

PD-R23-0003 SUPERIOR SELF STORAGE PHASE 3
EXHIBIT I - PROPOSED INITIAL STUDY NEGATIVE DECLARATION
NEGATIVE DECLARATION

FILE: PD-R23-0003 Planned Development Permit Revision

PROJECT NAME Superior Self Storage, Phase 3

NAME OF APPLICANT: Dave Kindelt

ASSESSOR'S PARCEL NO.: 117-160-064 **SECTION:** 11 **T:** 09N **R:** 08E, MDM

LOCATION: The project is located on southwest corner of the intersection between Town Center Boulevard and Latrobe Road in the El Dorado Hills area.

☐ **GENERAL PLAN AMENDMENT:** **FROM:** **TO:**

☐ **REZONING:** **FROM:** **TO:**

☐ **TENTATIVE PARCEL MAP**

☐ **SUBDIVISION: SUBDIVISION (NAME):**

☐ **SPECIAL USE PERMIT TO ALLOW:**

☒ **OTHER:** A Planned Development Permit Revision for an expansion (Phase 3) of an existing self-storage facility. The property is partially developed with the existing Phase 1 and Phase 2 self-storage facilities, while the undeveloped portion is comprised of vacant land and a former Pacific Gas & Electric (PG&E) substation enclosure (project site or expansion area). The proposed project consists of the development of four (4) new storage buildings to the south and west of the existing storage facility within the undeveloped portion of the project site for approximately 557 storage units ranging in size from 25 square feet to 480 square feet. The project proposes to add 91,965 square feet of storage space to the existing storage facility. Each building would have a height of 20 feet and would maintain the exterior finish used for the existing facility. These exterior finish elements would include brown tone stucco and Concrete Masonry Unit walls, a silver metal roof, and green tone roll-up metal doors. The project would maintain the existing encroachment onto Latrobe Road, a County-maintained roadway, and would include circular access around each building. The project would utilize the existing internal circulation system and driveways for ingress and egress to the local circulation system, as well as provide an additional emergency access point on Town Center Boulevard for fire truck entry. An additional four (4) parking stalls would be added for a total of 46 onsite parking stalls. The project site currently includes an associated waste disposal area, landscaping, and outdoor lighting. The project would incorporate a new waste disposal enclosure, additional landscaping, and outdoor lighting consistent with existing features. Construction of the project would include the demolition of the existing PG&E substation as well as removal and replacement of some trash enclosures, one (1) light standard, two (2) gates, and some of the fencing associated with the current storage facility. Demolition activities would also result in the removal of existing landscaping and irrigation elements. Demolition of the PG&E substation would include removal of overhead power lines connecting the substation to overhead power lines running along the western portion of the project parcel. The PG&E substation would not be replaced as it had been previously decommissioned by PG&E. Electric utility service to the new buildings would be provided by PG&E. The project site has water and sanitation service availability from El Dorado Irrigation District (EID). Construction of the project is estimated to result in a total cut of 3,077 cubic yards of soil and a total fill of 1,794 cubic yards of soil, resulting a total cut of 1,293 cubic yards of soil which would remain on-site to be used within new landscaping areas and as top dressing for existing landscaping areas. Seventeen (17) existing trees on-site would be removed with implementation of the project. None of these trees are oak trees.

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REASONS THE PROJECT WILL NOT HAVE A SIGNIFICANT ENVIRONMENTAL IMPACT:


- ☒ **NO SIGNIFICANT ENVIRONMENTAL CONCERNS WERE IDENTIFIED DURING THE INITIAL STUDY.**
- ☐ **MITIGATION HAS BEEN IDENTIFIED WHICH WOULD REDUCE POTENTIALLY SIGNIFICANT IMPACTS.**
- ☐ **OTHER:**

In accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), State Guidelines, and El Dorado County Guidelines for the Implementation of CEQA, the County Environmental Agent analyzed the project and determined that the project will not have a significant impact on the environment. Based on this finding, the Planning Department hereby prepares this NEGATIVE DECLARATION. A period of thirty (30) days from the date of filing this negative declaration will be provided to enable public review of the project specifications and this document prior to action on the project by COUNTY OF EL DORADO. A copy of the project specifications is on file at the County of El Dorado Planning Services, 2850 Fairlane Court, Placerville, CA 95667.

This Negative Declaration was adopted by _____ on _____.

Executive Secretary

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	<p>COUNTY OF EL DORADO</p> <p>PLANNING AND BUILDING DEPARTMENT</p> <p>INITIAL STUDY</p> <p>ENVIRONMENTAL CHECKLIST</p>
Project Title: PD-R23-0003/Superior Self-Storage, Phase 3	
Lead Agency Name and Address: El Dorado County, 2850 Fairlane Court, Placerville, CA 95667	
Contact Person: Bianca Dinkler, Senior Planner	Phone Number: (530) 621-5977
Applicant's Name and Address: David Kindelt, 4120 Douglas Blvd., Ste. 306-524, Granite Bay, CA 95746	
Project Location: The project parcel is located on the southwest corner of the intersection between Town Center Boulevard and Latrobe Road in the El Dorado Hills area.	
Assessor's Parcel Number: 117-160-064 Acres: 14.8 acres	
Sections: S: 11 T: 09N R: 08E	
General Plan Designation: Adopted Plan – El Dorado Hills Specific Plan (AP-EDHSP)	
Zoning: Commercial General – Planned Development (CG-PD)	
<p>Description of Project: A Planned Development Permit Revision for an expansion (Phase 3) of an existing self-storage facility. The property is partially developed with the existing Phase 1 and Phase 2 self-storage facilities, while the undeveloped portion is comprised of vacant land and a former Pacific Gas & Electric (PG&E) substation enclosure (project site or expansion area). The proposed project consists of the development of four (4) new storage buildings to the south and west of the existing storage facility within the undeveloped portion of the project site with approximately 557 storage units ranging in size from 25 square feet to 480 square feet. The project proposes to add 91,965 square feet of storage space to the existing storage facility. Each building would have a height of 20 feet and would maintain the exterior finish used for the existing facility. These exterior finish elements would include brown tone stucco and Concrete Masonry Unit walls, a silver metal roof, and green tone roll-up metal doors. The project would maintain the existing encroachment onto Latrobe Road, a County-maintained roadway, and would include circular access around each building. The project would utilize the existing internal circulation system and driveways for ingress and egress to the local circulation system, as well as provide an additional emergency access point on Town Center Boulevard for fire truck entry. An additional four (4) parking stalls would be added for a total of 46 onsite parking stalls. The project site currently includes an associated waste disposal area, landscaping, and outdoor lighting. The project would incorporate a new waste disposal enclosure, additional landscaping, and outdoor lighting consistent with existing features. Construction of the project would include the demolition of the existing PG&E substation as well as removal and replacement of some trash enclosures, one (1) light standard, two (2) gates, and some of the fencing associated with the current storage facility. Demolition activities would also result in the removal of existing landscaping and irrigation elements. Demolition of the PG&E substation would include removal of overhead power lines connecting the substation to overhead power lines running along the western portion of the project parcel. The PG&E substation would not be replaced as it had been previously decommissioned by PG&E. Electric utility service to the new buildings would be provided by PG&E. The project site has water and sanitation service availability from El Dorado Irrigation District (EID). Construction of the project is estimated to result in a total cut of 3,077 cubic yards of soil and a total fill of 1,794 cubic yards of soil, resulting a total cut of 1,293 cubic yards of soil which would remain on-site to be used within new landscaping areas and as top dressing for existing landscaping areas. Seventeen (17) existing trees on-site would be removed with implementation of the project. None of the trees are oak trees. (Attachments 5, 6).</p>	
<p>Environmental Setting: The project site is a 14.8-acre parcel contained within the larger property owned by Superior Self Storage, which is located at an elevation of approximately 600 feet above mean sea level (AMSL). The topography is relatively flat with a declining slope in the southwest portion of the project site. The project parcel is between the Latrobe Road/Town Center Boulevard intersection and the Latrobe Road/White Rock Road intersection, on the west side of Latrobe Road, in the El Dorado Hills Community Region. While the larger property is currently developed per the approved phases, Phase 1 and Phase 2, of the Superior Self-Storage facilities, the southern portion of the project site is primarily undeveloped land with a former PG&E substation enclosure, while the western portion of the project site is currently vacant land. This portion of the project site has been previously disturbed during the mass grading activities associated with development of the prior phases on the larger property. According to the California Geologic Survey</p>	

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mapping systems, the predominant onsite soils are classified as Argonaut gravelly loam 2 – 15 percent slope and Auburn silt loam 2 – 30 percent slopes. The vegetation community on the project site is comprised of non-native grasses and disturbed areas which includes gravel surfacing. The adjacent-neighboring parcels to the north, east, and west are zoned as CG; across White Rock Road to the south the adjacent properties are zoned Research & Development (R&D). The surrounding properties to the north and east have been developed per the Town Center West specific plan allowances; to the south are mostly undeveloped, with the exception of a CVS pharmacy; and, to the west is a senior assisted living facility and undeveloped parcels. (Attachments 5, 6).

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

1. El Dorado County Surveyor
2. El Dorado County Building Services
3. El Dorado County Environmental Management Department
4. El Dorado County Department of Transportation
5. El Dorado Hills Fire Protection District

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? On September 28, 2023, in accordance with the requirements of Assembly Bill (AB) 52, tribal consultation notices were sent to the Tribes affiliated with the project area. At the time of the application request, seven Tribes had requested to be notified of proposed projects for consultation in the project area; these Tribes are the Colfax-Todds Valley Consolidated Tribe, Ione Band of Miwok Indians, Nashville Enterprise Miwok-Maidu-Nishinam Tribe, Shingle Springs Band of Miwok Indians, T'si-Akim Maidu, United Auburn Indian Community of the Auburn Rancheria, and Washoe Tribe of California and Nevada. In response to the AB 52 tribal consultation letters, County staff received a request from the United Auburn Indian Community of the Auburn Rancheria (UAIC) for tribal consultation on September 29, 2023; from the Wilton Rancheria on October 20, 2023; and from the Shingle Springs Band of Miwok Indians (SSBMI) on October 30, 2023. These requests were received within the 30-day period from the date of County staff's consultation initiation response. County staff sent responses to each native nation and received follow-up correspondence from the UAIC. Neither SSBMI nor Wilton Rancheria returned County staff acknowledgment of consultation initiation. The UAIC, along with planning staff and the project proponents, conducted a site visit on November 8, 2023. Per the November 8, 2023 site visit, the UAIC provided an unanticipated discovery finding and provided language to be incorporated into the entitlement as conditions of approval. Pursuant to the records search conducted at the North Central Information Center on August 21, 2023, the proposed project area contains zero indigenous resources and zero historic-period cultural resources. Additionally, six cultural resources study reports covering some portion of the site are on file. Outside of the project area, but within the ¼-mile search radius of the geographic area, the broader search area contains one indigenous resource and three historic-period cultural resources. Additionally, two cultural resource study reports are on file which cover a portion of the broader search area. While cultural resources have been identified within the general vicinity, the degree of contemporary disturbance which has accompanied commercial development surrounding and including the area of potential effects (APE) has substantially decreased the probability of encountering cultural resources within the APE. In consultation with the UAIC, the project site may potentially contain a Tribal Cultural Resource (TCR) within an area of the site not subject to ground disturbance.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions		Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise		Population and Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities and Service Systems		Wildfire		Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

- ☒ I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- ☐ I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect: 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards; and 2) has been addressed by Mitigation Measures based on the earlier analysis as described in attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects: a) have been analyzed adequately in an earlier EIR or **NEGATIVE DECLARATION**, pursuant to applicable standards; and b) have been avoided or mitigated pursuant to that earlier EIR or **NEGATIVE DECLARATION**, including revisions or Mitigation Measures that are imposed upon the proposed project, nothing further is required.

Printed Name Bianca Dinkler, Senior Planner

For: El Dorado County

Signature:

Bianca Dinkler

Date:

12/17/24

Printed Name Ande Flower, Current Planning Manager

For: El Dorado County

Signature:

Ande Flower

Date:

12/17/24

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PROJECT DESCRIPTION

Introduction

This Initial Study has been prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts resulting from the proposed project. The proposed project consists of the planned expansion (Phase 3) of the Superior Self-Storage Facilities located on the southwest corner of the intersection between the Latrobe Road/Town Center Boulevard intersection and the Latrobe Road/White Rock Road intersection, on the west side of Latrobe Road, in the El Dorado Hills Community Region. The project site is designated as Adopted Plan – El Dorado Hills Specific Plan (AP-EDHSP) and is zoned Commercial General – Planned Development (CG-PD). The property is partially developed with the existing Phase 1 and 2 self-storage facilities, while the undeveloped portion is comprised of vacant land and a former PG&E substation enclosure (project site or expansion area). The project consists of the development of four new storage buildings to the south and west of the existing storage facilities within the project site. Approximately 557 storage units, ranging in size from 25 square feet to 480 square feet, would be provided within the four new storage buildings. The project proposes to add 91,965 square feet of storage space to the existing storage facilities. The project also includes four additional standard parking stalls and additional site improvements, including but not limited to landscaping and installation of parking lot and security lighting.

Throughout this Initial Study, please reference the following Attachments:

- Attachment 1: Location Map
- Attachment 2: Assessor's Parcel Page
- Attachment 3: General Plan Land Use Map
- Attachment 4: Zoning Map
- Attachment 5: Site Plans
- Attachment 6: Building Elevations
- Attachment 7: Biological Resources Evaluation

Project Location and Surrounding Land Uses

The project site is located on the southwest corner of the intersection between the Latrobe Road/Town Center Boulevard intersection and the Latrobe Road/White Rock Road intersection, on the west side of Latrobe Road, within the El Dorado Hills Community Region. The project site is designated as AP-EDHSP and is zoned CG-PD. The adjacent neighboring parcels to the north, east, and west are zoned as CG similar to the project site while the parcels across White Rock Road to the south are zoned as R&D. The surrounding properties to the north and east have been developed per the Town Center West specific plan allowances; to the south are mostly undeveloped; and, to the west contains a senior assisted living facility and undeveloped parcels.

Project Characteristics

1. Transportation/Circulation/Parking

The project's development plans were reviewed by the El Dorado County Transportation Division (DOT), who verified that there would be no changes to site access with project implementation. The access point on Town Center Boulevard currently used to reach the existing Superior Storage facilities would continue to be the access point for the new buildings. No new road entries would be created. Circulation within the expansion area would make use of the same drive-aisle surfacing and be the same width as within the existing developed area.

2. Utilities and Infrastructure

The El Dorado Irrigation District (EID) reviewed the project. The site has access to the EID water and sewer system and would be adequately served for these utilities by the existing EID facilities. For electricity, the site is connected to PG&E service.

