Initial Study

U-Haul Expansion & Amendment to Approved Use Permit Project

Nevada County, California

To:

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Fire Protection Planner – Dan Collins	County Counsel – Doug Johnson & Sims Ely
NC Transit Services – Robin Van Valkenburgh	Supervisor Hoek – District IV
Penn Valley Fire Protection District	Economic Development – Kimberly Parker
Northern Sierra Air Quality Management District	Caltrans – Highways
United Auburn Indian Community (UAIC)	Commissioner Foley – District IV
Tsi-Akim Maidu Tribal Council	Sheriff's Office – Sam Brown
Wilton Rancheria of Wilton, California	Assistant CEO – Patrick Eidman
Nevada City Rancheria Nisenan Tribe	Penn Valley Municipal Advisory Council
Shingle Springs Band of Miwok Indians	Nevada County Economic Resource Council
Colfax-Todds Valley Consolidated Tribe	Penn Valley Community Foundation
Penn Valley Area Chamber Of Commerce	Western Gateway Park District
Bear Yuba Land Trust	PG&E
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File Number: PLN25-0111; CUP25-0006; MGT25-0014; EIS25-0007
PLN25-0112; AAP25-0005

Assessor Parcel Numbers: 051-440-010 & 051-110-008

Zoning District: M1-SP, AG-5-SP, OS-SP & OS-SP, M1-SP

General Plan Designation: OS, IND & IND

Project Location: 17350 & 17400 Cattle Drive, Rough and Ready, CA 95975, approximately 1.8 miles southeast of Lake Wildwood and 206 feet north of State Highway 20 in unincorporated western Nevada County.

Project Site & Surrounding Land Uses:

The project parcels, 17350 & 17400 Cattle Drive (APNs: 051-440-010 & 051-110-008), are approximately 5.57 acres and 6.69 acres, and are located in an unincorporated area of Rough and Ready, CA, approximately 1.8 miles southeast of Lake Wildwood and 206 feet north of State Highway 20, in unincorporated western Nevada County. Both parcels will utilize the same shared access via Cattle Drive, a 50 foot right-of-way, and the access to 17400 Cattle Drive (APN: 051-110-008) is solely proposed through the northwestern and southwestern paved drive aisles on 17350 Cattle Drive (APN: 051-440-010) which provide direct internal access to APN: 051-110-008. 17400 Cattle Drive is zoned both Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP), and 17350 Cattle Drive is zoned General Agricultural with a minimum parcel size of 5-acres with a Site Performance Combining District (AG-5-SP), Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP). 17400 Cattle Drive is an undeveloped parcel and does not have any permanent structures at this time; however, the parcel does have wire perimeter fencing and a graveled area along the southern area of the parcel with an access gate. 17350 Cattle Drive is a developed parcel with an existing permitted mini storage facility for U-Haul, which includes eight (8) separate mini storage buildings with multiple units in each, a paved parking area with thirty-three (33) parking spaces including one (1) accessible space (ADA). Currently there is a septic system on 17350 Cattle Drive for the existing-Haul facility that will be utilized for the U-Haul expansion to 17400 Cattle Drive, and 17350 Cattle Drive also has an existing well that serves the existing U-Haul facility that will also be utilized to serve the expansion of the U-Haul facility at 17400 Cattle Drive for potable water, and the project site will be served by PG&E for electricity.

The subject parcels are surrounded by commercial and industrial development to the northeast and east, State Highway 20 to the south, and mostly undeveloped parcels to the west. The project parcels are bordered by four (4) parcels zoned Light Industrial with a Site Performance Combining District (M1-SP), Light Industrial with a Planned Development and a Site Performance Combining District (M1-PD-SP), and Open Space with a Site Performing Combining District (OS-SP) to the north and east, State Highway 20 to the south, and one (1) parcel zoned General Agricultural with a minimum parcel size of 5.00 acres with a Site Performance Combining District (AG-5-SP) to the west. All four (4) of the parcels directly surrounding the project parcels to the northeast and east have been developed with commercial and industrial uses, while the one (1) parcel to the west is currently undeveloped. The project parcels farmland are designated as both “Urban and Built-Up Land” and “Grazing Land” and the topography within the project area of 17400 Cattle Drive is generally level, with elevations ranging from approximately 1425 feet above mean sea level to 1430 feet above mean sea level, and 17350 Cattle Drive is a level site due to previous grading and

construction activities. Blue Oak woodland comprises approximately 1.20 acres (14%) of the project area, annual grassland comprises approximately 1.06 acres (13%) of the project area, Valley Oak riparian forest comprises approximately 0.59 acres (7%) of the project area, and urban/developed areas comprise approximately 4.74 acres (57%) of the project area. Figure 1 on page 4 below shows the subject project parcel, surrounding properties, and the zoning of the area.

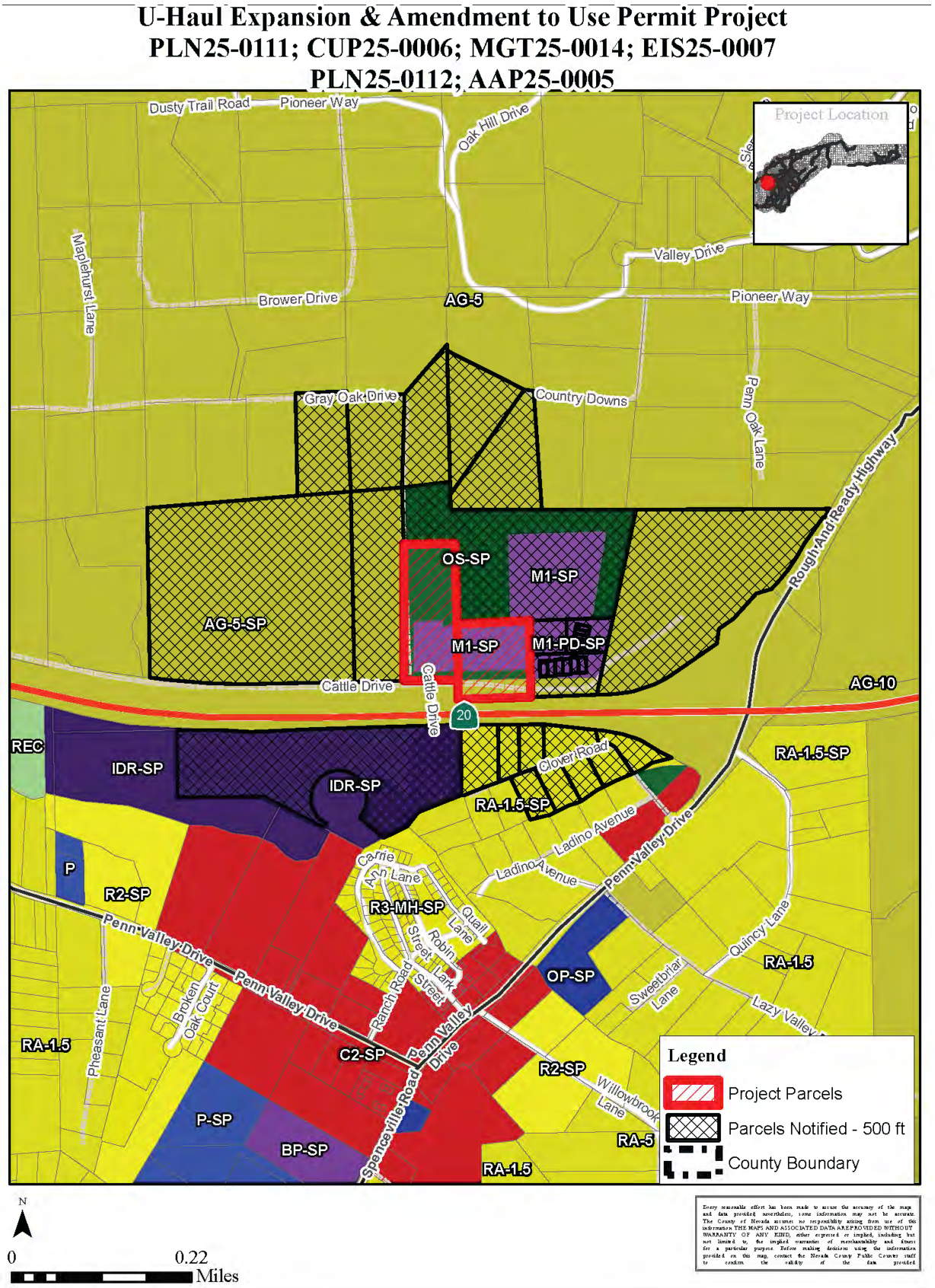

Figure 1 – Zoning, Noticed Parcels, and Vicinity Map

Project Description:

A Conditional Use Permit (CUP25-0006) and Oak Resource Management Plan (MGT25-0014) for the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel, with both Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP) zoning districts located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel, including General Agricultural with a minimum parcel size of 5-acres with a Site Performance Combining District (AG-5-SP), Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP) at 17350 Cattle Drive (APN: 051-440-010). Both project parcels are located within the boundaries of the Penn Valley Area Plan (Business Opportunity District) and are approximately 6.69 acres (APN: 051-110-008) and 5.57 acres (APN: 051-440-010) in size. Both parcels will utilize the same shared access via Cattle Drive, a 50 foot right-of-way, and the access to APN: 051-110-008 is solely proposed through the northwestern and southwestern paved drive aisles on APN: 051-440-010 which provide direct internal access to APN: 051-110-008. The existing gate to Cattle Drive shall not be used for access and will only be used for maintenance of the proposed water retention basin as needed. The proposed project includes approximately 1.84 acres of the project parcel being proposed for development with the remainder of the project parcel remaining Open Space on APN: 051-110-008 and to allow for both outdoor storage and for the existing light pole exterior lighting fixtures to remain on site at APN: 051-440-010).

The two projects will be combined and function as one (1) U-Haul mini storage operation across both parcels. The proposed development on APN: 051-110-008 includes four (4) total mini storage structures of different sizes, referenced by Buildings A-D. Building A is proposed to be a twenty-nine (29) unit, 6,114 square foot building with a non-lit cabinet wall sign on the southern portion of the building facing Cattle Drive. Building A units will have doors for access to each unit on the eastern side of the building, the western side includes faux doors, and the northern side will be bare. Building B is proposed to be a forty-two (42) unit, 8,927 square foot building, and all units will have doors for access on the western and eastern sides, with faux doors on the south side of the building, and the north side remaining bare. Building C is proposed to be a fifty-eight (58) unit, 12,337 square foot building, and all units will have doors for access on the western and eastern sides, with faux doors on the south side of the building, and the north side remaining bare. Building D is proposed to be an eight (8) unit, 1,678 square foot building, and all units will have doors for access on the southern side of the building with the northern, eastern, and western sides, all remaining bare. Both parcels will share internal parking to accommodate both sites of the U-Haul facility. There are four (4) total parking spaces for the mini storage facility, with one of the parking spaces being an ADA accessible parking space.

Additionally, the project description for proposed activities at 17350 Cattle Drive does not propose any new structures and will remain as an existing mini storage facility, with the only new aspect of the existing facility being the allowance of outdoor storage of vehicles and allowing exterior lighting fixtures on-site, which were not permitted under the original Use Permit. The outdoor

storage area will consist of thirty-three (33) parking spaces for the outdoor storage area to accommodate vehicles for storage, six (6) parallel parking spots and twenty-seven (27) angled parking spaces. All of the parking spots are paved and striped, and the proposed outdoor storage area is in a central area of the parcel with mini storage structures surrounding it. The proposed outdoor storage area has an existing electric gate, and the outdoor storage area will be completely fenced and will contain a dark green screening fabric along the fence lines to screen the outdoor storage from Cattle Drive and Highway 20. In addition to the fencing and green fabric, the outdoor storage area is screened by existing vegetation that provides a visual buffer between the roadways and public views to the proposed outdoor storage area. The three (3) light pole exterior lighting fixtures are existing already within the parking area internal to the existing U-Haul facility at 17350 Cattle Drive and are approximately 20 feet in height. The three (3) existing light pole exterior lighting fixtures shall remain shielded and downward facing pursuant to Title 12, Chapter 4, Section 12.04.108 Lighting of the Nevada County Code.

The proposed project includes Buildings A-D to be constructed of 12"W MBCI PBD vertical panels that are a gray color to match the existing U-Haul facility, mixed light toned faux stacked stone, 9”H trim painted dark green to match the existing U-Haul facility, and sierra sunset orange doors for each mini storage unit. There is no manager’s residence, retail store, or trash enclosures proposed as a part of this expansion project due to the new project parcel proposing to utilize the existing manager’s residence, retail store, and trash enclosures located on the existing U-Haul mini storage facility at APN: 051-440-010. Both parcels (APNs: 051-110-008 & 051-440-010) will share these services that have already been constructed and provided for the existing U-Haul business. The project will have the same hours of operation as the existing business, which is seven (7) days a week 8 a.m. to 5 p.m. No new employees will be hired for the expansion. There will continue to be a maximum of five (5) employees on staff. Not all will be there at the same time. There is no exterior lighting being proposed as part of the project and all maximum noise levels will be complied with due to the proposed project activities being conducted indoors and including a use that is typically very minor in nature in regard to noise. A Sign Plan was provided for the proposed addition of one (1) 45 square foot non-lit cabinet wall sign proposed on the front of the proposed mini storage facility.

A Preliminary Landscaping Plan was submitted which includes 1,257 proposed plantings consisting of eight (8) Blue Oak trees, nine (9) Valley Oak trees, 335 Korean Feather Reed Grass shrubs, 400 Dwarf Cape Rush shrubs, twenty-nine (29) Noel Grevillea shrubs, twenty-five (25) California Coffeeberry shrubs, 264 Low Boy Bank Catclaw ground covers, 187 Sunset Manzanita ground covers, and 8,148 square feet of bark. A landscape buffer along Cattle Drive and Grey Oak Drive is proposed within the Open Space area that includes Blue Oak trees, Valley Oak trees, California Coffeeberry shrubs, Noel Grevillea shrubs, and existing oak trees on site. The proposed project includes an Oak Resource Management Plan prepared by Dudek for the proposed removal of approximately seventeen (17) trees categorized as Landmark Oak Grove, including one (1) Landmark Oak Tree, to develop the project parcel and provide access to the existing U-Haul business. Five (5) trees will be retained and protected, which includes the other two Landmark Oak Trees in the project area. The project’s Preliminary Landscape Plan proposes planting seventeen (17) Oak trees (9 Valley Oak and 8 Blue Oak), each of which are 24” box size. Each 24” box Oak tree would have a DSH of a minimum of 2” at the time of planting. This would therefore satisfy replacement of 34” of trunk diameter pursuant to Nevada County Code, with the remaining 11” of

trunk diameter mitigation via an in-lieu fee payment to the Bear Yuba Land Trust's (BYLT) Oak Woodland Conservation Fund.

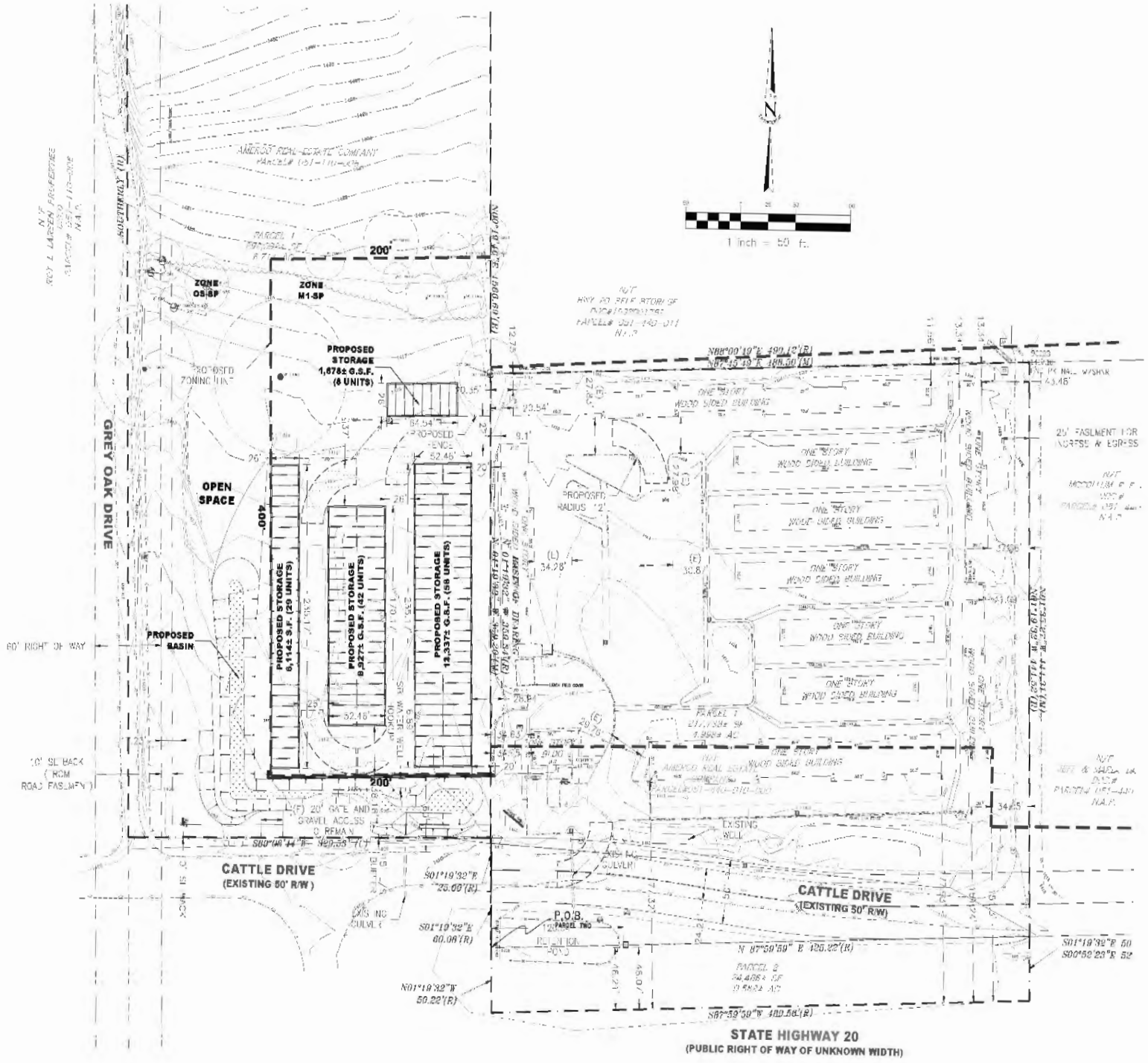

Figure 2 – Proposed Project Site Plan (Close Up)

