

# Initial Study and Draft Negative Declaration

**Ray Benner and Teasha Curren**  
**Environmental Review of a Mini Storage Facility Expansion**  
*May 2021*



*Prepared By*  
Del Norte County  
Community Development Department  
Planning Division  
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Crescent City, California 95531

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### Exhibits and Appendices Follow

## Project Information Summary

- 1. Project Title:** Ray Benner and Teasha Curren  
Environmental Review of a Mini-Storage Facility Expansion
  
- 2. Lead Agency Name and Address:** Del Norte County  
Planning Commission  
981 H Street, Suite 110  
Crescent City, CA 95531
  
- 3. Contact Person and Phone Number:** Heidi Kunstal  
(707) 464-7254  
hkunstal@co.del-norte.ca.us
  
- 4. Project Location and APN:** 175 Arnett Street, Crescent City, CA  
APN 116-160-068
  
- 5. Project Sponsor’s Name and Address:** Ray Benner and Teasha Curren  
1600 Breen Street  
Crescent City, CA, 95531
  
- 6. County Land Use:** General Commercial
  
- 7. County Zoning:** General Commercial (C-4)
  
- 8. Description of Project:**

Ray Benner and Teasha Curren of Benner Mini-Storage have submitted an application to expand an existing mini-storage facility located at 175 Arnett Street, in the Crescent City urban area. While the 3.39 acre parcel is addressed on Arnett Street, primary access to the mini-storage facility is from 1600 Breen Street located off of Washington Boulevard. This is the main entrance to a separate parcel owned by the Benner family and developed with mini-storage buildings. The subject parcel is currently developed with five mini-storage buildings and a manufactured home. The zoning and land use for the parcel allow for indoor and outdoor storage.

The applicants propose to add three new buildings along the southern portion of the property which is currently graveled and was formerly used for outside storage. No streams or wetlands were identified on the property or near the project area. The dimensions of the new buildings are:

- 1) Building A – 50 feet wide by 220 feet long by 11.5 feet high (11,000 sq. ft.);
- 2) Building B – 30 feet wide by 110 feet long by 11.5 feet high (3,300 sq. ft.); and
- 3) Building C - B – 30 feet wide by 110 feet long by 11.5 feet high (3,300 sq. ft.).

The new buildings will house 134 mini-storage units. No bathrooms are proposed.

The plan of operation includes gate access to the mini-storage units from Breen Street 7 days a week from 7:00 AM to 7:00 PM. The mini-storage facilities will be rented in stages in order to avoid congestion with clients accessing their units for the first time. The facility will be managed from the existing Benner Mini-Storage office located at 1600 Breen Street.

**9. Surrounding Land Uses and Settings:**

The 3.39 acre parcel is surrounded by a mixture of commercial and residential uses. The undeveloped land located immediately north of the parcel is zoned for single family residences. Access to this land is from Arnett Street off of Northcrest Drive. Land to the east is developed with single family residences accessed from Arnett Street and E. Adams Street off of Northcrest Drive. Land to the south is zoned commercial but is primarily developed with single family residences accessed from California Street. Land to the west is developed with a mini-storage facility also owned by the applicants. Access to this facility is from Breen Street which will also serve as primary access to the proposed expansion. Alternative access to the property is available from California Street and Arnett Street, although those entrances are limited to maintenance and staff.

**10. Required Approvals:** Adoption of a Negative Declaration (Del Norte County Planning Commission)

**11. Other Approval (Public Agencies):** N/A

**12. 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?**

Native American tribes, traditionally and culturally affiliated with the project area have been notified of the project application completion and the beginning of the AB 52 consultation period pursuant to PRC §21080.3.1. Notification of the beginning of the AB 52 consultation period was provided April 19, 2021. No requests for consultation pursuant to PRC §21080.3.1 were received.

### 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" without mitigation as indicated by the checklist on the following pages. All mitigation measures are provided in the Mitigation Monitoring and Reporting Program.

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

### Determination

On the basis of this initial evaluation:

<input checked="" type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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 on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
<input type="checkbox"/>	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.



Heidi Kunstal  
Community Development Director

5-21-2021

Date

## Environmental Checklist

### 1. Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or public views of the site and its surroundings? (Public views are those that are experienced from publically accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion of Impacts

- a. The project would have no impact on a scenic vista.
- b. The project would not damage scenic resources, as there are no scenic resources on-site.
- c. The project would not substantially degrade the existing visual character of the site. The project would result in the addition of three new buildings totally 17,600 square feet within a developed area.
- d. The project will include lighting but all lighting will be directed downward away from neighboring properties. The project will have a lighting conditions placed upon it.

### 2. Agriculture and Forest Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Production (as defined by Government Code section 51104(g))?				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

- a. No prime farmland exists on-site.
- b. No agricultural zoning exists on-site.
- c. No Timber Production zones exist on-site or adjacent to the property
- d. The project would not result in the loss of forestland.
- e. The project does not involve any other changes in the existing environment that could adversely affect farmland or timberlands.