3. Construction Considerations

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The project proposes the construction of a self-storage facility expansion. A portion of the project site already includes a self-storage facility. The portion of the project site specific to the expansion proposal has been graded prior. The proposed structures would be twenty (20) feet tall and would make use of similar exterior finish materials and color pallets as found on the existing self-storage structures. Grading activities would result in a total cut of 3,077 cubic yards of soil and a total fill of 1,794 cubic yards of soil, for a total of 1,293 cubic yards of soil to be removed from the project site. Construction of the proposed structures would include the removal of a decommissioned PG&E substation and demolition and replacement of existing trash enclosures, one onsite light standard, two gates, and fencing associated with the current self-storage facility. Demolition activities would also result in the removal of existing landscaping and irrigation elements. Demolition of the PG&E substation would include removal of overhead power lines connecting the substation to overhead power lines running along the western portion of the project parcel. Construction of the single-story component would be completed within eighteen (18) months after entitlement approval, which includes an estimated year for plan check approval. Upon completion of the single-story component, construction of the multi-story component would begin. It is estimated that the multi-story component would take up to a year to construct. Any construction activities would be completed in conformance with applicable agency requirements, and subject to building permits from the El Dorado County Building Services.

Project Schedule and Approvals

This Initial Study and proposed Negative Declaration (IS/ND) is being circulated for public and agency review for a minimum 30-day period. Written comments on the Initial Study should be submitted to the project planner indicated in the Summary section, above. Following the close of the written comment period, the IS/ND will be considered by the Lead Agency in a public meeting and will be adopted if it is determined to be in compliance with the California Environmental Quality Act (CEQA). The Lead Agency will also determine whether to approve the project.

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EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. If the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is a fair argument that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of Mitigation Measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the Mitigation Measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

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ENVIRONMENTAL IMPACTS

I. AESTHETICS. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?				X
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. Substantially degrade the existing visual character quality of the site and its surroundings?			X	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

No federal regulations are applicable to aesthetics in relation to the proposed project.

State Laws, Regulations, and Policies

In 1963, the California State Legislature established the California Scenic Highway Program, a provision of the Streets and Highways Code, to preserve and enhance the natural beauty of California. The state highway system includes designated scenic highways and those that are eligible for designation as scenic highways.

There are no officially designated state scenic corridors in the vicinity of the project site and the project site is not visible from any scenic highways or highways eligible for designation as scenic highways.

Local Laws, Regulations, and Policies

The County has several standards and ordinances that address issues relating to visual resources. Many of these can be found in the County Zoning Ordinance (Title 130 of the County Code). The Zoning Ordinance consists of descriptions of the zoning districts, including identification of uses allowed by right or requiring a special-use permit and specific development standards that apply in particular districts based on parcel size and land use density. These development standards often involve limits on the allowable size of structures, required setbacks, and design guidelines. Included are requirements for setbacks and allowable exceptions, the location of public utility distribution and transmission lines, architectural supervision of structures facing a state highway, height limitations on structures and fences, outdoor lighting, and wireless communication facilities.

The proposed project would be consistent with the existing land use designation and zoning for the project site, which is Adopted Plan – El Dorado Hills Specific Plan (AP-EDHSP) and Commercial General – Planned Development (CG-PD), respectively. Design and development of the proposed project would be consistent with the requirements related to aesthetics of the County's Zoning Ordinance and Development Code.

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Visual resources are classified as 1) scenic resources or 2) scenic views. Scenic resources include specific features of a viewing area (or viewshed) such as trees, rock outcroppings, and historic buildings. They are specific features that act as the focal point of a viewshed and are usually foreground elements. Scenic views are elements of the broader viewshed such as mountain ranges, valleys, and ridgelines. They are usually middle ground or background elements of a viewshed that can be seen from a range of viewpoints, often along a roadway or other corridor. A list of the County's scenic views and resources is presented in Table 5.3-1 of the El Dorado County General Plan EIR (p. 5.3-3). This list includes areas along highways where viewers can see large water bodies (e.g., Lake Tahoe and Folsom Reservoir), river canyons, rolling hills, forests, or historic structures or districts that are reminiscent of El Dorado County's heritage.

Discussion:

- a. **Scenic Vista or Resource:** The project proposes development of a self-storage facility. The project site is not located within a scenic vista, as designated by the county General Plan (El Dorado County, 2003, p. 5.3-3 through 5.3-5). The proposed project is the planned expansion (Phase 3) of the existing Superior Self-Storage Facility, located within the El Dorado Hills Community Region portion of the El Dorado County. The project site is located in the Town Center West and is surrounded on the west, north, and east by other CG zoned parcels and on the south by R&D zoned parcels. Development of the project would be similar in height and size as the existing onsite storage buildings as well as visually consistent with surrounding uses. Therefore, implementation of the project would not adversely affect a scenic vista or resource. There would be **no impact**.
- b. **Scenic Resources:** The project site is not visible from an officially designated State Scenic Highway or county-designated scenic highway, or any roadway that is part of a corridor protection program (Caltrans, 2013). There are no views of the project site from public parks or scenic vistas. There are no trees or historic buildings that have been identified by the County as contributing to exceptional aesthetic value at the project site, and no trees are proposed for removal with project implementation. Therefore, development of the project would not substantially damage scenic resources. There would be **no impact**.
- c. **Visual Character:** The proposed project would be visible from both Latrobe Road, White Rock Road, and Town Center Boulevard. The project site is located in the Town Center West and is surrounded on the west, north, and east by other CG zoned parcels and on the south by R&D zoned parcels. Development of the project would be similar in height and size as the existing onsite storage buildings as well as visually consistent with surrounding uses. Furthermore, the design and development of the project would be consistent with the requirements of the County's Zoning Ordinance and Development Code, which have been established to guide the visual character and architectural design of development within the County. Therefore, implementation of the proposed project would not substantially degrade the existing visual character of the project site or surrounding area. Impacts would be **less than significant**.
- d. **Light and Glare:** The proposed project would include the installation of additional parking lot and security lighting. As part of the project's application, photometric plans were prepared for the project to determine that these new light sources would not result in excess light or glare impacts to adjacent properties. In addition, the proposed project would be required to comply with the County's Lighting Ordinance, which includes mandatory shielding of lights to avoid off-site light spillover potential glare. The proposed project would be constructed with similar building materials as the existing onsite self-storage buildings and as such, would not include highly reflective materials which could create new sources of glare. Therefore, impacts associated with new sources of light and/or glare would be **less than significant**.

FINDING: As conditioned and with adherence to El Dorado County Code of Ordinances (County Code), for this Aesthetics category, any potential impacts would be **less than significant**.

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II. AGRICULTURE AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by California Department of forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Locally Important Farmland (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

No federal regulations are applicable to agricultural and forestry resources in relation to the proposed project.

State Laws, Regulations, and Policies

Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP), administered by the California Department of Conservation (CDC), produces maps and statistical data for use in analyzing impacts on California's agricultural resources (CDC 2024). FMMP rates and classifies agricultural land according to soil quality, irrigation status, and other criteria. Important Farmland categories are Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (CDC 2013a). The FMMP maps available on the CDC website

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(<https://www.conservation.ca.gov/dlrp/fmmp/>) show no Important Farmland affected by the proposed project. The project site is mapped as “Other Land” and there is no Important Farmland on the adjacent parcels or in the project vicinity.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965 (commonly referred to as the Williamson Act) allows local governments to enter into contracts with private landowners for the purpose of preventing conversion of agricultural land to non-agricultural uses (CDC 2013b). In exchange for restricting their property to agricultural or related open space use, landowners who enroll in Williamson Act contracts receive property tax assessments that are substantially lower than the market rate. There are no Williamson Act contracts on the project site or nearby parcels.

Discussion:

- a. **Farmland Mapping and Monitoring Program:** The site is zoned as CG-PD and is located within Town Center West. The project site is not designated as Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Locally Important Farmland by the CDC and is not zoned for agricultural use. In addition, the project site is not adjacent to an Agricultural District or agriculture-zoned parcels. Therefore, implementation of the proposed project would not convert designated farmland and no impact would occur.
- b. **Agricultural Uses:** The project site is not currently under an active Williamson Act Contract, nor does it contain current agricultural uses as the project site is the undeveloped portion of an existing self-storage facility. In addition, the project site is zoned as CG, which does not support any agricultural uses or operation. Therefore, development of the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. No impact would occur.
- c-d. **Loss of Forest land or Conversion of Forest land:** The project site is zoned CG and is not designated as a Timberland Preserve Zone (TPZ) or other forestland according to the County’s General Plan and Zoning Ordinance. No trees are proposed for removal as part of the project. Therefore, implementation of the project would not conflict with existing zoning for forest land, timberland, or timberland zoned Timberland Production nor would result in the loss of forest land or the conversion of forest land to non-forest use. No impact would occur.
- e. **Result in Changes Causing Conversion of Farmland or Forest Land:** The project site is zoned CG, where surrounding uses are also zoned CG as well as R&D. There is no farmland or forestland in the vicinity of the project site. Project activities have no mechanism to affect Farmland or Forest Land distant from the project site. No impact would occur.

FINDING: For this Agriculture and Forest Resources category, there would be **no impact** as a result of the project.

III. AIR QUALITY. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	

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c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d. Expose sensitive receptors to substantial pollutant concentrations?			X	
e. Create objectionable odors affecting a substantial number of people?				X

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

The Clean Air Act is implemented by the U.S. Environmental Protection Agency (USEPA) and sets ambient air limits, the National Ambient Air Quality Standards (NAAQS), for six criteria pollutants: particulate matter of aerodynamic radius of ten-micrometers or less (PM₁₀), particulate matter of aerodynamic radius of 2.5-micrometers or less (PM_{2.5}), carbon monoxide (CO), nitrogen dioxide (NO₂), ground-level ozone, and lead. Of these criteria pollutants, particulate matter and ground-level ozone pose the greatest threats to human health. El Dorado County is in non-attainment with NAAQS for ozone and PM_{2.5}.

State Laws, Regulations, and Policies

The California Air Resources Board (CARB) sets standards for criteria pollutants in California that are more stringent than the U.S. National Ambient Air Quality Standards (NAAQS) and include the following additional contaminants: visibility-reducing particles, hydrogen sulfide, sulfates, and vinyl chloride. The proposed project is located within the Mountain Counties Air Basin, which is comprised of seven air districts: the Northern Sierra Air Quality Management District (AQMD), Placer County Air Pollution Control District (APCD), Amador County APCD, Calaveras County APCD, the Tuolumne County APCD, the Mariposa County APCD, and a portion of the El Dorado County AQMD, which consists of the western portion of El Dorado County. The El Dorado County Air Quality Management District (EDCAQMD) manages air quality for attainment and permitting purposes within the west slope portion of El Dorado County. El Dorado County is in non-attainment with CAAQS for ozone and PM₁₀.

USEPA and CARB regulate various stationary sources, area sources, and mobile sources. USEPA has regulations involving performance standards for specific sources that may release toxic air contaminants (TACs), known as hazardous air pollutants (HAPs) at the federal level. In addition, USEPA has regulations involving emission criteria for off-road sources such as emergency generators, construction equipment, and vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB also establishes passenger vehicle fuel specifications.

Air quality in the project area is regulated by the EDCAQMD. The EDCAQMD regulates air quality through the federal and state Clean Air Acts, district rules, and its permit authority. EDCAQMD thresholds for a project's emissions to generate a significant impact under CEQA are provided in the chart below.

Criteria Pollutant	El Dorado County Threshold	
Reactive Organic Gasses (ROG)	82-lbs/day	
Nitrogen Oxides (NOx)	82-lbs/day	
Carbon Monoxide (CO)	Eight-hour average: Six parts per million (ppm)	One-hour average: 20-ppm

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Particulate Matter (PM10):	Annual geometric mean: 30- µg/m3	24-hour average: 50- µg/m3
Particulate Matter (PM2.5):	Annual arithmetic mean: 15- µg/m3	24-hour average: 65- µg/m3
Ozone	Eight-hour average: 0.12-ppm	One-hour average: .09

EDCAQMD's guide to air quality assessment includes a table listing project types with potentially significant or less than significant construction emissions (El Dorado County AQMD 2002: Table 5.2). ROG and NOx emissions from construction activities may be assumed to not be significant if:

- The project encompasses 12-acres or less of ground that is being worked at one time during construction;
- At least one of the recommended mitigation measures related to such pollutants is incorporated into the construction of the project;
- The project proponent commits to pay mitigation fees in accordance with the provisions of an established mitigation fee program in the district (or such program in another air pollution control district that is acceptable to District); or
- Daily average fuel use is less than 337-gallons per day for equipment from 1995 or earlier, or 402-gallons per day for equipment from 1996 or later.

If the project meets one of the conditions above, EDCAQMD assumed that exhaust emissions of other air pollutants from the operation of equipment and vehicles during construction are also not significant.

For Fugitive dust (PM₁₀), if dust suppression measures will prevent visible emissions beyond the boundaries of the project, further calculations to determine PM emissions are not necessary. For the other criteria pollutants, including CO, PM_{2.5}, SO₂, NO₂, sulfates, lead, and H₂S, a project is considered to have a significant impact on air quality if it will cause or contribute significantly to a violation of the applicable national or state ambient air quality standard(s).

Naturally occurring asbestos (NOA) is also a concern in El Dorado County because it is known to be present in certain soils and can pose a health risk if released into the air. The EDCAQMD has adopted an El Dorado County Naturally Occurring Asbestos Review Area Map that identifies those areas more likely to contain NOA (El Dorado County 2005). As shown on the El Dorado County Naturally Occurring Asbestos Review Area Map, the project site is not located within an area known or thought to include NOA (El Dorado County 2005).

Discussion:

- a. **Air Quality Plan:** El Dorado County has adopted the Rules and Regulations of the El Dorado County Air Quality Management District (2000) establishing rules and standards for the reduction of stationary source air pollutants (ROG/VOC, NOx, and O3). The El Dorado County (EDC)/State Clean Air Act Plan has set a schedule for implementing and funding transportation contract measures to limit mobile source emissions. Implementation of the project would not conflict with or obstruct implementation of either air quality plan due to the small amount of emissions associated with construction and operation of the proposed facility. As construction of the project includes grading activities, the project applicant would be required to prepare and implement a Fugitive Dust Mitigation Plan (FDMP) for grading and construction activities in accordance with County requirements. The FDMP would incorporate grading measures and regulate operation of construction equipment in a manner to minimize and reduce the level of defined particulate matter exposure and/or emissions to a less than significant level. Therefore, with regulatory compliance, impacts resulting from this project will be **less than significant**.
- b-c. **Air Quality Standards and Cumulative Impacts:** The proposed project consists of the planned expansion of the Superior Self-Storage facility and includes the construction and operation of four new storage buildings along with four new parking spaces and site improvements. Although this development would contribute air pollutants during construction, construction emissions are anticipated to be within the daily emission thresholds and would cease once construction is completed. While air pollutants would be generated by additional vehicle trips to and from the site during operation of the project, the amount of additional trips generated by the project would not be substantial due to the nature of the project being a storage facility,

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which generates less vehicle trips compared to residential and commercial uses. Therefore, due to the nature of the project, air quality impacts would be minimal as the project would be an extension of the current operations at the site. In addition, the project would be required to comply with all applicable federal, state, and local laws, regulations, and requirements associated with air quality, which have been established to minimize air quality impacts during construction and operation of a project. The project would be reviewed through the County's planning and building review processes to ensure compliance with such regulations, including the County's regulations that require any construction-related PM10 dust emissions to be reduced to acceptable levels. For these reasons, impacts would be **less than significant**.