Figure 3 – Project Site Aerial Imagery

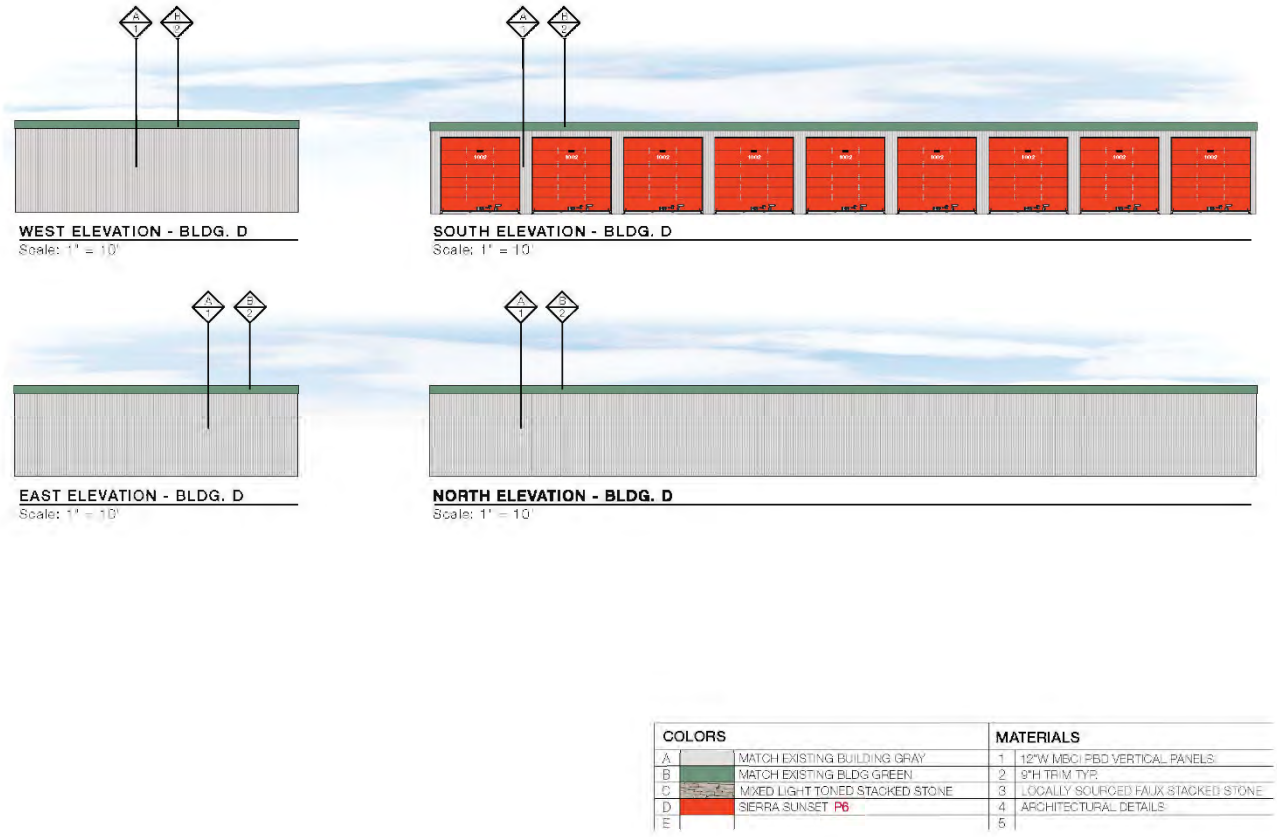

Figure 4 – Color Renderings

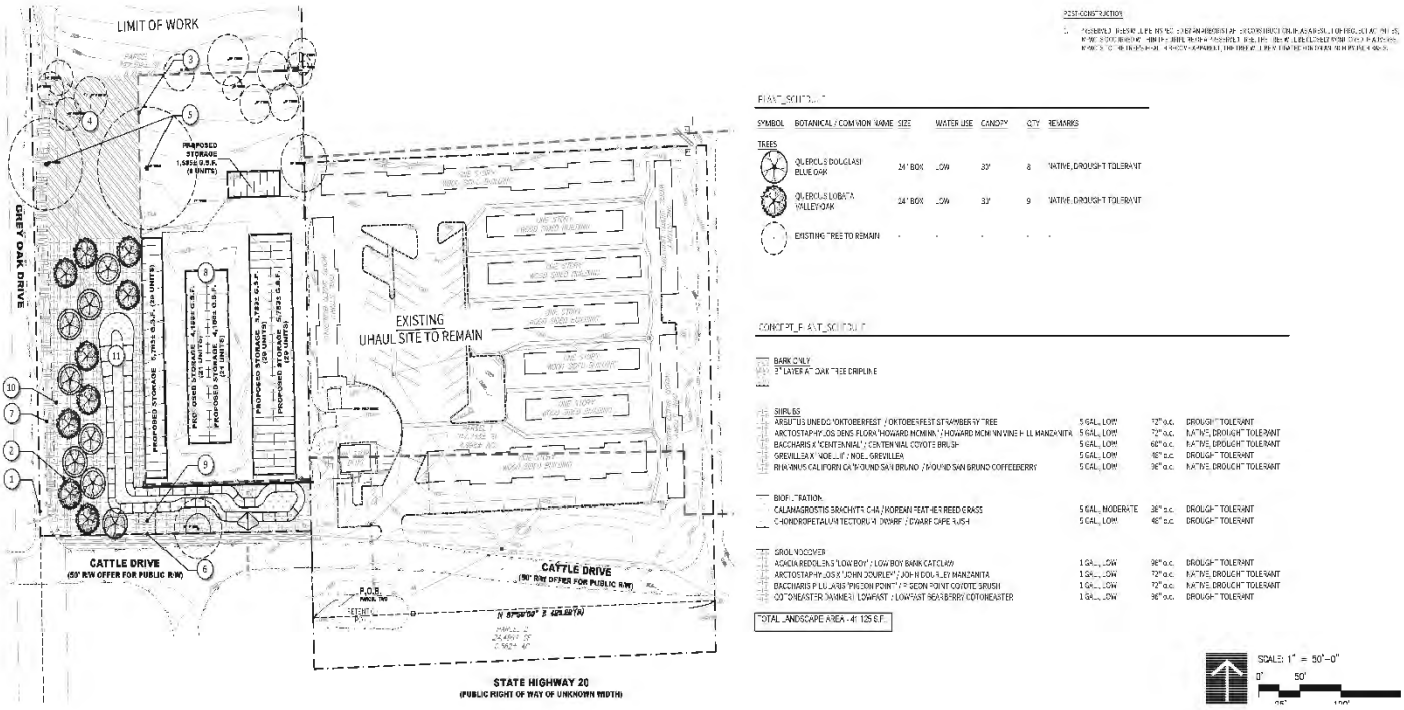

Figure 5 – Landscape Plan

Other Permits that May be Necessary:

1. Building and Grading Permits– Nevada County Building Department
2. Encroachment Permits – Nevada County Public Works Department
3. Septic System Permits – Nevada County Environmental Health Department
4. Drinking Water Well Permits – Nevada County Environmental Health Department
5. Stormwater Pollution Prevention Plan (SWPPP) – California State Water Resources Control Board
6. National Pollutant Discharge Elimination System (NPDES) – California State Water Resources Control Board

Relationship to Other Projects:
None.

Consultation with Native American Tribes:
Pursuant to Assembly Bill 52, tribal consultation began September 4, 2025. Native American tribes traditionally and culturally affiliated with the project area were notified of the project and invited to consultation. Tribes include the T'si Akim Maidu of the Taylorsville Rancheria, the United Auburn Indian Community (UAIC), the Nevada City Rancheria, the Wilton Rancheria, the Colfax-Todds Valley Consolidated Tribe, and the Shingle Springs Band of Miwok Indians. The UAIC requested consultation to review the cultural resources report and photographs and to conduct a site survey of the proposed project area on October 29, 2025. The site survey was conducted by the UAIC on October 29, 2025, and consultation was officially closed July 20, 2026 with Mitigation Measures provided for Tribal Cultural Resources (TCRs) included in Section 18 of this Initial Study. The California Native American Tribes will be sent a Notice of Availability for Public Review and Notice of Intent to Adopt a Mitigated Negative Declaration for this project, which will allow the California Native American Tribes the opportunity to comment on the analysis of environmental impacts and the implementation of the Mitigation Measures provided by the UAIC. Mitigation has been included in Sections 5 and 18 of this initial study to address a plan for further consultation, if needed.

Summary of Impacts and Proposed Mitigation Measures

Environmental Factors Potentially Affected:

All of the following environmental factors have been considered. Those environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Less Than Significant with Mitigation" as indicated by the checklist on the following pages.

	1. Aesthetics		2. Agricultural and Forestry Resources	✓	3. Air Quality
✓	4. Biological Resources	✓	5. Cultural Resources		6. Energy
✓	7. Geology and Soils		8. Green House Gas Emissions	✓	9. Hazards and Hazardous Materials
	10. Hydrology and Water Quality		11. Land Use and Planning		12. Mineral Resources
✓	13. Noise		14. Population and Housing		15. Public Services
	16. Recreation		17. Transportation	✓	18. Tribal Cultural Resources
✓	19. Utilities and Service Systems		20. Wildfire	✓	21. Mandatory Findings of Significance

Recommended Mitigation Measures:

The following measures shall be implemented, and where appropriate, included as a note on construction plans as outlined in each.

3. AIR QUALITY:

Mitigation Measure 3A: Reduce Emissions During Construction. The following are the minimum mitigation measures designed to help reduce project emissions related to

construction. These measures shall be included as a note on all plans prior to issuance of all grading, improvement, and building permits:

1. The mobile off-road construction equipment in use at any time on the project shall be equipped with Tier 4 engines.
2. Construction equipment idling time shall be limited to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). All construction equipment shall also be maintained and properly tuned in accordance with manufacturer's specifications. Clear signage shall be provided for construction workers at all access points.
3. In addition to these measures, all statewide air pollution control regulations shall be followed, including Airborne Toxic Control Measures (which may be accessed at https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures).

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Agency approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department / NSAQMD*

Mitigation Measure 3B: Use Alternative Methods to Open Burning for Vegetation Disposal. The following note shall be included on all grading and improvement plans: "Open burning of site-cleared vegetation is prohibited. Among suitable alternatives are chipping, grinding, hauling to an approved disposal site, cutting for firewood, and conversion to biomass fuel."

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Agency approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department / NSAQMD*

Mitigation Measure 3C: Mitigate any Asbestos Discovered During Construction. If serpentine, ultramafic rock or naturally occurring asbestos are discovered during construction or grading, the District shall be notified within 24 hours, and specific requirements contained in Section 93105 of Title 17 of the California Code of Regulations must be strictly complied with.

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Agency approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department / NSAQMD*

4. BIOLOGICAL RESOURCES:

Mitigation Measure 4A: Minimize Construction-Related Indirect Impacts to Biological Resources. Prior to issuance of any grading permit, the project's Applicant/Developer shall include the following in the construction contractor's plans and specifications to address indirect construction-related impacts to special-status species:

1. Delineation of Property Boundaries. Before beginning activities that would cause impacts, the contractor shall, clearly delineate the boundaries with fencing, stakes, or flags, consistent with the grading plan, within which the impacts will take place. All impacts outside the fenced, staked, or flagged areas shall be avoided, and all fencing, stakes, and flags shall be maintained until the completion of impacts in that area. In addition, any avoided environmental resources shall be clearly delineated.
2. Standard Dust Control Measures. Standard dust control measures shall be implemented to reduce dust impacts on nearby conserved lands, plants, and wildlife. Measures include controlling speed to 15 mph or less on unpaved roads, replacing ground cover in disturbed areas as quickly as possible, frequently watering active work sites, installing shaker plates, and suspending excavation and grading operations during periods of high winds.
3. Stormwater Pollution Prevention Plan. Prior to issuance of a grading permit for construction, the applicant shall submit a stormwater pollution prevention plan (SWPPP) that specifies best management practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sedimentation or any other pollutants from moving off site and into receiving waters. The requirements of the SWPPP shall be incorporated into design specifications and construction contracts. Best management practices categories employed on site would include erosion control, sediment control, and non-stormwater (good housekeeping).
4. Minimize Spills of Hazardous Materials. All vehicles and equipment shall be maintained in proper condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Hazardous spills and contaminated soil shall be immediately cleaned up and the contaminated soil shall be properly handled or disposed of at a licensed facility. Servicing of construction equipment shall take place only at a designated staging area.
5. Wildlife Hazards. The following measures shall be implemented to ensure that wildlife do not become trapped, entangled, injured, or poisoned by construction activities:
    - Structures in which wildlife may become trapped (e.g., open pipes, pits, trenches) shall be tightly covered at the end of each work day. If covering the structure is not possible, an escape ramp shall be provided to allow any wildlife that falls in to safely escape.
    - Debris piles, construction materials, equipment, and other items that may be used as wildlife refuge shall be inspected for wildlife at the start of each work day and prior to disturbance. If wildlife is discovered, it shall either be moved out of harm's way by a qualified biologist or allowed to move off of the study area on its own.

- Nets and mesh shall be made of loose-weave material that is not fused at the intersections of the weave, as nets with welded weaves present an entanglement risk.
- Toxic materials and garbage shall be removed from the work site and safely stored or disposed of at the end of each work day.

6. Night Work. All short-term construction lighting shall be facing active work areas only and shall be shielded to avoid light spillover and shall be directed away from adjacent open space areas to protect native wildlife from direct lighting. If lighting is required during construction activities that would occur during or after sunset, the lighting fixtures shall be located on the interior of work areas with a minimum of 50-foot buffer from the edge of adjacent open space.
7. Worker Environmental Awareness Training. Prior to construction a qualified biologist will review the relevant permits, mitigation measures, biological resources and other pertinent information with the construction crews

Timing: *Prior to building permit issuance and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4B: Avoid Impacts to Nesting Birds with Nesting Bird Surveys.
Construction-related ground-disturbing activities (e.g., clearing/grubbing, grading, tree removal, and other intensive activities) that occur during the avian breeding season (typically February 1 through September 15) shall require a one-time biological survey for nesting bird species to be conducted within the limits of grading and a 500-foot buffer (where feasible) within 72 hours prior to construction. This survey is necessary to ensure avoidance of impacts to nesting raptors and other birds protected by the federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503 and 3513. If any active nests are detected, the area shall be flagged and mapped on the construction plans or a biological resources figure, and the information provided to the construction supervisor and any personnel working near the nest buffer. Active nests shall have avoidance buffers established around them (e.g., 250 feet for passerines to 500 feet for raptors) by the project biologist in the field with brightly colored flagging tape, conspicuous fencing, or other appropriate barriers or signage. The project biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to avoid inadvertent impacts to these nests. The project biologist may adjust the 250-foot or 500-foot buffer at their discretion depending on the species and the location of the nest (e.g., if the nest is well protected in an area buffered by dense vegetation). However, if needed, additional qualified monitor(s) shall be provided to monitor active nest(s) or other project activities in order to ensure all of the project biologist's duties are completed. Once the nest is determined by a qualified monitor to be no longer occupied for the season, construction may proceed in the buffer areas. If construction activities, particularly clearing/grubbing, grading, and other intensive activities, stop for more than 3 days, an additional nesting bird survey shall be conducted within the proposed work area and a 500-foot buffer, where feasible. This Note shall be added to all improvement/grading/construction plans.

Timing: *Prior to building permit issuance and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4C: Preconstruction Surveys. New ground disturbance within areas of riparian or native vegetation that provide potential habitat for long-eared owl, yellow warbler, western red bat, Crotch's bumble bee, and western bumblebee shall be avoided to the extent feasible. If disturbance to riparian vegetation or native vegetation that could support special-status wildlife species cannot be avoided, a qualified biologist shall be retained to survey the proposed area of disturbance prior to construction. If evidence of occurrence of these species is found, a non-disturbance buffer shall be established around nest or burrow sites and CDFW shall be contacted to determine appropriate avoidance or impact minimization measures, which could include monitoring, buffer zones, seasonal work restrictions, or other measures.

Timing: *Prior to Grading/Improvement/Building permit final and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4D: Compensation for Unavoidable Loss of Landmark Tree 8860. To mitigate the loss of Landmark Tree 8860, (45" of tree diameter) replanting will occur with a mix of valley oak and blue oak trees in 15-gallon pot size to maximize establishment success. Depending on the diameter (likely 1-1.25") and nursery availability, this will be between 36 and 45 replacement trees. Appropriate planting locations for the replacement trees include the frontage along Gray Oak Drive, the open areas around Tree No. 8880, and the temporary grading and basin along Cattle Drive. See the Oak Management Plan for additional details.

Following planting, the trees should be staked, protected with fencing, and provided with water for the first 3 years to maximize establishment success—watered weekly the first year, watered twice per week during the second and third years, and given additional water during heat waves for the second and third years. They should be inspected regularly to make sure that the supports are not constricting the trunk. Fencing should remain in place as long as possible to prevent deer from rubbing the bark off while the trees are young.

Timing: *Prior to Grading/Improvement/Building permit final and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4E: Compensation for Unavoidable Loss of Aquatic Resources. If temporary or permanent loss of protected wetlands and other aquatic resources cannot feasibly be avoided, the project proponent will implement the following actions:

1. Prior to project activities, the project proponent will prepare a formal jurisdictional delineation and coordinate with the USACE RWQCB staff to assure conformance with permitting requirements of Section 401 and 404 of the Clean

Water Act and the Porter–Cologne Water Quality Control Act. Prior to activity within CDFW-jurisdictional lake or streambed or associated riparian habitat, the project proponent will coordinate with the appropriate CDFW staff to assure conformance with California Fish and Game Code Section 1600 permitting requirements.

2. As part of the permit application process, the project proponent will sufficiently mitigate to ensure no-net-loss of waters at a minimum of 1:1 with establishment or re-establishment for impacts on aquatic resources as a part of an overall strategy to ensure no net loss. If establishment or re-establishment mitigation is not available, a higher ratio may be needed to achieve no net loss. Final mitigation ratios and credits will be a minimum of 1:1 and determined in consultation with USACE, RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process.

Should applicant-sponsored mitigation be implemented, a mitigation and monitoring plan (Plan) will be prepared in accordance with resource agency guidelines and approved by the agencies in accordance with the proposed permits. The Plan will include but is not limited to a conceptual planting plan including planting zones, grading, and irrigation, as applicable; a conceptual planting plant palette; a long-term maintenance and monitoring plan; annual reporting requirements; proposed success criteria; legal and funding mechanisms; and parties responsible for long-term management and monitoring of the restored or enhanced habitat. Any off-site applicant-sponsored mitigation shall be conserved and managed in perpetuity.

1. As part of the permit application process, the project proponent will mitigate impacts to sensitive riparian vegetation communities to a less than significant level through preservation of the requisite habitat in perpetuity. Final mitigation ratios and credits will be a minimum of 1:1 and determined in consultation with USACE, RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process.

Best management practices shall be implemented to avoid any indirect impacts to jurisdictional waters, as follows:

1. Vehicles and equipment shall not be operated in ponded or flowing water except as described in permits.
2. Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows.
3. Spoil sites shall not be located within 30 feet from the boundaries of jurisdictional waters or in locations that may be subject to high storm flows where spoils might be washed back into drainages.

4. Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources resulting from Proposed Project-related activities shall be prevented from contaminating the soil and/or entering avoided jurisdictional waters.
5. No equipment maintenance shall be performed within 100 feet of jurisdictional waters, including wetlands and riparian areas, where petroleum products or other pollutants from the equipment may enter these areas. Fueling of equipment shall not occur on the project site.

Timing: *Prior to Grading/Improvement/Building permit final and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4F: Establish Environmentally Sensitive Areas (ESA's). Sensitive biological resources, as shown on the Site Plan, shall be mapped, and identified as ESAs on all future improvement/grading/construction plans to ensure their protection from future disturbance. These resources include any drainage channels, protected landmark oak groves, landmark oak trees, and slopes in excess of 30%. The following note shall be included: "No disturbance is allowed within areas delineated as Environmentally Sensitive Areas, unless a Management Plan is approved."

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department*

5. CULTURAL RESOURCES:

Mitigation Measure 5A. Halt work and contact the appropriate agencies if human remains or cultural materials are discovered during project construction. All equipment operators and employees involved in any form of ground disturbance at any phase of project improvements shall be advised of the remote possibility of encountering subsurface cultural resources. If such resources are encountered or suspected, work shall be halted immediately and the Nevada County Planning Department, United Auburn Indian Community of the Auburn Rancheria, and any other interested and affected tribe shall be contacted. A professional archaeologist shall be retained by the developer and consulted to access any discoveries and develop appropriate management recommendations for archaeological resource treatment. If bones are encountered and appear to be human, California Law requires that the Nevada County Coroner and the Native American Heritage Commission be contacted and, if Native American resources are involved, Native American organizations and individuals recognized by the County shall be notified and consulted about any plans for treatment. A note to this effect shall be included on the grading and construction plans for each phase of this project.

Timing: *Prior to the issuance of Building/Grading/Improvement permits and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency*: Planning Department*

7. GEOLOGY AND SOILS:

7A: Limit the Amount of Earthwork to be Completed During the Wet Season. As much as possible the earthwork portion of this project is to be completed during extended periods of dry weather. If earthwork is completed during the wet season (October 15th to April 15th) it will be necessary to take extra precautionary measures to protect subgrade soils. Wet season earthwork shall require additional mitigation measures, including diversion of surface runoff around exposed soils and draining of ponded water on the site. Once subgrades are established, exposed soils shall be protected from construction traffic.

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department*

Mitigation Measure 7B: Implement all Erosion Control Measures. To protect water quality and aquatic life in neighboring waterways and to ensure the integrity of the topographic changes, the following measures shall be implemented prior to, during, and after construction:

1. During construction, Best Management Practices (BMP's) for temporary erosion control shall be implemented to control any pollutants that could potentially affect the quality of storm water discharges from the site. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared in accordance with California State Water Resources Control Board (SWRCB) requirements. This SWPPP includes the implementation of BMP's for Erosion Control, Sediment Control, Tracking Control, Wind Erosion Control, Waste Management and Materials Pollution Control.
2. Topsoil shall be removed and stockpiled for later reuse prior to excavation activities. Topsoil shall be identified by the soil-revegetation specialist who will identify both extent and depth of the topsoil to be removed.
3. Upon completion of grading, stockpiled topsoil shall be combined with wood chips, compost and other soil amendments for placement on all graded areas. Revegetation shall consist of native seed mixes only. The primary objectives of the soil amendments and revegetation is to create site conditions that keep sediment on site, produce a stable soil surface, resist erosion and are aesthetically similar to the surrounding native forest ecosystem.
4. Geo-fabrics, jutes or other mats may be used in conjunction with revegetation and soil stabilization.

These erosion and sediment control notes will be shown on the roadway improvement plans and grading plans. Erosion control Best Management Practice's (BMPs) will also be shown on the plans with the final design for County review and approval.

Timing: *Prior to, during, and after the issuance of Grading/Improvement/Building permits.*
Reporting: *Approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department and Building Department*

Mitigation: See **Mitigation Measures 5A, and 18A**.

9. HAZARDS AND HAZARDOUS MATERIALS:

Mitigation: See **Mitigation Measures 7A-7B.**

13. NOISE:

Mitigation Measure 13A. Limit construction work hours to 7:00 AM to 7:00 PM: During grading and construction, work hours shall be limited from 7:00 AM to 7:00 PM, Monday – Saturday; no work is permitted on Sundays. Prior to issuance of grading and building permits, improvement plans shall reflect hours of construction. This shall be included as a Note on the Tentative Parcel Map and all future improvements plans.

Timing: *Prior to map recordation and prior to issuance of Grading/Improvement/Building permits*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

18. TRIBAL CULTURAL RESOURCES:

Mitigation Measure 18A: Unanticipated Tribal Cultural Resources. The following mitigation measures shall be required and shall be included as notes on all future site plans:

"If any suspected TCRs or resources of cultural significance to UAIC, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. A Tribal Representative and the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC §21074) and

the Tribal Representative shall make recommendations for further evaluation and treatment as necessary."

