



County of Fresno

DEPARTMENT OF PUBLIC WORKS AND PLANNING
STEVEN E. WHITE, DIRECTOR

EVALUATION OF ENVIRONMENTAL IMPACTS

- APPLICANT: Derrel's Mini Storage
- APPLICATION NOS.: Initial Study Application No. 7487 and Classified Conditional Use Permit Application No. 3618
- DESCRIPTION: Allow a personal/recreational vehicle storage facility and a caretaker's residence with attached office on two contiguous parcels totaling approximately 38.32-acres, in the AL-20 (Limited Agricultural, 20-acre minimum parcel size) Zone District.
- LOCATION: The project site is located on the southeast corner of East Shaw Avenue and North McCall Avenue, approximately three-quarter miles east of the nearest city limits of the City of Clovis (SUP. DIST. 5) (APN Nos. 571-011-13 & 571-011-14)(Previous APN Nos. 571-010-88 and 571-010-89).

This Initial Study was originally published on August 28, 2019. Since that time, changes to the Mitigation Measures represent a significant revision, which required the removal, modification and addition of mitigation measures. Pursuant to CEQA Guidelines Section 15073.5, recirculation of the proposed Mitigated Negative Declaration is required. Section IV Biological Resources and Section XVI Transportation contain minor technical revisions to the analysis and revised and additional mitigation measures. The modified mitigation measures for this project necessitated a change to the overall site footprint due to the inclusion of a 250-foot buffer between the proposed facility and an identified wetland feature in the northwest portion of the parcel. Consequently, the interior building area of the personal storage area was increased by approximately 124,4978 square feet in aggregate.

I. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

- A. Have a substantial adverse effect on a scenic vista; or
- B. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

FINDING: NO IMPACT:

No scenic vistas, or scenic resources including topographical features, trees, rock outcroppings or historical buildings were identified in the analysis; additionally, the project site is not located along a scenic highway.

- C. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

FINDING: LESS THAN SIGNIFICANT IMPACT:

According to the applicant's operational statement, the proposed personal storage and recreational vehicle (RV) storage facility will occupy the majority of the two contiguous parcels totaling approximately 38.32 acres, including approximately 523,000 square feet of enclosed personal storage space, within separate buildings located along the perimeter and interior of the site, and 187,000 square feet combined, enclosed and RV storage area and carport area. The site also includes a 2,522 square-foot building which contains a 1,327 square-foot caretaker's residence, an 804 square-foot attached office and a 391 square-foot attached garage. The exterior of the facility will be enclosed by an eight-foot-six-inch tall stucco perimeter wall. The proposed caretaker's residence/office has a peak roof height of approximately 16 feet.

The subject parcel is currently vacant and surrounded by a mix of large agricultural parcels to the west and south and rural residential development to the north and is westerly adjacent to a planned residential community. Once construction is complete, the proposed development would represent a substantial increase in urban development in the area, however, surrounding zoning and current development indicate a trend toward a future increase in residential uses. The subject parcel is located approximately three-quarter miles east of the nearest city limits of the City of Clovis; however, it is not within the City of Clovis Sphere of Influence.

The subject parcel and the area to the south is designated as Agriculture both in the Fresno County General Plan and the City of Clovis General Plan, however the land westerly adjacent is designated for mixed use/business, to the north Rural Residential and to the east, a Planned Residential Community. Based on the factors cited in the analysis, the proposed development would have a less than significant impact on the existing visual character or quality of the site or its surroundings.

- D. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The project proposes the installation of approximately 12, 40-foot tall poles, each with two (2) louvered security lights mounted at 35 feet, and security cameras mounted at 40 feet. Additionally, there are approximately 16 building-mounted light fixtures and one high-pressure sodium light mounted on an approximately seven-foot-six-inch tall fixture.

To reduce potential glare and impacts to daytime and nighttime views in the vicinity, a Mitigation Measure has been included that all lights be hooded and downturned.

* **Mitigation Measure(s)**

1. *Prior to operation of the proposed storage facility, all outdoor lighting shall be hooded and directed downward so as not to shine toward adjacent properties and public streets.*

II. AGRICULTURAL AND FORESTRY 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 the 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 in Forest Protocols adopted by the California Air Resources Board. Would the project:

- A. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use; or
- B. Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The subject parcels are located within the AL-20 (Limited Agricultural) Zone District which is partly intended to reserve certain lands for future urban uses and also limit agricultural uses that may be incompatible with surrounding non-agricultural uses. According the Fresno County Important Farmlands Map, the subject property is designated as Farmland of Local Importance, which indicates land that is either currently producing or has the capability of production; but does not meet the criteria for Prime farmland, farmland of Statewide Importance or Unique farmland.

In Fresno County, Local Importance includes all farmable lands that do not meet the definitions of Prime, Statewide or Unique, and land that is or has been used for irrigated pasture, dryland farming, confined livestock, dairy, poultry facilities, aqua culture and grazing land, thus the project will not convert Prime or Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Prior to the issuance of building permits for the proposed facility, the property owner shall be required as a condition of approval to record a Right-to-Farm covenant with the County, in compliance with the County's Right to Farm Ordinances, and with California Civil Code 3482 (right-to-farm law). The subject parcels are not restricted under Williamson Act Contract.

- C. Conflict with existing zoning for forest land, timberland or timberland zoned Timberland Production; or
- D. Result in the loss of forest land or conversion of forest land to non-forest use?

FINDING: NO IMPACT:

The subject property does not contain forestland or timberland, and is not zoned for forest land, or Timberland production, thus the project will not conflict with such zoning or result in the loss of or conversion of forest land.

- 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?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project will convert approximately 38-acres of farmland to non-agricultural uses, however, as noted previously, the land is designated as limited agricultural. The Limited Agricultural designation serves as a reserve area for future urban uses. The subject property, although not within the Sphere of Influence of the City of Clovis, is easterly adjacent to the Sphere of Influence boundary, and land which is designated by the City of Clovis for future commercial uses.

