. Drainage shall be contained on-site in an oil/water filtration system prior to discharge into the County storm drain system or piped under the sidewalk to the County road surface.

The Public Works requirements, mitigation measures, and less paved surface of the school than the church, should result in a lesser impact to hydrology/water quality than that of the church.

Land Use Planning

Original finding: There were no potentially significant impacts identified in the land use planning section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering land use planning. The project is consistent with the McKinleyville Local Coastal Plan and the zoning ordinance as both the planning and zoning designations are Public Facility. Laurel

Tree Charter School is consistent with these designations as it is a public charter school. There is no conflict with the proposed project and any habitat conservation plan or natural community conservation plan. The project does not physically divide an established community.

Mineral Resources

Original finding: There were no potentially significant impacts identified in the mineral resources section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering mineral resources. The project does not involve extraction of mineral resources and is not or adjacent to a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

Noise

Original finding: The project may result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies unless mitigation is incorporated; and may result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. According to Figure 3-2 of the Framework Plan, churches are normally acceptable at noise levels of up to 65 decibels (65dB), and the maximum interior noise level at a church is 45 dB. The church property lies approximately 135' from the center of the nearest travel lane on Highway 101. According to the 1999 Environmental Impact Report for the McKinleyville Community Plan, a 65 dB noise level is expected in the year 2020 within 185' from the center of the nearest travel lane on Highway 101. The project parcel is located approximately 30 feet above the exit lane and separation reduces noise on the site from the highway to some degree. Conditions of approval require that church facilities constructed within 185' of the center of the nearest travel lane on Highway 101 include construction materials and techniques to achieve a 45 dB interior noise level. The church facilities will be located entirely indoors. There are outdoor playgrounds that might cause ambient noise in the area to increase. Conditions of approval limit the hours the outdoor playground area may be used to between 7:00 am and 10:00 pm. With these conditions of approval, the noise impacts of the project are reduced to less than significant levels.

Mitigation Measure #6: Conditions of approval require that church facilities constructed within 185' of the center of the nearest travel lane on Highway 101 include construction materials and techniques to achieve a 45 dB interior noise level.

Mitigation Measure #7: Conditions of approval limit the hours the outdoor playground area may be used to between 7:00am and 10:00pm. With these conditions of approval, the noise impacts of the project are reduced to less than significant levels.

Addendum discussion:

The school will have indoor and outdoor spaces. An acoustical analysis was prepared for a property across Highway 101 from the subject parcel (the northwest corner of Ocean West Manufactured Home Park) which is adjacent to an off-ramp, which makes the parcels locations' proximity to Highway 101 very similar. Therefore, a reasonable assumption could be made that the noise levels are similar for the two properties. This analysis showed that noise levels outdoors, adjacent to the off-ramp, behind a fence, were CNEL 56 dBA. According to the General Plan, typical speech is measured at 60 dBA.

Noise levels inside the buildings will be attenuated to achieve a CNEL 45 dBA through appropriate construction materials, as required in Mitigation Measure #6 above. There will be no potentially

significant impacts with Mitigation Measures #6 and #7 incorporated. There is no anticipated difference between the noise impacts to and from the proposed church and to and from the proposed school due to anticipated hours of operations, construction materials, and noise measurements.

Population and Housing

Original finding: There were no potentially significant impacts identified in the population and housing section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering population and housing. The project is not displacing or removing any housing, and is not inducing population growth in the area directly or indirectly. The current student body of Laurel Tree Charter School has an equal amount of students living in McKinleyville and in Arcata. The school is currently located in Arcata. Therefore, it is not anticipated that this project would induce population changes in the County.

Public Services

Original finding: There were no potentially significant impacts identified in the public services section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering public services. The proposed project is consistent with the planned build-out of the area. All of the public service agencies have either recommended approval or conditional approval of the project, or had no comment. No issues were identified with regard to public services.

Recreation

Original finding: There were no potentially significant impacts identified in the recreation section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering recreation. The project may increase the use of the Hammond Trail due to the proposed school's location adjacent to the trail. However, it is not anticipated that the increased use will accelerate physical deterioration of the trail. The project does not include recreational facilities that will have an adverse physical effect on the environment.

Transportation and Circulation

Original finding: The IS/MND analyzed Level of Significance (LOS) and a Traffic Impact Study was prepared to identify impacts on Traffic and Circulation. This study found that the project would generate a less than significant traffic impact.

Addendum discussion: Since adoption of the IS/MND, as of July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using Vehicle Miles Traveled (VMT) consistent with Section 15064.3 of the CEQA Guidelines. The analysis, included at the end of this addendum, demonstrates that there are no potentially significant impacts from VMT. The project is consistent with the Transportation and Circulation findings identified in the IS/MND. SHN prepared a Traffic Analysis in 2008 using Level of Service for the church, which showed that LOS levels at the affected intersections would be maintained below a level of significance for vehicular or pedestrian traffic during peak hours. While the travel patterns anticipated from the school are different than those

of the church, project design measures attempt to reduce the amount of cars entering and exiting the school within the same time period, and reduce the number of cars traveling to the school in a given day.

