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STEPHEN L. VAGNINI
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2022-0036

To: Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: City of King
212 S. Vanderhurst Avenue
King City, CA 93930

x County Clerk
County of Monterey
168 West Alisal Street, 1st Floor
Salinas, CA 93901

Project Title: Grocery Outlet store

Project Applicant: Best Development Group, LLC

Project Location: 1023 Broadway Street City: King City County: Monterey County

Description of Nature, Purpose, and Beneficiaries of Project:

Construction of a 30-ft single-story, approximately 18,187 square foot Grocery Outlet store with new parking, landscaping and a monument sign. The project proposes to operate seven days a week and employ approximately 20-30 full time employees. The project site has a General Plan land use designation of Highway Service Commercial ("HSC"), with a zoning designation of Highway Service ("H-S") District.

Name of Public Agency Approving Project: City of King Planning Commission

Name of Agency Carrying Out Project: Best Development Group

Exempt Status: (check one)

Ministerial (Sec. 21080(b)(1); 15268);

Emergency Project (Sec. 21080(b)(4); 15269(b)(c));

Categorical Exemption. State type and section number: CEQA Guidelines §15332 Class 32, which exempts in-fill development projects.

Statutory Exemptions. State code number:

Reasons Why Project Is Exempt: The City has performed a review of the Environmental Assessment (EA) prepared by EMC Planning Group dated March 3, 2022, which this project meets all of the standards for a categorical exemption set forth in CEQA Guidelines section 15332, which exempts in-fill development projects. This Project meets all the standards for this categorical exemption. None of the exceptions to categorical exemptions set forth in the CEQA Guidelines, section 15300.2 apply to this Project. See Exhibit A attached hereto.

Lead Agency: City of King

Contact Person: Area Code/Telephone/Extension: Steve Adams, City Manager (831) 386-5917

If filed by applicant: City is filing, so no need to complete

1. Attach certified document of exemption finding.

2. Has a Notice of Exemption been filed by the public agency approving the project? _ Yes No

Signature: _____



Date: 3/16/2022 Title: City Manager

Signed by Lead Agency

Date received for filing at OPR: n/a

Signed by Applicant

EXHIBIT A

CEQA. The City has performed a preliminary environmental assessment of this Project. Based on the Environmental Assessment and other evidence in the administrative record, the Planning Commission finds and determines that the Project falls within the categorical exemption set forth in CEQA Guidelines section 15332, which exempts in-fill development projects, as this Project meets all of the standards for this categorical exemption as summarized below and as further described in the Environmental Assessment. Furthermore, none of the exceptions to categorical exemptions set forth in the CEQA Guidelines, section 15300.2 apply to this Project, and the Project is not subject to either the "cumulative impact" exception or the "unusual circumstance" exception, as further described in the Environmental Assessment and as summarized below. As such, the Planning Commission adopts a Categorical Exemption per CEQA Guidelines section 15332 for this Project. In this regard, the Planning Commission further finds and determines as follows:

- a. Finding: *The Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.*

Basis for Finding: The Project site has a King City General Plan Consolidated Plan Document (General Plan) land use designation of HSC (Highway Service Commercial) and a zoning designation of H-S (Highway Service District). Pursuant to the General Plan, the HSC zoning designation shall accommodate a mix of retailing, wholesaling, dining and entertainment, professional and business services, and shopping center developments. The H-S zoning district permits a grocery store subject to a conditional use permit. This zoning district allows heights up to 30 feet, which the Project does not exceed. Development of the Project site with a grocery store is consistent with the City's commercial land use goal, which encourages the City to provide adequate area for commercial land uses to meet the service needs of residents, business, and visitors, and to encourage development of retail commercial, service commercial, and highway-related uses that are compatible with surrounding land uses. Pursuant to the General Plan Policy 3.1.1, the City shall promote the availability of commercial sites within this land use category to accommodate a mix of retailing, wholesaling, dining and entertainment, professional and business services, and shopping center developments. The Project is consistent with this policy. (EA, pp. 1, 3.) As such, the Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.