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

- A. Conflict with or obstruct implementation of the applicable Air Quality Plan?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project would not conflict with or obstruct implementation of the applicable air quality plan. A measure for determining if the project is consistent with the air quality plans is if the project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the air quality plans.

The San Joaquin Valley Air Pollution Control District (Air District), has reviewed this proposal and determined that the mitigated baseline emission for construction and operation will be less than the significance threshold for criteria pollutants, and the project is exempt from District Rule 9510, Section 6.0 (General Mitigation Requirements) and Section 7.0 (off-site Emission Reduction Fee Calculations and Fee Schedules) of the rule. Emissions of ROG, NOx, PM10, and PM 2.5 associated with the construction and operation of the project would not exceed the Air District's significance

thresholds. The project would not result in CO hotspots that would violate CO standards, nor contribute to air quality violations.

Additionally, the project proposal complies with the emission reduction requirements of District Rule 9510 and is not subject to payment of off-site fees. Therefore, the project's emissions would be less than significant for all criteria pollutants after compliance with the Air District's regulations and would not result in inconsistency with the Air Quality Plan for this criterion. The project complies with all applicable rules and regulations from the applicable air quality plans; therefore, the project is consistent with, and would not obstruct implementation of the Air Quality Plan.

- B. 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?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Based on its review, the Air District required that the project is subject to District Rule 9510 (Indirect Source Review) and required that the applicant submit an Air Impact Assessment (AIA) application. After review of the AIA application, the District determined that the mitigated baseline emission for the construction and operation would be less than two tons of Oxides of Nitrogen and two tons of PM10 per year, thus the project is exempt from the payment of off-site fees for Emission Reduction.

The project does not contain sources that would produce substantial quantities of SO₂ (Sulfur Dioxide) emissions during construction and operation. Modeling conducted for the project shows that SO₂ emissions are well below the Air District's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). The projected emissions from all phases of construction in each year, are below the significance thresholds. Therefore, construction emissions would be less than significant on a project basis. Operational emissions occur over the lifetime of the project and are from two main sources: energy use from both stationary sources, and mobile sources.

Air District, Air Quality Attainment Plans predict that nonattainment pollutant emissions will continue to decline each year as regulations adopted to reduce these emissions are implemented, accounting for growth projected for the region; thus, the cumulative health impacts will decline even with the project's emission contribution.

Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment status under applicable federal or state ambient air quality standards.

- C. Expose sensitive receptors to substantial pollutant concentrations?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Based on comments from the Air District, this proposal is not expected to produce substantial pollutant concentrations, affecting sensitive receptors or result in other

emissions which would adversely affect a substantial number of people. The project does not contain sources that would produce substantial quantities of SO₂ emissions during construction and operation. Modeling conducted for the project shows that SO₂ emissions are below the Air District's (GAMAQI) thresholds. Emissions from all phases of construction in each year are below the significance thresholds.

The project may potentially expose sensitive receptors to substantial pollutant concentrations. Sensitive receptors include individuals, such as children, elderly persons, and persons with preexisting respiratory or cardiovascular conditions; and locations, such as hospitals, convalescent facilities, schools, and residences. The nearest sensitive receptor is a residence located approximately 280 feet northeast of the project site.

Emissions occurring at or near the project site have the potential to create a localized impact, referred to as an air pollutant hot spot. Localized emissions are considered significant if, when combined with background emissions, they would result in exceedance of any health-based air quality standard. An analysis of maximum daily emissions would exceed 100 pounds per day for any pollutant of concern. Based on the analysis, the project would not exceed Air District screening thresholds for localized criteria pollutant impacts; therefore, the project's localized criteria pollutant impacts would be less than significant.

Project construction would result in minor increases in traffic for the surrounding roads. Once the project becomes operational, vehicles accessing the site would also result in a minor increase in overall daily traffic trips on the surrounding roads but would not substantially reduce the Level of Service (LOS). Therefore, the project would not significantly exceed state or federal CO standards.

The proposed personal storage and recreational vehicle storage facility is not a use that would generate substantial toxic air contaminant emissions. Traffic generation from proposed the mini storage is minimal and the volume of truck traffic is low. The proposed facility includes a caretaker's residence.

- D. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

FINDING: LESS THAN SIGNIFICANT IMPACT

Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, schools, warrant consideration, however, consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas. The proposed project is located near residences; however, it is also in an area of agricultural uses where emissions may generate odors..

According to the screening table for land use types that are potential odor generators. available on the San Joaquin Valley Air Pollution Control District's website, the proposed mini storage facility would not be a source of odors. Construction activities, will involve various diesel-powered vehicles and equipment which would create localized emissions

and odors. However, emission would be temporary and not likely be noticeable for extended periods, beyond the project boundaries. Therefore, the potential for odor impacts, including those generated by diesel emissions, would be less than significant.

IV. BIOLOGICAL RESOURCES

Would the project:

- 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?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The California Department of Fish and Wildlife (CDFW) reviewed this proposal, and indicated in comments that the subject parcels, which consist of fallow agricultural fields, can support vernal pools, evidenced by review of aerial imagery and have the potential to support habitat for the State and federally threatened, California Tiger Salamander (CTS). Comments from CDFW also indicated that without appropriate avoidance and minimization measures for CTS, impacts from development of this project could potentially be significant, due to the potential for loss, degradation and fragmentation of suitable habitat.

Based on this evaluation, CDFW recommended that a biological habitat assessment of the project site be conducted to further evaluate the site for potential habitat features. CDFW also recommended the project be evaluated for potential impacts on nesting birds, and further recommended that project construction occur outside of the typical nesting bird breeding season, February through September. Additionally, the CDFW recommended that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than ten days prior to initiating project related ground disturbance, and that the surveys cover a sufficient area around the project site to identify any nests which may be impacted and the status of those nests if any.