- d. **Sensitive Receptors:** The CEQA Guidelines (14 CCR 15000) identify sensitive receptors as facilities that house or attract children, the elderly, people with illnesses, or others that are especially sensitive to the effects of air pollutants. Hospitals, schools, and convalescent hospitals are examples of sensitive receptors. The project parcel is located adjacent to a senior assisted living facility. Due to the site layout, the majority of construction activities would be located away from the project boundary adjacent to the senior assisted living facility. For the construction activities that would occur within proximity to the senior assisted living facility, construction activities would be implemented in conformance with standard AQMD conditions of approval which would result in no significant effects to the adjacent sensitive receptor. Operation of the project would be similar to existing onsite operations and would not generate substantial pollutant concentrations that would affect this sensitive receptor. Therefore, impacts to sensitive receptors would be **less than significant**.
- e. **Objectionable Odors:** Table 3-1 of the Guide to Air Quality Assessment (AQMD, 2002) does not list storage facilities as a use known to create objectionable odors. The existing storage facility is not considered a source of objectionable odors. For these reasons, implementation of the project would not be a source of objectionable odors. Thus, **no impact** would occur.

FINDING: The proposed project would not affect the implementation of regional air quality regulations or management plans. The proposed project would not cause substantial adverse effects to air quality, nor exceed established significance thresholds for air quality impacts. The project would not expose sensitive receptors to sensitive pollutant concentrations or be a source of objectionable odors to a substantial number of people. For this Air Quality category, any potential impacts would be **less than significant**.

IV. BIOLOGICAL RESOURCES. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X

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c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

Endangered Species Act

The Endangered Species Act (ESA) (16 U.S. Code [USC] Section 1531 *et seq.*; 50 Code of Federal Regulations [CFR] Parts 17 and 222) provides for conservation of species that are endangered or threatened throughout all or a substantial portion of their range, as well as protection of the habitats on which they depend. The U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) share responsibility for implementing the ESA. In general, USFWS manages terrestrial and freshwater species, whereas NMFS manages marine and anadromous species. No species listed as threatened or endangered under the ESA are known to occur on the project site (Bole & Associates, 2024).

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (16 USC, Chapter 7, Subchapter II) protects migratory birds. Most actions that result in take, or the permanent or temporary possession of, a migratory bird constitute violations of the MBTA. The MBTA also prohibits destruction of occupied nests. USFWS is responsible for overseeing compliance with the MBTA. Although vegetation on the project site is sparse, ornamental vegetation could be used for nesting by various migratory bird species.

Clean Water Act

Clean Water Act (CWA) section 404 regulates the discharge of dredged and fill materials into waters of the U.S., which include all navigable waters, their tributaries, and some isolated waters, as well as some wetlands adjacent to the aforementioned waters (33 CFR Section 328.3). Areas meeting the regulatory definition of waters of the U.S. are subject to the jurisdiction of U.S. Army Corps of Engineers (USACE) under the provisions of CWA Section 404. Section 401 of the CWA requires an evaluation of water quality when a proposed activity requiring a federal license

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or permit could result in a discharge to waters of the U.S. In California, the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) issue water quality certifications. There are no habitats or vegetation communities on the project site that fall within the jurisdiction of the CWA.

State Laws, Regulations, and Policies

California Fish and Game Code

The California Fish and Game Code includes various statutes that protect biological resources, including the California Endangered Species Act (CESA). CESA (California Fish and Game Code Section 2050–2098) prohibits state agencies from approving a project that would jeopardize the continued existence of a species listed under CESA as endangered or threatened. Section 2080 of the California Fish and Game Code prohibits the take of any species that is state listed as endangered or threatened, or designated as a candidate for such listing. In addition, Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code identify species that are fully protected from all forms of take. There are no plant or animal species known to occur on the project site that fall under CESA jurisdiction or that are designated as fully protected species (Bole & Associates, 2024).

Similar to the MBTA, California Fish and Game Code Section 3503, 3513, and 3800 protect native and migratory birds, including their active or inactive nests and eggs, from all forms of take. As stated above, although vegetation on the project site is sparse, ornamental vegetation could be used for nesting by various common migratory bird species.

Streambed Alteration Agreement

Sections 1601 to 1606 of the California Fish and Game Code require that a Streambed Alteration Application be submitted to CDFW for any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake. There are no habitats on the project site that fall within the jurisdiction of Section 1601 or 1606.

California Native Plant Protection Act

The California Native Plant Protection Act (California Fish and Game Code Section 1900–1913) prohibits the taking, possessing, or sale of any plants with a state designation of rare, threatened, or endangered (as defined by the California Department of Fish and Wildlife [CDFW]). The California Native Plant Society (CNPS) maintains a list of plant species native to California that have low population numbers, limited distribution, or are otherwise threatened with extinction. This information is published in the Inventory of Rare and Endangered Plants of California (CNPS 2001). Potential impacts to populations of CNPS-listed plants receive consideration under CEQA review. No plants under the jurisdiction of the NPPA or CNPS-listed plant species are known to occur on the project site (Bole & Associates, 2024). The project site does not contain gabbroic soils which many of the rare plants that occur in the project region are associated with.

Local Laws, Regulations, and Policies

The County General Plan also includes policies that contain specific, enforceable requirements and/or restrictions and corresponding performance standards that address potential impacts on special-status plant species or create opportunities for habitat improvement. The El Dorado County General Plan designates the Important Biological Corridor (IBC) and Priority Conservation Areas (PCAs). The Draft EIR for the General Plan also identifies locations of sensitive habitats, special-status species, and other important biological resources (e.g., Exhibits 5.12-4, 5.12-6, and 5.12-7) (El Dorado County, 2003). The project site does not occur within an IBC or PCA and does not have any sensitive biological resources identified in the General Plan Draft EIR. The subject parcel does occur within an area designated as the Mitigation Area 2 under the Rare Plant Mitigation Fee program. However, Mitigation Area 2 locations are simply within the EID service area and do not have the gabbroic soils that may be suitable for rare plants endemic to the region. Fees are paid in Mitigation Area 2; however, direct effects on the target plant species do not occur.

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Discussion:

- a. **Special Status Species:** A Biological Resources Evaluation was prepared for the project on January 11, 2024 by Bole & Associates. The Biological Resources Evaluation letter (Attachment 7) states that no species listed under either the ESA or CESA were found on the project site, and none are expected to occur. Due to the conditions of development surrounding and within the project site, there is very little potential habitat for even common plant and wildlife species. The limited area of potential habitat, which is located in the most southern portion of the project site, would remain undeveloped with project implementation. In addition, no other special status wildlife or plant species were found to be on the project site (Bole & Associates, 2024). General vegetation communities existing on the project site include non-native grasses and disturbed areas primarily covered with gravel. No removal of special status fauna and/or flora would occur as a result of the project. There would be **no impact** to special-status plant or wildlife species.
- b, c. **Riparian Habitat and Wetlands:** Based on review of the project site, the Biological Resources Evaluation letter (Attachment 7) determined the project site to not include any aquatic features, including wetlands, riparian habitat, and vernal pools. Therefore, there would be **no impact** to riparian habitat or wetlands.
- d. **Migration Corridors:** Review of the CDFW Migratory Deer Herd Maps and General Plan Draft EIR Exhibit 5.12-7 indicate that the Outside Deer Herd Migration Corridor does not extend over the project site. The El Dorado County General Plan does not identify the project site as an IBC. The Biological Resources Evaluation letter (Attachment 7) determined that no migratory species are known to exist or depend on the project site or within the general vicinity. Therefore, there would be **no impact** to migration corridors.
- e. **Local Policies:** The project site is not located within the County's Rare Plant Mitigation Overlay, the County's IBC overlay, or any other local environmental overlays with the goal of preserving and protecting sensitive natural resources within the County. Oak woodlands, individual native oak trees, or heritage trees, as defined in Section 130.39.030, have not been identified within the project site or vicinity and as such, no oak trees would be impacted or removed as a result of the proposed project. Therefore, impacts associated with removal of oak woodlands, individual native oak trees, or heritage trees would be **less than significant**.
- f. **Adopted Plans:** The Biological Resources Evaluation letter (Attachment 7) concluded that no significant impacts to protected species, habitat, wetlands, or oak trees would occur with implementation of the proposed project. The project would not conflict with the provisions of an adopted Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, **no impact** would occur to adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans.

Finding: As discussed within the Biological Resources Evaluation letter authored by Bole & Associates, implementation of the project would result in a less than significant impacts to biological resources, which would be further minimized with adherence to standard County development standards. Therefore, for this Biological Resources category, potential impacts would be **less than significant**.

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V. CULTURAL RESOURCES. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?			X	
b. Cause a substantial adverse change in the significance of archaeological resource pursuant to Section 15064.5?			X	
c. Directly or indirectly destroy a unique resource or site or unique geologic feature?			X	
d. Disturb any human remains, including those interred outside of formal cemeteries?			X	

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

The National Register of Historic Places

The National Register of Historic Places (NRHP) is the nation's master inventory of known historic resources. The NRHP is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

State Laws, Regulations, and Policies

California Register of Historical Resources

Public Resources Code (PRC) Section 5024.1 establishes the California Register of Historical Resources (CRHR). The register lists all California properties considered to be significant historical resources. The CRHR includes all properties listed as or determined to be eligible for listing in the National Register of Historic Places (NRHP), including properties evaluated under Section 106 of the National Historic Preservation Act. The criteria for listing are similar to those of the NRHP. There are no CRHR listed resources on the project site or in the immediate vicinity.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24-hours, the Native American Heritage Commission (NAHC).

California Public Resources Section 5097.98

Section 5097.98 of the California Public Resources Code stipulates that whenever the commission receives notification of a discovery of Native American human remains from a county coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify those persons it believes to be most likely

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descended from the deceased Native American. The decedents may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for addressing, with appropriate dignity, the human remains and any associated grave goods. The descendants shall complete their inspection and make their recommendation within 24-hours of their notification by the NAHC.

CEQA and CEQA Guidelines

Section 21083.2 of CEQA requires that the lead agency determine whether a project may have a significant effect on unique archaeological resources. A unique archaeological resource is defined in CEQA as an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it:

- Contains information needed to answer important scientific research questions, and there is demonstrable public interest in that information;
- Has a special or particular quality, such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Measures to avoid, conserve, preserve, or mitigate significant effects on these resources are also provided under CEQA Section 21083.2.

Section 15064.5 of the CEQA Guidelines notes that “a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” Substantial adverse changes include physical changes to the historic resource or to its immediate surroundings, such that the significance of the historic resource would be materially impaired. Lead agencies are expected to identify potentially feasible measures to mitigate significant adverse changes in the significance of a historic resource before they approve such projects. Historic resources are those that are:

- listed in, or determined to be eligible for listing in, the CRHR (Public Resources Code Section 5024.1[k]);
- included in a local register of historic resources (Public Resources Code Section 5020.1) or identified as significant in an historic resource survey meeting the requirements of Public Resources Code Section 5024.1(g); or
- determined by a lead agency to be historically significant.

There are no known historic resources on the project site or in the vicinity.

Discussion:

- a-c. **Historic or Archeological Resources:** A records search conducted at the North Central Information Center (NCIC) on August 21, 2023, found that the proposed project area contains zero indigenous resources and zero historic-period cultural resources. Additionally, six cultural resources study reports covering at least some portion of the project site were found to be on file. Outside of the project area, but within the ¼ mile search radius of the geographic area, this broader search area contains one indigenous resource and three historic-period cultural resources. Additionally, two cultural resource study reports are on file which cover a portion of the broader search area. According to the NCIC, there is low potential for locating indigenous cultural resources on the project site or within the immediate vicinity. Due to prior grading disturbance of the project site, there is low potential for locating historic-period cultural resources. Project activities should not affect known resources off the project site. The project site is not known to contain either Tribal Cultural Resources (TCRs) (see TCR Chapter) or historic-period resources. While there are no known historical or cultural resources onsite, the project would comply with all applicable laws and regulations related to cultural resources and the inadvertent discovery of a buried, unknown cultural resource. Therefore, regulatory compliance would ensure impacts to historical and cultural resources would be **less than significant**.
- d. **Human Remains:** No human remains are known to exist within the project site. However, there is the possibility that subsurface construction activities associated with the proposed project, such as grading, could

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potentially damage or destroy previously uncovered human remains. However, if human remains should be discovered, implementation of standard conditions of approval to address discovery of human remains consistent with California Health and Safety Code Section 7050.5 would ensure that impacts on previously undiscovered human remains would be **less than significant**.

FINDING: No significant cultural resources have been identified on the project site. Standard conditions of approval would apply in the event of accidental discovery during future construction activities. For this Cultural Resources category, any potential impacts would be **less than significant**.

VI. ENERGY. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Result in potential significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Environmental and Regulatory Setting

Federal Laws, Regulations, and Policies

No federal regulations related to energy are applicable to the evaluation of the proposed project.

State Laws, Regulations, and Policies

California Building Standards Code (Title 24, California Code of Regulations), including Energy Code (Title 24, Part 6) and Green Building Standards Code (Title 24, Part 11)

California first adopted the California Buildings Standards Code in 1979, which constituted the nation's first comprehensive energy conservation requirements for construction. Since this time, the standards have been continually revised and strengthened. In particular, the California Building Standards Commission adopted the mandatory Green Building Standards Code (CALGreen [California Code of Regulations, Title 24, Part 11]) in January 2010. CALGreen applies to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure. The California Code of Regulations, Title 24, Part 6 (also known as the California Energy Code), and associated regulations in CALGreen were revised again in 2013 by the California Energy Commission (CEC). The 2013 Building Energy Efficiency Standards are 25 percent more efficient than previous standards for residential construction. The latest update to the California Building Code was published on July 1, 2022, with an effective date of January 1, 2023. The California Building Code applies to all new development, and there are no substantive waivers available that would exempt development from its energy efficiency requirements. The California Building Code is revised on a regular basis, with each revision typically increasing the required level of energy efficiency.