- b. Finding: *The Project will be built within City limits on a site of no more than five acres substantially surrounded by urban uses.*

Basis for Finding: The 1.57-acre vacant Project site is located within the municipal

boundaries of King City at 1023 Broadway Street on assessor's parcel number (APN) 026-391-025, and is significantly less than five acres in size. Although the cemetery property across Broadway Street from the Project site could be considered open space, the cemetery occurs within the limits of Kings City and is not in a natural condition. The vacant land to the southeast of the Project site is disturbed and has long been planned for eventual development. The close proximity of U.S. Highway 101 to the Project site also contributes to the highly developed, urban character of the setting. (EA, pp. 1-2.) As such, the Project will be built within City limits on a site of no more than five acres substantially surrounded by urban uses.

- c. Finding: *The Project site has no value as habitat for endangered, rare or threatened species.*

Basis for Finding: There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans applicable to the Project site. The Project site has comparatively little value for any biological resources. The site was previously used as a car sales lot and is surrounded in all directions by previously developed open space and current development, including commercial buildings, parking lots, the King City Cemetery, the Monterey County Sheriff's Department, and U.S. Highway 101. The Project site contains developed (paved) and disturbed (gravel) areas, as well as some areas supporting low-quality habitats supportive of common species such as raccoons, skunks, and opossums. The only trees on the site are on its margins, and are non-native and ornamental in character. Most special-status plant and animal species known to occur in the region are not expected to occur on the Project site due to lack of suitable habitats. Out of an abundance of caution, and to comply with legal provisions protecting nesting birds, conditions of approval/project features address the possibility of a loss of nesting birds and roosting special-status bats. However, no potentially significant effects on biological resources have been identified. In particular, there are no potential adverse effects on species formally listed as endangered, rare, or threatened under either the federal Endangered Species Act, the California Endangered Species Act, or the California Native Plant Protection Act. (EA, p. 43.) As such, the Project site has no value as habitat for endangered, rare or threatened species.

- d. Finding: *Approval of the Project will not result in any significant effects relating to traffic, noise, air quality, or water quality*

Basis for Finding:

- i) *Traffic*: As of July 2020, “vehicle miles traveled [VMT] is the most appropriate measure of transportation impacts.” (CEQA Guidelines, § 15064.3, subd. (a).) VMT “refers to the amount and distance of automobile travel attributable to a project.” (*ibid.*) Level of service (LOS) is no longer a permitted metric for assessing the significance of traffic impacts under CEQA. (Pub. Resources Code, § 21099, subd. (b)(2).) The California Governor’s Office of Planning and Research (OPR) has published a document entitled, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (California Governor’s Office of Planning and Research 2018). This document provides what is currently the most authoritative general direction regarding the methods to be employed and significance criteria to evaluate VMT impacts. Because retail projects typically re-route travel from other retail destinations, OPR recommends that lead agencies should analyze VMT effects for retail projects by assessing the change in total VMT. As the OPR technical advisory states, “[b]y adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact.” Here, the Project will attract customers residing in King City and in surrounding communities. Today the closest existing Grocery Outlet stores are in Paso Robles (51 miles south) and Salinas (49 miles north), and the new store will provide a much closer option. The Grocery Outlet store will compete with the existing Safeway on Franciscan Street in the King City Plaza, and to lesser degree with local specialty markets such as El Pueblo Market and La Princessa Market on Broadway Street to the east. The Grocery Outlet store’s most likely effect on regional travel will be to slightly reduce the length of trips from northern areas of King City and to offer another option for shopping trips made by residents of areas to the south and east. The effect on VMT is likely to be small, but generally VMT will be reduced by offering a closer option. This conclusion is consistent with the OPR presumption that the VMT effects of locally serving retail uses of 50,000 square feet or less may be considered to be less than significant. The Project will consist of 18,187 square foot of interior space. The Project’s impact on regional VMT can be presumed to be less than significant under the OPR Locally Serving Retail criteria. (EA, pp. 74, 79-80.) As such, approval of the Project will not result in any significant effects relating to traffic.
- ii) *Temporary Construction Noise*: Construction noise will occur at various locations within the Project site through the construction period. Existing sensitive receptors (residences) are located as close as 350 feet from