When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA and UAIC protocols, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by UAIC or by the California Native American Tribe that is traditionally and culturally affiliated with the project area.

The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB52, have been satisfied.

Timing: *Prior to issuance of Grading/Improvement/Building permits and throughout construction*
Reporting: *Planning Department Approval of Grading and Construction Permits*
Responsible Agency: *Planning Department & United Auburn Indian Community (UAIC)*

Mitigation Measure 18B: Landmark Oak Tree Removal. Landmark Oak trees are considered culturally significant and the existing Landmark Oak tree to be removed has been deemed culturally significant pursuant to the United Auburn Indian Community (UAIC). Therefore, the United Auburn Indian Community (UAIC) shall be offered the opportunity to remove the Landmark Oak tree proposed for removal to reduce the impact of its removal prior to the final of any grading permits, building permits, or improvements. The applicant shall provide written documentation of the offer and all correspondence between the applicant and the UAIC regarding the Landmark Oak tree removal to the Nevada County Planning Department.

Timing: *Prior to final of Grading/Improvement/Building permits and during construction*
Reporting: *Planning Department Approval of Grading and Construction Permits*
Responsible Agency: *Planning Department*

Mitigation: See **Mitigation Measures 5A**

19. UTILITIES AND SERVICE SYSTEMS:

Mitigation Measure 19A: Appropriately Dispose of Vegetative and Toxic Waste: Industrial toxic waste (petroleum and other chemical products) is not accepted at the McCourtney Road transfer station and if encountered, shall be properly disposed of in compliance with existing regulations and facilities. This mitigation measure shall be included as a note on all improvement plans, which shall be reviewed and approved by the Planning Department prior to permit issuance.

Timing: Prior to issuance of Grading/Improvement/Building permits and during construction
Reporting: Agency approval of permits or plans
Responsible Agency: Nevada County Planning Department

21. MANDATORY FINDINGS OF SIGNIFIGANCE

See all Mitigation Measures listed above.

Mitigation and Monitoring Matrix:

MEASURE #	MONITORING AUTHORITY	IMPLEMENTATION TIMING
3A	Planning Department / NSAQMD	Prior to issuance of grading/improvement/building permits
3B	Planning Department / NSAQMD	Prior to issuance of grading/improvement/building permits
3C	Planning Department / NSAQMD	Prior to issuance of grading/improvement/building permits
4A	Planning Department	Prior to map recordation & issuance of grading/improvement/building permits
4B	Planning Department	Prior to map recordation & issuance of grading/improvement/building permits
4C	Planning Department	Prior to Grading/Improvement/Building permit final and during construction
4D	Planning Department	Prior to Grading/Improvement/Building permit final and during construction
4E	Planning Department	Prior to Grading/Improvement/Building permit final and during construction
4F	Planning Department	Prior to issuance of Grading/Improvement/Building permits
5A	Planning Department	Prior to map recordation & issuance of grading/improvement/building permits
7A	Planning Department / Building Department	Prior to issuance of Grading/Improvement/Building permits
7B	Planning Department / Building Department	Prior to, during, and after the issuance of grading/improvement/building permits.
13A	Planning Department	Prior to map recordation & issuance of grading/improvement/building permits
18A	Planning Department	Prior to map recordation & issuance of grading/improvement/building permits
18B	Planning Department	Prior to final of Grading/Improvement/Building permits and during construction
19A	Planning Department	Prior to map recordation & issuance of grading/improvement/building permits

Initial Study and Checklist

Introduction:

This checklist is to be completed for all projects that are not exempt from environmental review under the California Environmental Quality Act (CEQA). CEQA requires a brief explanation for answers to the Appendix G: Environmental Checklist except "No Impact" responses that are adequately supported by noted information sources. Answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. This Initial Study uses the following terms to describe the level of significance of adverse impacts. These terms are defined as follows.

- **No Impact**: An impact that would result in no adverse changes to the environment.
- **Less than Significant Impact**: An impact that is potentially adverse but does not exceed the thresholds of significance as identified in the impact discussions. Less than significant impacts do not require mitigation.
- **Less than Significant with Mitigation**: An environmental effect that may cause a substantial adverse change in the environment without mitigation, but which is reduced to a level that is less than significant with mitigation identified in the Initial Study.
- **Potentially Significant Impact**: An environmental effect that may cause a substantial adverse change in the environment; either additional information is needed regarding the extent of the impact to make the significance determination, or the impact would or could cause a substantial adverse change in the environment. A finding of a potentially significant impact would result in the determination to prepare an EIR.

1. Aesthetics:

Existing Setting: The project parcels are located in western Nevada County, California on Cattle Drive approximately 0.4 miles west of the intersection of Highway 20 and Penn Valley Drive. The sites are bounded by Highway 20 to its south, generally by Gray Oak drive on its west (although the project boundary extends slightly west of Gray Oak Drive), adjacent businesses to its east including the existing U-Haul facility, and another self-storage business and oak woodland to its northeast. APN: 051-110-008 is an undeveloped parcel adjacent to the existing U-Haul facility on APN: 051-440-010. The topography within the study area is generally level, with elevations ranging from approximately 1425 feet above mean sea level to 1430 feet above mean sea level. The project parcels are both surrounded by commercial/industrial development and undeveloped land. APN: 051-110-008 is directly visible from State Highway 20, and APN: 051+440-010 is minimally visible from State Highway 20 due to the presence of existing vegetation. The project parcels are fenced with wire fencing on APN: 051-110-008 and metal fencing on APN: 051-440-010.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Have a substantial adverse effect on a scenic vista?			✓		A, L
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓	A, L, 27
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 points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓		A
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓		A, 18

Impact Discussion:

1a,c,d A scenic vista is typically considered to be a view that possesses visual and aesthetic qualities of high value to the public. Scenic vistas can provide views of natural features or significant structures and buildings. The proposed project is not anticipated to result in an adverse effect on a scenic vista, degrade the visual character of the site or its surroundings, or to create a new source of substantial light or glare. The proposed project is for the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). The Open Space area will remain as raw land with some landscaping plantings being planted in the Open space areas along the southern and western property lines which provide screening from public views and ensures that the existing character of the Open space area will not be degraded. Due to the project site being located within an industrial and commercial area where the surrounding parcels have already been developed with other industrial and commercial uses, the visual character of the parcels nor their surroundings would experience an adverse effect and would keep consistent with the surrounding uses and character of the general area. Additionally, public views would not be adversely impacted due to the fact that the proposed new construction area at 17400 Cattle Drive will utilize existing vegetation and proposed landscaping along the southern portion of the parcel that is closest to the public view, and the outdoor storage area at 17350 Cattle Drive will also utilize existing vegetation along the land strip between State Highway 20 and 17350 Cattle Drive to limit the impact of the project on public views. The outdoor storage area is already existing and is located within a central area of the parcel

surrounded by existing mini storage structures and fencing; however, as a part of the project there will be a dark green fabric along the fencing to further screen the outdoor storage area to minimize the impacts of the proposed project on public views. As a part of the proposed project, the applicant will provide landscaping and utilize existing vegetation that will provide additional screening and buffering between the parcels and State Highway 20, as well as providing landscaping screening along Gray Oak Drive as well. Additionally, the proposed project is not anticipated to result in a significant new source of light or glare, as all lighting would be required to be fully shielded and downward facing the eliminate light pollution to the greatest possible. The proposed lighting has been reviewed and determined to be compliant with the Nevada County lighting standards. Due to the reasons discussed above, the project would result in ***less than significant*** impacts to public views, scenic vistas, and the general character of the area.

1b The proposed project is not anticipated to result in significant damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway. There are currently two officially designated State Scenic Highways in Nevada County, Highway 89 north of Truckee and the six miles of Highway 20 between the Skillman Flat Campground to just east of Lowell Hill Road. This is northeasterly of Nevada City, not in the vicinity of the project parcels. State Highway 49 and State Highway 174 are considered eligible state scenic highways by the California Department of Transportation (2011). State Highway 49 is approximately 5.9 direct miles (as the crow flies) from the project area and State Highway 174 is approximately 6.7 direct miles (as the crow flies) from the project area; there is no visibility of the project parcels from these highways due to the location being so far away. Additionally, existing mature trees and a proposed green fabric screening will be used on 17350 Cattle Drive to screen the outdoor storage area from State Highway 20. Therefore, the proposed project would have ***no impact*** on scenic resources within a state scenic highway.

Mitigation Measures: None required.

2. Agricultural and Forestry Resources:

Existing Setting: The project parcels are mapped entirely within an important farmland designation of both “Urban and Built-Up Land” and “Grazing Land” and do not contain any Farmland of Statewide or Local Importance. The project parcel located at 17400 Cattle Drive (APN: 051-110-008) is an undeveloped parcel zoned Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP) with a General Plan designation of both Open Space (OS) and Industrial (IND). The second project parcel located at 17350 Cattle Drive (APN: 051-440-010) is developed with an existing U-Haul facility. The second project parcel is zoned General Agricultural with a minimum parcel size of 5-acres with a Site Performance Combining District (AG-5-SP), Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP), with a General Plan designation of Industrial (IND). Additionally, the project parcels are located within the Penn Valley Area Plan, which provides further clarification that these parcels are meant for Industrial activities and uses.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
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?				✓	A, L, 7
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓	A, 18, 34
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resource Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓	A, L, 18
d. Result in the loss of forest land or conversion of forest land to non-forest use?				✓	L, 18
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?				✓	A, L, 7

Impact Discussion:

2a,b The project parcels are mapped entirely within an important farmland designation of both "Urban and Built-Up Land" and "Grazing Land" and do not contain any Farmland of Statewide or Local Importance, and will not result in a conversion of Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The proposed project will not propose a change in zoning that will conflict with or convert existing zoning for agricultural use, as the proposed project is solely for the construction of 137 new mini storage units and the operation of an extension to the existing U-Haul facility, and does not include any project action that would change the existing zoning designation of either parcel. The California Land Conservation Act of 1965 (Williamson Act) enables counties and cities to designate agricultural preserves and offer preferential taxation based on a property's agricultural use value rather than on its market value. Neither the subject parcel nor adjacent properties are under a Williamson Act contract, and due to the project parcels, both proposing activities within the portions of the parcels zoned Light Industrial (M1-SP) only with no construction activities proposed within the Open Space portions of 17400 Cattle Drive, there would be no impact with conflicting with existing zoning for agricultural use nor any Williamson Act contracts. With no Williamson Act contracts on or near the property and the project will not have any impacts on the designated Open Space, the proposed project is anticipated to have ***no impact*** on a Williamson Act contract(s) and ***no impact*** on protected farmlands.

2c,d,e The proposed project does not result in the loss or conversion of forest land to non-forest use due to there being no forest or timber resources located within the project area. Additionally, the property is not zoned Forest or Timber Production Zone. Therefore, due to the fact that there are no forest or timber resources within the project area on either parcel, the potential impacts to forest uses are anticipated to have ***no impact.***

Mitigation Measures: None required.

3. Air Quality:

Existing Setting: Nevada County is located in the Mountain Counties Air Basin (MCAB). The MCAB includes the central and northern Sierra Nevada Mountain range with elevations ranging from several hundred feet in the foothills to over 6,000 feet above mean sea level along the Sierra Crest. The MCAB generally experiences warm, dry summers and wet winters. Ambient air quality in the air basin is generally determined by climatological conditions, the topography of the air basin, and the type and amount of pollutants emitted.

The Northern Sierra Air Quality Management District has responsibility for controlling air pollution emissions including "criteria air pollutants" and "toxic air pollutants" from direct sources (such as factories) and indirect sources (such as land-use projects) to improve air quality within Nevada County. To do so, the District adopts rules, regulations, policies, and programs to manage the air pollutant emissions from various sources, and also must enforce certain statewide and federal rules, regulations and laws.

The Federal Clean Air Act of 1971 established national ambient air quality standards (NAAQS). These standards are divided into primary and secondary standards. Primary standards are designed to protect public health and secondary standards are designed to protect plants, forests, crops, and materials. Because of the health-based criteria identified in setting the NAAQS, the air pollutants are termed "criteria" pollutants. California has adopted its own ambient air quality standards (CAAQS). Criteria air pollutants include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, and particulate matter. CAAQS include the NAAQS pollutants, in addition to visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. A nonattainment area is an area where a criteria air pollutant's concentration is above either the federal and/or state ambient air quality standards. Depending on the level of severity, a classification will be designated to a nonattainment area. Failure of a state to reach attainment of the NAAQS by the target date can trigger penalties, including withholding of federal highway funds. Table 1 shows the current attainment/nonattainment status for the federal and state air quality standards in Nevada County.

Nevada County has two federally recognized air monitoring sites: The Litton Building in Grass Valley (fine particulate matter, also called PM2.5, and ozone) and the fire station in downtown Truckee (PM2.5 only). For eight-hour average ozone concentrations, Nevada County is serious nonattainment for both the 2008 and 2015 state and federal ozone standards of 75 and 70 parts per billion, respectively (Table 1). Unlike other pollutants, ozone is not typically released directly

into the atmosphere from any sources. Ozone is created by the interaction of Nitrogen Oxides and Reactive Organic Gases (also known as Volatile Organic Compounds) in the presence of sunlight, especially when the temperature is high. The major sources of Nitrogen Oxides and Reactive Organic Gases, known as ozone precursors, are combustion sources such as factories, automobiles and evaporation of solvents and fuels. Ozone is mainly a summertime problem, with the highest concentrations generally observed in July and August, when the days are longest, especially in the late afternoon and evening hours. Ozone is considered by the California Air Resources Board to be overwhelmingly transported to Nevada County from the Sacramento Metropolitan area and, to a lesser extent, the San Francisco Bay Area. This recognition of overwhelming transport relieves Nevada County of CAAQS-related requirements, including the development of CAAQS attainment plan with a "no-net-increase" permitting program or an "all feasible measures" demonstration.

For particulate matter, ambient air quality standards have been established for both PM10 and PM2.5. California has standards for average PM10 concentrations over 24-hour periods and over the course of an entire year, which are 50 and 20 $\mu g/m^3$, respectively. (The notation "$\mu g/m^3$" means micrograms of pollutant per cubic meter of ambient air.) For PM2.5, California only has a standard for average PM2.5 concentrations over a year, set at 12 $\mu g/m^3$, with no 24-hour-average standard. Nevada County is in compliance with all of the federal particulate matter standards, but like most California counties it is out of compliance with the state PM10 standards. Particulate-matter is identified by the maximum particle size in microns as either PM2.5 or PM10. PM2.5, is mostly smoke and aerosol particles resulting from woodstoves and fireplaces, vehicle engines, wildfires, and open burning. PM-10 is a mixture of dust, combustion particles (smoke) and aerosols from sources such as surface disturbances, road sand, vehicle tires, and leaf blowers.

Table 1: Attainment Status by Northern Sierra Air Quality Management District of State and Federal Air Quality Standards. In addition, the entire district is either Attainment or Unclassified for all State and Federal NO_2, SO_2, Pb, H_2S, visibility reducing particles, sulfates, and vinyl chloride standards.

Pollutant	State Designation	Federal Designation
Ozone (O_3)	Nevada County: Non-attainment (due to overwhelming transport)	2008 O_3 Standard (75 ppb) Western Nevada County: Serious Non-attainment;
		2015 O_3 Standard (70 ppb) Western Nevada County: Serious Non-attainment;
PM_{10}	Nevada County: Non-attainment	Unclassified
PM2.5	Nevada County: Unclassified	2012 Annual Standard (12$\mu g/m^3$) Nevada County: Unclassifiable/Attainment
		2012 24-hour Standard (35$\mu g/m^3$) Unclassifiable/Attainment
CO	Nevada: Unclassified	Unclassifiable/Attainment

Ultramafic rock and its altered form, serpentine rock (or serpentinite), both typically contain asbestos, a cancer-causing agent. Ultramafic rock and serpentine are likely to exist in several areas of western Nevada County. The area of the project site is not mapped as an area that is likely to contain ultramafic rock (California Department of Conservation, 2000). Natural occurrences of asbestos are more likely to be encountered in, and immediately adjacent to areas of ultramafic rock.

An evaluation and further discussion of related project impacts related to greenhouse gas emissions is provided in Section 8 of this Initial Study.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Conflict with or obstruct implementation of the applicable air quality plan?				✓	A, G
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?		✓			A, G, 33
c. Expose sensitive receptors to substantial pollutant concentrations?				✓	A, G, L, 33
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				✓	A, G

Impact Discussion:

3a Nevada County's General Plan, Chapter 14 Air Quality Element, contains numerous policies to protect air quality in Nevada County. With the exception of General Plan Air Quality Element Policy 14.7A, which requires compliance with Northern Sierra Air Quality Management District Rule 226, the Nevada County General Plan Air Quality Element policies are intended to apply to development that generates new residents or new employees. By assessing air pollution and emissions associated with the proposed project and recommending mitigation measures based on Thresholds of Significance established by the Northern Sierra Air Quality Management District (NSAQMD), the project as proposed would comply with Northern Sierra Air Quality Management District regulations. The proposed project would not conflict with or obstruct the implementation of an applicable air quality plan; therefore, ***no impact*** is anticipated on the potential adoption or implementation of an air quality plan.

3b The project is not anticipated to result in a cumulatively considerable net increase of criteria pollutants. Western Nevada County is in non-attainment for the Federal 8-hour ozone standard, and the entirety of Nevada County is in non-attainment for the State 1- and 8-hour ozone standards and PM10 standards. While most of the ozone in the County is transported from urban areas to the southwest, PM10 sources primarily come from within the County. PM10 violations in winter are largely due to wood smoke from the use of

woodstoves and fireplaces, while summer and fall violations often occur during forest fires or periods of open burning. Regulation 226 of the Northern Sierra Air Quality Management District (NSAQMD) requires a dust control plan if more than one (1) acre of natural surface area is to be altered or where the natural ground cover is removed. As a part of the project review, the Northern Sierra Air Quality Management District reviewed the proposed project and determined that the project would disturb over an acre of land and therefore required a Dust Control Plan prior to the project approval for review. The applicant provided a Dust Control Plan as a part of the project application, and the plan was reviewed by the NSAQMD on April 8, 2026. After reviewing the submitted Dust Control Plan, the NSAQMD is satisfied that the Dust Control Plan for the proposed project is adequate and therefore a Condition of Approval is included to require the Dust Control Plan to be included and all Notes of the Dust Control Plan to be included on all future improvement plans.

The California Emissions Estimation Model (CalEEMod) provides a means to estimate potential emissions associated for both construction and operation of land use projects. Estimated construction impacts were determined using the parameters specific to this proposed land division and conservative CalEEMod defaults and the results are outlined below in both Table 1 and Table 2. The Northern Sierra Air Quality Management District (NSAQMD) established thresholds of significance for assessing and mitigating air quality impacts of land use projects, as shown in the tables provided below. Level A requires the most basic mitigations, projects falling within the Level B range require more extensive mitigation and Level C requires the most extensive mitigations. Table 1, below, shows that estimated project construction related pollution levels would fall within NSAQMD Level A thresholds.

Table 1. Project Construction Air Quality Impacts (Unmitigated)		
Pollutant	**NSAQMD Threshold***	**Project Impact**
NOx	< 24 lbs/day	6.84 lbs/day (1.25 tons/yr)
ROG	< 24 lbs/day	1.93 lbs/day (0.35 tons/yr)
PM10	< 79 lbs/day	0.24 lbs/day (0.04 tons/yr)
CO	N/A	9.56 lbs/day (1.74 tons/yr)
*These thresholds are "Level A" in NSAQMD's *Guidelines*. CalEEMod Version 2022.1.1.44		

Mitigation Measure 3A is proposed to reduce emissions during project construction (increased particulate matter from diesel and dust and increase hydrocarbon release for the synthesis of ozone) from heavy equipment used for grading, brush chipping, and other construction activities. Table 2, below, shows resultant operational impacts are within NSAQMD Level A. These emissions are associated with energy use, landscape equipment (stationary sources) and mobile sources associated with vehicle use.

Table 2. Project Operational Air Quality Impacts (Unmitigated)		
Pollutant	**NSAQMD Threshold***	**Project Impact**

NOx	< 24 lbs/day	0.005 lbs/day (0.001 tons/yr)
ROG	< 24 lbs/day	0.91 lbs/day (0.17 tons/yr)
PM10	< 79 lbs/day	0.01 lbs/day (0.005 tons/yr)
CO	N/A	0.63 lbs/day (0.11 tons/yr)
*These thresholds are "Level A" in NSAQMD's Guidelines. CalEEMod Version 2022.1.1.44		

In order to ensure the project remains within the operational levels identified above, and to ensure that it does not contribute cumulatively considerable net increases in criteria pollutants that would substantially deteriorate ambient air quality or violate air quality standards, Mitigation Measures 3A reduces operational emissions, minimizing impacts through mitigation measures designed to help reduce project emissions related to construction. Additionally, Mitigation Measure 3B has been included which requires that during construction activities, the applicant shall use alternatives to open burning of vegetative material on the project site, unless deemed infeasible by the Air Pollution Control Officer. Further, while mapping does not indicate that the site is likely to contain serpentine, ultramafic rock or naturally occurring asbestos, Mitigation Measure 3C has been included that requires NSAQMD notification in the event of their discovery. Therefore, with implementation of these mitigation measures, the potential for this project to violate any air quality standards during either the construction or the operational phases would be ***less than significant with mitigation***.