The drop off and pick up times of the school schedule are staggered by grade to reduce traffic congestion. The project's location along the Hammond Trail, and use of bike/scooter/skateboard storage are incorporated into the project design to reduce the number of students traveling by car to school. The project will be conditioned to comply with Public Works' requirements for the driveway to maintain site visibility and a safe turning radius into the driveway from Murray Road.

Tribal Cultural Resources

Tribal cultural resources was not a required section in 2008 when the IS/MND was adopted.

Addendum discussion: The project would not have a potentially significant impact on tribal cultural resources. It would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and this is: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The project was referred to Bear River Band of the Rohnerville Rancheria, Blue Lake Rancheria, the Wiyot Tribe, and the Northwest Information Center (NWIC) for comment and recommendations on tribal cultural resources. NWIC recommended that an archeological survey be conducted, and to contact local tribes. The Tribal Historic Preservation Officers (THPO) of both Blue Lake Rancheria and the Wiyot Tribe recommended archeological discovery protocol. The Bear River Band of the Rancheria did not respond. Archeological discovery protocol is a condition of approval for the project.

Utilities and Service Systems

Original finding: There were no potentially significant impacts identified in the utilities and service systems section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church, and the projected impacts of the proposed Laurel Tree Charter School when considering utilities and service systems. The project will not result in or require the construction of new water or wastewater treatment facilities or expansion of existing facilities. The McKinleyville CSD recommended approval of the project. The project is not anticipated to generate a larger amount of solid waste than the proposed church.

Wildfire

Wildfire was not a required section in 2008 when the IS/MND was adopted.

Addendum discussion:

The project is not located in or near a state responsibility areas or lands classified as very high fire hazard severity zone. The subject property is not near wildlands associated with the Wildland-Urban Interface. The Arcata Fire Protection district responds to fires in the project area. The project will not substantially impair an adopted emergency response plan or emergency evacuation

plan. The project will not exacerbate wildfire risks, expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors. The project will not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing risks to the environment. The project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The land is relatively stable and is not in an area of historic landslides.

Mandatory Findings of Significance

Original finding: There were no potentially significant impacts identified in the mandatory findings of significance section of the IS/MND.

Addendum discussion: There are no projected differences in the studied impacts of the approved New Heart Church and the projected impacts of the proposed Laurel Tree Charter School when considering mandatory findings of significance. There is no evidence suggesting that the project will substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory; or have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. The Biological Resource Assessment explained that the site has little value to native wildlife or plants other than being disturbed open space. No special status species are expected to occur on the project site or immediately adjacent to it based on a query of CNDDDB (California Natural Diversity Database) and surveys conducted by SHN. There is no evidence to suggest that the project will have any substantial adverse effects on human beings- directly or indirectly, with previously adopted mitigation measures implemented.

Other CEQA Considerations

Staff suggests no changes for the revised project.

EXPLANATION OF DECISION NOT TO PREPARE A SUPPLEMENTAL MITIGATED NEGATIVE DECLARATION OR ENVIRONMENTAL IMPACT REPORT

See Purpose statement above.

In every impact category analyzed in this review, the projected consequences of the current project proposal are either the same or less than identified and disclosed in the IS/MND. Based upon this review, the following findings are supported:

FINDINGS

1. The proposed project will modify a previously approved CDP/CUP to allow for construction of a public K-12 charter school, parking lot, stormwater features, landscaping, and accessory structures.
2. The circumstances under which the project was approved have not changed substantially. There are no new significant environmental effects and no substantial increases in the severity of previously identified effects.
3. For the current proposed project, there has been no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous IS/MND was adopted as complete.

CONCLUSION

Based on these findings it is concluded that an Addendum to the certified IS/MND is appropriate to address the requirements under CEQA for the current project proposal. All of the findings, mitigation requirements, and mitigation and monitoring program of the IS/MND, remain in full force and effect.

VMT analysis for Laurel Tree Charter School

McKinleyville, Humboldt County

PLN-2021-17206

APN 511-401-039

Methodology

SB 743 required the Governor's Office of Planning and Research (OPR) to establish recommendations for identifying and mitigating transportation impacts within CEQA. In response, OPR prepared a document referred to in this memorandum as OPR's Technical Advisory. OPR's Technical Advisory recommends methodologies for quantifying VMT, significance thresholds for identifying a transportation impact, and screening criteria to quickly identify if a Project can be presumed to have a less than significant impact. Lead agencies are to adopt local guidelines appropriate for their jurisdiction. At this time, the County of Humboldt is yet to adopt VMT guidelines. Therefore, this VMT analysis has been prepared in accordance with OPR's Technical Advisory guidance. The Project consists of a public charter school for children in grades K-12. Also, per the recommendations in OPR's Technical Advisory, the Project is first evaluated using a screening criteria. If a component of the Project meets one of the specified screening criteria, that component of the Project can be presumed to have a less than significant impact. If a Project component does not meet a screening criteria, that component of the Project is then evaluated based on the applicable VMT threshold of significance. The screening criteria and VMT thresholds of significance used in this analysis are discussed below.