Assembly Bill 1493—Pavley Rules (2002, Amendments 2009, 2012 rule-making)

AB 1493 required the ARB to adopt vehicle standards that will improve the efficiency of light duty autos and lower GHG emissions to the maximum extent feasible beginning in 2009. Additional strengthening of the Pavley standards (referred to previously as "Pavley II," now referred to as the "Advanced Clean Cars" measure) has been proposed for vehicle model years 2017–2025. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per

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gallon by 2025. The improved energy efficiency of light duty autos will reduce statewide fuel consumption in the transportation sector.

Local Laws, Regulations, and Policies

The County General Plan Public Services and Utilities Element includes goals, objectives, and policies related to energy conservation associated with the County's future growth and development. Among these is Objective 5.6.2 (Encourage Energy-Efficient Development) which applies to energy-efficient buildings, subdivisions, development and landscape designs. Further, the County has other goals and policies that would conserve energy even though not being specifically drafted for energy conservation purposes (e.g., Objective 6.7.2, Policy 6.7.2.3).

Discussion:

- a. **Unnecessary Consumption:** Project-related construction and operation would be consistent with applicable energy legislation, policies, and standards for the purpose of reducing energy consumption and improving efficiency (i.e., reducing wasteful and inefficient use of energy) as described in the Environmental and Regulatory Setting. The proposed project would conform to building codes and other state and local energy conservation measures described in the Environmental and Regulatory Setting. With adherence to the above-mentioned codes and regulations, any potential impacts would be **less than significant**.
- b. **Conflict with Energy Plans:** Development of the project will be consistent with all applicable state and local plans for renewable energy or energy efficiency and will not obstruct implementation of applicable energy plans. Any potential impacts would be **less than significant**.

FINDING: The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The project would be consistent with all applicable state and local plans for renewable energy or energy efficiency. For this Energy category, any potential impacts would be **less than significant**.

VI. GEOLOGY AND SOILS. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	

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b. Result in substantial soil erosion or the loss of topsoil?			X	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			X	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?			X	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

National Earthquake Hazards Reduction Act

The National Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) and creation of the National Earthquake Hazards Reduction Program (NEHRP) established a long-term earthquake risk-reduction program to better understand, predict, and mitigate risks associated with seismic events. The following four federal agencies are responsible for coordinating activities under NEHRP: USGS, National Science Foundation (NSF), Federal Emergency Management Agency (FEMA), and National Institute of Standards and Technology (NIST). Since its inception, NEHRP has shifted its focus from earthquake prediction to hazard reduction. The current program objectives (NEHRP 2009) include promoting the adoption of earthquake hazard reduction activities by federal, state, and local governments and supporting national building standards and model building code organizations.

State Laws, Regulations, and Policies

Alquist–Priolo Earthquake Fault Zoning Act

The Alquist–Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621 *et seq.*) was passed to reduce the risk to life and property from surface faulting in California. The Alquist–Priolo Act prohibits construction of most types of structures intended for human occupancy on the surface traces of active faults and strictly regulates construction in the corridors along active faults (earthquake fault zones). It also defines criteria for identifying active faults, giving legal weight to terms such as “active,” and establishes a process for reviewing building proposals in and adjacent to earthquake fault zones. Under the Alquist-Priolo Act, faults are zoned and construction along or across them is strictly regulated if they are “sufficiently active” and “well defined.”

Historical seismic activity and fault and seismic hazards mapping in the project vicinity indicate that the area has relatively low potential for seismic activity (El Dorado County 2003). No active faults have been mapped in the project area, and none of the known faults have been designated as an Alquist-Priolo Earthquake Fault Zone.

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Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (Public Resources Code Sections 2690–2699.6) establishes statewide minimum public safety standards for mitigation of earthquake hazards. While the Alquist–Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other seismic hazards, and cities and counties are required to regulate development within mapped seismic hazard zones. In addition, the act addresses not only seismically induced hazards but also expansive soils, settlement, and slope stability. The State requires local governments to incorporate site-specific geotechnical hazard investigations and associated hazard mitigation as part of the local construction permit approval process.

As stated above, historical seismic activity and fault and seismic hazards mapping in the project vicinity indicate that the area has relatively low potential for seismic activity (El Dorado County 2003).

California Building Standards Code

Title 24 CCR, also known as the California Building Standards Code (CBC), specifies standards for geologic and seismic hazards other than surface faulting. These codes are administered and updated by the California Building Standards Commission. CBC specifies criteria for open excavation, seismic design, and load-bearing capacity directly related to construction in California.

Paleontological Resources

The lead agency having jurisdiction over a project under CEQA is responsible for ensuring that paleontological resources are protected in compliance with CEQA and other applicable statutes. Paleontological and historical resource management is also addressed in Public Resources Code Section 5097.5, “Archaeological, Paleontological, and Historical Sites.” This statute defines as a misdemeanor any unauthorized disturbance or removal of a fossil site or remains on public land and specifies that state agencies may undertake surveys, excavations, or other operations as necessary on state lands to preserve or record paleontological resources. The County General Plan contains policies describing specific, enforceable measures to protect cultural resources and the treatment of resources when found.

El Dorado County prepared a section on Paleontological Resources for the General Plan EIR (May 2003). Paleontological resources are predominately found in sedimentary rock formations, while El Dorado County’s geology is predominately volcanic (igneous rock type). Sedimentary formations are virtually nonexistent in El Dorado County; therefore, the potential to encounter paleontological resources anywhere in the County is very low. According to the Geologic Map of Camino, USGS Quadrangle, El Dorado County, California, the predominant onsite soils are classified as Argonaut gravelly loam 2 – 15 percent slope and Auburn silt loam 2 – 30 percent slopes. These soil types are not known to contain fossils or support the formation of fossils.

Discussion:

a. **Seismic Hazards:**

- i) There are no known active faults that traverse the project site and as such, the project site is not located within a mapped Alquist-Priolo Earthquake Fault Zone. In addition, there are no Alquist-Priolo fault zones within El Dorado County according to the California Department of Conservation Division of Mines and Geology (California Geological Survey 2024). Therefore, **no impacts** related to fault rupture would occur with project implementation.
- ii) According to the California Geologic Survey’s Fault Activity Map, the County includes various active faults, including but not limited to the Maidu Fault, Bear Mountains Fault, and West Tahoe Fault (CDC, 2024). However, the potential for strong seismic ground shaking in the project area is still considered remote. Any potential impacts due to seismic ground shaking would be addressed through compliance with the Uniform Building Code (UBC), the California Building Code (CBC), and County building requirements. All structures would be built to meet the

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construction standards of these building codes for the appropriate seismic zone. Therefore, impacts associated with strong ground shaking would be **less than significant**.

- iii) El Dorado County is considered an area with low potential for seismic activity. Based on the Seismic Hazards Mapping Program administered by the California Geological Survey, no seismic Hazard Zone, or areas prone to liquefaction and earthquake-induced landslides occur on the project site or the surrounding area (DOC, 2024). For these reasons, impacts associated with seismic-related ground failure, including liquefaction, would be **less than significant**.
 - iv) The portion of the project site proposed for development is relatively flat as a result of prior mass grading and is not located near any steep slopes. Therefore, the potential for seismic-induced landslides is considered to be very low. All grading activities onsite would be required to comply with the El Dorado County Grading, Erosion Control and Sediment Ordinance, which would minimize geologic hazards, such as landslides. As such, impacts associated with landslides would be **less than significant**.
- b. **Soil Erosion:** According to the United States Department of Agriculture (USDA) Soil Survey Map, the predominant onsite soils are classified as Argonaut gravelly loam, 2 – 15 percent slopes and Auburn silt loam, 2 – 30 percent slopes. These soil types are not known to be susceptible to erosion. Additionally, the area of disturbance is relatively flat, which would reduce the potential of soil erosion caused by grading activities. All future construction activities associated with the project would need to comply with the El Dorado County Grading, Erosion and Sediment Control Ordinance, including the implementation of pre- and post-construction Best Management Practices (BMPs). Implemented BMPs are required to be consistent with the County's California Stormwater Pollution Prevention Plan (SWPPP) issued by the SWRCB to eliminate run-off and erosion and sediment controls. Any grading activities exceeding 250-cubic-yards of graded material or grading completed for the purpose of supporting a structure must meet the provisions contained in the County of El Dorado Grading, Erosion, and Sediment Control Ordinance.
- In addition, if construction activities of the project disturb one-acre or more of soil, the project applicant must obtain a General Permit for discharges of storm water associated with activity from SWRCB. As part of this permit, a project-specific SWPPP must be prepared and implemented. The project-specific SWPPP must include erosion control measures and construction waste containment measures to ensure that waters of the State are protected during and after project construction. Therefore, regulatory compliance would ensure impacts associated with soil erosion would be **less than significant** with project implementation.
- c. **Geologic Hazards:** Based on the Seismic Hazards Mapping Program administered by the California Geological Survey, no portion of El Dorado County is located in a Seismic Hazard Zone or those areas prone to liquefaction and earthquake-induced landslides (DOC, 2024). Per the USDA Soil Survey Map, the predominant soils onsite are not known as prone to collapse. Additionally, the area of disturbance is relatively flat which would reduce the potential of landslide hazards associated with construction. Therefore, El Dorado County is not considered to be at risk from liquefaction hazards. Lateral spreading is typically associated with areas experiencing liquefaction. Because liquefaction hazards are not present in El Dorado County, the project site is not at risk for liquefaction or lateral spreading. In addition, development of the project would comply with all applicable federal, state, and local laws, regulations, and requirements, including the El Dorado County Grading, Erosion Control and Sediment Ordinance, UBC and CBC, which have been established to mandate incorporation of project-specific seismic and geotechnical engineering. As such, implementation of the project would result in **less than significant** impacts related to geologic hazards.
- d. **Expansive Soils:** Expansive soils are those that greatly increase in volume when they absorb water and shrink when they dry out. When buildings are placed on expansive soils, foundations may rise each wet season and fall each dry season. This movement may result in cracking foundations, distortion of structures, and warping of doors and windows. The western portions of the county generally have a low soil expansiveness rating; however, Argonaut gravelly loam 2 – 15 percent does have a high shrink swell potential. Development of the project would be required to implement the applicable seismic construction standards and industry best

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practices to minimize effects of expansive soils, as applicable. Therefore, impacts related to expansive soils would be **less than significant** with project implementation.

- e. **Septic Capability:** No septic systems are proposed as part of the project. As such, there would be **no impacts**.
- f. **Paleontological Resources:** As discussed in the Environmental and Regulatory Setting section above, the project area is not located in an area that is considered likely to have paleontological resources present. Fossils of plants, animals, or other organisms of paleontological significance have not been discovered within the project area. In this context, the project would not result in impacts to paleontological resources or unique geologic features. In the event that subsurface paleontological sites are discovered during grading activities at the site, standard conditions of approval requiring that all work activities shall be stopped in the event of an unanticipated discovery would ensure that impacts would be **less than significant**.

FINDING: A review of the soils and geologic conditions on the project site determined that the project would not result in a substantial adverse effect related to geology and soils. All construction activities, including grading, would be required to comply with all applicable federal, state, and local laws, regulations, and requirements, including the El Dorado County Grading, Erosion Control and Sediment Ordinance, UBC, and CBC, to address potential impacts related to seismic and geologic hazards, soil erosion, landslides, and other geologic impacts. For this Geology and Soils category, any potential impacts would be **less than significant**.

VII. GREENHOUSE GAS EMISSIONS. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Background/Science

Cumulative greenhouse gases (GHG) emissions are believed to contribute to an increased greenhouse effect and global climate change, which may result in sea level rise, changes in precipitation, habitat, temperature, wildfires, air pollution levels, and changes in the frequency and intensity of weather-related events. While criteria pollutants and toxic air contaminants are pollutants of regional and local concern (see Section III. Air Quality above); GHG are global pollutants. The primary land-use related GHG are carbon dioxide (CO₂), methane (CH₄) and nitrous oxides (N₂O). The individual pollutant's ability to retain infrared radiation represents its "global warming potential" and is expressed in terms of CO₂ equivalents; therefore, CO₂ is the benchmark having a global warming potential of one. Methane has a global warming potential of 21 and thus has a 21 times greater global warming effect per metric ton of CH₄ than CO₂. Nitrous Oxide has a global warming potential of 310. Emissions are expressed in annual metric tons of CO₂ equivalent units of measure (i.e., MTCO₂e/yr).

GHG Sources

The primary man-made source of CO₂ is the burning of fossil fuels; the two largest sources being coal burning to produce electricity and petroleum burning in combustion engines. The primary sources of man-made CH₄ are natural gas systems losses (during production, processing, storage, transmission, and distribution), enteric fermentation (digestion from livestock) and landfill off-gassing. The primary source of man-made N₂O is agricultural soil management (fertilizers), with fossil fuel combustion a very distant second. In El Dorado County, the primary source of GHG is fossil fuel combustion mainly in the transportation sector (estimated at 70% of countywide GHG emissions). A distant second are residential sources (approximately 20%), and commercial/industrial sources are third

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(approximately seven percent). The remaining sources are waste/landfill (approximately 3%) and agricultural (less than 1%).

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

At the federal level, USEPA has developed regulations to reduce GHG emissions from motor vehicles and has developed permitting requirements for large stationary emitters of GHGs. On April 1, 2010, USEPA and the National Highway Traffic Safety Administration (NHTSA) established a program to reduce GHG emissions and improve fuel economy standards for new model year 2012-2016 cars and light trucks. On August 9, 2011, USEPA and the NHTSA announced standards to reduce GHG emissions and improve fuel efficiency for heavy-duty trucks and buses.

State Laws, Regulations, and Policies

Executive Order (EO) S-3-5 (June 2005) established California's GHG emissions reductions targets and laid out responsibilities among the state agencies for implementing the EO and for reporting on progress toward the targets. This EO established the following targets:

- By 2010, reduce GHG emissions to 2000 levels
- By 2020, reduce GHG emissions to 1990 levels
- By 2050, reduce GHG emissions to 80 percent below 1990 levels

Discussion

Impact Significance Criteria

CEQA does not provide clear direction on addressing climate change. It requires lead agencies identify project GHG emissions impacts and their "significance," but is not clear what constitutes a "significant" impact. As stated above, GHG impacts are inherently cumulative, and since no single project could cause global climate change, the CEQA test is if impacts are "cumulatively considerable." Not all projects emitting GHG contribute significantly to climate change. CEQA authorizes reliance on previously approved plans (i.e., a Climate Action Plan (CAP), etc.) and mitigation programs adequately analyzing and mitigating GHG emissions to a less than significant level. "Tiering" from such a programmatic-level document is the preferred method to address GHG emissions. El Dorado County does not have an adopted CAP or similar program-level document; therefore, the project's GHG emissions must be addressed at the project-level.