construction activities. Construction noise is not considered to be a significant impact if construction is limited to daytime hours and construction equipment is adequately maintained and muffled. King City does not specifically provide limits on hours of construction; however, when construction is to occur near sensitive receptor locations, it is common practice to limit hours of construction to occur only between the hours of 7:00 a.m. to 8:00 p.m. (or other specific time limitations). These limitations are used because construction noise impacts could result in annoyance or sleep disruption for nearby residents if nighttime operations were to occur at night. The Project applicant has proposed and agreed to limit noise-related construction activities to 8 am to 5 pm, Monday through Saturday, with no construction on Sundays or holidays, which is the industry standard, which has been included as a condition of approval. As such, approval of the Project will not result in any significant effects relating to temporary construction noise.

iii) *Operational Noise*: The environmental impact report (EIR) prepared for the General Plan concluded that buildout under the General Plan would not result in a significant noise impact. Because the Project is an infill development consistent with the General Plan, the Project can be presumed to not result in a significant operational noise impact. The noise report prepared for the Project addressed a number of operational noise-generating activities. With respect to traffic-generated noise, the report concluded that the Project will not result in noise levels at any sensitive receptor locations that exceed any King City noise level standards or result in a substantial increase over existing (without Project) ambient noise levels. With respect to slow-moving trucks on site, the noise report concluded that ambient noise levels measured in the vicinity of the residential land uses north of the site already exceed the applicable King City noise level standards, and that noise levels associated with on-site truck movements will not exceed existing ambient noise levels and will generally not be audible at the residential land uses. With respect to loading docks, the noise report found that noise levels at the loading docks will not exceed any applicable King City noise level standards and will not exceed existing (without Project) ambient noise levels measured at the noise measurement sites near the residential land uses. With respect to noise from mechanical equipment, the noise report found that noise levels will not exceed any King City noise level standard or exceed existing (without Project) ambient noise levels. (EA, pp. 69-70.) As such, approval of the Project will not result in any significant effects relating to operational noise.

iv) *Construction-related air quality*: Table 5-2 (Construction Activity with

Potentially Significant Impacts) of the CEQA Guidelines issued by the Monterey Bay Area Resources District (Air District) identifies the level of construction activity that could result in significant temporary fugitive dust impacts if not mitigated. Construction activities with grading and excavation that disturb more than 2.2 acres per day and construction activities with minimal earthmoving that disturb more than 8.1 acres per day are assumed to be above the 82 pounds of particulate matter per day threshold of significance. Because the Project is located on a 1.57-acre site and thus cannot result in grading of more than 2.2 acres per day, the Project will not result in significant fugitive dust impacts as a result of construction activity. Nevertheless, EMC estimated the criteria air pollutant emissions that will be generated during construction using CalEEMod version 2020.4.0. The model results confirm that the Project's construction emissions (fugitive dust and equipment exhaust) will not exceed the Air District's criteria air pollutants emissions thresholds for ambient air quality. Therefore, the Project will not result in significant impacts to localized air quality during construction; and construction emissions will be less than cumulatively considerable on a regional basis. (EA, pp. 33-34, including Table 3.) Nor will Project construction generate emissions of toxic air contaminants (TACs) generate TAC concentrations that will exceed the Air District's health risk threshold at the locations of sensitive receptors north of the Project site. Additionally, due to the presence of prevailing winds from the north and northwest, there is little likelihood that Project emissions will drift to the apartment buildings west of San Antonio Drive or toward the King City High school facility north of Broadway Street. Although it is possible that receptors at the mobile home park could be exposed to Project construction emissions, the mobile home park is not located downwind from the Project site; and existing development on the parcel between much of the Project site and Franciscan Way creates a barrier to airborne particulates. Therefore, the health risk impacts associated with exposures to construction TAC emissions are less than significant. (EA, p. 35.) As such, approval of the Project will not result in any significant effects relating to construction-related air quality.