Prior to construction activities, CDFW recommended that, should any nests be identified, the applicant's qualified biologist conduct a survey to establish a behavioral baseline of those nests; and once construction has commenced the qualified biologist should monitor nests for any behavior changes that may result from the project. In lieu of continuous monitoring by a qualified biologist, CDFW recommended a minimum 250-foot no disturbance buffer around active nests of non-listed birds, and a 500-foot no disturbance buffer around active nests of non-listed raptors (birds of prey). The buffers should remain in place for the duration of breeding season, or until the qualified biologist has determined that, the nesting birds have fledged. The applicant will be responsible for ensuring that the project does not result in any violation of the Migratory Bird Treaty Act or other relevant Fish and Game Code.

A Biological Habitat Assessment dated May 2019, was prepared for the project by Argonaut Ecological Consulting, Inc. The Study utilized available literature, aerial

imagery, historic, and topographic maps, and several site visits were conducted as part of the assessment. During the site visits, various habitat types were mapped in order that they be assessed for their ability to support sensitive species. The study noted that the subject parcels have been historically used for agriculture purposes, and that the area to be developed did not support suitable habitat for any species of special concern. The Habitat assessment also included a search of the CDFW, California Natural Diversity Database (CNDDDB) and the U.S. Fish and Wildlife (FWS), IPAC database, to determine if any special status species may be present in the study area. The study found that no critical habitat for any listed species was found on or near the project site, and that no nesting habitat for migratory birds or raptors was found on the project site, and thus the project would not adversely impact nesting migratory birds or raptors.

However, the study also noted that two previously mapped wetland features, occupying separate portions of the subject parcel, could support breeding habitat for CTS. The two wetland areas were previously mapped as part of a Wetland Delineation, dated May 9, 2017, and completed by the applicant's consultant, as discussed under Section IV.C below. The recommendation of the Habitat Assessment was that potential impacts to CTS could be avoided with the implementation of avoidance and minimization measures. Consistent with comments and recommendations from CDFW, implementation or adherence to the following Mitigation Measures will reduce potential impacts to CTS, to a less than significant level.

* **Mitigation Measure(s)**

1. *With regard to the California Tiger Salamander (CTS), unless a qualified biologist conducts protocol-level surveys for CTS in the Project Area (and a 100-foot buffer around the Project Area in all areas of wetland and upland habitat that could support CTS) and thereby demonstrates that CTS are absent, the Project shall avoid CTS by establishing prior to any ground disturbance a minimum 50-foot no disturbance buffer delineated around all small mammal burrows and a minimum 250-foot no-disturbance buffer around potential breeding pools within and/or adjacent to the Project footprint. During any pre-ground disturbance or pre-activity surveys if it is determined CTS are occupying the Project Area and take cannot be avoided, take authorization prior to any ground disturbing activities may be warranted. Take authorization would occur through issuance of an ITP by CDFW, pursuant to Fish and Game Code § 2081(b).*
2. *With regard to Special-Status plants, the following mitigation measures shall be implemented:*
 - a. *Prior to any ground disturbance, a qualified botanist shall conduct a habitat assessment to determine if the Project Area or its immediate vicinity contain suitable habitat for special-status species. If suitable habitat is present, the Project Area be surveyed for special-status plants by a qualified botanist following the "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities" (CDFW 2018). If a plant species listed pursuant to CESA or the Native Plant Protection Act is identified during botanical surveys,*

consultation with CDFW is warranted to determine if the Project can avoid take. If take cannot be avoided, take authorization prior to any ground disturbing activities may be warranted. Take authorization would occur through issuance of an ITP by CDFW, pursuant to Fish and Game Code § 2081(b).

- b. If present in the project area, special-status plant species shall be avoided whenever possible by delineating and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.*
- 3. With regard to the Burrowing Owl (BUOW), the following mitigation measures shall be implemented.*
- a. Prior to any ground disturbance, a qualified biologist shall conduct surveys following the California Burrowing Owl Consortium’s “Burrowing Owl Survey Protocol and Mitigation Guidelines” (CBOC 1993) and CDFW’s “Staff Report on Burrowing Owl Mitigation” (CDFG 2012). The survey shall include a 500-foot buffer around the Project Area.*
 - b. Because BUOW occupy burrow habitat year-round, the Developer shall establish seasonal no-disturbance buffers, as outlined in the “Staff Report on Burrowing Owl Mitigation” (CDFG 2012), to be implemented prior to any during any ground disturbing activities associated with project implementation. Specifically, impacts to occupied burrows shall be avoided in accordance with the following table unless a qualified biologist approved by CDFW verifies through noninvasive methods that either: 1) the birds have not begun egg laying and incubation; or 2) the juveniles from the occupied burrow are foraging independently and are capable of independent survival.*

| Location | Time of Year | Level of Disturbance | | |
|---------------|----------------|----------------------|-------|-------|
| | | Low | Med | High |
| Nesting sites | April 1-Aug 15 | 200 m | 500 m | 500 m |
| Nesting sites | Aug 16-Oct 15 | 200 m | 200 m | 500 m |
| Nesting sites | Oct 16-Mar 31 | 50 m | 100 m | 500 m |

- c. If BUOW are found to occupy the Project Area and avoidance is not possible, burrow exclusion shall be conducted by qualified biologists during the non-breeding season and before breeding behavior is exhibited and after the burrow is confirmed to be empty through non-invasive methods.*

4. *To evaluate project related impacts to nesting birds, a qualified biologist shall conduct pre-activity surveys for active nests no more than ten (10) days prior to the start of ground disturbance. The survey shall encompass all areas of the project site, and if nests are present, the biologist shall establish a behavioral baseline of all identified nests. The qualified biologist shall continuously monitor nests during project construction/ground disturbing activity to detect changes resulting from the project. If continuous monitoring is not feasible, the qualified biologist shall establish a minimum 250-foot no disturbance buffer around active nests of non-listed bird species and a 500-foot no disturbance buffer around active nests of non-listed raptors. The buffers shall remain in place until the breeding season has ended or until the qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.*
- B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; or
- C. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION
INCORPORATED:

The Wetland Delineation Technical Memorandum prepared for this project by Argonaut Ecological Consulting, Inc., dated May 9, 2017, concluded that there were no State or Federally protected wetlands on or in the vicinity of the project site. The memorandum also included a review of the United States Fish and Wildlife Service (FWS), Wetland Mapper tool, which indicated that there are no FWS mapped wetlands on the subject parcel. However a review of historical aerial imagery and topographic maps included with the memorandum indicated that the elevation of the site varies by up to ten feet, and that the lower elevation points located in northwest portion of the parcel were found to contain a drainage swale, occupying approximately 2.42-acres near the intersection of East Shaw Avenue and North McCall Avenue; and that the swale receives some runoff from the adjacent roadway because the swale is below the road grade.