Unlike thresholds of significance established for criteria air pollutants in El Dorado County AQMD's (EDCAQMD) *Guide to Air Quality Assessment* (February 2002) ("CEQA Guide"), the District has not adopted GHG emissions thresholds for land use development projects. In the absence of County adopted thresholds, El Dorado County AQMD recommends using the adopted thresholds of other lead agencies which are based on consistency with the goals of AB 32. Since climate change is a global problem and the location of the individual source of GHG emissions is somewhat irrelevant, it's appropriate to use thresholds established by other jurisdictions as a basis for impact significance determinations. Projects exceeding these thresholds would have a potentially significant impact and be required to mitigate those impacts to a less than significant level. Until the County adopts a CAP consistent with CEQA Guidelines Section 15183.5, and/or establishes GHG thresholds, the El Dorado County AQMD has recommended the use of thresholds adopted by the Sacramento Metropolitan Air Quality Management District (SMAQMD). The thresholds of significance established by SMAQMD, and used by EDCAQMD, were developed to identify emissions levels for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move towards climate stabilization. Per the SMAQMD Thresholds of Significance Table, updated April 2020, if a proposed project results in emissions less than 1,100 MTCO₂e/yr during both construction or operation, the proposed project would result in a less-than-significant impact related to GHG emissions.

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- a-b. As stated above, the EDCAQMD recommends the use of thresholds adopted by the SMAQMD for assessing the significance of GHG emissions from individual projects. The SMAQMD thresholds were developed to identify emissions levels for which a project would not substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move towards climate stabilization. Within these thresholds is the criteria that if a proposed project results in emissions less than 1,100 MTCO₂e/yr during both construction and operation, the proposed project would result in a less-than-significant impact related to GHG emissions.

Although specific GHG emissions have not been calculated for the proposed project, it can still be confirmed that emissions from project construction and operation would be below the 1,100 MTCO₂e/yr threshold. The Initial Study/Mitigated Negative Declaration (IS/MND) for the Leave It To Us Self Storage Project includes GHG emissions modelling and estimates of project-generated GHG emissions. The IS/MND is available on the Office of Planning and Research's CEQAnet website at <https://ceqanet.opr.ca.gov/2019089029/2>. The Leave It To Us Self Storage Project included the development of nine self-storage buildings, two employee housing units, 30 recreational vehicle (RV) parking storage spaces, and parking lot and site improvements. According to the GHG emission modeling from the IS/MND, annual construction GHG emissions would not exceed 337 metric tons of CO₂ equivalent/year (MTCO₂e/yr), which is below the SMAQMD GHG Thresholds for annual construction emissions of 1,100 MTCO₂e/yr. Additionally, the model concluded operational GHG emissions would be less than 329 MTCO₂e/yr, which is below the annual GHG operational threshold of 1,100 MTCO₂e/yr.

Since the proposed project is similar in nature to the Leave It To Use Self Storage Project but includes the development of four self-storage buildings, four parking spaces, and site improvements, it is reasonable to conclude that the proposed project would also generate emissions that would be below the SMAQMD GHG daily and annual construction and operational thresholds. Because both the construction and operational GHG emissions of the proposed project would be below the SMAQMD GHG thresholds, any potential impacts related to GHG emissions would **be less than significant**. Since emissions would be less than significant, the project also would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

FINDING: The project would not result in GHG emissions that would result in a significant adverse environmental effect or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. For the GHG Emissions category, any potential impacts would be **less than significant**.

VIII. HAZARDS AND HAZARDOUS MATERIALS. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	

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d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	

Environmental and Regulatory Setting:

Hazardous materials and hazardous wastes are subject to extensive federal, state, and local regulations to protect public health and the environment. These regulations provide definitions of hazardous materials; establish reporting requirements; set guidelines for handling, storage, transport, and disposal of hazardous wastes; and require health and safety provisions for workers and the public. The major federal, state, and regional agencies enforcing these regulations are USEPA and the Occupational Safety and Health Administration (OSHA); California Department of Toxic Substances Control (DTSC); California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA); California Governor's Office of Emergency Services (Cal OES); and EDCAPCD.

Federal Laws, Regulations, and Policies

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, also called the Superfund Act; 42 USC Section 9601 *et seq.*) is intended to protect the public and the environment from the effects of past hazardous waste disposal activities and new hazardous material spills. Under CERCLA, USEPA has the authority to seek the parties responsible for hazardous materials releases and to ensure their cooperation in site remediation. CERCLA also provides federal funding (through the "Superfund") for the remediation of hazardous materials contamination. The Superfund Amendments and Reauthorization Act of 1986 (Public Law 99-499) amends some provisions of CERCLA and provides for a Community Right-to-Know program. No CERCLA designated sites occur on the project parcel or in the vicinity.

Resource Conservation and Recovery Act

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The Resource Conservation and Recovery Act of 1976 (RCRA; 42 USC Section 6901 *et seq.*), as amended by the Hazardous and Solid Waste Amendments of 1984, is the primary federal law for the regulation of solid waste and hazardous waste in the United States. These laws provide for the “cradle-to-grave” regulation of hazardous wastes, including generation, transportation, treatment, storage, and disposal. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of.

USEPA has primary responsibility for implementing RCRA, but individual states are encouraged to seek authorization to implement some or all RCRA provisions. California received authority to implement the RCRA program in August 1992. DTSC is responsible for implementing the RCRA program in addition to California’s own hazardous waste laws, which are collectively known as the Hazardous Waste Control Law.

Energy Policy Act of 2005

Title XV, Subtitle B of the Energy Policy Act of 2005 (the Underground Storage Tank Compliance Act of 2005) contains amendments to Subtitle I of the Solid Waste Disposal Act, the original legislation that created the Underground Storage Tank (UST) Program. As defined by law, a UST is “any one or combination of tanks, including pipes connected thereto, that is used for the storage of hazardous substances and that is substantially or totally beneath the surface of the ground.” In cooperation with USEPA, SWRCB oversees the UST Program. The intent is to protect public health and safety and the environment from releases of petroleum and other hazardous substances from tanks. The four primary program elements include leak prevention (implemented by Certified Unified Program Agencies [CUPAs], described in more detail below), cleanup of leaking tanks, enforcement of UST requirements, and tank integrity testing.

Spill Prevention, Control, and Countermeasure Rule

USEPA’s Spill Prevention, Control, and Countermeasure (SPCC) Rule (40 CFR, Part 112) apply to facilities with a single above-ground storage tank (AST) with a storage capacity greater than 660-gallons, or multiple tanks with a combined capacity greater than 1,320-gallons. The rule includes requirements for oil spill prevention, preparedness, and response to prevent oil discharges to navigable waters and adjoining shorelines. The rule requires specific facilities to prepare, amend, and implement SPCC Plans.

Occupational Safety and Health Administration

OSHA is responsible at the federal level for ensuring worker safety. OSHA sets federal standards for implementation of workplace training, exposure limits, and safety procedures for the handling of hazardous substances (as well as other hazards). OSHA also establishes criteria by which each state can implement its own health and safety program.

Code of Federal Regulations (14 CFR) Part 77

14 CFR Part 77.9 is designed to promote air safety and the efficient use of navigable airspace. Implementation of the code is administered by the Federal Aviation Administration (FAA). If an organization plans to sponsor any construction or alterations that might affect navigable airspace, a Notice of Proposed Construction or Alteration (FAA Form 7460-1) must be filed. The code provides specific guidance regarding FAA notification requirements.

State Laws, Regulations, and Policies

Safe Drinking Water and Toxic Enforcement Act of 1986 – Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986, more commonly known as Proposition 65, protects the state’s drinking water sources from contamination with chemicals known to cause cancer, birth defects, or other reproductive harm. Proposition 65 also requires businesses to inform the public of exposure to such chemicals in the products they purchase, in their homes or workplaces, or that are released into the environment. In accordance with Proposition 65, the California Governor’s Office publishes, at least annually, a list of such chemicals. OEHHA, an

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agency under the California Environmental Protection Agency (CalEPA), is the lead agency for implementation of the Proposition 65 program.

The Unified Program

The Unified Program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of six environmental and emergency response programs. CalEPA and other state agencies set the standards for their programs, while local governments (CUPAs) implement the standards. For each county, the CUPA regulates/oversees the following:

- Hazardous materials business plans;
- California accidental release prevention plans or federal risk management plans;
- The operation of USTs and ASTs;
- Universal waste and hazardous waste generators and handlers;
- On-site hazardous waste treatment;
- Inspections, permitting, and enforcement;
- Proposition 65 reporting; and
- Emergency response.

Hazardous Materials Business Plans

Hazardous materials business plans are required for businesses that handle hazardous materials in quantities greater than or equal to 55-gallons of a liquid, 500-pounds of a solid, or 200-cubic-feet (cf) of compressed gas, or extremely hazardous substances above the threshold planning quantity (40 CFR, Part 355, Appendix A). Per the California Office of Emergency Services, business plans are required to include an inventory of the hazardous materials used/stored by the business, a site map, an emergency plan, and a training program for employees. In addition, business plan information is provided electronically to a statewide information management system, verified by the applicable CUPA, and transmitted to agencies responsible for the protection of public health and safety (i.e., local fire department, hazardous material response team, and local environmental regulatory groups).

California Occupational Safety and Health Administration

Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations in California. Cal/OSHA regulations pertaining to the use of hazardous materials in the workplace (CCR Title 8) include requirements for safety training, availability of safety equipment, accident and illness prevention programs, warnings about exposure to hazardous substances, and preparation of emergency action and fire prevention plans.

Hazard communication program regulations that are enforced by Cal/OSHA require workplaces to maintain procedures for identifying and labeling hazardous substances, inform workers about the hazards associated with hazardous substances and their handling, and prepare health and safety plans to protect workers at hazardous waste sites. Employers must also make material safety data sheets available to employees and document employee information and training programs. In addition, Cal/OSHA has established maximum permissible RF radiation exposure limits for workers (Title 8 CCR Section 5085[b]), and requires warning signs where RF radiation might exceed the specified limits (Title 8 CCR Section 5085 [c]).

California Accidental Release Prevention

The purpose of the California Accidental Release Prevention (CalARP) program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws. In accordance with this program, businesses that handle more than a threshold quantity of regulated substance are required to develop a risk management plan (RMP). This RMP must provide a detailed analysis of potential risk factors and associated mitigation measures that can be implemented to reduce accident potential. CUPAs implement the CalARP program through review of RMPs, facility inspections, and public access to information that is not confidential or a trade secret.

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California Department of Forestry and Fire Protection Wildland Fire Management

The Office of the State Fire Marshal and the CALFIRE administer state policies regarding wildland fire safety. Construction contractors must comply with the following requirements in the Public Resources Code during construction activities at any sites with forest-, brush-, or grass-covered land:

- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (Public Resources Code Section 4442).
- Appropriate fire-suppression equipment must be maintained from April 1 to December 1, the highest-danger period for fires (Public Resources Code Section 4428).
- On days when a burning permit is required, flammable materials must be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor must maintain the appropriate fire suppression equipment (Public Resources Code Section 4427).
- On days when a burning permit is required, portable tools powered by gasoline fueled internal combustion engines must not be used within 25-feet of any flammable materials (Public Resources Code Section 4431).

California Highway Patrol

CHP, along with Caltrans, enforce and monitor hazardous materials and waste transportation laws and regulations in California. These agencies determine container types used and license hazardous waste haulers for hazardous waste transportation on public roads. All motor carriers and drivers involved in transportation of hazardous materials must apply for and obtain a hazardous materials transportation license from CHP.

Local Laws, Regulations, and Policies

CALFIRE provides a map of the Fire Hazard Severity Zones in State Responsibility Areas (SRAs) which shows the fire hazard severity classifications within the SRAs located in El Dorado County. CALFIRE's classification system provides three classes of fire hazards: Moderate, High, and Very High. The project site is located within a Moderate Fire Hazard Zone per CALFIRE classifications. Fire Hazard Ordinance (Chapter 8.08) requires defensible space as described by the State Public Resources Code, including the incorporation and maintenance of a 30-foot fire break or vegetation fuel clearance around structures in fire hazard zones. The County's requirements on emergency access, signing and numbering, and emergency water are more stringent than those required by state law (Patton 2002).

As discussed above in Section III. Air Quality, NOA is also a concern in El Dorado County because it is known to be present in certain soils and can pose a health risk if released into the air. The EDCAQMD has adopted an El Dorado County Naturally Occurring Asbestos Review Area Map that identifies those areas more likely to contain NOA (El Dorado County 2005). Parcels identified as Asbestos Review Parcels and that require a grading permit must prepare and implement an Asbestos Dust Mitigation Plan. The parcel containing the proposed project site is not identified as an Asbestos Review Parcel.

Discussion:

There are no public schools within 0.25-miles of the project site. The nearest school is Madrone Montessori School approximately 0.4 miles to the south. The Gift of Kids Daycare and Preschool is also approximately 0.4 miles south of the project site.

There are no public use airports/airstrips or private airstrips within 2-mile of the project facility. The closest aviation facility is the Cameron Airpark approximately 5-miles northeast of the project site.

- a-c. **Hazardous Materials:** Project construction, demolition, and operation may involve transport, storage, and use of small quantities of some hazardous materials on a temporary basis, such as paints, cleaning solvents, or fuels. Although it is unlikely due to the age of the existing PG&E substation, demolition of the existing PG&E substation could result in exposure to asbestos. Beyond the small amounts of hazardous materials used, compliance with existing laws, as identified above, would further limit the potential for a significant hazard to the public to occur. The proposed project does not include installation of a permanent back-up

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- standby diesel-fuel generator. As stated above, there are no schools within 0.25 miles of the project site. Given this information, impacts related to hazardous materials would be **less than significant**.
- d. **Hazardous Sites:** Neither the SWRCB GeoTracker database nor the DTSC EnvirStor database show any contaminated facilities at the project site or in the vicinity. The nearest site is a leaking gas station underground storage tank that is approximately 0.4 miles away and cleanup was completed in 1991. Therefore, **no impacts** related to hazardous sites would occur with project implementation.
- e-f. **Aircraft Hazards, Private Airstrips:** As shown on the El Dorado County Geographic Information Systems Maps, the project is not located within an Airport Safety District combining zone or near a public airport or private airstrip. As indicated above, the nearest aviation facility to the project site is the Cameron Airpark approximately 5-miles to the northeast of the project site. Therefore, **no impacts** related to airport hazards would occur with project implementation.
- g. **Emergency Plan:** The proposed project is an extension of an existing self-storage facility, where construction activities would occur entirely on the project site and would not interfere with existing operation of surrounding roadways. Once operational, the project would utilize the existing driveway to access the local transportation system. Therefore, project development would not affect any existing roadways or operational levels and as such, would not physically interfere with an adopted emergency plan. The project also does not add any residents or other individuals that would require evacuation during an emergency. For these reasons, **no impact** would occur with project implementation.
- h. **Wildfire Hazards:** According to the California Department of Forestry and Fire Protection (CalFire) 2022 State Responsibility Area Fire Hazard Severity Zones Map for El Dorado County, the project site is in an area designated as a moderate fire hazard severity zone for wildland fire. The project site is located within a developed property with sparse ornamental vegetation within an urban setting. The project site is within the El Dorado Hills Fire Protection District (EDHFPD) for structural fire protection and emergency medical services. With implementation of standard county fire safe requirements and any additional requirements per EDCFPD's building permit review, impacts related to wildfire hazards would be **less than significant**.