3c,d The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base at 17400 Cattle Drive, and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility at 17350 Cattle Drive. Mini storage facilities are not anticipated to generate substantial pollutant concentrations, nor are there sensitive receptors in the immediate area of the proposed parcels. Vantage Point Charter School and Ready Sprigs Elementary School appear to be the closest sensitive receptors, located approximately 1.6 driving miles to the southeast from the closest project parcel. The proposed project is proposed within an area designated for industrial and commercial uses pursuant to the Penn Valley Area Plan, and the proposed project includes a commercial mini storage expansion which is a use that emits minimal emissions that would adversely affect a substantial group of people. Therefore, ***no impacts*** related to exposing sensitive receptors to substantial pollutant concentrations are anticipated as a result of this proposed project and ***no impacts*** related to the generation of emissions that could affect a substantial amount of people are anticipated.

Mitigation Measures: To offset potentially adverse air quality impacts associated with the project activities, the following mitigation measures shall be required and shall be included in the improvement plans for the project:

Mitigation Measure 3A: Reduce Emissions During Construction. The following are the minimum mitigation measures designed to help reduce project emissions related to construction. These

measures shall be included as a note on all plans prior to issuance of all grading, improvement, and building permits:

1. The mobile off-road construction equipment in use at any time on the project shall be equipped with Tier 4 engines.
2. Construction equipment idling time shall be limited to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). All construction equipment shall also be maintained and properly tuned in accordance with manufacturer's specifications. Clear signage shall be provided for construction workers at all access points.
3. In addition to these measures, all statewide air pollution control regulations shall be followed, including Airborne Toxic Control Measures (which may be accessed at https://ww2.arb.ca.gov/resources/documents/airborne-toxic-control-measures).

Timing: *Prior to issuance of Grading/Improvement/Building permits and throughout construction*
Reporting: *Agency approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department / NSAQMD*

Mitigation Measure 3B: Comply with Open Burning Prohibitions. Use alternatives to open burning of vegetative material on the project site, unless deemed infeasible by the Air Pollution Control Officer. Treat cleared vegetation by legal means other than open burning, such as chipping, shredding, grinding, use as firewood, and conversion to biomass fuel. Open burning of site-cleared vegetation shall be permitted only upon Northern Sierra Air Quality Management District (NSAQMD) approval of documentation showing alternatives are unobtainable or economically infeasible. Obtain an approval letter from NSAQMD prior to approval of improvement or grading plans for road, driveway or future residential construction indicating the approved method of cleared vegetation disposal. Note such methods on any project plans prior to approval. At no time shall open burning of materials generated by this project occur at another site unless approved in advance by the NSAQMD.

Timing: *Prior to issuance of Grading/Improvement/Building permits and throughout construction*
Reporting: *Agency approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department / NSAQMD*

Mitigation Measure 3C: Mitigate any Asbestos Discovered During Construction. If serpentine, ultramafic rock or naturally occurring asbestos are discovered during construction or grading, the District shall be notified within 24 hours, and specific requirements contained in Section 93105 of Title 17 of the California Code of Regulations must be strictly complied with.

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Agency approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department / NSAQMD*

4. Biological Resources:

Existing Setting: The project parcels (APNs: 051-440-010 & 051-110-008) lie in the Sierra Nevada foothills and are 12.26 acres in size combined. Approximately 75% of the parcel is an oak woodland, and the vegetation within the project area consists of annual grasses and 21 oak trees. The topography within the project area of 17400 Cattle Drive is generally level, with elevations ranging from approximately 1425 feet above mean sea level to 1430 feet above mean sea level, and 17350 Cattle Drive is a level site due to previous grading and construction activities. The subject parcel is surrounded by commercial and industrial development to the north and east, and with undeveloped parcels mainly to the west of the subject parcels and overall project area. The project region has a Mediterranean climate with cool, wet winters and hot, dry summers. On average, July is the warmest month with an average high temperature of 91˚Farehenheit (F), and January is the coolest month on average with a low of 53˚F. Rainfall occurs primarily between November through April, with the maximum average precipitation occurring in January. The mean annual rainfall for the region is approximately 53 inches of rain per year

Annual grassland comprises approximately 1.06 acres (13%) of the biological study area (BSA). Annual grasslands are open grasslands composed primarily of annual herbaceous and forb species, with annual grasses as the dominant plant species. Blue oak woodland comprises approximately 1.20 acres (14%) of the BSA. Blue oak woodlands have an over story of scattered trees, although the canopy can be nearly closed. The canopy is dominated by broad-leaved trees 16 feet to 50 feet tall, commonly forming open savanna-like stands on dry ridges and gentle slopes. Valley oak riparian forest comprises approximately 0.59 acres (7%) of the BSA. It is present along the southern border of the project site. Disturbed habitat comprises approximately 0.76 acres (9%) of the BSA. Disturbed habitat is described as areas generally lacking vegetation due to high levels of existing or historical human disturbance and are no longer recognizable as a native or naturalized vegetation association. The subject parcel does not contain any wetlands that would be regulated by the state or federal government.

Special Status Species:
A current review of the California Natural Diversity Data Base and database information provided by the United States Fish and Wildlife Service were used for special status species consideration, as part of the Biological Resources Inventory. Special-status species were considered for this Biological Resources Assessment is based on a current review of both the California Natural Diversity Data Base (CNDDB) and database information provided by the United States Fish and Wildlife Service (USFWS) for the proposed project area. The database searches did reveal forty-eight (48) special-status species and includes thirty-three (33) wildlife species and fifteen (15) plant species within the biological survey area. The assessment below is based on the potential special-status species that have the potential to occur in the greater Rough and Ready, western Nevada County area and to determine whether the subject parcel and overall project area contains the suitable habitat requirements for any of those species to be present within or adjacent to the proposed areas of disturbance. A total of five (5) special status species have a moderate potential to occur within the proposed project area, and these species are discussed in detail within this Biological Resources Assessment below:

- Long-Eared Owl (Asio otus)
- Yellow Warbler (Setophaga petechia)

- Western Red Bat (Lasiurus frantzii)
- Crotch's Bumble Bee (Bombus crotchii)
- Western Bumble Bee (Bombus occidentalis)

Long-Eared Owl (Asio otus):
Long-eared owl is a California Species of Special Concern for nesting. It primarily uses riparian habitat for roosting and nesting, but can also use live oak thickets and other dense stands of trees. The long-eared owl usually does not hunt in the woodlands where it nests, but in open space areas such as fields, rangelands, and clearings. This species has a moderate potential to occur within the study area.

Yellow Warbler (Setophaga petechia):
Yellow warbler is a California Species of Special Concern. It breeds commonly in riparian thickets and woodlands throughout the region and has a moderate potential to occur within the study area.

Western Red Bat (Lasiurus frantzii):
Western red bat is a California Species of Special Concern. This species roosts in tree canopy in forests, woodlands, riparian habitats, mesquite bosques, and orchards. It generally forages in grasslands, shrublands, open woodlands, and croplands. This species has a moderate potential to occur within the study area.

Crotch's Bumble Bee (Bombus crotchii):
Crotch's bumble bee is a candidate for state listing as endangered. In general, the species has the potential to occur in any native vegetation community or non-native grassland supporting suitable nesting microhabitats and floral resources. Floral resources are present within the study area, as well as potential refugia for overwintering bees. As such, this species has a moderate potential to occur within the study area.

Western Bumble Bee (Bombus occidentalis):
Western bumble bee is a candidate for state listing as endangered. In general, the species has the potential to occur in any native vegetation community or non-native grassland supporting suitable nesting microhabitats (underground refugia) and floral resources. Floral resources are present within the study area, as well as potential refugia. As such, this species has a moderate potential to occur within the study area.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
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 Game or U.S. Fish and Wildlife Service?		✓			A, K, 38

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
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?		✓			A, K, L, 38, 39
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?		✓			A, K, L, 10, 38
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?		✓			A, L, 38, 35
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		✓			A, 38, 39
f. Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓	A, 18, 38

Impact Discussion:

4a,d The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). The Open Space area will remain mostly as raw land with some landscaping plantings being planted in the Open space areas along the southern and western property lines and with the mini storage construction activities being proposed in the Light Industrial zoned area only. The project does propose a catch basin within the Open space area on the western side of 17400 Cattle Drive, and this catch basin will provide a drainage solution for removing excess water and preventing flood damage to surrounding parcels and businesses nearby. This item typically contains a grate with a pipe used to drain excess water through and away from the area and to collect water and debris like sticks, leaves, and other small items from the project area. The project is not anticipated to result in any 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 (CDFW) or U.S. Fish and Wildlife Service (USFWS) because the proposed project disturbance areas within the subject parcel do not contain any jurisdictional wetlands or "waters of the U.S." and it does not contain any stream or related riparian habitat that would be regulated by CDFW. The project area does not contain suitable habitat for any known special-status plant species documented within the USGS Rough and Ready Topo Quad where the project area is located. Results of the USFWS and CNDDB database searches revealed 33 special-status wildlife species that are known to occur in the biological study area (BSA) region. Of the 33 species, 28 of these species were determined to have a low potential to occur or are not expected to occur due to the lack of suitable habitat or the presence of very low-quality habitat within or adjacent to the BSA, the lack of documented occurrences near the BSA, or due to the BSA being outside of the species' known geographic or elevation range. Five special-status wildlife species have a moderate potential to occur within the BSA: long-eared owl, yellow warbler, western red bat, Crotch's bumble bee, and western bumblebee. No federally or state-listed wildlife species have a moderate or high potential to occur within the study area. Project development has the potential to result in both direct and indirect impacts to special-status wildlife.

It is anticipated that any direct impacts to special-status wildlife from implementation of the project would be reduced to less than significant with mitigation incorporated with the implementation of Mitigation Measure 4A (Minimize Construction-Related Indirect Impacts to Biological Resources). While no significant direct impacts are expected to special-status wildlife, there is the potential for indirect impacts to special-status birds within the study area. Potential indirect impacts to special-status wildlife resulting from construction activities include the release of chemical pollutants; generation of fugitive dust, vibration, and increased human presence; and nighttime lighting. Additionally, adverse effects from noise could result from project construction activities, which has the potential to disrupt foraging, nesting, and reproductive activities of special-status birds. These potential construction-related indirect impacts to special-status wildlife would be potentially significant absent mitigation. The proposed project will have minimal operational impacts to biological resources because the proposed and existing lighting is required to be fully shielded and downward facing to prevent light pollution through the Conditions of Approval from the Nevada County Planning Department. Additionally, noise impacts from an operational standpoint will be minor in nature due to the project being a mini storage expansion and outdoor storage area, which are not land uses that create excess noise through daily operations of the site.

Project implementation of Mitigation Measures 3A, 4A-4F, and 7B, and Conditions of Approval from the Department of Public Works would help to reduce potential direct, indirect, and operational impacts to a less-than-significant level through delineation of project boundaries, development of a Storm Water Pollution Prevention Plan (SWPPP), implementation of standard dust control measures, requirement that all vehicles and equipment be serviced in designated staging areas mandating that construction will not be conducted at night, construction biological surveys. Additionally, potential noise impacts to nesting birds would be avoided and minimized through implementation of Mitigation Measure 4B (Nesting Bird Surveys), which requires a nesting bird survey to be

conducted within the project area and a 500-foot buffer 72 hours prior to any construction activities should work be conducted during the breeding season, and the implementation of appropriate disturbance avoidances buffers for any active nests. Implementation of Mitigation Measures 4A-4D would reduce construction-related indirect impacts to special-status wildlife to less than significant with mitigation incorporated.

Loss of limited numbers of common species of plants or animals, as could occur due to further development of the property, is not a significant impact under current CEQA guidelines pertaining to biological resources. However, the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (FGC) §3513 prohibit take of migratory birds, which is defined to include destruction of active nests (presumed to contain eggs or nestlings). Compliance with the MBTA requires that no grading, brush clearing (mechanized or otherwise), or tree removal occur during the nesting season without a nesting bird survey that confirms that no occupied nests are present. Further, the MBTA requires contingent mitigation actions if nests are present, so Mitigation Measure 4A requires a nesting survey prior to any disturbance to avoid impacts to potentially nesting raptors and migratory birds.

Additionally, the project is not anticipated to substantially interfere with the movement of any native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites because the subject parcels do not contain any known major deer migration corridors, known deer holding areas, nor critical deer fawning areas given the high levels of disturbance and development within and adjacent to the subject parcels to the north and east and proposed project area. Per the Migratory Deer Ranges Nevada County General Plan map, the project area is located in an area identified as containing Resident Herd. The field survey did not record any observations of deer. The project area does not contain any known major deer migration corridor, known deer holding area, nor any known critical deer fawning area. In order to best minimize construction related indirect impacts to biological resources, measures shall be implemented to ensure that wildlife do not become trapped, entangled, injured, or poisoned by construction activities. Therefore, Mitigation Measures 4A-4D have been included which require nesting bird surveys, preconstruction surveys, and the inclusion of specific Notes to include on all improvements plans to address indirect construction related impacts to special status species. With implementation of these Mitigation Measures (3A, 4A-4F, and 7B) and Conditions of Approval, the proposed project is anticipated to have a ***less than significant impact with mitigation*** on the loss of any special-status plant or animal species in this area, and impacts related to wildlife movement and disturbance of local wildlife would be ***less than significant with mitigation.***

4b,c The field survey conducted by the project biologist on April 17, 2025, identified five aquatic features including two non-wetland waters, two potential wetland waters, and one upland swale within the project area of the subject parcels. However, within the overall project area, there are no streams, drainages, wetlands, ponds, or other aquatic resources recognized by the Department of Geological Survey (USGS) and no USFWS National Wetland Inventory (NWI) resources or USGS National Hydrography Dataset (NHD) resources mapped within the review area that are subject to Nevada County Resource Standards. Although within the overall project area there are no jurisdictional wetlands or “waters of the U.S.”, the proposed

project would still result in potential temporary indirect impacts from construction activities and would include impacts from the generation of fugitive dust and the potential introduction of chemical pollutants (including herbicides). Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, and transpiration; increased penetration of phytotoxic gaseous pollutants; and increased incidence of pests and diseases. Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. However, during construction, erosion-control measures would be implemented as part of the stormwater pollution prevention plan for the project. Prior to the start of construction activities, the contractor is required to file a Permit Registration Document with the State Water Resources Control Board in order to obtain coverage under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities or the latest approved general permit. The Department of Public Works has included a Condition of Approval stating that Dischargers whose project disturbs one or more acres or where projects less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, shall be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Oder No. 2022-0057-DWQ. The Construction General Permit shall require the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

Additionally, although within the overall project area there are no jurisdictional wetlands or "waters of the U.S.", the proposed project would still result in direct permanent and temporary impacts to the 5 aquatic features that were identified including two non-wetland waters, two potential wetland waters, and one upland swale. Direct impacts to state protected aquatic resources would be reduced to a less than significant level through incorporation of Mitigation Measure 4E (Compensation for Unavoidable Loss of Wetlands and Other Aquatic Resources), which requires consultation with the Regional Water Quality Control Board (RWQCB) and California Department of Fish & Wildlife (CDFW) agency staff to ensure no net loss of regulated aquatic resources. Further, Mitigation Measure 4F is proposed, requiring aquatic resources, landmark oak groves, landmark oak trees, and slopes in excess of 30% to be delineated as Environmentally Sensitive Areas with non-disturbance buffers on all future grading and improvements plans. With the implementation of standard Conditions of Approval in combination with Mitigation Measures 7A, 7B, and 4A-4F, project impacts to riparian habitat, wetlands, timber resources (landmark oak groves and landmark oak tree) or other sensitive natural communities are anticipated to be ***less than significant with mitigation***. There are no aquatic resources recognized by the Department of Geological Survey (USGS) and no USFWS National Wetland Inventory (NWI) resources or USGS National Hydrography Dataset (NHD) resources mapped within the review area on the project parcel; therefore, the project will have a ***less than significant with mitigation*** through direct removal, filling, or hydrological interruption of these resources.

4e The project area is located in an area where annual grassland communities are comprise approximately 1.06 acres (13%) of the biological study area (BSA). Annual grasslands are open grasslands composed primarily of annual herbaceous and forb species, with annual grasses as the dominant plant species. This vegetation community type exists in the open field west of the existing storage units, including: wild oats (*Avena fatua, A. barbata*), soft chess (*Bromus hordeaceus*), ripgut brome (*B. diandrus*), red brome (*B. tectorum*), wild barley (*Hordeum murinum* ssp. *leporinum*), and rattail sixweeks grass (*Festuca myuros*). Common forbs include broadleaf filaree (*Erodium botrys*), redstem filaree (*E. cicutarium*), turkey mullein (*Croton setiger*), true clovers (*Trifolium* spp.), bur clover (*Medicago polymorpha*), popcorn flower (*Plagiobothrys* spp.), California poppy (*Eschscholzia californica*), and many others. Annual grassland occurs mostly on flat plains to gently rolling foothills. Blue oak woodland comprises approximately 1.20 acres (14%) of the BSA. Blue oak woodlands have an over story of scattered trees, although the canopy can be nearly closed. The canopy is dominated by broad-leaved trees 16 feet to 50 feet tall, commonly forming open savanna-like stands on dry ridges and gentle slopes. Blue oak (*Quercus douglasii*) is typically the dominant tree species. Valley oak riparian forest comprises approximately 0.59 acres (7%) of the BSA. It is present along the southern border of the project site. Valley oak riparian forest has an open to continuous canopy, with an open to continuous shrub layer and a grassy herbaceous layer. Valley oak (*Quercus lobata*) is typically the dominant tree species or is co-dominant in the tree canopy with box elder (*Acer negundo),* Oregon ash (*Fraxinus latifolia),* interior live oak (*Quercus wislizeni)* and willow species (*Salix* spp.). The understory is characterized by riparian species including Dutchman's pipe (*Aristolochia californica*), valley sedge (*Carex barbarae),* skunkbush sumac (*Rhus trilobata),* California wildrose (*Rosa californica)* and blackberry species (*Rubus* spp.). This community occurs in valley bottoms, floodplains, creeks and stream terraces that have seasonally saturated soils and may be intermittently flooded.

Nevada County's Municipal Code, Title 12, Chapter 4, Division 4.3, Section 12.04.215 describes rules and regulations for protected trees. Three categories of trees are granted specific protections in the County:

1. Landmark Trees: any oak (Quercus species) thirty-six (36) or more inches at diameter breast height (dbh or four-foot six inches (4'6")), or any tree whose size, visual impact, or association with a historically significant structure or event has caused it to be marked for preservation by the County, State, or Federal government;
2. Landmark Groves: hardwood tree groves with thirty-three-plus percent (33+%) canopy closure, or groves whose size, visual impact, or association with a historically significant structure or event has caused it to be marked for preservation by the County, State, or Federal government; and
3. Heritage Trees and Groves: a tree or a group of hardwood trees designated by the Board of Supervisors to be of historical or cultural value, outstanding specimens, unusual species, or of significant community benefit due to size, age, or any other unique characteristic and considered to be in good health.

Section 12.04.215, Subsection C describes the standards for preventing, managing, and mitigating impacts to protected trees during development. If a project cannot be developed without protecting all Landmark Trees, Landmark Groves, and/or Heritage Trees and Groves, a Management Plan is required prepared by a certified arborist, registered forester, qualified biologist or botanist, or landscape architect. Required components and attributes of such a plan include emphasis on protecting groups of trees, and specifically the protection of blue oak (*Quercus douglasii*) and valley oak (*Quercus lobata*), impacts of the project on defined trees or groves, and recommendations for project modifications to avoid or minimize impacts. If trees must be removed for the project, replacement is required at a 1:1 diameter ratio. Additionally, there must be a long-term maintenance plan for replacement trees. If replacement is not feasible on-site, the code states that an in-lieu fee may be paid in the amount of the current market value of the tree removed plus the value of replacement trees (and costs for planting and maintenance). Based on site specific field survey, within the project area, the existing trees do not form a contiguous canopy with the grove on the northern section of the parcel, and the overall canopy cover is less than 33%. To complete the proposed project, seventeen (17) of the subject oak trees in the project area will be removed, including one Landmark Tree. Five (5) trees will be retained and protected, which includes the other two Landmark Trees in the project area. Due to the removal of the Landmark Oak tree, an Oak Resource Management Plan was submitted as a part of the proposed project. The Oak Resources Management Plan included a specific Mitigation Measure that is included as Mitigation Measure 4D to ensure that the removal of the Landmark Oak tree will be mitigated to a less than significant impact with mitigation, which includes replanting with a mix of Valley Oak and Blue Oak trees, paying a mitigation via in-lieu fee payment to the Bear Yuba Land Trust's (BYLT) Oak Woodland Conservation Fund, and for the required mitigation replanting's to be staked, protected with fencing, and provided with water for the first 3 years to maximize establishment success—watered weekly the first year, watered bi-weekly during the second and third years, and given additional water during heat waves for the second and third years.

Overall, Nevada County has a number of local policies and ordinances that protect sensitive resources, including deer habitat; rare, threatened, and endangered species and their habitats; timber resources; and watercourses, wetlands, and riparian areas and steep slopes. Migratory birds would be protected through proposed Mitigation Measure 4A as discussed above (4a,d); and riparian habitat and aquatic resources would be protected through proposed Mitigation Measures 4E and 4F as discussed above (4b.c). Therefore, with the implementation of the recommended Conditions of Approval and Mitigation Measures 4A-4F, conflicts with local policies and ordinances protecting biological resources are expected to be ***less than significant with mitigation.***

4f The subject property is not part of a Habitat Conservation Plan or any other adopted conservation plans; therefore, the project would have ***no impacts*** or conflicts with adopted conservation plans.