The memorandum also found that the portion of the northwest corner of the parcel, in which the swale is located, is part of a historical natural drainage channel, and that there was an unnamed tributary of Dog Creek which flowed southwest from the center of the parcel, but which has since been graded over, altering the direction of drainage to the northwest. Additionally, the memorandum determined that this drainage swale met the criteria for it to be categorized as a wetland. Another smaller area, occupying approximately 0.1-acre of the subject parcel, in the southeast corner was also found to meet the criteria for identification as a seasonal swale/wetland, defined as containing hydric soils, prevalence/dominance by hydric plants, and evidence of wetland hydrology; this smaller wetland area appears to be part of a larger swale located primarily on the easterly adjacent parcel.

The applicant's submitted site plan indicates that the two existing identified wetland areas will be preserved in their current locations and no construction is proposed within those areas. However, to further address the potential for the project to impact the identified wetland features, the following Mitigation Measure has been included:

* **Mitigation Measure**

1. *To mitigate impacts to wetland features, a formal stream mapping and wetland delineation shall be conducted by a qualified biologist to determine the location and extent of streams (including any floodplain) and wetlands within and adjacent to the Project Area to help inform how the Project will impact or avoid hydrological alteration. The wetland delineation shall identify both State and Federal wetlands in in the Project Area as well as what activities may require Notification to comply with Fish and Game Code. Fish and Game Code § 1600 et seq. requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial.*

- 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?

FINDING: LESS THAN SIGNIFICANT IMPACT:

No native or migratory fish or wildlife species, or migratory wildlife corridors were observed on the project site, nor are there any wildlife nurseries or fisheries were identified on or in the vicinity of the project site.

- E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

FINDING: NO IMPACT:

The project will not conflict with local policies or ordinances protecting biological resources. No such policies or ordinances, applicable to the subject property were identified in the analysis. The project site consists of open cultivated farmland, which is currently fallow, no trees were observed on the site.

- 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?

FINDING: NO IMPACT:

The project is located within the PG&E San Joaquin Valley Operation and Maintenance Habitat Conservation Plan (HCP), which is limited to PG&E maintenance activities. The project will not conflict with this HCP or any other adopted or approved HCP or Natural Community Conservation Plan.

V. CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5; or
- B. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or
- C. Disturb any human remains, including those interred outside of formal cemeteries?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The subject property is not located in an area designated as highly or moderately sensitive for the existence of archaeological resources, however, to address the potential for their existence, the applicant has submitted a Cultural Resources Assessment prepared by Sierra Valley Cultural Planning and dated February 6, 2018.

The assessment consisted of a records search by the Southern San Joaquin Valley Information Center (SSJVIC), of the California Historical Resources Information System (CHRIS), to identify areas that have been previously studied and to identify any known cultural/historical resources that may be present within or in the vicinity of the project area. The records search yielded negative results for historic or prehistoric sites, or structures within the project site and within a one half-mile radius.

There have been three previous cultural/historical resource investigations done within one half-mile, with no cultural resource sites, listed on the:

- National Register of Historic Places,
- California Register of Historic Resources,
- California Points of Historical Interest, State Historic Landmarks, or the
- California Inventory of Historic Resources.

The results of the study were that no archaeological, cultural or historic resources were identified, therefore the likelihood for such resources to be encountered is minimal. However, there is still a limited potential for historical or archaeological materials to be exposed during ground disturbing activities. Implementation of the following Mitigation Measure will reduce potential impacts on cultural and historical resources to a less than significant level.

* **Mitigation Measure(s)**

1. *In the event that cultural resources are unearthed during ground-disturbing activities, all work shall be halted in the area of the find. An Archeologist shall be called to evaluate the findings and make any necessary mitigation recommendations. If human remains are unearthed during ground-disturbing activities, no further disturbance is to occur until the Fresno County Sheriff-Coroner has made the necessary findings as to origin and disposition. All normal evidence procedures should be followed by photos, reports, video, etc. If such remains are determined to be Native American, the Sheriff-Coroner must notify the Native American Commission within 24 hours.*

VI. ENERGY

Would the project:

- A. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
- B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Construction of this project is planned to occur in three phases, with Phase 1 expected to commence within approximately two-years of project approval and is anticipated to take approximately 17 months to complete. With adherence to standard construction practices, energy usage during all three construction phases is not anticipated to be wasteful, inefficient or unnecessary, nor conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Anticipated electrical usage was based on a comparison to historical annual electricity use from a similar facility, however, because the proposed facility is substantially larger in terms of building area, the projections were based on the increase in building square footage from the similar existing facility. For this project, the projected annual electrical usage is anticipated to be approximately 27,130.50 Kilowatt Hours (kWh). The project will be subject to Title 24, California Code of Regulations (CCR) of the California Building Standards Code, and Part 11 of Title 24, California Green Building Standards (CAL Green) Code; which contains regulations on energy production, fuels, and motor vehicles that apply to both new and existing development.

VII. GEOLOGY AND SOILS

Would the project:

- A. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 1. 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?

2. Strong seismic ground shaking?
3. Seismic-related ground failure, including liquefaction?
4. Landslides?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project site is not located in an area subject to a substantial risk from seismic activity, per Figure 9-5 of the Fresno County General Plan Background Report (FCGPBR), which indicates that, given a ten percent probability of an earthquake occurrence in within 50 years, the project site is in an area where ground acceleration due to seismic activity has a 10 percent probability of exceeding 0-20 percent of peak horizontal ground acceleration or a maximum of .20 g (percent of the force of gravity) during an earthquake, which is a relatively low probability. However, known fault systems along the eastern and western boundaries of the County, do have the potential to cause high magnitude earthquakes, which could affect other parts of the County. The project will be subject to current California Building Code which addresses seismic design standards. The project site is not located in an area prone to liquefaction, or landslides. Therefore, based on the analysis, the potential for the project to cause adverse effects related to seismic activity would be less than significant.