FINDING: For the Hazards and Hazardous Materials category, with the incorporation of standard county requirements, any potential impacts would be **less than significant**.

IX. HYDROLOGY AND WATER QUALITY. Would the project:				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements?			X	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c. Substantially alter the existing drainage pattern of the site or area, including through			X	

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the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or -off-site?				
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e. 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?			X	
f. Otherwise substantially degrade water quality?			X	
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j. Inundation by seiche, tsunami, or mudflow?			X	

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

Clean Water Act

The Clean Water Act (CWA) is the primary federal law that protects the quality of the nation's surface waters, including lakes, rivers, and coastal wetlands. The key sections pertaining to water quality regulation for the Proposed Project are CWA Section 303 and Section 402.

Section 303(d) — Listing of Impaired Water Bodies

Under CWA Section 303(d), states are required to identify "impaired water bodies" (those not meeting established water quality standards), identify the pollutants causing the impairment, establish priority rankings for waters on the list, and develop a schedule for the development of control plans to improve water quality. USEPA then approves the State's recommended list of impaired waters or adds and/or removes waterbodies. There are no 303(d) listed water bodies on the subject parcel. As indicated in Section IV. Biological Resources, there are no water bodies on the subject parcel. The nearest 303(d) listed water body is Folsom Lake, approximately 4.5 miles northwest of the project site. Folsom Lake is 303(d) listed due to mercury contamination.

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Section 402—NPDES Permits for Stormwater Discharge

CWA Section 402 regulates construction-related stormwater discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES), which is officially administered by USEPA. In California, USEPA has delegated its authority to the SWRCB, which, in turn, delegates implementation responsibility to the nine RWQCBs; in the case of this project, the Central Valley RWQCB.

The NPDES program provides for both general (those that cover a number of similar or related activities) and individual (activity- or project-specific) permits. General Permit for Construction Activities: Most construction projects that disturb one or more acres of land are required to obtain coverage under SWRCB's General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ). The general permit requires that the applicant file a public notice of intent to discharge stormwater and prepare and implement a SWPPP. SWPPP must include a site map and a description of the proposed construction activities, demonstrate compliance with relevant local ordinances and regulations, and present a list of BMPs that will be implemented to prevent soil erosion and protect against discharge of sediment and other construction-related pollutants to surface waters. Permittees are further required to monitor construction activities and report compliance to ensure that BMPs are correctly implemented and are effective in controlling the discharge of construction-related pollutants.

Municipal Stormwater Permitting Program

SWRCB regulates stormwater discharges from municipal separate storm sewer systems (MS4s) through its Municipal Storm Water Permitting Program. Permits are issued under two phases depending on the size of the urbanized area/municipality. Phase I MS4 permits are issued for medium (population between 100,000 and 250,000 people) and large (population of 250,000 or more people) municipalities and are often issued to a group of co-permittees within a metropolitan area. Phase I permits have been issued since 1990. Beginning in 2003, SWRCB began issuing Phase II MS4 permits for smaller municipalities (population less than 100,000).

El Dorado County is covered under two SWRCB Regional Boards. The West Slope Phase II Municipal Separate Storm Sewer Systems (MS4) NPDES Permit is administered by the Central Valley RWQCB (Region Five). The Lake Tahoe Phase I MS4 NPDES Permit is administered by the Lahontan RWQCB (Region Six).

On May 19, 2015, the El Dorado County Board of Supervisors formally adopted revisions to the Storm Water Quality Ordinance (Ordinance 5022). Previously applicable only to the Lake Tahoe Basin, the ordinance establishes legal authority for the entire unincorporated portion of the County. The purpose of the ordinance is to 1) protect health, safety, and general welfare, 2) enhance and protect the quality of Waters of the State by reducing pollutants in storm water discharges to the maximum extent practicable and controlling non-storm water discharges to the storm drain system, and 3) cause the use of BMPs to reduce the adverse effects of polluted runoff discharges on Waters of the State.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities complying with FEMA regulations that limit development in floodplains. The NFIP regulations permit development within special flood hazard zones provided that residential structures are raised above the base flood elevation of a 100-year flood event. Non-residential structures are required either to provide flood proofing construction techniques for that portion of structures below the 100-year flood elevation or to elevate above the 100-year flood elevation. The regulations also apply to substantial improvements of existing structures. The project site is not within nor near a 100-year flood hazard zone.

State Laws, Regulations, and Policies

Porter–Cologne Water Quality Control Act

The Porter–Cologne Water Quality Control Act requires RWQCBs to develop water quality control plans (also known as basin plans) that designate beneficial uses of California's major surface-water bodies and groundwater basins and establish specific narrative and numerical water quality objectives for those waters. Beneficial uses represent the

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services and qualities of a waterbody (i.e., the reasons that the waterbody is considered valuable). Water quality objectives reflect the standards necessary to protect and support those beneficial uses. Basin plan standards are primarily implemented by regulating waste discharges so that water quality objectives are met. Under the Porter-Cologne Act, basin plans must be updated every three years.

Discussion:

- a. **Water Quality Standards:** No waste discharge would occur as part of the self-storage expansion development project. Erosion control would be required as part of the project's building or grading permit. Stormwater runoff from the potential development would contain water quality protection features in accordance with a NPDES stormwater permit, as deemed applicable. The project would comply with County ordinances and standards regarding waste discharge. The project would not use groundwater or release materials into groundwater or surface water. Therefore, the project would not violate water quality standards with regulatory compliance. As such, impacts associated with water quality standards would be **less than significant**.
- b. **Groundwater Supplies:** The project does not propose the use of groundwater as the larger property is already served by EID, which would continue to serve the site with development of the project. While the development of the project would increase impervious surfaces onsite, the project would not substantially interfere with groundwater recharge as onsite permeable surfaces would remain with project implementation and the project site is not currently used for groundwater recharge. Furthermore, there is no evidence that the project will substantially reduce or alter the quantity of groundwater in the vicinity, or materially interfere with groundwater recharge in the area of the proposed project. The project would not affect potential groundwater supplies above pre-project levels. Therefore, impacts to groundwater supplies would be **less than significant**.
- c-e. **Drainage Patterns:** While the proposed project would add an additional 91,965 square feet of new impervious surface, runoff and potential erosion would be managed per the regulations and policies described in the Environmental and Regulation Setting above. As stated previously, there are no existing streams or other water bodies on the subject parcel that could be altered or otherwise affected by the project. In addition, the subject parcel is outside of any floodplains. A County-issued grading permit would be required to address grading, erosion, and sediment control for any construction. Construction activities would be required to adhere to the El Dorado County Grading, Erosion Control and Sediment Ordinance, which includes the use of BMPs to minimize degradation of water quality during construction. Therefore, implementation of the project would result in **less than significant** impacts related to drainage patterns.
- f. **Water Quality:** As stated in (a.) above in this section, the proposed project would not result in discharge into bodies of water in the vicinity of the project. Erosion control measures would be required as part of the project's building or grading permit. Stormwater runoff from the proposed development would contain water quality protection features in accordance with a NPDES stormwater permit, as deemed applicable. The project would comply with County ordinance and standards regarding waste discharge which could impact the water quality of water bodies located in the vicinity of the project site. The project would not use groundwater or release materials into groundwater or surface water. Therefore, the project would not violate water quality standards with regulatory compliance. As such, impacts associated with water quality standards would be **less than significant**.
- g-j. **Flood-related Hazards:** The project site is not located within any mapped 100-year flood areas and would not result in the construction of any structures that would impede or redirect flood flows (El Dorado County Geographic Information Systems, 2024). No dams exist that would result in potential hazard to the project site related to dam failures. There are no water bodies in the project vicinity that could generate risk of exposure to seiche or tsunamis. There are no geologic or topographic features that could generate mudflow risk. As such, impacts related to flood-related hazards would be **less than significant** with project implementation.

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FINDING: For this project, no significant hydrological impacts would occur with the development of the project either directly or indirectly. For this Hydrology and Water Quality category, any potential impacts would be **less than significant**.

X. LAND USE PLANNING. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Physically divide an established community?				X
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	

Environmental and Regulatory Setting:

California State law requires that each City and County adopt a general plan "for the physical development of the City and any land outside its boundaries which bears relation to its planning." Typically, a general plan is designed to address the issues facing the City or County for the next 15-20 years. The general plan expresses the community's development goals and incorporates public policies relative to the distribution of future public and private land uses. The El Dorado County General Plan was adopted in 2004, and most recently amended in 2019. The 2021-2029 Housing Element was adopted in August 2021 and amended in March 2022.

Discussion:

- a. **Divide An Established Community:** The project is located within a portion of a property developed with Phases 1 and 2 of the Superior Self-Storage Facility within the Town Center West area within the El Dorado Hills Community Region. The project site is also surrounded by similarly zoned CG properties, with R&D zoned properties to the south. Since the project would be located within a demarcated parcel, development of the project would not conflict with the existing land use pattern in the area or physically divide an established community. Therefore, implementation of the project would not physically divide an established community and **no impact** would occur.
- b. **Land Use Consistency:** The project is an extension of the current Superior Self-Storage facility on the larger property. The project site has a General Plan Land Use Designation of AP-EDHSP and zoning designation of CG-PD. The AP-EDHSP land use designation allows for commercial development within the Town Center West development area. Therefore, development of the project would be compatible with the existing General Plan land use designation and the zoning for the site. Therefore, the project would not conflict with any applicable land use plan, policy, or regulation and impacts would be **less than significant**.

FINDING: The proposed project would not physically divide an established community and use of the project site would be consistent with the County's General Plan and Zoning Ordinance. For this Land Use and Planning category, any potential impacts would be **less than significant**.

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XI. MINERAL RESOURCES. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies apply to mineral resources and the Proposed Project.

State Laws, Regulations, and Policies

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act of 1975 (SMARA) requires that the State Mining and Geology Board identify, map, and classify aggregate resources throughout California that contain regionally significant mineral resources. Local jurisdictions are required to enact planning procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans.

The California Mineral Land Classification System represents the relationship between knowledge of mineral deposits and their economic characteristics (grade and size). The nomenclature used with the California Mineral Land Classification System is important in communicating mineral potential information in activities such as mineral land classification, and usage of these terms are incorporated into the criteria developed for assigning mineral resource zones. Lands classified as MRZ-2 are areas that contain identified mineral resources. Areas classified as MRZ-2a or MRZ-2b (referred to hereafter as MRZ-2) are considered important mineral resource areas. The project site is not located within a designated MRZ-2 area.

Local Laws, Regulations, and Policies

El Dorado County in general is considered a mining region capable of producing a wide variety of mineral resources. Metallic mineral deposits, including gold, are considered the most significant extractive mineral resources. Exhibit 5.9-6 shows the MRZ-2 areas within the county based on designated Mineral Resource (-MR) overlay areas. The -MR overlay areas are based on mineral resource mapping published in the mineral land classification reports referenced above. The majority of the county's important mineral resource deposits are concentrated in the western third of the county. However, the project site does not occur in, and is not near, any of the designated -MR overlay areas.

Discussion

- a-b. **Mineral Resources.** The project site has not been delineated in the El Dorado County General Plan as a locally important mineral resource recovery site (2015, EDC General Plan Figure CO-1). Review of the California Department of Conservation Geologic Map data showed that the project site is not within a mineral resource zone district. As such, implementation of the project would not obstruct extraction of mineral resources nor conflicts with mineral extraction operations. **No impacts** would occur.

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FINDING: Project implementation would not result in any impacts related to mineral resources, either directly or indirectly. For this Mineral Resources category, there would be **no impact**.

XII. NOISE. <i>Would the project result in:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. 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?			X	
b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			X	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing, or working in the project area to excessive noise level?				X
f. For a project within the vicinity of a private airstrip, would the project expose people residing, or working in the project area to excessive noise levels?				X

Environmental and Regulatory Setting:

The project site is designated as CG-PD and is part of a larger property that currently operates Phases 1 and 2 of the Superior Self-Storage Facility. Surrounding uses include other parcels zoned CG and RD as well as a senior living facility, which is adjacent to the project site to the west and is considered a noise sensitive use. These uses generate noise levels typical for urban environments. The primary noise source at the project site would be vehicle traffic on US 50 and Latrobe Road. Noise generated by the existing storage facility is associated with customers entering and existing the facility and moving belongings to and from their storage units.

The El Dorado County General Plan provides maximum allowable noise exposure levels and noise level performance standards in Tables 6-1 through Table 6-5. Table 6-1 addresses transportation noise sources. Because the proposed project will generate a very small number of vehicle trips that would not appreciably increase transportation noise and does not include uses that would be sensitive to noise from nearby roadways, Table 6-1 is not provided here. Table 6-2 provides noise level performance protection standards for noise sensitive land uses affected by non-transportation sources and is reproduced below.

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TABLE 6-2 NOISE LEVEL PERFORMANCE PROTECTION STANDARDS FOR NOISE SENSITIVE LAND USES AFFECTED BY NON-TRANSPORTATION* SOURCES						
Noise Level Descriptor	Daytime 7 a.m. - 7 p.m.		Evening 7 p.m. - 10 p.m.		Night 10 p.m. - 7 a.m.	
	Community	Rural	Community	Rural	Community	Rural
Hourly Leq, dB	55	50	50	45	45	40
Maximum level, dB	70	60	60	55	55	50
<p>Each of the noise levels specified above shall be lowered by five dB for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).</p> <p>The County can impose noise level standards which are up to 5 dB less than those specified above based upon determination of existing low ambient noise levels in the vicinity of the project site.</p> <p>In Community areas the exterior noise level standard shall be applied to the property line of the receiving property. In Rural Areas the exterior noise level standard shall be applied at a point 100' away from the residence. The above standards shall be measured only on property containing a noise sensitive land use as defined in Objective 6.5.1. This measurement standard may be amended to provide for measurement at the boundary of a recorded noise easement between all effected property owners and approved by the County.</p> <p>*Note: For the purposes of the Noise Element, transportation noise sources are defined as traffic on public roadways, railroad line operations and aircraft in flight. Control of noise from these sources is preempted by Federal and State regulations. Control of noise from facilities of regulated public facilities is preempted by California Public Utilities Commission (CPUC) regulations. All other noise sources are subject to local regulations. Non-transportation noise sources may include industrial operations, outdoor recreation facilities, HVAC units, schools, hospitals, commercial land uses, other outdoor land use, etc.</p> <p>Source: El Dorado County 2003.</p>						

The proposed project is located in an area that falls within the Community category in Table 6-2.