Measure 4A: Minimize Construction-Related Indirect Impacts to Biological Resources. Prior to issuance of any grading permit, the project's Applicant/Developer shall include the following in the

construction contractor's plans and specifications to address indirect construction-related impacts to special-status species:

1. Delineation of Property Boundaries. Before beginning activities that would cause impacts, the contractor shall, clearly delineate the boundaries with fencing, stakes, or flags, consistent with the grading plan, within which the impacts will take place. All impacts outside the fenced, staked, or flagged areas shall be avoided, and all fencing, stakes, and flags shall be maintained until the completion of impacts in that area. In addition, any avoided environmental resources shall be clearly delineated.
2. Standard Dust Control Measures. Standard dust control measures shall be implemented to reduce dust impacts on nearby conserved lands, plants, and wildlife. Measures include controlling speed to 15 mph or less on unpaved roads, replacing ground cover in disturbed areas as quickly as possible, frequently watering active work sites, installing shaker plates, and suspending excavation and grading operations during periods of high winds.
3. Stormwater Pollution Prevention Plan. Prior to issuance of a grading permit for construction, the applicant shall submit a stormwater pollution prevention plan (SWPPP) that specifies best management practices to prevent all construction pollutants from contacting stormwater, with the intent of keeping sedimentation or any other pollutants from moving off site and into receiving waters. The requirements of the SWPPP shall be incorporated into design specifications and construction contracts. Best management practices categories employed on site would include erosion control, sediment control, and non-stormwater (good housekeeping).
4. Minimize Spills of Hazardous Materials. All vehicles and equipment shall be maintained in proper condition to minimize the potential for fugitive emissions of motor oil, antifreeze, hydraulic fluid, grease, or other hazardous materials. Hazardous spills and contaminated soil shall be immediately cleaned up and the contaminated soil shall be properly handled or disposed of at a licensed facility. Servicing of construction equipment shall take place only at a designated staging area.
5. Wildlife Hazards. The following measures shall be implemented to ensure that wildlife do not become trapped, entangled, injured, or poisoned by construction activities:
    - Structures in which wildlife may become trapped (e.g., open pipes, pits, trenches) shall be tightly covered at the end of each work day. If covering the structure is not possible, an escape ramp shall be provided to allow any wildlife that falls in to safely escape.
    - Debris piles, construction materials, equipment, and other items that may be used as wildlife refuge shall be inspected for wildlife at the start of each work day and prior to disturbance. If wildlife is discovered, it shall either be

moved out of harm's way by a qualified biologist or allowed to move off of the study area on its own.
    - Nets and mesh shall be made of loose-weave material that is not fused at the intersections of the weave, as nets with welded weaves present an entanglement risk.
    - Toxic materials and garbage shall be removed from the work site and safely stored or disposed of at the end of each work day.
6. Night Work. All short-term construction lighting shall be facing active work areas only and shall be shielded to avoid light spillover and shall be directed away from adjacent open space areas to protect native wildlife from direct lighting. If lighting is required during construction activities that would occur during or after sunset, the lighting fixtures shall be located on the interior of work areas with a minimum of 50-foot buffer from the edge of adjacent open space.
7. Worker Environmental Awareness Training. Prior to construction a qualified biologist will review the relevant permits, mitigation measures, biological resources and other pertinent information with the construction crews

Timing: *Prior to building permit issuance and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4B: Avoid Impacts to Nesting Birds with Nesting Bird Surveys.
Construction-related ground-disturbing activities (e.g., clearing/grubbing, grading, tree removal, and other intensive activities) that occur during the avian breeding season (typically February 1 through September 15) shall require a one-time biological survey for nesting bird species to be conducted within the limits of grading and a 500-foot buffer (where feasible) within 72 hours prior to construction. This survey is necessary to ensure avoidance of impacts to nesting raptors and other birds protected by the federal Migratory Bird Treaty Act and California Fish and Game Code Sections 3503 and 3513. If any active nests are detected, the area shall be flagged and mapped on the construction plans or a biological resources figure, and the information provided to the construction supervisor and any personnel working near the nest buffer. Active nests shall have avoidance buffers established around them (e.g., 250 feet for passerines to 500 feet for raptors) by the project biologist in the field with brightly colored flagging tape, conspicuous fencing, or other appropriate barriers or signage. The project biologist shall serve as a construction monitor during those periods when construction activities occur near active nest areas to avoid inadvertent impacts to these nests. The project biologist may adjust the 250-foot or 500-foot buffer at their discretion depending on the species and the location of the nest (e.g., if the nest is well protected in an area buffered by dense vegetation). However, if needed, additional qualified monitor(s) shall be provided to monitor active nest(s) or other project activities in order to ensure all of the project biologist's duties are completed. Once the nest is determined by a qualified monitor to be no longer occupied for the season, construction may proceed in the buffer areas. If construction activities, particularly clearing/grubbing, grading, and other intensive activities, stop for more than 3 days, an additional nesting bird survey shall be conducted within the proposed work area and a 500-foot buffer, where feasible. This Note shall be added to all improvement/grading/construction plans.

Timing: *Prior to building permit issuance and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4C: Preconstruction Surveys. New ground disturbance within areas of riparian or native vegetation that provide potential habitat for long-eared owl, yellow warbler, western red bat, Crotch's bumble bee, and western bumblebee shall be avoided to the extent feasible. If disturbance to riparian vegetation or native vegetation that could support special-status wildlife species cannot be avoided, a qualified biologist shall be retained to survey the proposed area of disturbance prior to construction. If evidence of occurrence of these species is found, a non-disturbance buffer shall be established around nest or burrow sites and CDFW shall be contacted to determine appropriate avoidance or impact minimization measures, which could include monitoring, buffer zones, seasonal work restrictions, or other measures.

Timing: *Prior to Grading/Improvement/Building permit final and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4D: Compensation for Unavoidable Loss of Landmark Tree 8860. To mitigate the loss of Landmark Tree 8860, (45" of tree diameter) replanting will occur with a mix of valley oak and blue oak trees in 15-gallon pot size to maximize establishment success. Depending on the diameter (likely 1-1.25") and nursery availability, this will be between 36 and 45 replacement trees. Appropriate planting locations for the replacement trees include the frontage along Gray Oak Drive, the open areas around Tree No. 8880, and the temporary grading and basin along Cattle Drive. See the Oak Management Plan for additional details.

Following planting, the trees should be staked, protected with fencing, and provided with water for the first 3 years to maximize establishment success—watered weekly the first year, watered twice per week during the second and third years, and given additional water during heat waves for the second and third years. They should be inspected regularly to make sure that the supports are not constricting the trunk. Fencing should remain in place as long as possible to prevent deer from rubbing the bark off while the trees are young.

Timing: *Prior to Grading/Improvement/Building permit final and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4E: Compensation for Unavoidable Loss of Aquatic Resources. If temporary or permanent loss of protected wetlands and other aquatic resources cannot feasibly be avoided, the project proponent will implement the following actions:

1. Prior to project activities, the project proponent will prepare a formal jurisdictional delineation and coordinate with the USACE RWQCB staff to assure conformance with permitting requirements of Section 401 and 404 of the Clean Water Act and the Porter–Cologne Water Quality Control Act. Prior to activity

within CDFW-jurisdictional lake or streambed or associated riparian habitat, the project proponent will coordinate with the appropriate CDFW staff to assure conformance with California Fish and Game Code Section 1600 permitting requirements.

2. As part of the permit application process, the project proponent will sufficiently mitigate to ensure no-net-loss of waters at a minimum of 1:1 with establishment or re-establishment for impacts on aquatic resources as a part of an overall strategy to ensure no net loss. If establishment or re-establishment mitigation is not available, a higher ratio may be needed to achieve no net loss. Final mitigation ratios and credits will be a minimum of 1:1 and determined in consultation with USACE, RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process.

Should applicant-sponsored mitigation be implemented, a mitigation and monitoring plan (Plan) will be prepared in accordance with resource agency guidelines and approved by the agencies in accordance with the proposed permits. The Plan will include but is not limited to a conceptual planting plan including planting zones, grading, and irrigation, as applicable; a conceptual planting plant palette; a long-term maintenance and monitoring plan; annual reporting requirements; proposed success criteria; legal and funding mechanisms; and parties responsible for long-term management and monitoring of the restored or enhanced habitat. Any off-site applicant-sponsored mitigation shall be conserved and managed in perpetuity.

1. As part of the permit application process, the project proponent will mitigate impacts to sensitive riparian vegetation communities to a less than significant level through preservation of the requisite habitat in perpetuity. Final mitigation ratios and credits will be a minimum of 1:1 and determined in consultation with USACE, RWQCB and/or CDFW based on agency evaluation of current resource functions and values and through each agency's respective permitting process.

Best management practices shall be implemented to avoid any indirect impacts to jurisdictional waters, as follows:

1. Vehicles and equipment shall not be operated in ponded or flowing water except as described in permits.
2. Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows.
3. Spoil sites shall not be located within 30 feet from the boundaries of jurisdictional waters or in locations that may be subject to high storm flows where spoils might be washed back into drainages.
4. Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to

vegetation or wildlife resources resulting from Proposed Project-related activities shall be prevented from contaminating the soil and/or entering avoided jurisdictional waters.

5. No equipment maintenance shall be performed within 100 feet of jurisdictional waters, including wetlands and riparian areas, where petroleum products or other pollutants from the equipment may enter these areas. Fueling of equipment shall not occur on the project site.

Timing: *Prior to Grading/Improvement/Building permit final and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

Mitigation Measure 4F: Establish Environmentally Sensitive Areas (ESA's). Sensitive biological resources, as shown on the Site Plan, shall be mapped, and identified as ESAs on all future improvement/grading/construction plans to ensure their protection from future disturbance. These resources include any drainage channels, protected landmark oak groves, landmark oak trees, and slopes in excess of 30%. The following note shall be included: "No disturbance is allowed within areas delineated as Environmentally Sensitive Areas, unless a Management Plan is approved."

Timing: *Prior to map recordation and prior to issuance of Grading/Improvement/Building permits*
Reporting: *Approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department*

5. Cultural Resources:

Existing Setting: A complete records search was conducted by searching California Historic Resources Information System (CHRIS) maps for cultural resource site records and survey reports in Nevada County within a 1/4-mile radius of the proposed project area on March 4, 2025. Review of this information indicates that the proposed project area contains zero (0) recorded indigenous period/ethnographic period cultural resources and zero (0) recorded historic-period cultural resources. Additionally, cultural resources study report on file at this office covers the proposed project area.

Outside the proposed project area, but within the 1/4-mile radius, the broader search area contains one (1) recorded indigenous period/ethnographic period cultural resource and zero (0) recorded historic-period cultural resources: indigenous-period bedrock milling features. Additionally, eleven (11) cultural resources study reports on file at this office covers a portion of the broader search area. In this part of Nevada County, archaeologists locate indigenous period/ethnographic period habitation sites "along streams or on ridges or knolls, especially those with southern exposure" (Moratto 1984: 290). This region is known as the ethnographic period territory of the Nisenan, also called the Southern Maidu. The Nisenan maintained permanent settlements along major rivers in the Sacramento Valley and foothills; they also periodically traveled to higher elevations (Wilson and Towne 1978: 387-389). The proposed project search area is situated in the Sierra Nevada foothills about ¼-mile north of Squirrel Creek. The proposed project area has been previously surveyed with negative results for indigenous period/ethnographic period cultural resources.

As a part of the proposed project application, it was determined that the overall project area has a low potential for locating historic-period cultural resources in the immediate vicinity of the proposed project area, and therefore it is anticipated that the proposed project would not have any adverse impacts of tribal cultural resources. Additionally, given the extent of known cultural resources and patterns of local history, there is low potential for locating historic-period cultural resources in the immediate vicinity of the proposed project area.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?		✓			A, J, 22
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		✓			A, J, 22
c. Disturb any human remains, including those interred outside of formal cemeteries?		✓			A, J, 22

Impact Discussion:

5a-c As a part of the proposed project application, pursuant to the submitted Records Search Results from the North Central Information Center (NCIC), it was determined that the overall project area is not a sensitive site with respect to cultural resources. Additionally, given the extent of known cultural resources and patterns of local history, there is low potential for locating historic period cultural resources in the immediate vicinity of the proposed project area. Given the extent of known cultural resources and the environmental setting, there is low potential for locating indigenous period/ethnographic period cultural resources within the proposed project area. This conclusion is based on the information provided in the NCIC letter, the extent of known cultural resources, and patterns of local history for the area.

Given the extent of known cultural routes and patterns of local history, there is low potential for locating historic-period cultural resources within the proposed project area; however, discovery is still possible. Given that there is some amount of ground disturbance required for this project, there is a potential for unanticipated discovery of cultural resources, including historic, prehistoric, and paleontological resources, during project construction. While cultural resource discovery has been determined to be highly unlikely, Mitigation Measure 5A has been included, which requires that work shall be halted and proper notification and consultation shall be required if any artifacts, cultural resources, or human remains are discovered during construction. With the implementation of Mitigation Measure 5A, impacts to cultural resources are expected to be ***less than significant with mitigation***.

Mitigation Measures: To offset potentially adverse cultural or historical resources impacts associated with the construction activities, the following mitigation measure shall be required:

Mitigation Measure 5A. Halt work and contact the appropriate agencies if human remains or cultural materials are discovered during project construction. All grading and construction plans shall include a Note outlining the requirements provided below to ensure that any cultural resources discovered during project construction are properly managed. These requirements including the following: All equipment operators and employees involved in any form of ground disturbance shall be trained to recognize potential archeological resources and advised of the remote possibility of encountering subsurface cultural resources during grading activities. If such resources are encountered or suspected, work within 100 feet shall be halted immediately and the Nevada County Planning Department shall be contacted. A professional archaeologist shall be retained by the developer and consulted to access any discoveries and develop appropriate management recommendations for archaeological resource treatment. If bones are encountered and appear to be human, California Law requires that the Nevada County Coroner be contacted. Should the discovery include Native American human remains, in addition to the required procedures of Health and Safety Code Section 7050.5, Public Resources Code 5097.98 and California Code of Regulations Section 15064.5(e), all work must stop in the immediate vicinity of the find and the Nevada County Coroner must be notified. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in California Environmental Quality Act Sections 15064.5(d) and (e) shall be followed. If Native American resources are involved, Native American Organizations and individuals recognized by the County shall be notified and consulted about any plans for treatment.

Timing: *Prior to the issuance of Building/Grading/Improvement permits and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

6. Energy

Existing Setting: On February 12, 2019, the Nevada County Board of Supervisors approved the Energy Action Plan (EAP) as the County's unincorporated area's roadmap for expanding energy-efficiency, water-efficiency, and renewable-energy, and the cost-savings that accompany these efforts. The EAP is focused on operations of structures, infrastructure that generates energy, and efficient use of water. 17350 Cattle Drive is developed with a mini storage facility that has PG&E for electricity, while 17400 Cattle Drive is currently undeveloped. There are existing PG&E utility poles that would allow for future connection.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)

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

Impact Discussion:

6a The proposed project is not anticipated to result in significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources during either the construction or the operational phase of the project. There is an existing U-Haul facility on 17350 Cattle Drive that already has PG&E established, and the new proposed project would solely be an extension of the existing U-Haul facility to accommodate 137 additional mini storage units. PG&E already has existing power poles near the project site and the proposed project will utilize PG&E for its expansion. There are no interior hallways that will utilize lighting or energy and there is no exterior lighting proposed in addition to the existing lighting at 17350 Cattle Drive. Operationally, energy needs for commercial mini storage facilities and outdoor storage areas are low because there are no exterior lighting fixtures proposed for the new mini storage expansion area and no internal lights proposed, and therefore the need for electricity would be minimal for the expansion area. The outdoor storage area on 17350 Cattle Drive does include three (3) existing pole lights, however these are existing and have been on site for years and have not caused any adverse impacts to energy resources, and therefore the official permitting of the existing light fixtures would not have an adverse impact on energy resources. All future improvements, if any, would be required to meet energy standards in place at the time of their construction. The scale of the project along with requirements to meet energy standards for both construction equipment and materials will ensure that the use of energy resources would not be excessive and therefore, the project would have a ***less than significant impact.***

6b The proposed project would not conflict with any state or local plans for renewable energy or energy efficiency. Permits would be required in order to construct the future improvements on the proposed project parcels. As part of the building permit review, all equipment and structures would be required to meet energy standards identified in the California Building Code. Likewise, the project would not obstruct or prevent plans for renewable energy or efficiency. Therefore, the project would have ***no impact*** to state or local plans for renewable energy or energy efficiency.

Mitigation: None required.

7. Geology and Soils:

Existing Setting: According to the U.S. Department of Agriculture NRCS Web Soil Survey (USDA 2025a), four soil mapping units occur within the study area: Aiken loam, 9 to 15 percent slopes, high precipitation; Ahwahnee sandy loam, 2 to 9 percent slopes; Trabuco loam, 5 to 15 percent slopes; and Placer diggings. Soil series are described by the NRCS as follows (USDA 2025a):

Aiken Series:
The soils of the Aiken series occur on broad gently sloping tabular ridges and moderately steep to steep side-slopes at elevations of about 1,200 to 1,500 feet and formed in material weathered from basic volcanic rocks. They are well-drained soils, with slow to rapid runoff and moderately slow permeability.

Ahwahnee Series:
The soils of the Ahwahnee series occur on foot-slopes, mountains and formed in material weathered from granitic rock. They are somewhat well drained soils, with slow to rapid runoff depending on the slope, and moderately rapid permeability.

Trabuco Series:
The soils of the Trabuco series occur on foothills at elevations of 800 to 3,500 feet and formed in material weathered from basic igneous rock. They are well drained, with medium to rapid runoff and slow permeability.

Placer Series (Diggings):
The soils of the Placer series occur on hills and Plateaus and formed in residuum. They are well drained, with rapid runoff and moderate permeability.

According to the *Geologic Map of the Chico Quadrangle, California, 1:250,000* (G.J. Saucedo and D.L. Wagner, 1992) the property is located in an area mapped as Mesozoic Granite Rocks (andesite pyroclastic). The Miocene and Pliocene epochs were from approximately 252 to 66 million years ago. The Alquist-Priolo Earthquake Fault Zoning Act was adopted in 1972 to prevent the construction of buildings in areas where active faults have surface expression. Ground or fault rupture is generally defined as the displacement that occurs along the surface of a fault during an earthquake. The project site is not within an Alquist-Priolo Earthquake Fault Zone and there are no known faults that cross through the project site. The project parcel has been determined to not be within any Earthquake Fault Zone. Generally, western Nevada County is located in the low intensity zone for earthquake severity. The project site is located within Seismic Zone I—the Low Intensity Zone of the Modified Mercalli scale—meaning the site has a low risk for strong ground motion (Nevada County, 1991).

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Directly or indirectly cause potential substantial adverse effects, including 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. ii. Strong seismic ground shaking? iii. Seismic-related ground failure including liquefaction? iv. Landslides?			✓		A, L, 5, 6, 12, 16, 29, 30, 31
b. Result in substantial soil erosion or the loss of topsoil?		✓			A, D, 25, 32
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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?		✓			A, D, 12, 25, 30, 31, 32
d. Be located on expansive soil creating substantial direct or indirect risks to life or property?			✓		A, D, 25, 30, 31, 32
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?				✓	A, C, 11
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓			A, L

Impact Discussion:

7a,c,d The proposed project is not anticipated to result in adverse effects due to unstable soils or cause significant erosion. The project site is not within an Alquist-Priolo Earthquake Fault Zone and there are no known faults that cross through the project site; however, the project site is located more than 2-miles northeast of Pre-Quaternary faults, which are older than 1.6 million years. The project site is located within Seismic Zone I, the Low Intensity Zone of the Modified Mercalli scale, meaning the site has a low risk for strong ground motion and thus the project is not anticipated to result in earthquake related impacts. Aiken loam, 9 to 15 percent slopes, high precipitation is described as being a well-drained, deep soil commonly found in the lower foothills of the Sierra Nevada and Cascade ranges in California. Formed from basic volcanic rocks, it is prized for its excellent agricultural properties and high timber production potential. Ahwahnee sandy loam, 2 to 9 percent

slopes is a gently undulating, moderately deep, well-drained soil primarily found on mountainous uplands and foot slopes in California. Derived from weathered granitic rocks, it features medium runoff and a moderate erosion hazard. As detailed in the Soil Survey of Nevada County Area, this map unit is typically used for annual range, improved dry pasture, and irrigated pasture. It holds a USDA land capability classification of IIIe-1, meaning it requires careful management to prevent soil erosion under clean cultivation. Trabuco loam on 5 to 15 percent slopes is a well-drained, moderately permeable upland soil primarily found in California foothills and mountains. In its natural environment (such as the Sierra Nevada and Southern California), the upper 5 to 15 inches of the soil remain continuously moist through the winter and spring but dry out from late May until October. Placer Diggings in Rough and Ready, California, are mapped in the Soil Survey of Nevada County as heavily disturbed remnants of historical hydraulic and placer mining. These soils consist of 90% to 100% stones, cobbles, and gravel, leaving them highly unsuitable for agriculture, building, or landscaping without major soil amendment. Because of the high stone content and excessive drainage, these soils are poorly suited for typical farming and are generally only capable of supporting limited, sparse brush and small trees. Building permits will be required for all earthwork, which would require compliance with the Nevada County grading standards outlined in Title 14, Chapter 12, Section 14.12.060 of the Nevada County Code. Building permits would also require compliance with the California Building Code (CBC) and the Nevada County Code requirements to ensure protection during seismic events. Therefore, impacts to standard permit requirements are expected to be ***less than significant.*** Additionally, Mitigation Measures 7A and 7B, which require the implementation of erosion control measures and limiting the amount of earthwork completed during the wet season, are proposed to ensure that the potential impacts to project soils and potential impacts with unstable earth conditions will reduce the impact to be ***less than significant with mitigation.***

7b The project parcels are both relatively flat and there have been no areas on the parcels identified as having slopes in excess of 30% slope. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). All work would be required to be in compliance with Nevada County grading standards and/or the California Building Code, requiring erosion control measures as needed to ensure that activities do not result in substantial erosion. The Department of Public Works has included a condition of approval that clearly states that the applicant shall submit grading and drainage plans, along with a supporting Hydrology and Hydraulics analysis prepared by a registered civil engineer. The analysis must demonstrate that the proposed project will result in no net increase in stormwater runoff and shall fully comply with the requirements of Nevada County Land Use and Development Code Section 16.12. It shall evaluate all relevant aspects of the project's drainage system, including culvert and pipe sizing, inlet and outlet dimensions, invert elevations, freeboard for the design storm, and the capacity of proposed detention or retention basins, infiltration systems, water quality treatment measures, and any other required stormwater mitigation features. The

hydrologic analysis must also compare post-development peak runoff to pre-development peak runoff at all discharge points from the site. The grading plan shall show proposed grading for structures, parking areas, and any stormwater detention facilities. With the implementation of Conditions of Approval, and Mitigation Measures 7A-7B, these measures will ensure that the potential impacts to soils erosion, or to disturbance within steep slopes resulting from the proposed project are anticipated to be ***less than significant with mitigation***.