- v) *Operational air quality.* Table 5-4 of the Air District's CEQA Guidelines indicates that a supermarket of less than 69,000 square feet would typically not be expected to exceed the Air District's threshold for operational ozone emissions. Therefore, long-term operations of the proposed 18,871 square foot supermarket will not result in a cumulatively considerable net increase of ozone precursors. Nevertheless, EMC estimated the criteria air pollutant emissions that will be generated during Project operation using CalEEMod

version 2020.4.0. The model results confirm that the Project emissions will not exceed the Air District's criteria air pollutants emissions thresholds for ambient air quality. Therefore, the Project will not result in significant impacts to localized air quality, and the Project's contribution to regional air quality will be less than cumulatively considerable. (EA, pp. 32-33, including Table 2.) As such, approval of the Project will not result in any significant effects relating to operational air quality.

- vi) *Water Quality*: The Project will result in the development of a 18,187 square foot grocery store; therefore, the Project will create more than 15,000 square feet of impervious surfaces. The Project is therefore required to comply with the Stormwater Technical Guide for Low Impact Development – Compliance with Stormwater Post-Construction Requirements in King City (City of King City 2015) ("stormwater technical guide"). This regulatory document requires that projects creating or replacing 15,000 square feet or more of impervious surfaces must (i) treat runoff with an approved and appropriately sized Low Impact Development (LID) treatment system prior to discharge from the site and (ii) prevent offsite discharge from events up to the 95th percentile rainfall event using Stormwater Control Measures. The Project will also be subject to the "Post-Construction Requirements" that apply to projects (such as the Grocery Outlet Project) that are located within the National Pollutant Discharge Elimination System permit boundaries defined by the Central Coast Regional Water Quality Control Board. The Project includes a Preliminary Stormwater Control Plan that demonstrates adequate low-impact development features and facilities that can be accommodated within the Project site and landscape design. The Project's Preliminary Stormwater Control Plan includes 11 drainage management areas throughout the Project site, which direct the stormwater to these areas and connect to the proposed storm drain systems that join the existing City storm drain system in Broadway Street. Finally, the Project is required to comply with the requirements of the City of King City Municipal Code Section 17.56.100, Stormwater Pollution Prevention; and the Project's Preliminary Stormwater Control Plan is subject to the review and approval of the City of King City Community Development Department. All of these requirements ensure that the Project will result in less than significant impacts related to water quality standards and waste discharge requirements. As such, approval of the Project will not result in any significant effects relating to water quality.

- e. Finding: *The Project site can be adequately served by all required utilities and public services.*

Basis for Finding:

- i. *Water:* The Project will be served by California Water Services Company (California Water Service), which relies on the Salinas Valley Groundwater Basin recharged by the Salinas River. The Project will require approximately 100,000 gallons of water per month (or 3.7 acre-feet of water per year) to operate. California Water Service's "2020 Urban Water Management Plan – King City District" states that the City's commercial uses consumed 432 acre-feet of water in 2020 and are projected to use 433 acre-feet of water in 2025 (p. 35). The Project will make up 0.85 percent of the commercial water use total projected for 2025 $([3.7 \text{ acre-feet per year} / 433 \text{ acre-feet per year}] \times 100)$. The Project's water use needs will be met without requiring the construction of new or expanded water facilities. (EA, p. 87.) The sole source of water supply for the City is groundwater. While long-term impacts of Groundwater Sustainability Plan implementation in the Salinas Valley Basin remain uncertain, the groundwater supply is expected, based on all available information, to be sufficient to support the City's projected water demand through 2045. (See California Water Service. June 2021. 2020 Urban Water Management Plan – King City [California Water Service 2021], p. 16). "Because of the demonstrated ability of the King City District to meet historical demands from the underlying basin that are even greater than the projected demands, the available groundwater supplies are considered to be equal to projected District demands under all conditions (i.e., current and projected, and for normal, single dry, and multiple dry years including a five-year drought period)" (California Water Service 2021, p. 74). (EA, pp. 88-89.) As such, the Project site can be adequately served by water utilities and public services

- ii. *Wastewater:* According to the King City Wastewater Treatment Facilities Plan – Final (2017), retail uses require approximately 750 gallons per day per acre. With a square footage of 18,187, the Project will generate about 314 gallons per day, or 0.0003 million gallons per day (mgd). The facilities plan indicates that the treatment facility has a design capacity of 1.2 mgd, with new commercial development within the City anticipated to generate a total of 0.03 mgd of wastewater. The Project will generate a minimal amount of this commercial use total, with 0.0297 mgd of wastewater remaining for the other anticipated commercial uses in the City. The Project will use only approximately 0.025 percent of the total design capacity. (EA, p. 88.) As such, the Project site can be adequately served by all required wastewater utilities and public services.