**3. Air Quality**

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors or dust) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

- a. This project would have no foreseeable impact on scenic vistas.
- b. This project would have no foreseeable impact on scenic resources.
- c. The project would not degrade the existing visual character or public views of the site and its surroundings.
- d. The project does not propose any development which would create a new source of substantial light or glare which would adversely affect views.

**4. Biological Resources**

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



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as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
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 Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

a-f. The 3.39 acre parcel is partially developed with existing buildings and paved area. The undeveloped portion of the parcel is comprised of gravel. No habitat would be modified as a result of the project. Riparian habitat does not exist on site and project would not affect the migratory patterns of wildlife. The project would not be in conflict with local ordinances or habitat conservation plans. Additionally, a quad level species list was obtained from the CDFW Biogeographic Information and Observation System (BIOS) and a subsequent field review of the project by the County’s Environmental Review Committee did not identify any biological resources in or adjacent to the proposed project location.

**5. Cultural Resources**

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant Impact with Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion of Impacts**

a-c. No cultural resources are known to exist on-site. The County records were searched for known cultural sites in the general project vicinity, and none were identified. The project is located on a previously heavily disturbed site. Notice was provided to the two tribes traditionally culturally affiliated with the project area and no comment was given with regard to cultural resources. Additionally, cultural staff from the Tolowa-Dee-ni’ Nation is a voting member of the County Environmental Review Committee which reviews projects and makes CEQA recommendations. While resources are not known to exist on-site, the possibility of an inadvertent discovery is always possible during construction or other implementation activities associated with the project. The County’s inadvertent find condition find will be placed on the project approval.

## 6. Energy

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a. The project would have no foreseeable impacts on increasing wasteful, inefficient, or unnecessary energy use due to the relatively small size of the project and the limited use of the buildings as a personal storage for people who reside off-site. The project will use minimal amounts of fuel and energy.
- b. This project does not conflict with nor obstruct a state or local plan for renewable energy or energy efficiency.

## 7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

indirect risks to life or property?				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

a-f. The project is not anticipated to cause significant impacts including the risk of loss, injury, or death related to soils impacts. The site is flat and has no potential for landslides, mass wasting, or other slope-related impacts. Seismic ground shaking and liquefaction could occur in any region of coastal California, however the potential impacts would be considered less than significant as structural development will be engineered and constructed to current building code. The site is not located on expansive soil as defined in Table 18-1-B and soils will not be utilized for sewage disposal. No known paleontological resources or unique geologic features are known to exist on site.

## 8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

a-b. In 2002, the California legislature declared that global climate change was a matter of increasing concern for the state’s public health and environment, and enacted a law requiring the State Air Resource Board (ARB) to control GHG emission from motor vehicles (Health and Safety Code §32018.5 et seq.). CEQA Guidelines define GHG to include carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The California Global Warming Solutions Act of 2006 (AB 32) definitively established the state’s climate change policy and set GHG reduction targets (Health and Safety Code §38500 et seq.). The state has set its target at reducing greenhouse gases to 1990 levels by the year 2020.

Approval of the project by the Planning Commission and subsequent construction of the new buildings may generate GHG emissions as a result of combustion of fossil fuels used in construction equipment. Use of variety of construction materials would contribute indirectly to GHG emissions because of the emissions associated with their manufacture. The construction-related GHG emissions would be minor and short-term and would not constitute a significant impact based on established thresholds.

According the Facility Manager who keeps detailed records of entries into the facility on a daily basis, the combined facility receives on aviates of 19.48 gate entries per day. The additional units will add 19% more units to the mini-storage inventory resulting in an additional 3 to 4 more gate entries per day. Vehicular emissions associated with additional 3 to 4 vehicles entering the facility each day should not have a significant impact on the environment.

The project does not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

## 9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a-c. The project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. The applicants propose to construct three new buildings which would house 134 mini-storage units to be rented to individuals for personal storage. It is expected that any hazardous materials stored on-site will be below thresholds warranting oversight by the Del Norte Certified Unified Program Agency (DN CUPA). If a future end user does store hazardous materials over designated thresholds, the County will regulate the business and local first responders will be made aware through the California Environmental Reporting System (CERS) of the quantity and location of any hazardous materials on the property.
- d. The project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.e.
- e. According the 2017 Airport Land Use Compatibility Plan, the project area is outside of any sensitive noise contour.
- f. This project would not impair or physically interfere with an adopted emergency response or evacuation plan.
- g. The project location is not located within an area subject to wildfires. It is located within the Local Responsibility Area for fire response with a low fire hazard severity rating due to surrounding urban and residential uses.

