Memo

455 Capitol Mall, Suite 300
Sacramento, CA 95814
916.444.7301

Date: December 22, 2025

To: Deirdre Clem, Cal Poly Humboldt

From: Mike Parker and Alta Cunningham

Subject: Cal Poly Humboldt Health Education Hub – Stewart Building

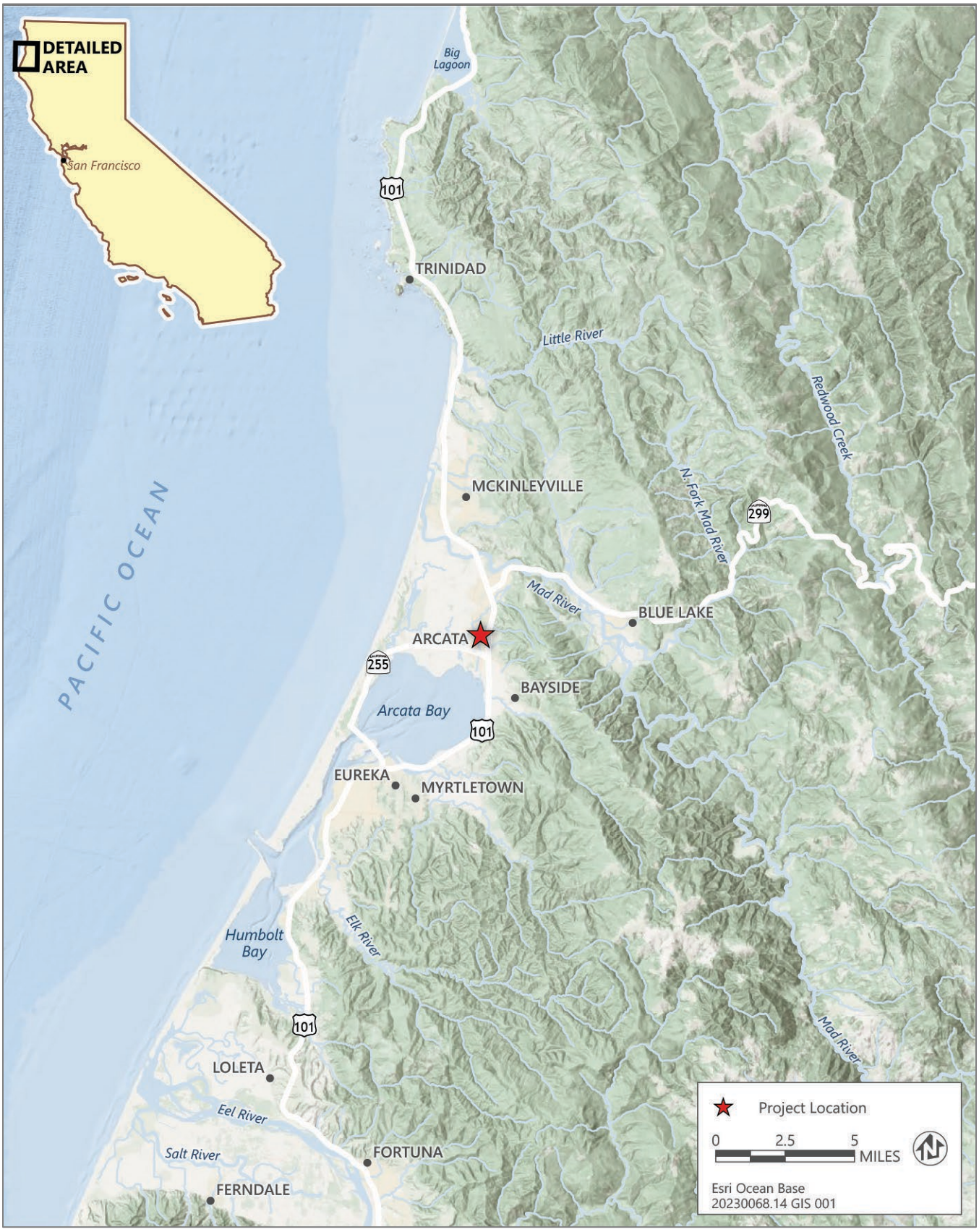
California State Polytechnic University, Humboldt (Cal Poly Humboldt) is proposing the renovation of the existing building located at 1125 16th Street, Arcata, to support the educational programs and functions of both Cal Poly Humboldt and College of the Redwoods. The following memorandum evaluates and provides evidence in support of the use of a Categorical Exemption (CE; Classes 1,3, and 31) in compliance with the California Environmental Quality Act (CEQA) for the development of Health Education Hub – Stewart Building (project).