- iii. *Storm Water*: The Project will connect to the City's existing drainage system on Broadway Street. According to the City's Collection System Master Plan - Final, the City's existing collection system has sufficient capacity to convey current peak wet weather flows (p. 6-1). (EA, p. 88.) As such, the Project site can be adequately served by all required stormwater utilities and public services.
 - iv. *Electric Power/Gas/Telecommunications*: Pacific Gas and Electric provides electricity and natural gas to the Project vicinity. Wireless internet service and cable television in the Project vicinity are provided by companies such as AT&T and Xfinity. The Project will not require or result in the relocation or construction of new or expanded facilities. (EA, p. 88.) As such, the Project site can be adequately served by all required electric, gas, and telecommunications utilities and public services.
 - v. *Solid Waste*: Solid waste from King City is currently transported to the Johnson Canyon Landfill facility east of the City of Gonzales. According to CalRecycle, the landfill has a remaining capacity of 6.9 million tons and is expected to serve until 2055. (CalRecycle. "SWIS Facility /Site Activity Details – Johnson Canyon Sanitary Landfill (27-AA-0005).") The Project will result in the addition of approximately 30 employees, and is expected to generate the equivalent of 31.1 pounds of solid waste per employee per day. (CalRecycle. "Disposal Rate Calculator – King City" Accessed on September 14, 2021b.) This number of employees will cause the Project to generate approximately 933 pounds of solid waste each day (30 employees x 31.1 pounds per employee per day), or 170 tons of solid waste generated each year. These amounts will consume only a small portion of the capacity remaining at the landfill, which has sufficient capacity to accept solid waste generated by the Project. No physical changes would be required at the landfill. (EA, p. 89.) As such, the Project site can be adequately served by all required solid waste services.
 - vi. *Police and Fire*: The City's police and fire services can adequately serve the Project without the need for any new or physically altered facilities. (EA, pp. 72, 87-89.) As such, the Project site can be adequately served by all required police and fire services.
- f. *Finding: The Project is not subject to the exception to the use of categorical exception that exists when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

Basis for Finding: Notably, the physical universe under consideration for this exception

is smaller than the physical universe of potential cumulative impacts that is implicated where an agency has prepared a mitigated negative declaration or environmental impact report. (See, e.g., *San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012, 1030 [in considering a proposal to install 726 metal utility boxes housing telecommunications equipment on sidewalks in order to expand its fiber-optic network, the City and County of San Francisco was not required to consider similar projects throughout the entire City because, if there were such a requirement, “the exception would swallow the rule, and the utility of the ... exemption would be vitiated”], citing *Robinson v. City and County of San Francisco* (2012) 208 Cal.App.4th 950, 958; see also *Association for Protection etc. Values v. City of Ukiah* (1991) 2 Cal.App.4th 720, 733 [in upholding the use of a categorical exemption for the construction of a single home, court rejects the petitioner’s invocation of the cumulative impact exception, stating that “[n]o serious argument or evidence was presented to the City that more than one house could be constructed on the lot or that as the last house to be constructed in this otherwise fully developed neighborhood, any sort of cumulative impact could be anticipated”].) Here, there is no indication or substantial evidence that successive projects of the same type in the same place will result in cumulative impacts. Indeed, no successive projects of the same type in the same place are contemplated in the vicinity of the Project or within King City. (EA, p. 95.) In addition, the absence any significant cumulative impacts associated with the Project is evident both from the discussions in the EA of individual impact categories and of the discussion of cumulative impacts. For example, the air quality analysis in the EA concluded that because the Project’s pollutants are projected to be significantly below the Air District’s thresholds (for both construction and operational emissions), the Project will not result in a cumulatively considerable net increase in criteria pollutants. (EA, p. 92.) Nor will the Project’s biological resource impacts be cumulatively considerable. (EA, p. 92.) For the reasons set forth in the portion of the EA dealing with cumulative impacts (pp. 92-93), the same is true with respect to the Project’s impacts relating to cultural resources, greenhouse gas (GHG) emissions, noise, and transportation. As such, the Project is not subject to the exception to the use of categorical exception that exists when the cumulative impact of successive projects of the same type in the same place, over time is significant.