Table 1: Screening thresholds

Category	Criteria/Screening	Threshold	Screened Out (Yes/No)
Trip generation screening	Small Projects can be screened out from completing a full VMT analysis.	If the Project generates less than 110 trips per day, the Project is assumed to have a less than significant impact.	No
Map-based screening	Residential or office projects that are located in areas with low VMT can be screened out from completing a full VMT analysis.	If the Project is in a low VMT area, the Project is assumed to have a less than significant impact.	No
Proximity to transit	Projects within ½ mile of a major transit stop or a stop located along a high-quality transit corridor reduce VMT and therefore can be	If the Project is within ½ mile of a major or high-quality transit stop/corridor, the Project is assumed to have a less than significant impact.	No

	screened out from completing a full VMT analysis.		
Affordable Residential development	Affordable housing in infill locations can be screened out from completing a full VMT analysis.	If the Project is comprised 100% of affordable units and is located in an infill location, then the Project is assumed to have a less than significant impact.	No
Retail	Retail Projects that are locally serving can be screened out from completing a full VMT analysis.	If a retail project is considered to be locally (and not regionally serving), the Project is assumed to have a less than significant impact.	Yes; see explanation below.

Source: OPR, 2018

Trip Generation Screening – Caltrans' referral letter explained that the project would generate more than 110 trips per day and requested a VMT analysis. Since the Project is estimated to generate more than 110 daily trips, the small Project screening criteria does not apply.

Map-Based Screening – OPR's Technical Advisory recommends that residential and office Projects that are located in areas with low VMT per capita, and that incorporate similar features to the existing development in those areas, will exhibit similarly low VMT per capita and therefore will have less than significant impacts to VMT. At this time, Humboldt County has not developed a map-based resource or database for identifying areas in the County with low VMT per capita. Therefore, this screening criteria cannot be applied to the Project.

Proximity to High-Quality Transit – OPR's Technical Advisory indicates that a Project can be screened out as having a less than significant impact on VMT if the Project is within a half-mile of an "existing major transit stop or an existing stop along a high-quality transit corridor". A major transit stop is defined as the intersection of two or more major bus routes with a frequency service interval of 15 minutes or less during the morning and afternoon peak commute periods. A high-quality transit corridor is defined as an existing corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

Based on the definition described above, the Project would not be eligible to be screened out under this threshold since current bus stops within ½ mile of the Project site have frequency intervals of greater than 15 minutes. Therefore, the Project does not meet the criteria for a transit priority area screening.

Affordable Housing – OPR's Technical Advisory indicates that 100% affordable housing projects located in infill locations can be assumed to have a less than significant impact on VMT. The Project is not comprised 100% of affordable housing in an infill area, so this screening threshold does not apply.

Locally-Serving Retail – OPR's Technical Advisory indicates that if a Project proposes locally-serving retail uses that are 50,000 square feet or less is eligible to be screened out.

The Advisory states that the lead agency should determine whether a retail development is locally or regionally serving. If the project is regionally serving, the project may have a significant

impact if short trips are being replaced by longer ones. If the project is locally serving, it is presumed to have a less than significant impact.

Analysis:

While OPR's Technical Advisory does not specifically state what category schools would be considered, the County has determined that the Project has the most in common with the retail category, due to the following similarities: specific daily hours of operation, two groups of types of users who will generate trips (employees and shoppers; employees and parents/students), and peak hours. Other jurisdictions have made this comparison as well, such as the County of Santa Cruz and the City of Carlsbad.

The County considers Laurel Tree Charter School to be locally serving, because students who currently attend the school live within the areas of Trinidad, McKinleyville, Blue Lake, Arcata, and Eureka. The current demographics of students and staff are in Table 2 below. These locations are all within a 15-mile radius of the McKinleyville site (average distances in Table 3 below). For Humboldt County, this is considered local and not regional. Therefore, the project is screened out from needing to complete a full VMT analysis, and is presumed to have a less than significant impact in regards to VMT.

Table 2: Home locations of current students and staff with school currently in Arcata with 180 students (numbers provided by school)

Home Location	McKinleyville	Arcata	Eureka	Blue Lake	Trinidad	Total
# of students	67	65	44	2	2	180
# of staff	11	7	4	1	1	24

Table 3: Distance to proposed McKinleyville site (avg miles) (source: Google maps)

Average miles	4 miles (from McKinleyville Middle School)	3.9 miles (from Arcata Plaza)	12.8 miles (from Sequoia Park)	6.4 miles (from City Hall)	13.2 miles (from Trinidad Elementary)	
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Conclusion: The project is screened out from needing to complete a full VMT analysis, and is presumed to have a less than significant impact in regards to VMT.

Sources

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