As detailed under Section 1.3, "Exemptions under CEQA," Cal Poly Humboldt has determined that the Health Education Hub – Stewart Building project is exempt under CEQA Guidelines Section 15301, for existing facilities, on a separate and independent basis Section 15303, for conversion of small structures, and under Section 15331, for the restoration/rehabilitation of historical resources. Finally, the project qualifies under the common sense exemption (CEQA Guidelines Section 15061[b][3]).

1 PROJECT LOCATION

Cal Poly Humboldt plans to renovate an existing commercial building ("Stewart Building") located at 1125 16th Street, Arcata, Humboldt County, California (APN No. 020-133-003), as shown in Figure 1. The building site is located northwest of downtown Arcata, approximately 0.4 miles west of the Cal Poly Humboldt campus. The building site is bound by 15th Street to the south, L Street to the west, 16th Street to the north, and Stewart Park to the east. In addition to the building, the site has a surface parking lot and some landscaping and mature street trees, as shown in Figure 2. The project site, which spans approximately 1.58 acres, is designated as "Residential Low Density" in the City of Arcata General Plan and is zoned as Residential Low Density Planned Development (RLPD) (City of Arcata 2024; City of Arcata 2025). The building has recently been occupied by commercial/office uses, including fitness and art studios, physical therapy space, federal governmental agency offices, Cal Poly Humboldt office, program, and extended education spaces, and realtor offices.

Uses surrounding the project site include single-family residential homes to the east and south, a public park to the southeast, the Telio Christian Fellowship church to the west, and Arcata High School to the northwest. The closest sensitive receptors to the project site are single-family residential homes located along 16th Street, approximately 30 feet east of the project site, and along 15th Street, and approximately 120 feet south.



Source: Adapted by Ascent in 2025.

Figure 1 Regional Location

Source: Adapted by Ascent in 2025.

Figure 2 Project Site Location

2 PROJECT DESCRIPTION

Cal Poly Humboldt proposes to repurpose the Stewart Building to create a state-of-the-art Health Education Hub, which will include multiple high fidelity simulation labs that will replicate pre-hospital care, intra-hospital care, and home care experiences. The facility will have space for classrooms, offices, and a conference site to be used by Cal Poly Humboldt and College of the Redwoods. In addition to nursing education, it will also be used to train allied health professionals such as EMTs, paramedics, kinesiology and fall prevention specialists, physical therapists, psychiatric technicians, scrub technicians, respiratory therapy, radiology technicians, and more. Furthermore, the building will undergo seismic retrofitting, Americans with Disabilities Act (ADA)-compliant upgrades, and become a LEED Gold Equivalent certified per version 4 for BD+C of the USGBC standard. As a result, renovations to the interior and exterior of the Stewart Building will be required.

2.1 INTERIOR RENOVATIONS

Interior renovations will include seismic and utility upgrades as well as interior remodeling. Seismic retrofitting will include joist beams or rafters to span between load-bearing walls for seismic resistance. Upgrades to existing utilities will consist of updating existing lighting fixtures, flooring, plumbing, heating, ventilation and cooling. Additionally, current interior spaces will be reconfigured to create new work and learning environments, including classrooms, labs, and a conference hall consistent with the plans detailed above.