General Plan tables 6-3 through 6-5 address construction noise standards, with Table 6-3 providing maximum allowable noise levels for Community Regions, Table 6-4 providing the same data for Rural Centers, and Table 6-5 addressing Rural Regions. The proposed project is located in an area that falls within the Community Regions category and Table 6-3 is reproduced below.

TABLE 6-3 MAXIMUM ALLOWABLE NOISE EXPOSURE FOR NONTRANSPORTATION NOISE SOURCES IN COMMUNITY REGIONS AND ADOPTED PLAN AREAS—CONSTRUCTION NOISE			
Land Use Designation ¹	Time Period	Noise Level (dB)	
		Leq	Lmax
Higher-Density Residential (MFR, HDR, MDR)	7 am–7 pm	55	75
	7 pm–10 pm	50	65
	10 pm–7 am	45	60
Commercial and Public Facilities (C, R&D, PF)	7 am–7 pm	70	90
	7 pm–7 am	65	75
Industrial (I)	Any Time	80	90

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Note:

¹ Adopted Plan areas should refer to those land use designations that most closely correspond to the similar General Plan land use designations for similar development.

General Plan Policy 6.5.1.11 provides an exception to the maximum allowable noise standards for construction provided in Tables 6-3 through 6-5, stating:

“The standards outlined in Tables 6-3, 6-4, and 6-5 shall not apply to those activities associated with actual construction of a project as long as such construction occurs between the hours of 7 a.m. and 7 p.m., Monday through Friday, and 8 a.m. and 5 p.m. on weekends, and on federally recognized holidays. Further, the standards outlined in Tables 6-3, 6-4, and 6-5 shall not apply to public projects to alleviate traffic congestion and safety hazards.”

Discussion:

- a. **Noise Exposures:** The proposed project would not expose people to noise levels in excess of standards established in the General Plan or Zoning Ordinance. Future construction may require the use of trucks and other equipment, which may result in short-term noise impacts to surrounding neighbors. These activities would require grading and building permits and would be restricted to construction hours pursuant to the General Plan. Operation of the proposed project would be a continuation of business operations already present on the project site. Operation of such a storage facility is not considered a land use that generated high levels of noise. Therefore, the project would not generate noise levels exceeding the performance standards contained within the Zoning Ordinance and impacts would be **less than significant**.
- b. **GroundBorne Vibration:** While the larger property is currently developed with Phases 1 and 2 of the Superior Self Storage Facility, the project site is primarily vacant land. Any future construction may generate short-term ground borne vibration or shaking events during project construction. However, the project site is located at a great enough distance from adjacent uses that ground borne vibration would not impact adjacent structures or persons. Ground borne vibration dissipates quickly with distance. Vibration caused by construction activities that cause the highest levels of ground borne vibration, such as impact pile driving, becomes imperceptible at less than 200-feet of distance. Construction of the proposed project will not require impact pile driving or similar methods that generate high levels of ground borne vibration. Land uses sensitive to ground borne vibration are 200-feet or more from locations where project related construction activity would occur. In addition, any construction related generation of ground borne vibration would be intermittent and during a short period during the construction phase of the project. Operation of the proposed project would not generate ground borne vibration perceptible in nearby areas. As such, impacts related to ground borne vibration would be **less than significant**.
- c. **Permanent Noise Increases:** As the project site is surrounded by other commercial land uses and is developed with a use not known to create substantial noise sources, a noise study was not required for the project. Although some noise would be generated by the loading and unloading of personal effects, it would be temporary and likely imperceptible due to existing ambient noise levels associated with freeway traffic and the existing urban setting. Therefore, impacts related to permanent noise increases would be **less than significant**.
- d. **Short Term Noise:** The construction noise resulting from the proposed project may result in short-term noise impacts. Construction activities would require grading and building permits and would be restricted to construction hours. All construction and grading operations would be required to comply with the noise performance standards contained in the General Plan. Impacts would be **less than significant**.

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- e-f. **Aircraft Noise:** The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. Therefore, **no impacts** related to aircraft noise would occur with project implementation.

FINDING: With adherence to County Code, no significant direct or indirect impacts to noise levels would occur. For this Noise category, the thresholds of significance would not be exceeded, and any potential impacts would be **less than significant**.

XIII. POPULATION AND HOUSING. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Induce substantial population growth in an area, either directly (i.e., by proposing new homes and businesses) or indirectly (i.e., through extension of roads or other infrastructure)?				X
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

Environmental and Regulatory Setting:

No federal or state laws, regulations, or policies apply to population and housing and the proposed project.

There are no housing units on the project site or larger property. The project site is designated in the General Plan as AP-EDHSP and zoned as CG-PD. There are no plans for development of housing on the project parcel.

Discussion:

- a. **Population Growth:** The subject parcel is not zoned or developed for residential uses. The proposed project would provide an additional self-storage service in the immediate area, and this would not result in a substantial population increase. Therefore, **no impact** would occur with project implementation.
- b. **Housing Displacement:** The parcel of concern is not zoned or developed for residential uses. There would be no housing removed or developed as a result of this self-storage development. Therefore, **no impact** would occur with project implementation.
- c. **Replacement Housing:** Since the project would not displace existing housing, the proposed project would not result in the need for the construction of additional housing elsewhere. Given there is no impact to existing housing, the project would not be required to provide replacement housing. Therefore, **no impact** would occur with project implementation.

FINDING: The project would not displace housing or limit planned future development of housing. There would be no potential for a significant impact due to substantial growth either directly or indirectly. For this Population and Housing category there would be **no impacts**.

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XIV. PUBLIC SERVICES. <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Fire protection?			X	
b. Police protection?			X	
c. Schools?				X
d. Parks?				X
e. Other government services?			X	

Environmental and Regulatory Setting:

The project site is within the SRA where CAL FIRE is the primary emergency response agency responsible for wildfire fire suppression and prevention. The project site is within the EDHFPD for structural fire protection and emergency medical services.

Police services at the project site are provided by the El Dorado County Sheriff's Office (EDSO).

Discussion:

- a. **Fire Protection:** EDHFPD provides fire protection to the project site and the surrounding area. As the project site is part of a larger property which is already included in the EDHFPD's service area, implementation of the project would not increase demand for fire protection services from the EDHFPD. No new fire protection facilities or equipment would be needed to serve the project. The project would be required to be designed to adhere to applicable requirements for emergency vehicle access, including roadway widths and turning radii, fire flow and sprinkler requirements, and vehicle ingress/egress. Compliance with these requirements would ensure adequate emergency access and evacuation routes and water for fire suppression. In addition, the EDHFPD would review the project's building permit application and would incorporate any necessary fire protection measures into the project at that time. Therefore, with adherence to the standard fire safe requirements, impacts related to fire protection would be **less than significant**.
- b. **Police Protection:** Police services would continue to be provided by the EDSO. As the project site is part of a larger property which is already included in the EDSO's service area, implementation of the project would not increase demand for police protection services from the EDSO. No new police facilities or equipment would be needed to serve the project. Therefore, impacts related to police protection services would be **less than significant**.
- c. **Schools:** As the project does not include any residential uses, development of the project would not induce population growth and would not contribute additional students to existing schools. Therefore, **no impacts** to schools would occur with project implementation.
- d. **Parks.** This project would not result in additional residents and therefore, would not increase the use of parks and recreational facilities within the surrounding area. Therefore, **no impacts** to parks would occur with project implementation.

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- e. **Government Services.** There are no government services that would be significantly impacted as a result of the project. Therefore, impacts would be **less than significant**.

FINDING: The project would not result in a significant increase of public services to the project or conflict with the ongoing provision of existing services. For this Public Services category, any potential impacts would be **less than significant**.

XV. RECREATION.				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Environmental and Regulatory Setting:

The project site is not located near a recreational facility and does not include any onsite recreational facilities.

Discussion:

- a. **Parks.** The proposed self-storage expansion project would not result in additional residential units and would not increase the local population. Therefore, the project would not substantially increase the use of parks and recreational facilities. Therefore, **no impacts** to parks would occur with project implementation.
- b. **Recreational Services.** The project would not include additional recreation services or sites as part of the project. In addition, since the project would not induce population growth as it does not include any residential uses, development of the project would not require the construction or expansion of existing recreational facilities. Therefore, **no impacts** to recreational facilities would occur with project implementation.

FINDING: No significant impacts to open space or park facilities would result as part of the project and no new or expanded recreation facilities would be necessary as a result of project approval. For this Recreation category, there would be **no impact**.

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XVI. TRANSPORTATION/TRAFFIC. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			X	
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) (Vehicle Miles Traveled)?			X	
c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d. Result in inadequate emergency access?			X	

Environmental and Regulatory Setting:

Vehicles currently access the project site via a driveway on Town Center Boulevard. The driveway has an entry lane and exit lane and is also used to access the El Dorado Estates Gracious Retirement Living facility. A sidewalk is on Town Center Boulevard on the side bordering the project site and accessibility ramps are provided at the driveway crossing. The portion of Latrobe Road bordering the project site has a designated bike lane but no sidewalk. The portion of White Rock Road bordering the project site has both a designated bike lane and sidewalk.

Local Laws, Regulations, and Policies

Starting on July 1, 2020, automobile delay and level of service (LOS) can no longer be used as the performance measure to determine the transportation impacts of land development under CEQA. Instead, an alternative metric that supports the goals of Senate Bill (SB) 743 legislation is required. The use of vehicle miles traveled (VMT) has been recommended by the Governor's Office of Planning and Research (OPR) and is cited in the CEQA Guidelines as the most appropriate measure of transportation impacts (Section 15064.3(a)).

El Dorado County Department of Transportation (DOT) adopted VMT screening thresholds through Resolution 141-2020 on October 6, 2020. The County significance threshold is 15 percent, as recommended by OPR's Technical Advisory, below baseline for residential projects. There is a presumption of a less than significant impact for projects that generate or attract less than 100 trips per day, consistent with OPR's determination of projects that generate or attract fewer than 110 trips per day, and further reduced to 100 to remain consistent with the existing thresholds in General Plan Policy TC-Xe.

Although CEQA does not consider traffic congestion as an environmental impact, Policy TC-Xd in the Transportation Element of the County General Plan, LOS for County-maintained roads and state highways within the unincorporated areas of the county shall not be worse than LOS E in the Community Regions or LOS D in the Rural Centers and Rural Regions. The proposed project is in a Community Region. LOS is defined in the latest edition of the Highway Capacity Manual (Transportation Research Board, National Research Council). There are some roadway segments that are excepted from these standards and are allowed to operate at LOS F. According to Policy TC-Xe, "worsen" is defined as any of the following number of project trips using a road facility at the time of issuance of a use and occupancy permit for the development project:

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- A. A two percent increase in traffic during a.m., p.m. peak hour, or daily
- B. The addition of 100 or more daily trips, or
- C. The addition of 10 or more trips during the a.m. or p.m. peak hour.

Discussion: As the project site is part of a larger property, the project would utilize the existing internal circulation system and driveway on Town Center Boulevard for ingress and egress. No modifications to existing vehicle, pedestrian, bicycle, or transit infrastructure are required.

- a. **Conflicts with a Transportation Plan, Policy, or Ordinance:** No substantial traffic increases would result from the proposed project. Access to the project site and circulation within the project site would remain unchanged. The El Dorado County Department of Transportation reviewed the project and determined that a Transportation Impact Study (TIS) and On-Site Transportation Review (OSTR) were not required, and both the TIS and OSTR were waived. Trip generation from the proposed self-storage facility using the ITE Trip Generation Manual, 10th Edition is 103 trips daily, which is 200 daily trips less than the light industrial use which had been approved and reviewed prior. The self-storage expansion would result in the addition of 6 trips in the a.m. peak hour and 11 trips in the p.m. peak hour. This is presumed to have less than significant transportation impacts, per El Dorado County Resolution 141-2020. In addition, the proposed use as a self-storage facility does not produce peak hour traffic patterns that have the greatest potential to generate LOS changes. As stated above, the project would have no effect on pedestrian, bicycle, or transit facilities. The project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be **less than significant**.
- b. **Vehicle Miles Travelled (VMT):** The proposed project would expand an existing self-storage facility. Trip generation from the project using the ITE Trip Generation Manual, 10th Edition is less than 100 trips daily. This is presumed to have less than significant transportation impacts, per El Dorado County Resolution 141-2020. Therefore, impacts related to VMT would be **less than significant**.
- c. **Design Hazards:** As the project site is part of a larger property, the project would utilize the existing internal circulation system and driveways for ingress and egress to the local circulation system. Implementation of the project does not include any changes to the existing roadway operations and therefore, would not create a new design hazard. Furthermore, the project has been reviewed by DOT and the EDHFPD. Per both reviews, the site contains no design hazards. Therefore, impact related to design hazards would be **less than significant**.
- d. **Emergency Access:** As the project site is part of a larger property, the project would utilize the existing internal circulation system and driveways for ingress and egress to the local circulation system. As such, site access and on-site circulation would remain unchanged from existing conditions. The existing site and uses have been approved as providing sufficient emergency access and the same access criteria would be applied to new facilities. Therefore, the proposed facilities within the same parcel would not interfere with emergency access. Therefore, impacts would be **less than significant**.

FINDING: The project would not conflict with applicable General Plan policies regarding effective operation of the County circulation system. Furthermore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b). The project would not create any road hazards or affect road safety and would not result in inadequate emergency access. For this Transportation category, the threshold of significance would not be exceeded, and any potential impacts would be **less than significant**.

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XVII. TRIBAL CULTURAL RESOURCES. <i>Would the project: Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in 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 that is:</i>	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. 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			X	
b. 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Environmental and Regulatory Setting:

Federal Laws, Regulations, and Policies

No federal laws, regulations, or policies apply to Tribal Cultural Resources (TCRs) and the proposed project.

State Laws, Regulations, and Policies

Assembly Bill (AB) 52

AB 52, which was approved in September 2014 and effective on July 1, 2015, requires that CEQA lead agencies consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if so requested by the tribe. The bill, chaptered in CEQA Section 21084.2, also specifies that a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment.