7e The project site does not have soils incapable of adequately supporting septic systems. Currently there is a septic system on 17350 Cattle Drive for the existing-Haul facility that will be utilized for the U-Haul expansion to 17400 Cattle Drive, and 17350 Cattle Drive also has an existing well that serves the existing U-Haul facility that will also be utilized to serve the expansion of the U-Haul facility at 17400 Cattle Drive for potable water. Therefore, no Environmental Health permits are required nor have been applied for at this time. Any potential future construction activities at 17400 Cattle Drive may require an individual septic system. Based on recent soils testing confirmation and Finaled permits, as well as the Environmental Health Department team reviewing the submittal and finding no adverse impacts, the project would have ***no impact*** relative to a lack of soils for sewage disposal.

7f There are no known paleontological resources or unique geological features in or around the project parcel. However, because ground disturbance is anticipated to bring the proposed driveways up to required standards, or that associated with potential future development within building envelopes, Mitigation Measures 5A and 18A would require work to halt in the event that there is an unanticipated discovery of paleontological resources. Direct or indirect damage to paleontological resources is anticipated to be ***less than significant with mitigation.***

Mitigation Measures: To protect water quality and aquatic life in neighboring waterways and to ensure the integrity of the topographic changes, the following Mitigation Measures shall be implemented during and after construction. The required mitigation measures include, but are not limited to:

7A: Limit the Amount of Earthwork to be Completed During the Wet Season. As much as possible the earthwork portion of this project is to be completed during extended periods of dry weather. If earthwork is completed during the wet season (October 15th to April 15th) it will be necessary to take extra precautionary measures to protect subgrade soils. Wet season earthwork shall require additional mitigation measures, including diversion of surface runoff around exposed soils and draining of ponded water on the site. Once subgrades are established, exposed soils shall be protected from construction traffic.

Timing: *Prior to issuance of Grading/Improvement/Building permits*
Reporting: *Approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department and Building Department*

Mitigation Measure 7B: Implement all Erosion Control Measures. To protect water quality and aquatic life in neighboring waterways and to ensure the integrity of the topographic changes, the following measures shall be implemented prior to, during, and after construction:

1. During construction, Best Management Practices (BMP's) for temporary erosion control shall be implemented to control any pollutants that could potentially affect the quality of storm water discharges from the site. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared in accordance with California State Water Resources Control Board (SWRCB) requirements. This SWPPP includes the implementation of BMP's for Erosion Control, Sediment Control, Tracking Control, Wind Erosion Control, Waste Management and Materials Pollution Control.
2. Topsoil shall be removed and stockpiled for later reuse prior to excavation activities. Topsoil shall be identified by the soil-revegetation specialist who will identify both extent and depth of the topsoil to be removed.
3. Upon completion of grading, stockpiled topsoil shall be combined with wood chips, compost and other soil amendments for placement on all graded areas. Revegetation shall consist of native seed mixes only. The primary objectives of the soil amendments and revegetation is to create site conditions that keep sediment on site, produce a stable soil surface, resist erosion and are aesthetically similar to the surrounding native forest ecosystem.
4. Geo-fabrics, jutes or other mats may be used in conjunction with revegetation and soil stabilization.

These erosion and sediment control notes will be shown on the roadway improvement plans and grading plans. Erosion control Best Management Practice's (BMPs) will also be shown on the plans with the final design for County review and approval.

Timing: *Prior to, during, and after the issuance of Grading/Improvement/Building permits.*
Reporting: *Approval of the Parcel Map for recordation and future permit issuance*
Responsible Agency: *Planning Department and Building Department*

8. Greenhouse Gas Emissions:

Existing Setting: Global climate change refers to changes in average climatic conditions on the earth as a whole, including temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in the average temperature of the earth's surface and atmosphere. One identified cause of global warming is an increase of greenhouse gases (GHGs) in the atmosphere. Greenhouse gases (GHGs) are those gases that trap heat in the atmosphere. GHGs are emitted by natural and industrial processes, and the accumulation of GHGs in the atmosphere regulates the earth's temperature. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g. gasoline, diesel, coal, etc.), are believed to have contributed to the increase in atmospheric levels of GHGs. GHGs that are regulated by the State and/or EPA are carbon dioxide (CO_2), methane (CH_4), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6) and nitrous oxide (NO_2). Emission

inventories typically focus on GHG emissions due to human activities only, and compile data to estimate emissions from industrial, commercial, transportation, domestic, forestry, and agriculture activities. CO_2 emissions are largely from fossil fuel combustion and electricity generation. Agriculture is a major source of both methane and NO_2, with additional methane coming primarily from landfills. Most HFC emissions come from refrigerants, solvents, propellant agents, and industrial processes, and persist in the atmosphere for longer periods of time and have greater effects at lower concentrations compared to CO_2. Global warming adversely impacts air quality, water supply, ecosystem balance, sea level rise (flooding), fire hazards, and causes an increase in health-related problems.

To reduce emissions of greenhouse gases, the California Legislature enacted AB 32 (Núñez and Pavley), which is referred to as the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 provided initial direction on creating a comprehensive, multiyear program to limit California's GHG emissions at 1990 levels by 2020, and initiate the transformations required to achieve the state's long-range climate objectives. In April 2015, the California Air Resources Board issued Executive Order B-30-15 to set an interim target goal of reducing GHG emissions to 40 percent below 1990 levels by 2030 to keep California on its trajectory toward meeting or exceeding the long-term goal of reducing GHG emissions to 80 percent below 1990 levels by 2050 as set forth in EO S-3-05. SB 32, enacted in 2016, codified the 2030 the emissions reduction goal of CARB Executive Order B-30-15.

In addition, the Governor signed Senate Bill 97 in 2007 directing the California Office of Planning and Research to develop guidelines for the analysis and mitigation of the effects of greenhouse gas emissions and mandating that GHG impacts be evaluated in CEQA documents. CEQA Guidelines Amendments for GHG Emissions were adopted by OPR on December 30, 2009. The Northern Sierra Air Quality Management District (NSAQMD) has prepared a guidance document, Guidelines for Assessing Air Quality Impacts of Land Use Projects, which includes mitigations for general air quality impacts that can be used to mitigate GHG emissions when necessary. Continuing to reduce greenhouse gas emissions is critical for the protection of all areas of the state, but especially for the state's most disadvantaged communities, as those communities are affected first, and, most frequently, by the adverse impacts of climate change, including an increased frequency of extreme weather events, such as drought, heat, and flooding.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓		A, G, 20
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			✓		A, G, 20

Impact Discussion:

8a,b The proposed project is not expected to generate greenhouse gases that would result in significant environmental impacts or that would be in conflict with plans for greenhouse gas reductions. Carbon dioxide (CO_2) is the main component of greenhouse gases, and vehicles are a primary generator of CO_2. The proposed project is located in the Sierra Nevada Foothills, within a rural area surrounded by low-density general agricultural properties, industrial properties, and open space, and overall GHG outputs are expected to be minimal. California is divided geographically into air basins for the purpose of managing the air resources of the State on a regional basis. An air basin generally has similar meteorological and geographic conditions throughout. Nevada County and Placer County are both within the Mountain Counties Air Basin. Nevada County is within the jurisdiction of the Northern Sierra Air Quality Management District (NSAQMD), but the NSAQMD has not adopted thresholds of significance for greenhouse gases. However, Placer County Air Pollution District (APCD) has adopted thresholds of significance for greenhouse gases. Due to greenhouse gas emissions being not only a regional, but also a global concern, with the similarities between neighboring air districts, it was determined that the Placer APCD thresholds are a relevant standard for the determination of significance. The thresholds adopted by Placer County APCD include a bright-line threshold of 10,000 metric tons of Carbon dioxide equivalent per year and a De Minimis level of 1,100 metric tons of carbon dioxide per year (MT CO_2e/yr). A De Minimis Level for the operational phases of 1,100 MT CO_2e/yr represents an emissions level which can be considered as less than cumulatively considerable and be excluded from the further GHG impact analysis.

The overall GHG impact is expected to remain at a level that is ***less than significant***, due to several factors including but not limited to: the proposed project and potential future improvements will apply standard building permit requirements ensuring any new structures meet energy efficiency standards; adherence to mitigation measure 3A which requires 50% of equipment to utilize Tier 1 engines or clear, and equipment idle times to be less than five (5) minutes; and because the proposed development is a commercial project that will have minimal operational impacts related to greenhouse gases because the uses are an extension of the existing mini storage facility and legal establishment of an outdoor storage area which both require very little energy to run, have few visitors, and do not create products or generate heavy waste.

Mitigation Measures: None required.

9. Hazards and Hazardous Materials:

Existing Setting: The project site is not within or adjacent to any hazardous materials sites compiled pursuant to Government Code Section 65962.5 (California Department of Toxic Substances Control, 2019). The project is not located within ¼ mile of an existing or proposed school, the Limberlost Ranch Airport is located approximately 2.3 miles northwest of the project parcels, and the project parcels are both located within the boundaries of the Penn Valley Area Plan. The project area is in a high fire hazard severity zone as designated by Cal Fire, and the closest residence is approximately 0.16 miles from the eastern property boundary line of 17350 Cattle Drive (APN: 051-440-010).

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓		C
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?			✓		C
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓	A, L
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, create a significant hazard to the public or the environment?				✓	C, 24
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓	A, L
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓		H, M
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			✓		H, M

Impact Discussion:

9a,b The proposed project does not include routine transport, use or disposal of hazardous materials. Small quantities of hazardous materials could be stored, used, and handled during construction. The hazardous materials anticipated for use are small volumes of petroleum hydrocarbons and their derivatives (e.g., gasoline, oils, lubricants, and solvents) required to operate the construction equipment. These relatively small quantities would be below reporting requirements for hazardous materials business plans and would not pose substantial public health and safety hazards through release of emissions or risk of upset. Safety risks to construction workers for the proposed project would be reduced by compliance with Occupational Safety and Health Administration standards. The Nevada County Department of Environmental Health reviewed the proposed project and concluded that parcel history research on both parcels does not show a record of hazardous materials used or released on either site, and that there are no solid waste dump sites or abandoned

mine lands on the subject parcels that are known. The Department of Public Works has included a Condition of Approval stating that Dischargers whose project disturbs one or more acres or where projects less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, shall be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Oder No. 2022-0057-DWQ. The Construction General Permit shall require the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Additionally, the Department of Public Works has also included another Condition of Approval requiring that the final drainage design shall comply with General Plan Chapter 11: Water Element by incorporating water quality treatment measures consistent with Policy 11.6A to minimize pollutant discharge to surface waters. Acceptable methods include biotreatment (low-impact development) or, where appropriate, mechanical systems such as oil, grease, and silt traps. Mechanical systems must be designed by a registered civil engineer and include a legally enforceable maintenance mechanism in accordance with Policy 3.19C. Therefore, with the implementation of Conditions of Approval, the project related hazard impacts relative to routine transport, use, disposal, or emission of hazardous substances to the public or environment would be ***less than significant.***

9c The proposed project site is not located adjacent to, or within a quarter mile of, any schools. Therefore, the project would have ***no impact*** relative to the handing or emitting of hazardous materials in close proximity to a school.

9d The proposed project area is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, there would be ***no impact.***

9e The project is considered outside the Nevada County airport influence boundary area. The project site is approximately 2.3 air-miles southeast of the nearest private airstrip, Limberlost Ranch Airport. Limberlost Ranch Airport is a private airstrip located southwest of Lake Wildwood and is restricted to use by the property owner. The project site is located approximately 9.2 miles southwest of the Nevada County Airport. As a result, the project is anticipated to result in ***no impact*** to safety hazard for people residing or working near a public airport. Therefore, due to the proximity of the proposed project site to a private airstrip or airport and the determinations made by the other reviewing agencies, the proposed project would not result in a safety hazard to people working or residing in the area; and a is anticipated to result in ***no impact***.

9f The proposed project is not anticipated to interfere with an adopted emergency response plan or emergency evacuation plan, nor would it expose people or structures to a significant risk of loss, injury or death involving wildland fires. The subject property is directly adjacent to State Highway 20, and the encroachment onto the State Highway is only approximately 190 feet, which is maintained by Caltrans. The project parcels are served by the Penn Valley Fire Protection District, in an area designated by CalFire as a High Fire Severity Zone area. The Nevada County Office of the Fire Marshal and Penn Valley Fire Protection District have reviewed the project proposal and did not have any comment on any adverse impacts to emergency response or evacuation plans. The County Office of

Emergency Services does not publish emergency evacuation plans; however, an Evacuation Study was completed in 2024 by the Nevada County Office of Emergency Services, and it has been determined that the proposed project will not have any adverse impacts to evacuation plans . The proposed project would not impair or physically interfere with emergency response and evacuation plans, resulting in a ***less than significant*** impact to emergency response or evacuation plans.

9g The proposed project, upon approval, would allow for the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (APN: 051-110-008), and to allow for exterior lighting and outdoor storage for the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). While 17400 Cattle Drive will have four (4) new mini storage structures on it, the surrounding area will be mostly graveled with the driving areas being paved, and all vegetation besides required landscaping will be compliant with defensible space requirements. Additionally, 17350 Cattle Drive does not proposing any structures and will be solely be to allow outdoor storage of vehicles and exterior lighting fixtures at the existing site, which would not propose any threat to people or structures. All future improvements would require applicable Planning Permits and Building Permits and conformance with Title 14 of the Nevada County Code for building and grading standards. As a condition in the project Conditions of Approval from the Penn Valley Fire Protection District, the applicant would be required to provide defensible space around all structures consistent with California Public Resources Code 4291, which requires up to 100 feet of fuels treatment or to the property line, whichever is closer. With the implementation of all applicable Conditions of Approval, the proposed project would have a ***less than significant impact*** in regard to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Mitigation Measures: None required.

10. Hydrology and Water Quality:

Existing Setting: The natural parcel runoff is from northeast to northwest within both subject parcels given the topography of the overall project area. However, within the overall project area, there are no streams, drainages, wetlands, ponds, or other aquatic resources recognized by the Department of Geological Survey (USGS). The project corridor is not located within or near a 100-year flood hazard zone according to the Federal Emergency Management Agency's (FEMA) Flood Information. The Federal Emergency Management Agency identifies the area as Zone X, which is an area determined to be outside of the 500-year flood or protected by levee from 100-year floods. The project is not in a tsunami or seiche zones.

The California State Water Resources Control Board regulates stormwater discharges from construction sites because of its potential to mobilize pollutants and discharge into waterbodies or watersheds. By regulating these discharges, the State Water Board is preserving, enhancing, and restoring California's waterbodies and its resources.

Sustainable management of groundwater basins is overseen by the Department of Water Resources (DWR) and State Water Resources Control Board (SWRCB) via the Sustainable Groundwater Management Act (SGMA). This project is not located within any groundwater basins or priority basins identified by the DWR Bulletin 118, or the SGMA Basin Prioritization Dashboard. The nearest DWR Bulletin 118 basins are the North and South Yuba Subbasins of the Sacramento Valley Basin (5-21.60 and 5-021.61, respectively). No Groundwater Sustainability Agency, no Groundwater Sustainability Plan, and no sustainability criteria or goals have been established for the underlying aquifer of this project.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓		A, C, D, I
b. Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓		A, C
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 off-site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows?			✓		A, D, 9, 38
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓	A, L, 9, 13
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✓	A, D
f. Place housing within a 100-year flood hazard area as mapped on a federal Flood hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓	A, L, 9, 13

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)
g. Place within a 100-year flood hazard area structures that would impede or redirect flood flows?				✓	A, L, 13

Impact Discussion:

10a,c The proposed project is not anticipated to negatively affect water quality standards or waste discharge requirements, nor is it anticipated to contribute amounts that could exceed drainage system capacity. Due to the proposed project area being so far from any water features recognized by the Department of Geological Survey (USGS), the proposed project would have no impact on any water features or drainage patterns on the project parcels. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (051-110-008) and to allow for outdoor storage of vehicles and allowing exterior lighting fixtures on-site at the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). Additionally, the project description for proposed activities at 17350 Cattle Drive does not propose any structures and will remain as an existing mini storage facility, the only new aspect of the existing facility would be allowing outdoor storage of vehicles and allowing exterior lighting fixtures on-site.

A storm drain basin is proposed within the open space area to the south and west of the project to assist with stormwater collection. Additionally, any work conducted within the right of way will require an encroachment permit from the Nevada County Department of Public Works. Standard erosion control measures will be required to ensure that this work, and any future improvements does not result in offsite erosion or deposition of sediment into water features. The Department of Public Works has included a Condition of Approval stating that Dischargers whose project disturbs one or more acres or where projects less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, shall be required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Oder No. 2022-0057-DWQ. The Construction General Permit shall require the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Additionally, the Department of Public Works has also included another Condition of Approval requiring that the final drainage design shall comply with General Plan Chapter 11: Water Element by incorporating water quality treatment measures consistent with Policy 11.6A to minimize pollutant discharge to surface waters. Acceptable methods include biotreatment (low-impact development) or, where appropriate, mechanical systems such as oil, grease, and silt traps. Mechanical systems must be designed by a registered civil engineer and include a legally enforceable maintenance mechanism in accordance with Policy 3.19C. As another good faith measure to ensure drainage is being addressed adequately, another Condition of Approval from the Department of Public Works requires that the applicant maintain all drainage facilities constructed as part of the project through a permanent, legally enforceable mechanism

such as, but not limited to, a CSA, CSD, or recorded covenant. Prior to grading or improvement permit issuance, the applicant shall demonstrate that a legally enforceable mechanism for long-term maintenance of such facilities has been provided.

Based on the above discussion, the proposed project would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, alter the existing drainage pattern of the site or area, or contribute amounts that could exceed drainage system capacity or alter existing drainage patterns. Therefore, the impacts to water quality and drainage patterns would be ***less than significant***.

10b The proposed project would not result in a substantial decrease in groundwater supplies, interfere with groundwater recharge or conflict with water quality/groundwater management plans because the proposed project does not propose a new well to serve the new proposed mini storage expansion area at 17400 Cattle Drive, and the proposed project will utilize the already existing restroom facility. The project parcels will both utilize the same existing well located on 17340 Cattle Drive (APN: 051-440-010) to serve both sites which will not result in depletion of groundwater supplies because the new mini storage expansion use does not propose additional plumbing fixtures to be served by the existing well; however, pursuant to a Condition of Approval from the Department of Environmental Health, should the scope of the project or land use change in the future, the buildout of compliant water at 17400 Cattle Drive (APN: 051-110-008) may be required. Operational impacts will be minimal due to no new plumbing fixtures being proposed as a part of the mini storage expansion area, and therefore there will be no additional strain on groundwater supplies or interfere with groundwater recharge. A catch basin is proposed in the western portion of the Open space area which will help prevent excess water saturation on the parcel, and the catch basin would not result in in a substantial decrease in groundwater supplies, interfere with groundwater recharge or conflict with water quality/groundwater management plans because catch basins collect standing surface water runoff from rain or hardscapes using a top grate, while groundwater management handles subsurface water moving through saturated soil underground. Therefore, the proposed project is anticipated to have a ***less than significant*** impact on groundwater supplies and recharge.

10d-g There is no flood hazard or designated flood zone on the project parcels. Furthermore, the proposed project is not within a tsunami or seiche zone, and it does not conflict with or obstruct the implementation of a water quality control plan. The proposed project does not expose people or structures to a significant risk of loss or injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, there would be ***no impact*** associated with flooding, tsunamis or seiches, water quality control plans, or a sustainable groundwater management plan.