- g. Finding: *The Project is not subject to the exception to the use of categorical exception that exists where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

Basis for Finding: Case law makes clear that application of this exception must proceed in two steps. The first is to determine whether a proposed project involves “unusual circumstances.” If the answer to that question is in the affirmative, the second

step is to consider whether those unusual circumstances will give rise to potentially significant environmental effects. (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1097-1105.) As explained below, the Project does not involve any unusual circumstances with respect to its location, size, environmental setting, physical attributes, surrounding land uses, or planning context – factors considered relevant under case law. (See *Berkeley Hillside*, *supra*, 60 Cal.4th at pp. 1118–1119; *San Lorenzo Valley Community Advocates for Responsible Education v. San Lorenzo Valley Unified School Dist.* (2006) 139 Cal.App.4th 1356, 1381; *McQueen v. Bd. of Directors* (1988) 202 Cal.App.3d 1136, 1149; *Lewis v. Seventeenth Dist. Agricultural Assn.* (1985) 165 Cal.App.3d 823, 828–829; *City of Pasadena v. State of California* (1993) 14 Cal.App.4th 810, 826–827; *Bloom v. McGurk* (1994) 26 Cal.App.4th 1307, 1315–1316; and *Voices for Rural Living v. El Dorado Irrigation Dist.* (2012) 209 Cal.App.4th 1096, 1109.) The Project is consistent with the King City General Plan land use designation of Highway Service Commercial (HSC), and the City’s zoning designation of Highway Service District (H-S). The Project site is a highly disturbed flat parcel surrounded by urban development within the city core of King City. There is nothing unusual about the Project site as a typical infill parcel and there is similarly nothing unusual about the Project as a typical infill project. The Project features (grocery store and associated parking) are typical project features that do not differ from other similar projects subject to the Class 32 categorical exemption for infill projects. The closest residential uses are approximately 350 feet away behind a wall, and will not experience significant noise impacts from the Project. There are no conditions in the immediate vicinity of the Project site that indicate unusual circumstances. The Project site and immediate vicinity are flat, and the Project site is surrounded by urban development within the city core of King City. Therefore, there are no unusual circumstances regarding conditions of the Project site or in the immediate vicinity. As such, the Project is not subject to the exception to the use of categorical exemption that exists where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

- h. Finding: *The Project is not subject to any other exceptions to the use of categorical exemption per CEQA Guidelines section 15300.2.*

Basis for Finding:

- i. *Location:* The location exception only applies to categorical exemption classes 3, 4, 5, 6 and 11. The Project qualifies for a Class 32 exemption, which is not one of the specified classes of exemptions to which this exception applies. As such, the locational exception does not apply to this Project.

- ii. *Scenic Highways:* This exception only applies to projects that may result in damage to scenic resources “within a highway officially designated as a state scenic highway.” The Project site is located more than eight miles north of the nearest eligible state scenic highway, Highway 198 (California Department of Transportation 2021). Therefore, development of the Project would not substantially damage scenic resources, rock outcroppings, and historic buildings within a state scenic highway. As such, the scenic highway exception does not apply to this Project.

- iii. *Hazardous Waste Sites:* This exception only applies to projects that are located on a site including on any list compiled pursuant to Government Code section 65962.5. As the Project site is not on any such list (i.e., not a designated hazardous waste site), the hazardous waste site exception does not apply to the Project.

- iv. *Historical Resources:* This exception only applies to projects that may cause a substantial, adverse change in the significance of a historical resource. As discussed in the EA, there are no above-ground structures located on the Project site, and there is no evidence in the record or from a surface reconnaissance that there are historical resources of an archaeological nature located on the Project site. Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource, and the historical resource exception does not apply to the Project.