- B. Result in substantial soil erosion or loss of topsoil?

FINDING: NO IMPACT:

The proposed project will entail grading of a majority of the 38.32-acre site and the addition of a substantial amount of impervious surface area, consisting of buildings and paved parking and access drives. Any grading proposed with this project will require a grading permit or grading voucher, which will be reviewed to ensure that substantial erosion does not result.

- C. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of project development, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

FINDING: NO IMPACT:

The project site is not located in an area of the County that is subject to on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

- D. Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

FINDING: NO IMPACT:

The subject parcel is not located in an area of expansive soils as identified by Figure 7-1 of the Fresno County General Plan Background Report (FCGPBR), which is a generalized location.

- 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?

FINDING: NO IMPACT:

The project proposes the installation of an onsite wastewater treatment system to serve the caretakers residence. The system will require permitting from the County of Fresno to ensure that the soils are capable of supporting the septic tank.

- C. Directly or indirectly, destroy a unique paleontological resource or site or unique geologic feature?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

The subject property is not located in an area of moderate or high sensitivity for archaeological resources. A cultural resources assessment completed for the project, found no unique paleontological or geological resources on the subject property. However, in the unlikely event that such resource is discovered during excavation, the project will be required to follow mitigation procedures.

* **Mitigation Measure(s)**

1. See Mitigation Measure 1, Section V, above.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project would generate direct and indirect greenhouse gas (GHG) emissions; however, these emissions would not result in a significant impact on the environment. In the Air Quality and Greenhouse Gas Analysis prepared for this project, GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) 2016.3.2. Emissions generated for all phases of construction were based on a 30-year project lifespan assumption.

Fresno County has not adopted its own GHG thresholds or prepared a Climate Action Plan that can be used as a basis for determining project significance; however, the Air District's Guidance for Valley Land Use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA includes thresholds based on whether the project will reduce or mitigate GHG levels by 29 percent from business as usual (BAU) levels

compared with 2005 levels (SJVAPCD 2009b). This level of GHG reduction is based on the target established by ARB's AB 32 Scoping Plan, approved in 2008.

The Air District does not recommend assessing the significance of construction-related emissions. Operational or long-term emissions occur over the life of the project. Sources of emissions may include passenger vehicles and trucks, energy usage, waste generation, and other sources in the area such as landscaping activities, or consumer use products. Operational emissions for this project were modeled for 2023 and 2030 using CalEEMod.

The project would achieve a reduction of 31.9 percent from BAU by the year 2023 with regulations and design features incorporated. This is above the 29 percent reduction from all sources of GHG emissions now required to achieve AB 32 Targets. The project will be subject to State regulations under the provisions of AB 32, administered by the California Air Resources Board (ARB). The project would also achieve reductions of 9.90 percent beyond the ARB 2020 21.70 percent target and 2.60 percent beyond the Air District's 29 percent reduction from BAU requirements from adopted regulations and on-site design features.

No new threshold has been adopted by the County or the Air District for the SB 32, 2030 target. However, the project would achieve reductions of 18.70 percent beyond the 2020 target by 2030 through compliance with existing regulations. The project is consistent with the 2017 SB 32 Scoping Plan and will contribute a reasonable fair-share contribution to achieving the 2030 target. Fair share may be achieved through compliance with state regulations that apply to new development, such as Title 24, California Code of Regulations (CCR) of the California Building Standards Code, and Part 11 of Title 24, California Green Building Standards (CAL Green) Code; which contains regulations on energy production, fuels, and motor vehicles, that apply to both new and existing development.

- B. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed mini storage facility is a low energy consumption use and is not subject to state energy efficiency standards; however, the caretaker's residence and office will be required to comply with state energy efficiency standards. The proposed facility is also subject to the California Green Building Standards Code, which requires a 20 percent reduction in indoor water use for residential and commercial development.

The project complies with applicable regulations adopted to achieve the AB 32, 2020 target and would not interfere or conflict with the State's ability to implement regulations and programs to reduce GHG emissions. Additionally, considering the proposed project's emissions, consistency with the SB 32 Scoping Plan measures, and the progress being made by the state in achieving emissions reduction goals, the project would be consistent with the State's AB 32 and SB 32 goals, and not impact the attainment of those goal.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- A. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or
- 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; or
- C. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

FINDING: NO IMPACT:

The project does not involve the handling of hazardous materials as part of the operation of the proposed personal storage and recreational vehicle storage facility. Additionally, this project will be subject to the provisions of the California Health and Safety Code (HSC), which requires that any business that handles a hazardous material or hazardous waste may be required to submit a Hazardous Materials Business Plan online, through the Cal EPA, California Environmental Reporting System (CERS). All hazardous waste shall be handled in accordance with the California HSC, Title 22, Division 4.5. The nearest school to the project site is Quail Lake Environmental Charter School, located approximately 0.80 miles southeast.

- 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?

FINDING: NO IMPACT:

According to a search of the Environmental Protection Agency's NEPAAssist tool, and the California Environmental Protection Agency's (Cal EPA), Department of Toxic Substances Control, EnviroStor mapping tool, the proposed project is not located on or near a known hazardous material site.

- 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 or excessive noise for people residing or working in the project area?

FINDING: NO IMPACT:

The project is not located within an airport land use plan or within two miles of a public airport or public use airport, and therefore will not result in a safety hazard or excessive noise for people residing or working in the project area.

- F. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

FINDING: NO IMPACT:

The subject property is not located within an area subject to an adopted emergency response plan or emergency evacuation plan; therefore, the project will not impair implementation of or physically interfere with any such plans.

- G. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

FINDING: NO IMPACT:

The subject property is not within a wildland fire area or State Responsibility Area (SRA).