2.2 EXTERIOR RENOVATIONS

Renovations to the exterior of the building will be limited and consist of upgrading or replacing existing building features consistent with the existing historic character and design. The stairs and ramp, located to the east of the building, will be rebuilt to be ADA compliant. The old metal windows will be replaced with aluminum or fiberglass storefronts and will keep the same storefront pattern. The existing curved windows in the front will remain as is. The roof will be replaced with a Spanish tile-looking material such as a faux clay roof. Possible roof materials may include metal or composition shingles that will remain orange in color and would be placed along the building's perimeter. The exterior of the building, including the relief panels on the front, will be painted an off-white color with a dark bronze trim to be consistent with the historic color scheme that is used on several of the older buildings on the Cal Poly Humboldt campus (Gist Hall, Jenkins Hall, Trinity Early Learning Center). Additionally, the gutters and downspouts will be replaced and painted similar to the dark bronze color, which is also consistent with the historic building color scheme.

2.3 CONSTRUCTION WORKFORCE AND TIMING

During construction, an average of 40 construction workers may be present on site per day. Consistent with the City of Arcata's municipal code Chapter 9.30, construction would be limited to the hours between 8 a.m. and 7 p.m. on Monday through Friday and 9 a.m. and 7 p.m. on Saturday. Construction is scheduled to start in January 2026, and doors are planned to open in August 2027.

2.4 OPERATIONS

When Cal Poly Humboldt purchased the Stewart Building in 2022, it was fully occupied by commercial uses. Cal Poly continued this use by leasing out office space to the commercial uses described previously while also using the space to accommodate university programs. Cal Poly Humboldt used the space for their Osher Lifelong Learning Institute, part of the Cal Poly Humboldt's College of Extended Education, and also for TRIO Educational Talent Search. TRIO is

a federally-funded education support program, with the goal of increasing the number of youth from disadvantaged backgrounds who complete high school, enroll in post-secondary education, graduate, and find meaningful employment that pays a living wage. The project would continue these educational operations, hosting regular classes with students and faculty attendance from Cal Poly Humboldt and College of the Redwoods; various trainings for other health care professionals as described previously; and some conferences.

3 CATEGORICAL EXEMPTIONS UNDER CEQA

As noted above, the project appears to qualify for CEs under both Class 1 (Existing Facilities) and Class 3 (New Construction or Conversion of Small Structures). The following provides the definitions of Classes 1 and 3 as set forth in the CEQA Guidelines.

3.1 CLASS 1 – EXISTING FACILITIES

As defined in Section 15301 of the CEQA Guidelines, a Class 1 CE is applicable to the 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. The types of "existing facilities" listed below are not intended to be all-inclusive of the types of projects which might fall within Class 1. The key consideration is whether the project involves negligible or no expansion of use. Examples include but are not limited to:

1. Interior or exterior alterations involving such things as interior partitions, plumbing, and electrical conveyances;
2. Existing facilities of both investor and publicly-owned utilities used to provide electric power, natural gas, sewerage, or other public utility services;
3. Existing highways and streets, sidewalks, gutters, bicycle and pedestrian trails, and similar facilities (this includes road grading for the purpose of public safety, and other alterations such as the addition of bicycle facilities, including but not limited to bicycle parking, bicycle-share facilities and bicycle lanes, transit improvements such as bus lanes, pedestrian crossings, street trees, and other similar alterations that do not create additional automobile lanes);
4. Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety, unless it is determined that the damage was substantial and resulted from an environmental hazard such as earthquake, landslide, or flood;
5. Additions to existing structures provided that the addition will not result in an increase of more than:
    i. 50 percent of the floor area of the structures before the addition, or 2,500 sf, whichever is less; or
    ii. 10,000 sf if:
        a) The project is in an area where all public services and facilities are available to allow for maximum development permissible in the General Plan and
        b) The area in which the project is located is not environmentally sensitive.
6. New copy on existing on and off-premise signs;
7. Maintenance of existing landscaping, native growth, and water supply reservoirs (excluding the use of pesticides, as defined in Section 12753, Division 7, Chapter 2, Food and Agricultural Code).