## 10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional source of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a. The project would allow for the construction of a three new buildings totaling 17,600 square feet of area. Earth disturbance will be limited to the building sites and paved access aisles. An erosion and runoff control plan will be required as a condition of the project to ensure that the project will not violate any water quality standards. No waste discharge is proposed.
- b. The project site is served by public water. No impacts to groundwater will occur.
- c. A condition of the project approval will be the submission of engineered grading and drainage plan to address on-site and off-site drainage impacts caused by the reduction in impervious surfaces at the site. No drainages are being altered.
- d. The project is not in any Special Flood Hazard Area and would not affect flood waters. Additionally, it is identified as being outside the Tsunami Hazard Map for Crescent City.
- e. The project will not conflict with or obstruct implementation of a water quality control plan or sustainable ground water management plan.

## 11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact

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a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

a-b. This project does not divide an established community nor does it cause a conflict with any land use plan in the County. The proposed project substantially will substantially conform to the General Plan as well as other applicable ordinances and code.

**12. Mineral Resources**

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

a-b. No mineral resources are known to exist on site.

**13. Noise**

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

a-b. The project does not have the potential to generate a significant temporary or permanent increase in ambient noise levels in the vicinity of the project above that currently exists on the property. Temporary noise and vibration will be generated as a result of construction activities, however this is not considered significant nor

will it exceed any applicable thresholds. Based on information provided by the applicants, the mini-storage units are not frequently accessed by renters. Additionally, due to the pandemic rent for the units may be paid online, automatically, by phone or by mail which has reduced trips to the facility to even lesser levels. Feedback from the clients is that they non-visit related options are more convenient and the plan is to retain these options on a permanent basis.

- c. The project is located within two miles of McNamara Field and is within its Airport Influence Area as mapped in the Airport Land Use Compatibility Plan. The project does not fall within any noise contours that would indicate the exposure of the residential use to excessive noise levels generated by the airport.

## 14. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a. The project will not induce substantial population growth in the area. It is expected the renters of the units already reside in Del Norte County.  
The project would not displace substantial numbers of existing people or housing. The project is located in a commercial area designated for commercial activities.

## 15. Public Services

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a. The project would not result in substantial adverse impacts associated with the need for new or altered governmental facilities and/or public services. Any impacts to service ratios, response times, or other performance objectives of these public services are expected to be less than significant.

## 16. Recreation

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a-b. The project does not impact existing recreational areas nor does it increase the need for additional recreational facilities. The project does not increase the development potential above what currently exists.

## 17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

- a. The project is not anticipated to conflict with a program, plan, ordinance, or policy addressing any circulation system. The property is currently used in a commercial manner and the expansion of the existing commercial use by 134 mini-storage units would not affect the circulation system.

- b. The project is not expected to be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). According to the 2020 Del Norte Region SB 743 Implementation Plan, the Traffic Analysis Zone (TAZ 100) containing the project area describes the average VMT to be approximately 5.08 daily per capita and 23.07 daily per employee. The project was analyzed subject to screening criteria outlined in the 2020 Del Norte Region SB 743 Implementation Plan.



Using to the 10<sup>th</sup> Edition of the Institute of Transportation Engineers Trip Generation Manual, mini-storage facilities similar to the Benner Mini-Storage facility have 0.20 average daily trips per 1,000 square feet of floor area. It is projected using this methodology that the project would create 3.52 additional trips per day which aligns with the application data. Further, the 2020 Del Norte Region SB 743 Implementation Plan provides for thresholds of significance that screen certain projects out of constituting a significant impact toward VMT generation. In this case, the project is expected to generate less than 110 trips per day, so it can be considered to have a less than significant impact as a ‘Small Project’ under Section 3.2.1 of the SB 743 Implementation Plan.

c. The project does not increase hazards due to a design feature. The project would allow primary access to the project from Breen Street with secondary access from California Street and Arnett Street. There are no dangerous features in the project area and this project would not require improvements that would introduce circulation or traffic safety hazards.

d. Emergency access to the project site would remain the same. No other emergency access in the surrounding area would be affected by development of this project.

## 18. Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
i) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion of Impacts

a) The project would have no foreseeable impacts on tribal cultural resources. A member of the Environmental Review Committee is a Native American representative and has not issued notice of any concern of resources on-site. Further, an AB 52 tribal consultation has been sent to local tribes associated with the project area and no requests for consultations have been received by the Lead Agency.

## 19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 providers existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

a-e. The project would not have any impact on utilities and service systems. The applicants have submitted materials showing that no significant impacts would occur as a result of public services needed at the project site. No water or sewer is planned for the project. The project may result in a higher solid waste generation rate, however not in excess of established thresholds.

**20. Wildfire**

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion of Impacts**

a-d. The project site is located in a Local Responsibility Area for fire management and in a Moderate Fire Hazard Area. The topography of the site is flat with a lack of wildland vegetation which would require mitigation for issues associated with rapid wildfire movement or an excess of fuels. No other significant wildfire risk exists as a result of this project. Additionally, the project would substantially impair an adopted emergency response plan or emergency evacuation plan.

## 21. Mandatory Findings of Significance

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-c. The project does not 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 species 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. Additionally, the project does not have impacts that are individually limited but cumulatively considerable and does not have environmental effects which will cause substantial adverse effects on human beings directly nor indirectly.