X. HYDROLOGY AND WATER QUALITY

Would the project:

- A. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

FINDING: NO IMPACT:

The project is not expected to violate any water quality standards.

- B. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

FINDING: NO IMPACT:

The project is not anticipated to impact groundwater supplies or recharge. The proposed facility is projected to use approximately 400 gallons per day for operation, and domestic use associated with the on-site caretaker's residence and public restroom.

- C. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on, or off-site?

- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or
- iv. Impede or redirect flood flows?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is not anticipated to result in substantial off-site erosion or siltation, increase the rate of surface runoff, resulting in off site flooding, create or contribute storm water runoff that would exceed existing or planned drainage capacity, or create substantial sources of polluted runoff. The project does entail the addition of impervious surfaces; however, an on-site drainage basin is proposed to manage increased run off from the proposed facility. There are two low-lying topographical depressions on the property, which are subject to flooding from the two-percent chance storm event. Both of those areas will be preserved as part of development of this project. A Hydrology Report (Hydro Report) by Harbour and Associates Civil Engineers dated January 18, 2020 was prepared for this project. The analysis primarily focused its evaluation on the identified wetland feature located in the northwest corner of the site and noted that the smaller wetland feature in the southeast did not account for a substantial amount of drainage from site, and that the area is not designated for development. The Hydro Report found that runoff currently drains toward the northwest wetland area and discharges to the west across McCall Avenue through an existing culvert. The Hydro Report concluded that the proposed development would not impact the existing drainage discharge to the northwest because the development would not alter the existing culvert or the wetland area.

- D. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

FINDING: NO IMPACT:

Portions of the project site are subject to flooding from the two-percent chance (50 year) storm event, however the subject property is not located with a flood hazard, tsunami or seiche zone. To handle additional storm runoff created by the increase in impervious surfaces the project proposes an on-site drainage basin, to be located at the southwest corner of the facility.

- E. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

FINDING: NO IMPACT:

The project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project was reviewed by the

Fresno County Department of Public Works and Planning, Water and Natural Resources Division, which did not express any concerns.

XI. LAND USE AND PLANNING

Would the project:

- A. Physically divide an established community; or
- B. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

FINDING: NO IMPACT:

The project will not physically divide an established community; the immediate area, within one-quarter mile of the project site contains a mix of farmland to the south and west, rural residential development to the north, northwest and northeast, and higher density residential development to the east, contained within the Quail Lake community, a planned residential development. The project will not conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect; the proposed use is allowed with discretionary approval in unincorporated areas of the County which are within one-half mile of the sphere of influence of the City of Clovis. In the case of this application, the project site is easterly adjacent to the City of Clovis sphere of influence boundary, and approximately three-quarter miles east of its nearest city limits.

XII. MINERAL RESOURCES

Would the project:

- 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; or
- 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?

FINDING: NO IMPACT:

The project site is not located within any known mineral resource zones as identified by Figures 7-7 through 7-11 of the Fresno County General Plan Background Report (FCGPBR).

XIII. NOISE

Would the project result in:

- A. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- B. Generation of excessive ground-borne vibration or ground-borne noise levels; or

FINDING: LESS THAN SIGNIFICANT IMPACT:

There will be minor increases in the ambient noise level due to construction and operation of the facility. The new use will not cause excessive ground-borne vibration or exceed the County's noise ordinance.

- C. For a project located within the vicinity of a private airstrip or 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 levels?

FINDING: NO IMPACT:

The project is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport, and therefore will not expose people in the project area to excessive noise levels.

XIV. POPULATION AND HOUSING

Would the project:

- A. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or
- B. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

FINDING: NO IMPACT:

The project will not induce population growth, as no new infrastructure, residential or commercial development, other than the proposed mini storage facility, is proposed with this project. The project will not displace any people or a substantial amount of housing in the area. The subject property is agriculturally zoned which prohibits residential subdivisions.

XV. PUBLIC SERVICES

Would the project:

- A. Result in substantial adverse physical impacts associated with the provision of new or physically-altered governmental facilities, or the 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?

1. Fire protection;
2. Police protection;
3. Schools;
4. Parks; or
5. Other public facilities?

FINDING: NO IMPACT:

The project will not require the provision of, or create the need for new or physically-altered governmental facilities. The proposed facility will provide one residential dwelling for an on-site full-time caretaker. The nearest fire station is Fresno County Fire Station No. 86 is located approximately one and one half-mile east of the subject property.

XVI. RECREATION

Would the project:

- A. 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; or
- B. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

FINDING: NO IMPACT:

The project will not require the construction of new or expansion of existing recreational facilities, nor increase the use of existing neighborhood and regional parks.

XVI. TRANSPORTATION

Would the project:

- A. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION
INCORPORATED:

A Traffic Impact Study (TIS) dated May 31, 2019, was prepared for this project by Peters Engineering Group, per the recommendation from the Fresno County Department of Public Works and Planning, Road Maintenance and Operations Division and Design Division. The TIS evaluated three surrounding street intersections as well as the proposed site entrance off of Shaw Avenue, during weekday (7:00-9:00) A.M. and (4:00-6:00) P.M. peak hours, to determine the existing traffic conditions and anticipated conditions from the project.

Data from the Institute of Transportation Engineers (ITE) Trip Generation Manual are typically used to estimate the number of traffic trips anticipated to be generated by the project, however, part of the traffic impact evaluation for this project included previous Trip Generation estimates done for existing Derrel's Mini Storage facilities, which found that the facilities that were studied generated fewer trips than the average trips derived from the ITE manual, which are calculated as number of trips, both AM and PM peak hours, per 1,000 square feet of net rentable area.

The existing Derrel's facilities trip generation rates were calculated using net rentable area and occupied RV storage units. The given ITE average values indicated that the proposed facility would generate 2.50 trips per 1,000 square feet, and the existing facilities demonstrated an average of 1.43 trips per 1,000 square feet, plus 0.10 trips per occupied RV storage unit. Based on the existing facilities calculation, the proposed project trip generation rates were estimated to be a total of 606 traffic trips per day, for both A.M and P.M. peak traffic volumes.