Application to the Proposed Project

As noted in Section 1.2, the project would include upgrades to existing utilities, seismic retrofitting, upgrades to lighting and flooring, and reconfiguring the existing outdoor stairs and ramp to be ADA compliant. There would be no additions to the building. The project would involve the transition to new classroom and conference space to meet existing classroom demand and to support implementation of a new healthcare training facility, which would be a negligible expansion of use, as the building has recently been used as university program and commercial/office spaces. The project also includes minor alterations to improve seismic stability. Restoration or rehabilitation of deteriorated or damaged structures, facilities, or mechanical equipment to meet current standards of public health and safety clearly falls within the bounds of this exemption (CEQA Guidelines Section 15301[d]).

3.2 CLASS 3 – NEW CONSTRUCTION OR CONVERSION OF SMALL STRUCTURES

As defined under Section 15303 of the CEQA Guidelines, Class 3 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. The numbers of structures described in this section are the maximum allowable on any legal parcel or to be associated with a project within a two-year period. Examples of this exemption include but are not limited to:

1. One single-family residence or a second dwelling unit in a zone which permits residential uses. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption;
2. A duplex or similar multi-family residential structure totaling no more than four dwelling units if not in conjunction with the building or conversion of two or more such structures. In urbanized areas, exemption applies to single apartments, duplexes, and similar structures designed for not more than six dwelling units;
3. A store, motel, office, restaurant or similar commercial or institutional structure not involving the use of significant amounts of hazardous substances, and not exceeding 2,500 sf in floor area. In urbanized areas, the exemption also applies to up to four such commercial buildings not exceeding 10,000 sf in floor area on sites zoned for such use, if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.
4. Water mains, sewage, electrical, gas, and other utility extensions including street improvements, to serve individual customers;
5. Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.

Application to the Proposed Project

The project, as defined above, would involve minor modifications to the exterior of the building, including replacing old roof shingles and metal windowpanes with similar material, appearance, and placement. The proposed renovation of the existing facility is intended to support classroom demand and public safety, and no new facilities or structures would be constructed. Additionally, the project area is not considered environmentally sensitive for biological nor for cultural resources, and the project sites are already served by existing public utilities from the City of Arcata.

3.3 CLASS 31 – HISTORICAL RESOURCE RESTORATION/REHABILITATION

As defined in Section 15331 of the CEQA Guidelines, a Class 31 CE is applicable to projects limited to maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction of historical resources in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer.

Application to the Proposed Project

The project, as defined above, would involve physical modifications to the Stewart Building, including utility and ADA compliant upgrades, seismic retrofitting, and roof replacement. The goal is to replace exterior elements in-kind visually but with alternate materials where necessary. As described below under "Historical Resources" and in Appendix A (Stewart Building - Secretary of the Interior's Standards Consistency Analysis), the Stewart Building is a City of Arcata Historic Landmark and is therefore a historical resource. The proposed modifications would comply with eight of the *Secretary of the Interior Standards for the Treatment of Historic Properties* (Secretary's Standards); the remaining two do not apply.

3.4 COMMON SENSE EXEMPTION

The common sense exemption, as defined in CEQA Guidelines Section 15061(b)(3), includes projects that do not have the potential for causing a significant effect on the environment. This includes projects "where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment."

Application to the Proposed Project

As documented below in Section 1.4, "Exceptions to Reliance on Categorical Exemptions," the project would be within the scope, scale, and nature of operations already occurring at the Stewart Building, and would not result in a significant effect on the environment. Therefore, the project would also be consistent with the common sense exemption, as described in CEQA Guidelines Section 15061(b)(3).