Mitigation: See **Mitigation Measure 4E.**

11. Land Use and Planning:

Existing Setting: The project parcels, 17350 & 17400 Cattle Drive, (APNs: 051-440-010 & 051-110-008) are located in an unincorporated area of Rough and Ready, CA, approximately 1.8 miles southeast of Lake Wildwood and 206 feet north of State Highway 20. Both parcels utilize the same shared access via Cattle Drive, a 50 foot right-of-way. 17350 Cattle Drive has already been developed with an existing U-Haul facility, and 17400 Cattle Drive is undeveloped. 17400 Cattle Drive is zoned both Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP), and 17350 Cattle Drive is zoned General Agricultural with a minimum parcel size of 5-acres with a Site Performance Combining District (AG-5-SP), Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP).

The project parcels are surrounded by commercial and industrial development to the northeast and east, State Highway 20 to the south, and mostly undeveloped parcels to the west. The project parcels are bordered by four (4) parcels zoned Light Industrial with a Site Performance Combining District (M1-SP), Light Industrial with a Planned Development and a Site Performance Combining District (M1-PD-SP), and Open Space with a Site Performing Combining District (OS-SP) to the north and east, State Highway 20 to the south, and one (1) parcel zoned General Agricultural with a minimum parcel size of 5.00 acres with a Site Performance Combining District (AG-5-SP) to the west. All four (4) of the parcels directly surrounding the project parcels to the northeast and east have been developed with commercial and industrial uses, while the one (1) parcel to the west is currently undeveloped.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Physically divide an established community?				✓	A, L, 17, 18
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?			✓		A, B, 18, 38

Impact Discussion:

11a The proposed project would not physically divide an established community. The subject parcels are located in an established industrial area designated in the Loma Rica Industrial Area Plan off of Park Court, which directly connect to Charles Drive. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (051-110-008) and to allow for outdoor storage of vehicles and allowing exterior lighting fixtures on-site at the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). These parcels are located within an established commercial and industrial area designated by the Penn Valley Area Plan and both the General Plan and Zoning designations for both parcels allows for industrial and commercial development, and there is no residential component of the project. Mini-storage facilities have a low physical impact on dividing established communities because they require very little infrastructure,

generate minimal traffic, and blend easily into existing neighborhoods. Unlike major highways, rail lines, or large commercial complexes, mini storage facilities do not act as concrete barriers that cut off neighbors from one another. Mini-storage facilities have a low impact on community division because they typically occupy a smaller parcel footprint without disrupting existing infrastructure, public access, or connectivity. Additionally, the proposed project areas are located within the central portions of both parcels that are zoned Light Industrial and there are no structure proposed in the Open Space area. Since the proposed project would include development on a parcel zoned Light Industrial and does not include any uses which would divide an established community, the proposed project would not physically divide an established community, and thus ***no impact*** is anticipated.

11b The purpose of the Light Industrial zoning designation is to provide areas for the production, repairing, distribution, and warehousing of goods and equipment, along with supporting businesses and services. Uses should provide for buffering from adjacent land uses to minimize incompatibility and should have convenient, controlled access to arterial or major collector roads without passing through residential areas. Additionally, Industrial (IND) General Plan designations are intended to provide for areas in which goods are produced, distributed and warehoused, along with supporting business and service uses. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (051-110-008) and to allow for outdoor storage of vehicles and allowing exterior lighting fixtures on-site at the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). Additionally, the project description for proposed activities at 17350 Cattle Drive does not propose any new structures and will remain as an existing mini storage facility, the only new aspect of the existing facility would be allowing outdoor storage of vehicles and allowing exterior lighting fixtures on-site. The Preliminary Landscaping Plan provided includes 1,257 proposed plantings consisting of eight (8) Blue Oak trees, nine (9) Valley Oak trees, 335 Korean Feather Reed Grass shrubs, 400 Dwarf Cape Rush shrubs, twenty-nine (29) Noel Grevillea shrubs, twenty-five (25) California Coffeeberry shrubs, 264 Low Boy Bank Catclaw ground covers, 187 Sunset Manzanita ground covers, and 8,148 square feet of bark. A landscape buffer along Cattle Drive and Grey Oak Drive is proposed within the Open Space area that consists of Blue Oak trees, Valley Oak trees, California Coffeeberry shrubs, Noel Grevillea shrubs, and existing oak trees on site. Additionally, existing native vegetation fronts 17350 Cattle Drive and provides for additional screening from the project parcels to State Highway 20. Due to the existing fencing, existing native vegetation, proposed fabric fencing screening, and the proposed landscaping screening, there will be a less than significant impact to the visual characteristics of the area and the screening requirements of the Nevada County Code.

The project parcels are located in the Business Opportunity District area designated in the Penn Valley Area Plan. The Business Opportunity District is intended to recognize the importance of local employment opportunities and intends to provide for limited growth in a manner consistent with existing development patterns and style. Much like the Village Core District, the Business Opportunity District has the potential to act as an employment center and provide for enhanced shopping, employment and business opportunities in the

Penn Valley region. The proposed project includes the expansion of an existing U-Haul facility, which would directly align with the goals of the Business Opportunity District. Additionally, due to being located within the boundaries of the Penn Valley Area Plan, the proposed project is subject to the Appendix A: Design Guidelines Checklist of the Penn Valley Area Plan, which already includes the integration of the Design Guidelines identified in the Western Nevada County Design Guidelines. The proposed project is mostly compliant with the Penn Valley Area Plan, and Conditions of Approval from the Planning Department regarding the final design of the proposed structure will be included which will require that the design of the building, including architectural features, materials, and colors, shall be in substantial conformance with the design authorized in the approval, as represented on the approved building elevations kept on file with the Planning Department. The applicant shall provide a color pattern in substantial conformance with the architectural features, materials, and colors of the existing, approved building design of the existing U-Haul mini storage facility, which is green trim with earth toned walls. Due to the reasons listed above, the proposed project is in compliance with the requirements set forth in the Nevada County Code and mostly in compliance with the Penn Valley Area Plan, and any environmental impacts related to land use policy inconsistency and land use incompatibility are considered ***less than significant***.

Mitigation Measures: None required.

12. Mineral Resources:

Existing Setting: Mineral resources, particularly gold, have played a major role in the history of Nevada County. Since 1849, when gold was first discovered in the area, to the years preceding World War II, most of the County's population was economically supported, directly or indirectly, by the local gold mining industry. Other metals produced in the County since 1880 include silver, copper, lead, zinc, chromite, and small amounts of tungsten and manganese. Industrial minerals include barite, quartz for silicon production, and small amounts of limestone, asbestos, clay, and mineral paint. Also, significant deposits of sand, gravel, and rock types suitable for construction aggregate are exposed throughout the County. (Mineral Land Classification of Nevada County, State Division of Mines and Geology, 1990).

In order to promote the conservation of the state's mineral resources, and ensure adequate reclamation of mined lands, the Surface Mining and Reclamation Act of 1975 (SMARA) was enacted. SMARA requires that the State Geologist classify land in California for its mineral resource potential. Local governments are required to incorporate the mineral and classification reports and maps into their general plans and consider the information when making land use decisions.

Areas subject to mineral land classification studies are divided into various Mineral Resource Zone (MRZ) categories that reflect varying degrees of mineral potential. Mineral deposits of all types which are designated MRZ-2a or MRZ-2b, are used for areas underlain by mineral deposits where geologic data indicate that significant measured or indicated (MRZ-2a) or inferred (MRZ-2b)

resources are present. The project area is not mapped within a Mineral Resource Zone (MRZ), or area of known valuable mineral deposits.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)
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?				✓	A, 1
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?				✓	A, 1

Impact Discussion:

12a-b The proposed project is not mapped within a known mineral resource area or MRZ and would not change existing land uses on the project site. None of the project parcels contain known or designated mineral resources. Therefore, the proposed project would have ***no impact*** on mineral resources.

Mitigation Measures: None required.

13. Noise:

Existing Setting: 17350 Cattle Drive (APN: 051-440-010) has already been developed with an existing U-Haul facility, and 17400 Cattle Drive (APN: 051-110-008) is undeveloped. Both parcels are located in an unincorporated area of Rough and Ready, CA, approximately 1.8 miles southeast of Lake Wildwood and 206 feet north of State Highway 20, and are within the boundaries of the Business Opportunity District of the Penn valley Area Plan. The subject parcels are surrounded by commercial and industrial development to the northeast and east, State Highway 20 to the south, and mostly undeveloped parcels to the west. All four (4) of the parcels directly surrounding the project parcels to the northeast and east have been developed with commercial and industrial uses, while the one (1) parcel to the west is currently undeveloped.

The existing ambient noise environment at the project site is defined primarily by commercial and industrial operations at varying businesses to the north and east of the project site, and the traffic from Cattle Drive and State Highway 20, and those noises that commonly accompany industrial, rural, and residential uses. The Limberlost Ranch Airport, a private airstrip, is located approximately 2.3 air-miles northwest of the project parcels, and the project parcels are not located within the boundaries of the Nevada County Airport Land Use Compatibility Plan.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess standards established in the local General Plan or noise ordinance, or applicable standards of other agencies?			✓		A, 17, 18, 39
b. Generation of excessive ground borne vibration or ground borne noise levels?			✓		A, 18, 39
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?				✓	A, L

Impact Discussion:

13a,b The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (051-110-008) and to allow for outdoor storage of vehicles and allowing exterior lighting fixtures on-site at the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). Additionally, the project description for proposed activities at 17350 Cattle Drive does not propose any new structures and will remain as an existing mini storage facility, the only new aspect of the existing facility would be allowing outdoor storage of vehicles and allowing exterior lighting fixtures on-site. The proposed project activities associated with 17350 Cattle Drive are all located within the central area of the parcel which is surrounded by gates, fencing, and existing mini storage structures, which provides a noise buffer from the project area to the surrounding areas. Additionally, existing vegetation located on the land area between 17350 Cattle Drive and State Highway 20 provide screening of the project area from the highway, and the project also proposes a dark green fabric that will be placed along all the fencing, and both the existing vegetation and fabric screening will also provide a noise buffer from the project site to surrounding Generally, these land uses are compatible with other commercial and industrial land uses and are not expected to generate significant noise impacts thereto because they inherently lack the consistent, high-decibel acoustic triggers that characterize standard commercial or industrial projects. Operational noise impacts are expected to be low impact for the proposed project due to it being a mini storage facility expansion which does not utilize continuously running mechanical systems and are not climate controlled and therefore have no industrial compressors or cooling towers that would produce noise. The biggest operational impact on noise would potentially be traffic; however, the vast majority of customers access their units using everyday personal vehicles (cars, SUVs, pickups) rather than semi-trucks, avoiding the loud backup alarms, air brakes, and idling diesel engines,

and customer visits are brief, staggered, and highly intermittent throughout the day, preventing sustained ambient noise inflation.

The exception to this would be noises and potential vibration generated during the required construction during any future construction of improvements on the subject parcels. Vibration is typically sensed at nearby properties when it causes objects within the structures to vibrate such as rattling windows. Construction noises and construction related vibration are not an ongoing land use and as they are short term in nature, they are exempt from the County noise standards. While the County's Zoning Code does not apply its noise standards to temporary construction (Nevada County 2012), nonetheless there could be a temporary exposure of nearby uses to noise in excess of County thresholds. Therefore, Mitigation Measure 13A is recommended to limit construction work to the hours of 7 AM to 7 PM Monday through Saturday. Ambient noise levels in the area those typical noises commonly accompanying the aforementioned uses found on and within the general area along with the noise generated by traffic along Lasso Loop. Potential noise generated by the proposed project are anticipated to be in keeping with the noises generated by mini storage activities and thus result in ***less than significant*** noise impacts; and ***less than significant*** construction related noise impacts ***with mitigation***.

With the implementation of Mitigation Measure 13A and all Conditions of Approval, the proposed project in anticipated to result in ***less than significant*** noise impacts; and ***less than significant*** construction related noise impacts ***with mitigation.***

13c The project site is not located within an airport land use plan and is approximately 2.3 air-miles southeast of the nearest private airstrip, the Limberlost Ranch Airport. The private airstrip is restricted to use by the property owner. Given the restricted use of the Limberlost Ranch Airport, the project would result in ***no impacts*** related to exposing people residing or working in the project area to excessive airport noise levels.

Mitigation Measures: To offset potential construction related noises, the following mitigation measures shall be required and shall be included as notes on the supplemental data sheets that record concurrently with the parcel map:

Mitigation Measure 13A. Limit construction work hours to 7:00 AM to 7:00 PM: During grading and construction, work hours shall be limited from 7:00 AM to 7:00 PM, Monday – Saturday; no work is permitted on Sundays. Prior to issuance of grading and building permits, improvement plans shall reflect hours of construction. This shall be included as a Note on the Tentative Parcel Map and all future improvements plans.

Timing: *Prior to map recordation and prior to issuance of Grading/Improvement/Building permits*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Planning Department*

14. Population and Housing:

Existing Setting: Both project parcels are located in an unincorporated area of Rough and Ready, CA, approximately 1.8 miles southeast of Lake Wildwood and 206 feet north of State Highway 20 and are within the boundaries of the Business Opportunity District of the Penn valley Area Plan. The subject parcels are surrounded by commercial and industrial development to the northeast and east, State Highway 20 to the south, and mostly undeveloped parcels to the west. All four (4) of the parcels directly surrounding the project parcels to the northeast and east have been developed with commercial and industrial uses, while the one (1) parcel to the west is currently undeveloped. 17400 Cattle Drive is zoned both Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP), and 17350 Cattle Drive is zoned General Agricultural with a minimum parcel size of 5-acres with a Site Performance Combining District (AG-5-SP), Light Industrial with a Site Performance Combining District (M1-SP) and Open Space with a Site Performance Combining District (OS-SP).

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)
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)?			✓		A, 17, 18
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			✓		A, 17, 18

Impact Discussion:

14a-b The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (051-110-008) and to allow for outdoor storage of vehicles and allowing exterior lighting fixtures on-site at the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). Pursuant to the proposed project there would be a very limited impact to population growth in the area due to the project not increasing density in any way. Therefore, the proposed project would have a ***less than significant impact*** related to these potential issues, as the potential increase in population would be considered minor in nature. Additionally, the proposed project would not displace substantial numbers of existing people or housing due to the project including the expansion of an existing U-Haul facility in an area designated for commercial and industrial development and not any type of project that could increase the density of the area. Therefore, the proposed project would have a ***less than significant impact*** related to these issues.

Mitigation Measures: None required.

15. Public Services:

Existing Setting: The following services are provided within the project corridor:

Fire: The Penn Valley Fire Protection District provides fire protection services to the project parcel.

Police: The Nevada County Sheriff Department provides law enforcement services.

Schools: The project site is within the Grass Valley Elementary School District and Nevada Joint Union High School District 3.

Parks: The project is within the Western Gateway Recreation Benefit Zone.

Water: The project site will be served by individual private wells for potable water.

Sewer: Sewage disposal is by individual private septic systems.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)
a. Result in substantial adverse physical impacts associated with the provision of or 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 following the public services:					
i) Fire protection?			✓		H, M
ii) Police protection?			✓		A
iii) Schools?			✓		A, L, P
iv) Parks?			✓		A, L
v) Other public services or facilities?			✓		A, B, L

Impact Discussion:

15a The proposed project is not anticipated to have significant impacts on fire protection or law enforcement services because of the low-density nature of this project. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). Due to the proposed project not creating any new parcels or residential units there would be no impact on the density within the area, and the only additional traffic would be temporary and minor for construction, and then operation related traffic would be minimal, pursuant to the use being a mini storage facility and small scale outdoor storage area which the typical daily trip generation rate is 1.65 trips per 1,000 square feet, which would equate to about 48 daily trips, which is well below 110 VMT. Therefore, this impact is considered ***less than significant.***

The proposed project would not adversely impact schools, or public recreational facilities because the project would not result in a substantial increase in population that would require schools, parks, and other public services and facilities. School, fire mitigation, and recreation impact fees are in place and applicable at the time of building permit issuance to offset the incremental impact on these services. The proposed parcels are intended for commercial uses and improvements and both will be served by an existing private well on 17350 Cattle Drive for potable water. The project would not impact sewer services because currently there is a septic system on 17350 Cattle Drive for the existing-Haul facility that will be utilized for the U-Haul expansion to 17400 Cattle Drive, and therefore no Environmental Health permits are required nor have been applied for at this time. Therefore, there would be a ***less than significant impact*** as a result of the project approval of the proposed project.

Mitigation Measures: None required.

16. Recreation:

Existing Setting: The project parcels are located within the Western Gateway Recreation & Park District with Western Gateway Park located south of State Highway 20, directly southwest of the project parcels. Nearby recreational resources include Western Gateway Park and the Penn Valley Bike Trail approximately 0.71 miles southeast of the project parcels, Englebright Lake Recreation Area approximately 5.0 miles northwest of the project parcels, Lake Wildwood approximately 2.4 miles northwest of the project parcels. The project parcels are located within the Penn Valley Area Plan Business Opportunity District, which is an area meant for commercial and industrial development that is intended to recognize the importance of local employment opportunities and intends to provide for limited growth in a manner consistent with existing development patterns and style, and not recreational. The Nevada County General Plan recommends the level of service for recreation needs as three acres per each 1,000 persons, countywide.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
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?			✓		A
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?			✓		A
c. Conflict with established recreation uses of the area, including biking, equestrian and/or hiking trails?			✓		A, L

Impact Discussion:

16a-c The proposed project is not anticipated to result in negative impacts to recreational facilities, trigger the need for new facilities, or conflict with established facilities because the proposed project parcels are not located near any recreational trails and the closest recreational facility is Western Gateway Park, which is located on the opposite side of State Highway 20 approximately 2.0 driving miles from the project site, and is accessed via Penn Valley Drive only with no access off State Highway 20. The proposed project would not increase the use of the neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility takes place due to the fact that the project does not generate new residential populations or induce population growth and therefore would not result in negative impacts to existing recreational facilities, nor trigger the need for new facilities. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul at 17400 Cattle Drive (051-110-008) and to allow for outdoor storage of vehicles and allowing exterior lighting fixtures on-site at the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). There are no existing recreational facilities on the subject parcel, and there will be no impact to existing local biking, equestrian, or hiking trails caused by the project due to their being no trails located within the project area or within the general vicinity of the project area. Due to the minimal potential increase to temporary population, the lack of existing facilities onsite or in close proximity, and no trigger of needing new facilities or conflicting with established facilities, the proposed project would have a ***less than significant impact*** related to recreational facilities and established recreational uses of the area.

Mitigation Measures: None required.

17. Transportation:

Existing Setting: Both project parcels utilize the same shared access via Cattle Drive, a paved road within a 50 foot right-of-way, and the access to 17400 Cattle Drive (APN: 051-110-008) is solely proposed through the northwestern and southwestern paved drive aisles on 17350 Cattle Drive (APN: 051-440-010) which provide direct internal access to APN: 051-110-008. Cattle Drive is classified as a Local Road, and it directly connects to State Highway 20, which is designated as an Other Principal Arterial Road. The nearest Major Collector Road is Rough and Ready Highway. 17350 Cattle Drive has already been developed with an existing U-Haul facility, and the access roads are already mostly existing and paved. Figure 2 shows the property and the existing and proposed access.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)
a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle or pedestrian facilities?				✓	A, B, 17

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?				✓	A, B, 17, 37
c. Substantially increase hazards due to a geometric design feature (e.g., a sharp curve or dangerous intersection) or incompatible uses (e.g., farm equipment)?			✓		A, H, M
d. Result in inadequate emergency access?			✓		H, M
e. Result in an increase in traffic hazards to motor vehicles, bicyclists, or pedestrians, including short-term construction and long-term operational traffic?			✓		A, H, M

Impact Discussion

17a,b The proposed project is for the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). Both project parcels utilize the same shared access via Cattle Drive, a paved road within a 50 foot right-of-way, and the access to 17400 Cattle Drive (APN: 051-110-008) is solely proposed through the northwestern and southwestern paved drive aisles on 17350 Cattle Drive (APN: 051-440-010) which provide direct internal access to APN: 051-110-008. Cattle Drive connects directly to State Highway 20. The proposed project would not conflict with any program plan, ordinance, or policies regarding transit, roadway, bicycle, or pedestrian facilities because the project parcels are not located within an area that has an applicable specific program plan, ordinance, or policy regarding transit, roadway, bicycle, or pedestrian facilities. The proposed project parcels are located within the Route 6 – Penn Valley-Lake Wildwood route map, and the closest transit services as shown on the route map are approximately 3.1 miles northeast and would not be affected by the proposed project. The project is located in the western Nevada County travel forecasting model area and generates less than 630 VMT per day (VMT≈ 48 trips @ 7 miles = 336 miles < 630).