The Traffic Impact Analysis also evaluated the project traffic impacts based on the Level of Service (LOS) model, which is a quantification of performance measures that relate to quality of service from the drivers perspective, measured using an A-F scale, representing the best (LOS A) to worst (LOS F) operating conditions for a particular segment of roadway, as defined by the Transportation Research Board, Highway Capacity Manual, 2010 (HCM 2010). LOS A, B and C are considered acceptable within the County areas that are not within a city sphere of influence (SOI), and LOS D for those areas that are.

In this case, the project site is located easterly adjacent to the boundary of the City of Clovis SOI. A project is considered to have a significant impact, if the traffic increase attributed to the project, when combined with the existing conditions, would cause the current Level of Service (LOS) on a roadway segment, or a signalized or unsignalized intersection, to deteriorate below an acceptable LOS for the given area. The conclusions of the TIS found that the project would not cause a significant change in the current LOS conditions at the study intersections; however, future planned roadway improvements within the City of Clovis include the widening of Shaw Avenue and Signalization of the intersection of Shaw Avenue and Leonard Avenue, approximately one and one-half mile west of the project site. According the conclusions of the Traffic Impact Study, planned road widening and signalization along Shaw Avenue within the City of Clovis are expected to cause a significant impact existing plus approved and pending projects plus the proposed project by exacerbating existing delays by more than five (5) seconds per vehicle. Therefore, it is recommended that future projects that impact the affected intersections be required to construct mitigation measures.

Signalization and widening of the study intersections will mitigate the cumulative impacts. The project is anticipated to contribute a low number of trips to each cumulative significant impact and can mitigate its share of the significant impacts with payment of a fair share contribution toward the cost of mitigation; accordingly, the following mitigation measure has been included.

* ***Mitigation Measure(s)***

1. To address project-related impacts to the intersection of McCall and Shaw Avenue and the intersection of Ashlan Avenue and Shaw Avenue, and as per the conclusion of the Traffic Impact Study prepared for the project by Peters Engineering Group, dated May 13, 2019; prior to the issuance of building permits for the use approved for the project, the Applicant shall enter into a traffic Mitigation Agreement with the County of Fresno Department of Public Works and Planning, Road Maintenance and Operations Division, agreeing to participate in the funding of future traffic improvements as defined in items 'a' and 'b' below, and pay for the funding deemed appropriate by the County of Fresno based on the following pro-rata share.

- a. Widen the intersection of McCall and Shaw Avenue including:

- Eastbound: one left-turn lane, one through lane, and one right turn lane;
- Westbound: one left-turn lane, one through lane, one through lane, and one right-turn lane;
- Northbound: one left-turn lane, one through lane, and one right-turn lane;
- Southbound: one left-turn lane, one through lane, and one right-turn lane.

The project shall pay its fair share cost of \$26,189.33 (1.75% of widening costs)

- b. Widen and signalize the intersection of Ashlan Avenue and McCall Avenue including:

- Eastbound: one left-turn lane, one through lane, and one right turn lane;
- Westbound: one left-turn lane, one through lane, one through lane, and one right-turn lane;
- Northbound: one left-turn lane, one through lane, and one right-turn lane;
- Southbound: one left-turn lane, one through lane, and one right-turn lane.

- B. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Regarding Vehicle Miles Travelled (VMT), the Traffic Impact Study referenced the State of California Governors Office of Planning and Research (OPR) guidance in evaluating a projects VMT impacts in under CEQA, which indicates that residential, office and retail projects typically have the greatest influence on VMT. The CEQA guidelines defines vehicle miles travelled as the “amount and distance of automobile travel attributable to a project. OPR guidance provides that, absent substantial evidence supporting the conclusion that a project would generate a potentially significant level of VMT, or is inconsistent with a Sustainable Communities Strategy or General Plan; projects generate or attract fewer than 110 trips per day generally may be considered to result in a less than significant transportation impact. CEQA guidelines also state that, projects that decrease vehicle miles travelled, in the project area compared to existing conditions, should be presumed to have a less than significant transportation impact. The OPR guidance adds that, “..local serving retail development tends to shorten trips and reduce VMT, therefore, lead agencies generally may presume such development creates a less than significant transportation impact”. According to the TIS, the proposed personal/RV storage facility is not one of the three primary generators of VMT identified by the OPR Guidance, and therefore could be considered either an industrial type project or a retail project. If considered as an industrial project, the number of employee/office trips would be below the OPR suggested threshold of 110 trips per day. The TIS concludes that, If considered as retail, it could be considered a local-serving retail development because storage facilities tend to generate customers from nearby areas and are not a “large scale regional attractor” of traffic trips, and as a local serving retail development, may also be presumed to result in a less than significant transportation impact.

- C. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed facility will have a gated entrance, accessible from East Shaw Avenue located approximately 1,200 feet east of its intersection with North McCall Avenue. A Traffic Impact Study (TIS) prepared for the projected concluded that the project as proposed will not create a significant impact on traffic, nor increase hazards to traffic due to design features.

Included in the TIS was a site entrance analysis, which evaluated the potential impact to the roadway from vehicles entering and exiting the facility and determine whether or not the addition of a left turn lane along providing access into the site, was warranted. Based on a review of the applicant’s site plan, the entrance to the proposed facility consists of a 36-foot wide driveway off Shaw Avenue, leading to a small parking area with an electronically controlled gate just beyond. The gate is located approximately 135 feet south of the existing right-of-way of Shaw Avenue. The trip generation analysis

portion of the TIS suggested that approximately 30 vehicles would enter the site during the peak hour, or one vehicle every two minutes. The TIS noted that the applicant's site plan indicates that there will be approximately 130 feet of queuing area at the facility entrance, which was determined to be adequate vehicle storage capacity, and that no additional storage via a dedicated left turn lane into the facility from the west bound lanes of Shaw Avenue, was recommended for this project, at this time. However, by the year 2040 a left-turn lane will be warranted.