4 EXCEPTIONS TO RELIANCE ON CATEGORICAL EXEMPTIONS

CEQA Guidelines Section 15300.2 identifies exceptions - conditions under which CEs do not apply. Of the exceptions listed, the exceptions that are relevant to consideration of Classes 1 and 3 are:

- Location (Specific to Class 3): if a project that would ordinarily be insignificant in its impact is located within a particular sensitive area, it may be significant. Where a project may impact an environmental resource of hazardous or critical concern, a categorical exemption is inapplicable.
- Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- Significant Effect. A CE 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.
- Scenic Highways. A CE 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. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

- Hazardous Waste Sites. A CE 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.
- Historical resources. A CE shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

4.1 EVALUATION OF EXCEPTIONS

The following discussion presents an evaluation of whether the exceptions to the use of a CE (Classes 1 and 3) would apply to the project.

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. (CEQA Guidelines Section 15300.2[a])

The project site, as noted above, is located in the City of Arcata, and is surrounded by existing developed uses. The project would involve interior and exterior modifications to accommodate a healthcare training center. Due to the developed nature of the project site and surrounding uses, project implementation would not occur within environmentally sensitive areas. As further described below, project activities would also not occur in an area known to contain hazardous substances, nor would project activities occur in locations that contain known significant cultural resources. As a result, this exception does not apply.

Cumulative Impact

All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant. (*CEQA Guidelines Section 15300.2[b])*

The project would not result in substantial contributions to any known cumulative condition. Successive projects of the same type in the same place are not planned. As described above, the specific uses of this building have changed over time and maintenance projects occur on an ongoing basis. These projects are not associated with significant environmental effects. There are no known successive projects near the site in Humboldt County or the city of Arcata.

Significant Effect/Unusual Circumstances

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. (*CEQA Guidelines Section 15300.2[c])*

Unusual circumstances occur when the project has some feature that distinguishes it from others in the exempt class, such as its size or location. If these unusual circumstances result in a project having a significant effect on the environment, then an exemption cannot be relied upon. There are no unusual circumstances related to the project or the project site; all project activities will be conducted within existing developed or paved areas, primarily within the interior and exterior of the Stewart Building, and the building rooftop.

Project activities would consist of the use of construction equipment during the course that renovations will be taking place. All construction equipment will be staged and stored within the project site boundary. The project would not involve an increase in impermeable surfaces, as the project site is already developed and paved. With respect to air

quality, greenhouse gas, and energy, the size of the project is limited and emissions and energy use associated with its construction would be similarly limited. As a result, the project is not anticipated to exceed emissions thresholds of the North Coast Unified Air Quality Management District. Construction would occur periodically over 18 months, during daytime hours, and would not require the use of a substantial amount of heavy equipment. Similarly, project operations are not expected to exceed noise or transportation thresholds. The Health Education Hub will host regular classes, students and faculty attendance, training opportunities for other health care professionals, and potentially an occasional conference. However, these activities would not increase the noise or transportation levels over what has occurred at the Stewart Building over the last 5 to 10 years. As stated previously, the project site is located adjacent to a high school and a public park, where frequent traffic and associated noise is expected. There would not be a substantial level of energy used, or emissions generated due to the project. Thus, there would not be significant impacts on air quality, energy, greenhouse gas emissions, noise, or transportation.

There would not be potential for significant effects on aesthetics, agriculture and forestry resources, biological resources, geology and soils, hazards and hazardous materials, hydrology, land use and planning, mineral resources, energy, population and housing, public services, recreation, utilities, or wildfire hazards because the project is a continuation of a like use on a developed site. This exception does not apply, and there is no reasonable possibility that the project would have a significant impact on the environment.

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. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR. (CEQA Guidelines Section 15300.2[d])

There are no designated State scenic highways in the project vicinity. However, a section of US Highway 101 (US 101), approximately 0.3 miles east of the project site, is listed as an eligible state scenic highway (Caltrans 2025). Existing development, vegetation, and topography currently block views of the project. As such, the project site is not located within the view corridor of any officially designated state scenic highway. Thus, the project would not result in damage to scenic resources within/along a designated scenic highway, and this exception does not apply.