Defined in Section 21074(a) of the Public Resources Code, TCRs are:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the CRHR; or
 - b. Included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1.
2. 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

See Section V. Cultural Resources, for more information on the CRHR and PRC Section 5024.1.

TCRs are further defined under Section 21074 as follows:

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- a. A cultural landscape that meets the criteria of subdivision (a) is a TCR to the extent that the landscape is geographically defined in terms of the size and scope of the landscape; and
- b. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a TCR if it conforms with the criteria of subdivision (a).

Mitigation measures for TCRs must be developed in consultation with the affected California Native American tribe pursuant to Section 21080.3.2, or according to Section 21084.3. Section 21084.3 identifies mitigation measures that include avoidance and preservation of TCRs and treating TRCs with culturally appropriate dignity, accounting for the tribal cultural values and meaning of the resource.

Discussion:

- a-b. **Tribal Cultural Resources.** At the time of the application request, seven Tribes: Colfax-Todds Valley Consolidated Tribe, Ione Band of Miwok Indians, Nashville Enterprise Miwok-Maidu-Nishinam Tribe, Shingle Springs Band of Miwok Indians, T’si-Akim Maidu, United Auburn Indian Community of the Auburn Rancheria (UAIC), Washoe Tribe of California and Nevada, had requested to be notified of proposed projects for consultation in the project area. Consultation notices were sent on September 28, 2023. Staff received a response from the UAIC on September 29, 2023, from the Wilton Rancheria on October 20, 2023, and from the Shingle Springs Band of Miwok Indians on October 30, 2023. Each of these consultation requests were within a 30-day period from the date of staff’s consultation initiation response. Staff sent responses to each native nation and received follow-up correspondence from the UAIC. Neither SSBMI nor Wilton returned staff acknowledgment of consultation initiation. The UAIC is a federally recognized Tribe comprised of both Miwok and Maidu (Nisenan) Tribal members who are traditionally and culturally affiliated with the project area. UAIC conducted background search for the identification of Tribal Cultural Resources for this project, which included a review of pertinent literature, historic maps, and a records search using UAIC’s Tribal Historic Information System (THRIS). UAIC’s THRIS database is composed of UAIC’s areas of oral history, ethnographic history, and places of cultural and religious significance, including UAIC Sacred Lands that are submitted to the NAHC. The THRIS resources shown in this region also include previously recorded indigenous resources identified through the CHRIS as well as historic resources and survey data.

The UAIC, along with planning staff and the project proponents, conducted a site visit on November 8, 2023. Per the November 8, 2023 site visit, the UAIC provided an unanticipated discovery finding. Due to prior grading disturbance within the portion of the project site proposed for development, there is low potential for locating TCRs. Portions of the project site which will remain undeveloped may be potentially sensitive for resource finds. If future expansion should be proposed -including within portions of the site left in the natural form- an entitlement revision permit review would be required at that time. Pursuant to the records search conducted at the North Central Information Center on August 21, 2023, the proposed project area contains zero indigenous resources and zero historic-period cultural resources. Additionally, six cultural resources study reports covering all or a portion of the site are on file. Outside of the project area, but within the ¼ mile radius of the geographic area, a broader search area contains zero indigenous resources and four historic-period cultural resources. Additionally, 19 cultural resource study reports are on file which cover a portion of the broader search area. There is potential for discovering unknown subsurface resources, including human remains, during all project excavation activities. The project has been conditioned with standard County conditions concerning the finding of subsurface tribal cultural resources, including human remains. As conditioned, any potential impacts would be **less than significant**.

FINDING: No TCRs are known to exist on the project site and conditions of approval have been included to ensure protection of TCRs if discovered during future construction activities. As a result, the proposed project would not cause a substantial adverse change to any known TCRs, and any potential impacts would be **less than significant**.

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XVIII. UTILITIES AND SERVICE SYSTEMS. <i>Would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				X
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g. Comply with federal, state, and local statutes and regulations related to solid waste?			X	

Environmental and Regulatory Setting:

State Laws, Regulations, and Policies

California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (Public Resources Code, Division 30) requires all California cities and counties to implement programs to reduce, recycle, and compost wastes by at least 50-percent by 2000 (Public Resources Code Section 41780). The state, acting through the California Integrated Waste Management Board (CIWMB), determines compliance with this mandate. Per-capita disposal rates are used to determine whether a jurisdiction's efforts are meeting the intent of the act.

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California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act of 1991 (Public Resources Code Sections 42900-42911) requires that all development projects applying for building permits include adequate, accessible areas for collecting and loading recyclable materials.

Discussion: The project design shows no changes to existing electrical, water, wastewater, or communications delivery infrastructure to the subject parcel. The contractor is directed to identify and avoid existing utility facilities. A new underground stormwater line will be constructed on the project parcel to deliver project generated stormwater to the existing municipal stormwater system. No changes or improvements to the existing municipal stormwater system are required.

- a. **Wastewater Requirements:** The project would maintain existing EID sanitation service and would not generate additional wastewater as no new bathrooms are proposed as part of the project. EID has verified adequate wastewater capacity to serve the proposed expansion. Therefore, **no impacts** to wastewater would occur with project implementation.
- b. **Construction of New Facilities:** As the project site is part of a larger property that is currently adequate served by water and wastewater utilities, the proposed project would connect to the existing onsite water and wastewater utilities and would not require new utility facilities. Therefore, **no impacts** to water and wastewater would occur with project implementation.
- c. **New Stormwater Facilities:** The project does not propose any new drainage facilities beyond those needed to manage stormwater caused by project impervious surfaces. Any potentially needed drainage facilities as a result of the proposed project would be built in conformance with the County of El Dorado Drainage Manual, including the proposed stormwater connection, as determined by Development Services standards, during the grading and building permit processes. Therefore, impacts related to stormwater facilities would be **less than significant**.
- d. **Sufficient Water Supply:** The self-storage facility proposal has been reviewed by EID. Per EID, the existing water supply is sufficient for the expansion project as proposed. According to EID's hydraulic model, the existing system can deliver the fire flow as required by the Fire Authority. Therefore, the project site would have sufficient water to serve the project and impacts would be a **less than significant**.
- e. **Adequate Wastewater Capacity:** As discussed in (a.) above, the project will tie into EID sanitation service. EID has verified adequate wastewater capacity for the project as proposed. Therefore, impacts would be **less than significant**.
- f-g. **Solid Waste Disposal and Requirements:** El Dorado Disposal distributes municipal solid waste to Forward Landfill in Stockton and Kiefer Landfill in Sacramento. Pursuant to El Dorado County Environmental Management Solid Waste Division staff, both facilities have sufficient capacity to serve the County. Recyclable materials are distributed to a facility in Benicia and green wastes are sent to a processing facility in Sacramento. County Ordinance No. 4319 requires that new development provide areas for adequate, accessible, and convenient storing, collecting, and loading of solid waste and recyclables. This project does not propose to add any activities that would generate substantial additional solid waste, as a self-storage facility would generate minimal amounts of solid waste for disposal. Therefore, impacts would be **less than significant** with project implementation.

FINDING: No adverse utility and service system effects would occur with the project, either directly or indirectly. For this Utilities and Service Systems category, any potential impacts would be **less than significant**.

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XX. WILDFIRE. <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c. 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 impacts to the environment?			X	
d. 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?			X	

Environmental and Regulatory Setting

According to the California Department of Forestry and Fire Protection (CalFire) 2022 State Responsibility Area Fire Hazard Severity Zones Map for El Dorado County, the project site is in an area of moderate fire hazard severity zone for wildland fire (CalFire 2022). However, the project site is located within a developed property with sparse ornamental vegetation within an urban setting. The project site is within the EDHFPD for structural fire protection. The project site is relatively flat due to prior mass grading associated with Phases 1 and 2 of the Superior Self-Storage Facility. The project site is not prone to landslide or other forms of slope instability.

Discussion:

- a. **Emergency Response or Evacuation Plans:** Implementation of the proposed project would not alter any roadways, access points, or otherwise substantially hinder access to the area in such a way that would interfere with an emergency response or evacuation plan. The project site is a portion of a larger property which is developed with Phases 1 and 2 of the Superior Self-Storage Facility and would utilize the existing internal circulation system and driveways for ingress and egress to the local circulation system as well as provide an additional emergency access point on Town Center Boulevard for fire truck entry. Furthermore, the project does not include any residential uses and therefore, would not contribute vehicles or persons to an evacuation if one occurred. For these reasons, impacts to an adopted emergency response plan or emergency evacuation plan would be **less than significant** with project implementation.
- b. **Exacerbate Wildfire Risks:** The project would develop the primarily vacant portion of the larger property with additional self-storage facilities as well as would implement site improvements, which would not appreciably increase the risk of wildfire ignitions. Due to the nature of the project, as a self-storage facility, implementation of the proposed project would not expose people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project is required to adhere to all fire prevention and protection

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requirements and regulations of El Dorado County, including the El Dorado County Fire Hazard Ordinance and the Uniform Fire Code, as applicable. Pertinent measures include, but are not limited to, the use of equipment with spark arrestors and non-sparking tools during project activities. The project applicant would also be required to develop the project structures to meet 'defensible space' requirements as specified under Objective 6.2.1 of the Safety Element of the El Dorado County General Plan. Because the project would not exacerbate wildfire risk and would not expose individuals to adverse effects associated with wildfire, impacts would be **less than significant**.

- c. Installation or Maintenance of Associated Infrastructure:** The project site is a portion of a larger property which is developed with Phases 1 and 2 of the Superior Self-Storage Facility and is within an urban environment. The project would comply with all fire prevention and protection requirements and regulations of El Dorado County, including the El Dorado County Fire Hazard Ordinance and the Uniform Fire Code, as applicable. No elements of the proposed project appreciably increase wildfire risk. Therefore, impacts would be **less than significant**.
- d. Runoff, Post-Fire Slope Instability, or Drainage Changes:** The project site is not prone to landslide or other forms of slope instability. There are no streams or drainages on the parcel and no areas prone to flooding on the project site or in the project vicinity. The proposed project would not expose people or structures to significant risk from potential post wildfire conditions. Therefore, impacts would be **less than significant**.

FINDING: For this wildfire category, any potential impacts would be **less than significant**.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE. <i>Does the project:</i>				
	Potentially Significant Impact	Less than Significant with Mitigation	Less Than Significant Impact	No Impact
a. Have the potential to degrade the quality of the environment, 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?			X	
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Discussion

- a. No substantial evidence contained in the project record has been found that would indicate that this project would have the potential to significantly degrade the quality of the environment. There are no project impacts which will result in significant impacts. With adherence to County permit requirements and mitigation

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measures as applied, this project would not have the potential to 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 California history or pre-history. Any impacts from the project would be **less than significant** due to the design of the project and required standards that would be implemented with the building permit processes and/or any required project specific improvements on the property.

- b. Cumulative impacts are defined in Section 15355 of the California Environmental Quality Act (CEQA) Guidelines as *two or more individual effects, which when considered together, would be considerable or which would compound or increase other environmental impacts.*

The project would not involve development or changes in land use that would result in an excessive increase in population growth or demand for public services. The project would not contribute substantially to increased traffic in the area and the project would not require an increase in the wastewater treatment capacity of the County. Due to the small size of the proposed project, types of activities proposed, and site-specific environmental conditions, which have been disclosed in the Project Description and analyzed in Items I through XX above, there would be no significant impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, or wildfire that would combine with similar effects such that the project's contribution would be cumulatively considerable. For these issue areas, either no impacts or less than significant impacts would occur. As outlined and discussed in this document, as conditioned and with compliance to County Codes, this project would have a less than significant project-related environmental effect which would not cause substantial adverse effects on human beings, either directly or indirectly. Based on the analysis in this study, it has been determined that the project would have **less than significant** cumulative impacts.

- c. Based on the discussion contained in this document, no potentially significant impacts to human beings would occur as a result of project impacts. Regulatory compliance and adherence to the County's standard conditions would reduce potential impacts to a **less than significant** level.

FINDINGS: It has been determined that the proposed project would not result in significant environmental impacts. The project would not exceed applicable environmental standards, nor significantly contribute to cumulative environmental impacts.

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SUPPORTING INFORMATION SOURCE LIST

- Bole & Associates. 2024. *Biological opinion letter regarding proposed development Project located at 4250 town center boulevard, El dorado hills*. Attachment 7.
- California Department of Conservation (CDC). (2024). *Farmland Mapping and Monitoring Program: El Dorado County Important Farmland 2024*. Available at:
<ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2024/eld08.pdf>.
- California Department of Conservation (CDC). (2013a). Important Farmland Categories webpage. Available online at: www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx.
- California Department of Conservation (CDC). (2013b). The Land Conservation Act. Available online at: www.conservation.ca.gov/dlrp/lca/Pages/Index.aspx.
- California Department of Toxic Substances (DTSC). 2024. EnviroStor - 4250 Town Center Blvd, El Dorado Hills, CA 95762. Available:
<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=4250+Town+Center+Blvd%2C+El+Dorado+Hills%2C+CA+95762>. Accessed August 2024.
- California Geologic Survey. 2024. Fault Activity Map of California – El Dorado County. Available:
<https://maps.conservation.ca.gov/cgs/fam/>. Accessed August 2024.
- California Department of Forestry and Fire Protection (CalFire). 2022. State Responsibility Area Fire Hazard Severity Zones – El Dorado County. Available:
https://www.eldoradocounty.ca.gov/files/assets/county/v/1/documents/public-safety-amp-justice/wildfire-amp-disaster/fhsz_county_sra_11x17_2022_eldorado_ada-003.pdf. Accessed August 2024.
- El Dorado County. (2003). *El Dorado County General Plan Draft Environmental Impact Report*. State Clearinghouse No. 2001082030. Placerville, CA: El Dorado County Planning Services.
- El Dorado County Air Quality Management District (AQMD). (2002). *Guide to Air Quality Assessment*. Retrieved September 4, 2024 from
<https://www.eldoradocounty.ca.gov/files/assets/county/v/1/documents/government/air-quality/guide-to-air-quality-assessment.pdf>.
- El Dorado County Geographic Information System (GIS) Data. Placerville, CA: Esri ArcGIS. Available: El Dorado County controlled access data GISDATA\LIBRARIES.
- State Water Resources Control Board (SWRCB). 2024. GeoTracker - 4250 Town Center Blvd, El Dorado Hills, CA 95762. Available:
<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=4250+Town+Center+Blvd%2C+El+Dorado+Hills%2C+CA+95762>. Accessed August 2024.
- United States Department of Agriculture (USDA) Soil Conservation Service and Soil Service. (1974). *Soil Survey of El Dorado Area, California*. Retrieved September 4, 2024 from
http://www.nrcs.usda.gov/Internet/FSE_MANUSCRIPTS/california/el_doradoCA1974/EDA.pdf