D. Result in inadequate emergency access?

FINDING: NO IMPACT:

The project site plan proposes a dedicated emergency fire access gate at the southwest corner of the property off of North McCall Avenue, in addition to the main facility entrance of East Shaw Avenue in the northeast corner of the site. Gate access will be subject to current Fresno County Fire Protection District requirements pertaining to emergency access and the current Fire Code. The Fresno County Fire Protection District reviewed this proposal and did not identify any concerns.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project:

- A. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
1. 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
 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 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.)

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

Under the provisions of Assembly Bill (AB) 52, the County was required to provide notice of the preparation of this Initial Study to Native American Tribes who had previously indicated interest in reviewing CEQA projects. Notices were sent on July 23, 2018 to representatives of the Dumna Wo Wah, Table Mountain Rancheria, Santa Rosa Rancheria Tachi-Yokut Tribe and the Picayune Rancheria of the Chukchansi Indians. None of the Tribal Governments responded.

The project site is not located in an area of archaeological sensitivity and no cultural resources inventory was recommended by any reviewing agency. A Cultural Resources Assessment dated February 6, 2018, was prepared for the project by Sierra Valley Cultural Planning (applicant's consultant). The Cultural Resources Assessment consisted of a records search through the California Historical Resources Information System (CHRIS), to identify any known cultural resources or previous inventories within or in proximity to the project area, and a pedestrian survey of the subject parcel.

The records search, completed by the Southern San Joaquin Valley Information Center (SSJVIC), yielded three previous investigations within a half-mile radius of the project Area of Potential Effect (APE); however, no tribal cultural or historic resources were identified in any of those previous studies. The pedestrian survey, consisted of walking north to south transects across the subject parcel, observation and photographs, and soil inspection. No archaeological or tribal cultural resources were identified during the site survey; however, the potential exists for undiscovered subsurface, cultural resources to be discovered during ground disturbance. Therefore, the following mitigation measure is proposed to reduce impacts to yet unknown tribal cultural resources to a less than significant level.

* **Mitigation Measure(s)**

1. *See Mitigation Measure 1, Section V, above.*

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

- A. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project will involve the construction of a new on-site wastewater treatment system to serve the proposed caretaker's residence and public restroom. No other wastewater facilities are planned. The project will also entail the construction of a new drainage basin to be located in the southwest portion of the facility, to handle the increase water runoff generated by addition of impervious surfaces, parking areas, access roads and buildings, associated with construction of the facility. There are no major electrical, gas or telecommunications distribution facilities proposed with this application.

- B. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The project is anticipated to use approximately 400 gallons of water per day during operation of the facility, which will be supplied by an on site well. The subject property is not located in an area of the County designated as water-short, and no concerns related to water supply were raised by any reviewing agencies or County departments.

- C. 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?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Wastewater generated by the project will be handled by a proposed on-site septic system. Septic system placement, expansion areas and capacity will be subject to the provisions of California Plumbing Code, and the Fresno County Local Area Management Program (LAMP), which regulates the design, installation, and operation of on-site wastewater treatment systems (OWTS).

- D. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or
- E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

FINDING: LESS THAN SIGNIFICANT IMPACT:

The proposed facility is not anticipated to exceed State or local standards, or the capacity of local infrastructure, or impair attainment of solid waste reduction goals. The project will be required to comply with federal, state and local solid waste reduction statutes, and Chapter 8.20.060 of the Fresno County Ordinance Code, which relates to solid waste removal.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- A. Substantially impair an adopted emergency response plan or emergency evacuation plan, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; or
- 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; or
- 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; or

- 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?

FINDING: NO IMPACT:

The subject property is not located in a State Responsibility Area, or in an area of increased wildfire risk; as such the project will not impair any adopted emergency response or evacuation plans, nor impair telecommunications facilities, or the construction or relocation thereof. The subject parcel is located in area of relatively flat terrain with, a combination of open irrigated farmland, orchards, and some residential subdivisions, and no substantial slopes. The nearest boundary of a State Responsibility/Wildland Fire Area, is located approximately four and one-half miles to the east. The project will not require the installation or maintenance of infrastructure that would exacerbate fire risk or expose people or structures to post-fire slope instability or flooding.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

- A. Have the potential to substantially 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, substantially 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?

FINDING: LESS THAN SIGNIFICANT IMPACT WITH MITIGATION INCORPORATED:

Based on the Habitat Assessment prepared for this project the subject parcel does not support suitable habitat for any special status species, and that the proposed development will preserve the two seasonal wetland areas within the parcel; the project would not have a significant detrimental impact on the environment, with adherence to the recommended Mitigation Measures. Mitigation Measures have also been applied to this project to reduce impacts to Cultural Resources, Paleontology, and Tribal Cultural Resources to less than significant.

* **Mitigation Measure(s)**

1. See Section IV.
2. See Section V.

- 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)?

FINDING: LESS THAN SIGNIFICANT IMPACT:

Emissions of criteria pollutants from this project will be consistent with the State Implementation Plan administered by the San Joaquin Valley Air Pollution Control District.

- C. Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

FINDING: NO IMPACT:

No environmental effects which would result in adverse effects on human beings, either directly or indirectly were identified in the analysis.

CONCLUSION/SUMMARY

Based upon the Initial Study prepared for Unclassified Conditional Use Permit Application No. 3618, staff has concluded that the project will not/will have a significant effect on the environment. It has been determined that there would be no impacts to Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation and Wildfire.

Potential impacts related to Agriculture and Forestry, Noise, Air Quality, Energy, Geology and Soils, Greenhouse Gases, Hazards and Hazardous Materials, Hydrology and Water Quality, have been determined to be less than significant.

Potential impacts relating to Aesthetics, Biological Resources, Cultural Resources, Transportation and Tribal Cultural Resources, have been determined to be less than significant with compliance with the included Mitigation Measures.

A Mitigated Negative Declaration/Negative Declaration is recommended and is subject to approval by the decision-making body. The Initial Study is available for review at 2220 Tulare Street, Suite A, street level, located on the southwest corner of Tulare and "M" Street, Fresno, California.

JS

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