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. (CEQA Guidelines Section 15300.2[e])

According to 14 CCR 15300.2(e), "[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." According to the California Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board GeoTracker database, there are no hazardous materials sites within or in the vicinity of the project site that could create a significant hazard to the public or the environment as a result of project implementation (DTSC 2025; SWRCB 2025). Therefore, this exception does not apply.

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. (CEQA Guidelines Section 15300.2[f])

"Historical resource" is a term with a defined statutory meaning (CEQA Section 21084.1; CEQA Guidelines Sections 15064.5[a] and [b]). Under CEQA Guidelines Section 15064.5(a), historical resources include both built-environment features and archaeological sites.

On January 5, 2024, a search of records for the entire Cal Poly Humboldt campus and off-site properties, which includes the project site, was conducted at the Northwest Information Center (NWIC) at Sonoma State University (NWIC File No.: 23-0865). The results of the records search review revealed that two previously conducted historical resource studies cover the project site. The records search did not reveal any previously recorded historical resources, either built environment or archaeological, within the project site. However, further investigation revealed that the Stewart Building is a City of Arcata Historic Landmark; in related documentation, the building has been recommended ineligible for the CRHR and the NRHP (Appendix A; Stewart Building - Secretary of the Interior's Standards Consistency Analysis).

Alterations to the Stewart Building have the potential to reduce the integrity of the historical resource such that it would no longer be eligible for local listing as a Historic Landmark if not planned and implemented in an appropriate manner. However, according to PRC Section 15126.4(b)(1), if a project adheres to the *Secretary of the Interior Standards for the Treatment of Historic Properties* (Secretary's Standards), the project's impact on historic resources, the Stewart Building, "will generally be considered mitigated below the level of a significance and thus is not significant." As described in Appendix A, the proposed modifications would comply with eight of the Secretary's Standards; the remaining two do not apply. Therefore, according to PRC Section 15126.4(b)(1), no significant impacts to the Stewart Building would occur. Therefore, after the implementation of the project, the historic property would retain its integrity and remain eligible for local listing.

In accordance with CEQA Guidelines (Sections 15064.5 and 15126.4), the effects of the proposed project have been assessed. The project modifications would not result in adverse changes to the integrity of the building and the NWIC records search did not reveal any previously recorded historical resources of an archaeological nature within the project site. Standard best management practices and compliance with state guidelines (CEQA Section 21083.2[b]) would address accidental discovery concerns related to archaeological sites during construction. For these reasons, the project would not result in a substantial adverse change in the significance of a historic resource. As a result, this exception does not apply to the project.

5 OVERALL CONCLUSION

As demonstrated in this documentation and its attached Stewart Building - Secretary of the Interior's Standards Consistency Analysis (Appendix A) the project is exempt from the need to conduct further environmental review under CEQA pursuant to the provisions of Class 1, 3, 31 CEs and the common sense exemption. The project meets all the criteria listed by the respective sections of the CEQA Guidelines and substantial evidence supports the finding that none of the exceptions to the CEs apply.

6 REFERENCES

California Department of Transportation. 2025. California State Scenic Highway System Map. Available: https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774. Accessed November 4, 2025.

Caltrans. *See* California Department of Transportation.

City of Arcata. 2024. Arcata General Plan: 2045. *Chapter 2: Land Use Element*. Available: https://gis-https://cityofarcata.org/DocumentCenter/View/14695/21_Land-Use. Accessed November 6, 2025.

City of Arcata. 2025. City of Arcata Public Parcel Finder. Available: https://gis-cityofarcata.hub.arcgis.com/apps/36369aa719ed4103bc4de2f95effeca3/explore. Accessed November 6, 2025.

Department of Toxic Substances Control. 2025. Envirostor – Database search for Cal Poly Humboldt. Available: https://www.envirostor.dtsc.ca.gov/public/. Accessed November 4, 2025.

DTSC. *See* Department of Toxic Substances Control.

State Water Resources Control Board. 2025. GeoTracker. Available: https://geotracker.waterboards.ca.gov/map/?global_id=T0607500629. Accessed December 18, 2025.

SWRCB. *See* State Water Resources Control Board.