According to the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th edition, the proposed self-storage uses would be categorized under Land Use Category 151, "Mini- Warehouse (Storage Units)." This use type generates 1.65 trips per 1,000 square feet (sf) of gross floor area (gfa). With 29,057 square feet of gross floor area, the project would result in 48 additional Average Daily Trips (ADT). Additionally, the Nevada County Department of Public Works reviewed the project submittal and found the project to be in compliance with the Nevada County Traffic Impact Analysis Guidelines due to the project resulting in an increase of 4 ADT during peak hour times and a total of 48 ADT, and therefore a Traffic Study was not required. The project's ADT impacts would be mitigated with traffic impact fees that would be applied to the project as a Condition of Approval from the Nevada County Public Works Department. Additionally, the Nevada County Department of

Public Works has not conducted traffic counts on Cattle Drive because it maintains less than one-half mile of this low-volume frontage road and also due to the road being classified as a Local Road, which is defined as Level of Service A (Nevada County General Plan, Volume 1, Chapter 4: Circulation). The level of service (LOS) of roadways is a measure of the operating efficiency of a transportation facility. Letter designations from A (best) to F (worst) are assigned to a road or intersection to describe how well it functions. Due to Cattle Drive being classified as a Local Road which falls under the Level of Service A, and with the estimated ADT associated with the proposed project being a total of 48 ADT, the potential increase in traffic resulting from the proposed project would be insignificant in nature and therefore there would be ***no impacts*** relating to conflicts with traffic review. The proposed project area is outside of the Community Areas and Proposed Trail Corridor Study Areas identified in the Western Nevada County Non-Motorized Recreational Trails Master Plan, and there are no trails that currently pass through the project area, so bicycle and pedestrian movement will not be affected by the proposed project due to the lack of non-motorized recreational trails within the project area. Therefore, overall, the proposed project would have ***no impact*** on any policies regarding transit, roadway, bicycle, or pedestrian facilities.

17c,e The proposed project would not result in an increase in hazards due to incompatible uses, or due to a geometric design feature either during construction or during future occupation of the properties. The proposed grading activities for vehicular purposes will not be located within any areas that exceed 30% grade and all of the vehicular access areas will be located within an area that is already flat and mostly graded. Due to the use being a mini storage facility and small scale outdoor storage area, the operational typical daily trip generation rate is 1.65 trips per 1,000 square feet, which would equate to about 48 daily trips, which is well below 110 VMT and therefore would have a negligible impact on traffic hazards to motor vehicles, bicyclists, or pedestrians, regarding long-term operational traffic. The applicant provided a Truck Turning Diagram, which was reviewed by the Nevada County Department of Public Works and Nevada County Fire Marshal and found to be adequate for the design purposes of vehicular access for both ingress and egress. As a Condition of Approval, the Department of Public Works will require an encroachment permit for sight distance improvements, if required for the new encroachment, which includes a sight distance exhibit and analysis for the encroachments onto the public right of way using the County's procedures for measurements in Standard Drawing A-6. Encroachment permits include review of Traffic Control Plans and/or other safety measures to ensure the work does not result in hazards during construction, and the Traffic Control Plan shall be approved by the County prior to commencement of work. The Department of Public Works included a Condition of Approval requiring that Cattle Drive shall be conformed to the site and improved to the following standards: Standard Drawing A-1, Local Class 1 & 2 Road and Standard Drawing D-7, Typical Culvert Detail. Additionally, a condition of approval regarding the traffic mitigation fees will be required to be complied with, as well as creating and establishing the authority for imposing and charging a Road Improvement Fee with the unincorporated territory of Nevada County, will be levied at the issuance of building permits for each parcel. Therefore, with the application of these standard Conditions of Approval, project impacts due to geometric design and traffic hazards for both short-term construction and long-term operational traffic would be a ***less than significant impact.***

17d The proposed project is for the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). The proposed access way and internal driving aisle improvements are required to be consistent with Nevada County Local Road Standards, and the proposed grading for any of the vehicular access roads will be at a minimal to due previous grading activities within those areas. The applicant provided a Truck Turning Diagram, which was reviewed by the Nevada County Department of Public Works and Nevada County Fire Marshal and found to be adequate for the design purposes of vehicular access for both ingress and egress for emergency purposes. Both project parcels utilize the same shared access via Cattle Drive, a paved road within a 50 foot right-of-way, and the access to 17400 Cattle Drive (APN: 051-110-008) is solely proposed through the northwestern and southwestern paved drive aisles on 17350 Cattle Drive (APN: 051-440-010) which provide direct internal access to APN: 051-110-008. The Nevada County Department of Public Works, Nevada County Office of the Fire Marshal, and Penn Valley Fire Protection District all reviewed the proposed project and approved the project with conditions, as the proposed project would have a minimal impact on emergency access. The Department of Public Works included a Condition of Approval requiring that Cattle Drive shall be conformed to the site and improved to the Standard Drawing A-1, Local Class 1 & 2 Road standards. Any road improvements within the County right of way shall require an Encroachment Permit from the County prior to any work within the right of way. Therefore, the project would have a ***less than significant impact*** relative to resulting in inadequate emergency access.

Mitigation Measures: None required.

18. Tribal Cultural Resources:

Existing Setting: Assembly Bill 52 (Chapter 532, Statutes 2014) required an update to Appendix G (Initial Study Checklist) of the CEQA Guidelines to include questions related to impacts to tribal cultural resources. Changes to Appendix G were approved by the Office of Administrative Law on September 27, 2016. Tribal Cultural Resources include sites, features, and places with cultural or sacred value to California Native American Tribes. The United Auburn Indian Community (UAIC) is a federally recognized Tribe comprised of both Miwok and Maidu (Nisenan) Tribal members who are traditionally and culturally affiliated with the project area. The Tribe has a deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The Tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. It is the Tribe's goal to ensure the preservation and continuance of their cultural heritage for current and future generations. See Section 5 for additional information regarding tribal resources.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
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 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.		✓			J, 22

Impact Discussion:

18a The United Auburn Indian Community (UAIC) conducted background search for the identification of Tribal Cultural Resources for this project, which included a review of pertinent literature, historic maps, and a records search using UAIC's Tribal Historic Information System (THRIS). UAIC's THRIS database is composed of UAIC's areas of oral history, ethnographic history, and places of cultural and religious significance, including UAIC Sacred Lands that are submitted to the Native American Heritage Commission (NAHC). The THRIS resources shown in this region also include previously recorded indigenous resources identified through the California Historic Resources Information System Center (CHRIS) as well as historic resources and survey data. According to THRIS data, there are 5 known TCRs, including bedrock milling features, habitation sites, and lithic scatters, less than a 1-mile radius of the project area. No known TCRs are recorded in the project area.

On February 2, 2026, UAIC Representative Anna M. Starkey and Luz Salazar conducted a survey for the identification of TCRs using both tribal and archaeological techniques. Ground visibility was poor due to thick grasses. Twenty meter transects heading north-south were used. The survey did not identify any TCRs in the project area and there is a moderate to low potential for buried TCRs. However, the Landmark Oak trees are

considered culturally significant, and therefore because Landmark Oak trees are considered culturally significant and the proposed project will remove one (1) Landmark Oak tree, Mitigation Measure 18B is proposed which would require for the applicant to reach out to the United Auburn Indian Community (UAIC) and offer the UAIC the opportunity to remove the Landmark Oak tree proposed for removal prior to the final of any grading permits, building permits, or improvements, and the applicant shall provide written documentation of the offer and all correspondence between the applicant and the UAIC regarding the Landmark Oak tree removal to the Nevada County Planning Department.

The inadvertent discovery of archaeological resources during project implementation could be a potentially significant impact. While cultural resource discovery has been determined to be unlikely, Mitigation Measure 5A is proposed that would require construction to be halted and local tribes to be notified in the unlikely event that there is a discovery of cultural resources, including historic, prehistoric, tribal, and paleontological resources. Additionally, Mitigation Measure 18A is proposed which would require that if any suspected TCRs or resources of cultural significance to UAIC, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. A Tribal Representative and the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC §21074) and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary. With these protections in place, impacts to Tribal Cultural Resources would be ***less than significant with mitigation***.

Mitigation Measures: To offset potentially adverse cultural or historical resources impacts associated with the construction activities, the following mitigation measures shall be required and shall be included as notes on all future site plans.

Mitigation Measure 18A: Unanticipated Tribal Cultural Resources. The following mitigation measures shall be required and shall be included as notes on all future site plans:

"If any suspected TCRs or resources of cultural significance to UAIC, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. A Tribal Representative and

the Lead Agency shall be immediately notified, and the Tribal Representative in coordination with the Lead Agency shall determine if the find is a TCR (PRC §21074) and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary."

When avoidance is infeasible, preservation in place is the preferred option for mitigation of TCRs under CEQA and UAIC protocols, and every effort shall be made to preserve the resources in place, including through project redesign, if feasible. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. Permanent curation of TCRs will not take place unless approved in writing by UAIC or by the California Native American Tribe that is traditionally and culturally affiliated with the project area.

The contractor shall implement any measures deemed by the CEQA lead agency to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including, but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a TCR may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until all necessary investigation and evaluation of the discovery under the requirements of the CEQA, including AB52, have been satisfied.

Mitigation Measure 18B: Landmark Oak Tree Removal. Landmark Oak trees are considered culturally significant and the existing Landmark Oak tree to be removed has been deemed culturally significant pursuant to the United Auburn Indian Community (UAIC). Therefore, the United Auburn Indian Community (UAIC) shall be offered the opportunity to remove the Landmark Oak tree proposed for removal to reduce the impact of its removal prior to the final of any grading permits, building permits, or improvements. The applicant shall provide written documentation of the offer and all correspondence between the applicant and the UAIC regarding the Landmark Oak tree removal to the Nevada County Planning Department.

Timing: *Prior to final of Grading/Improvement/Building permits and during construction*
Reporting: *Planning Department Approval of Grading and Construction Permits*
Responsible Agency: *Planning Department*

Mitigation: See **Mitigation Measures 5A.**

19. Utilities and Service Systems:

Existing Setting: 17350 Cattle Drive has already been developed with an existing U-Haul facility that utilizes PG&E for electrical services, and 17400 Cattle Drive is undeveloped. There are existing

PG&E utility poles that would allow for future connection. All of the surrounding parcels have been developed with commercial and industrial uses and structures or residential and rural uses and structures, all of which have been supplied power through PG&E.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Require or result in the relocation or the construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?			✓		A, D
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓		A
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?			✓		C
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 goals?		✓			A, C
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?		✓			B, C

Impact Discussion:

19a-c The proposed project is anticipated to have a minimal impact relative to extension of utilities to serve the project due to the project consisting of uses that require minimal water, produce virtually no wastewater, generate low traffic, and draw little electricity because the individual units are not climate controlled and do not have interior lighting. 17350 Cattle Drive has already been developed with an existing U-Haul facility that utilizes PG&E for electrical services, and 17400 Cattle Drive is undeveloped. The proposed expansion area is intended for serving the existing U-Haul facility directly adjacent, and due to the proposed project only including new development on 17400 Cattle Drive, the electrical extension will be minimal because there are no new exterior lighting fixtures proposed, no lit signs, and no internal lighting within each unit, thus demonstrating the need for limited electric power. Currently there is a septic system on 17350 Cattle Drive for the existing-Haul facility that will be utilized for the U-Haul expansion to 17400 Cattle Drive, and 17350 Cattle Drive also has an existing well that serves the existing U-Haul facility that will also be utilized to serve the expansion of the U-Haul facility at 17400 Cattle Drive for potable water, therefore no

Environmental Health permits are required nor have been applied for at this time. Although both parcels will have access to the existing septic system and well currently serving the existing U-Haul facility at 17350 Cattle Drive, the proposed construction activities on 17400 Cattle Drive where the new expansion area will go will not have a restroom facility nor any plumbing fixtures installed, and therefore there will be no additional strain on the existing well and septic system; both parcels will utilize the same existing restroom facility which has connection to the septic tank and well. Electrical service currently serves the general project area as all of the surrounding parcels are developed with PG&E as their electrical service. No wastewater treatment facilities or the expansion of existing facilities are proposed or required for the proposed project because the parcels are located in an area where wastewater treatment facilities do not provide service and instead rely on a single private septic system for both parcels. Additionally, a storm drain basin is proposed within the open space area to the south and west of the project to assist with stormwater collection, and any additional storm drainage runoff generated by the project would be required to be kept within the drainage areas being created as a part of the proposed project. Therefore, the proposed project is anticipated to have a ***less than significant*** impact related to utility/service extension.

19d,e The proposed project would not result in an increase in solid waste that would be in excess of the capacity of local infrastructure or otherwise impair the attainment of solid waste goals because the proposed project includes uses which experience very low daily human traffic, generate minimal routine commercial trash, and strictly prohibit perishable goods or active manufacturing. Due to the fact mini storage facilities and outdoor storage areas have such a low impact on the creation of solid waste, the proposed project is expected to have a marginal impact on the generation of solid waste and would not impair the attainment of solid waste goals. Construction is required for the new 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base at 17400 Cattle Drive (APN: 051-110-008), and the Amendment to an Approved Use Permit (U87-023) does not consist of any construction activities and only proposes to allow for exterior lighting and outdoor storage for the existing U-Haul facility at 17350 Cattle Drive (APN: 051-440-010). These construction activities could result in solid waste in the form of construction materials or vegetative debris. Nevada County provides solid waste collection through a franchise for collection and disposal of waste and recyclables for both residential and non-residential areas. Waste Management is the current holder of this contract; refuse and recyclables in this area of the County are typically hauled to the McCourtney Road Transfer Station, located at 14741 Wolf Mountain Road. All solid waste refuse is later hauled to out-of-County landfills, most of which are in the State of Nevada under contract with Waste Management Systems, Inc. There are no known capacity issues with any Waste Management facilities. Any waste generated would be required to comply with federal, state, and local statutes, and regulations related to solid waste. Although there is a low chance that the proposed project will increase the total waste generation in the area, the incremental contribution of the proposed project could be reasonably accommodated by the landfill, if needed. Mitigation Measure 19A requires solid waste debris generated during construction activities including vegetation and industrial waste such as glues, paint, and petroleum products to be appropriately disposed of to

avoid potentially adverse landfill and solid waste disposal impacts. Therefore, impacts related to disposal of construction debris would be ***less than significant with mitigation***.

Mitigation Measures: To offset potentially adverse impacts related to construction waste, the following mitigation measure is recommended:

> **Mitigation Measure 19A: Appropriately Dispose of Vegetative and Toxic Waste**: Industrial toxic waste (petroleum and other chemical products) is not accepted at the McCourtney Road transfer station and if encountered, shall be properly disposed of in compliance with existing regulations and facilities. This mitigation measure shall be included as a note on all improvement plans, which shall be reviewed and approved by the Planning Department prior to permit issuance.

Timing: *Prior to issuance of Building/Grading/Improvement permits and during construction*
Reporting: *Agency approval of permits or plans*
Responsible Agency: *Nevada County Planning Department*

20. Wildfire:

Existing Setting: The project parcels are within the Nevada County Consolidated Fire District and falls within a High Fire Hazard Severity Zone as designated by CalFire. Both parcels will utilize the same shared access via Cattle Drive, a 50 foot right-of-way, and the access to 17400 Cattle Drive (APN: 051-110-008) is solely proposed through the northwestern and southwestern paved drive aisles on 17350 Cattle Drive (APN: 051-440-010) which provide direct internal access to APN: 051-110-008. The project area is located approximately 1.2 driving miles north of the existing Penn Valley Fire Protection District Station 43, which is located at 10513 Spenceville Road, Penn Valley, CA. The Safety Element of the Nevada County General Plan addresses wildfire hazards in Nevada County and has several policies to improve fire safety and was updated in 2026. Nevada County has also adopted a Local Hazard Mitigation Plan (LHMP) that was updated in 2025. Additionally, there is a Community Wildfire Protection Plan for Nevada County that was updated in April 2016.

The Nevada County Office of Emergency Services published a Wildfire Evacuation Preparedness Action Plan in 2020. The plan highlights five (5) initiatives to reduce wildfire risk in Nevada County:

1. Create safer evacuation routes countywide to save lives.
2. Improve early warning systems and emergency communications to reach everyone.
3. Establish defensible space around our homes and neighborhoods by reducing hazardous vegetation and encouraging voluntary compliance with defensible space standards.
4. Provide a coordinated approach to wildfire response preparedness through planning, community engagement, and project implementation.
5. Enhance critical infrastructure needed to respond to wildfires such as evacuation route improvements, water storage, fire hydrants, communication systems, and green waste facilities.

Additionally, in February of 2024, the 2024 Nevada County Evacuation Study was completed in order to develop actionable plans to establish a resilient strategy for effective emergency situations. The study highlights eight (8) Key Elements of the Study:

1. Document Research: Examining county and regional planning efforts and conducting a literature review to identify evacuation planning best practices and emergency readiness.
2. Stakeholder Interviews: Engaging in in-depth discussions with local emergency services, community leaders, and decision-makers to gain insights into practical evacuation challenges and past experiences.
3. Field Surveys: Inspecting crucial evacuation routes and critical infrastructure to assess real-world conditions, bottlenecks, and practical evacuation challenges.
4. Data Analysis: Conducting extensive data analysis using advanced traffic and fire behavior modeling techniques to comprehend and predict fire spread scenarios and traffic flow.
5. SB 99 Accessibility Assessment: Reviewing evacuation routes and infrastructure compliance with the standards set by California Senate Bill 99, with a focus on accessibility and safety.
6. Emergency Evacuation Assessment: Utilizing Ladris evacuation modeling software for dynamic traffic assessment, along with a review of fire behavior studies and stakeholder input to develop comprehensive evacuation outcome improvements.
7. Human Behavioral Considerations: Emphasizing public awareness, education, and the importance of clear and timely communication to address the critical human behavioral aspects of successful evacuation.
8. Fire Behavior Analysis: Conducting a historical and predictive analysis of fire behavior in Nevada County, incorporating various climatic and topographic factors to understand and plan for potential wildfire scenarios

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			✓		A, H, M, 19, 23
b. Due to slope, prevailing winds, or other factor, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of wildfire?			✓		A, B, H, M, 18, 19
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?			✓		A, H, M

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**	**Reference Source (Appendix A)**
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?			✓		A, H, M, 9, 31

Impact Discussion

20a,c The proposed project is not anticipated to conflict with emergency plans or result in negative environmental impacts due to infrastructure installation because the project area is not located within an area with a specific adopted emergency response plan. The proposed project includes the construction of 137 mini storage units, approximately 7.67'x 26' in size each, for a total floor area of 29,057 square feet on a crushed gravel base for U-Haul on a mixed zoned parcel located at 17400 Cattle Drive (APN: 051-110-008), and an Amendment to an Approved Use Permit (U87-023) to allow for exterior lighting and outdoor storage for the existing U-Haul facility on a mixed zoned parcel at 17350 Cattle Drive (APN: 051-440-010). Mini-storage facilities do not introduce high permanent populations or heavy commercial traffic, and mini storage facilities typically feature minimal electrical demand and zero gas hookups and lack high-voltage operations that frequently spark wildfires. Both parcels will utilize the same shared access via Cattle Drive, a paved road within a 50 foot right-of-way, and the access to APN: 051-110-008 is solely proposed through the northwestern and southwestern paved drive aisles on APN: 051-440-010 which provide direct internal access to APN: 051-110-008.

The proposed U-Haul expansion area at 17400 Cattle Drive is currently undeveloped and will require the installation of access roads between the proposed mini storage structures, and the access roads will be paved which help prevent the spread of wildfire. The proposed mini storage units are proposed to be made out of metal and faux stacked stone with metal roofs, and will be placed on a gravel base, all of which are fire resistant materials. Additionally, the existing U-Haul facility at 17350 Cattle Drive is already developed with multiple mini storage structures, paved access ways, and a managers residence with a bathroom facility, and due to the project description for 17350 Cattle Drive consisting only of allowing three (3) existing exterior light poles to remain and permit an existing paved outdoor storage area, and therefore would have a negligible impact on 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. Additionally, a Condition of Approval from the Nevada County Deputy Planning Department will require vegetation clearance around structures that meets the minimum requirements of Public Resources Code Section 4291, which will provide defensible space to help prevent wildfire. Therefore, with the implementation of the recommended Conditions of Approval, the project temporary and ongoing impacts relative to compliance with emergency plans, impacts relative to increased fire risk, and impacts to the environment would be a ***less than significant impact.***

20b,d The topography within the project area is generally level, with elevations ranging from approximately 1425 feet above mean sea level to 1430 feet above mean sea level. 17350 Cattle Drive has already been developed with an existing U-Haul facility, and 17400 Cattle Drive is undeveloped, and both parcels are located in a High Fire Hazard Severity Zone. Wildfires are ongoing issue in rural areas of California and wildfire smoke can impact vast regions. There are no factors that could be reasonably anticipated to expose occupants to pollutant concentrations from wildfire more than they would be in similar regions of rural California. The proposed project would require Building Permits for the grading and site improvements, which would require compliance with the Nevada County grading standards outlined in Title 14, Chapter 12 of the Nevada County Code. The building permits would require grading and erosion control plans for the soil disturbance, and a drainage analysis to ensure no additional runoff leaves the project site. As part of the project improvements and site inspections by the Building Department, soil compaction testing would be required for the grading at the site for the proposed building and associated improvements. Furthermore, the project area is not in an area that is mapped with high landslide activity and the project parcels do not have any steep slopes. Additionally, all future improvements would require building permits and conformance with requirements including but not limited to maximum impervious surface coverage on each of the parcels, the prohibition of increasing stormflow onto offsite parcels, and adequate erosion control measures. The proposed project will not expose project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of wildfire because the project area is a mostly flat area and the proposed development on 17400 Cattle Drive will be located within a central portion of the parcel that will have paved access roads, metal mini storage structures, and a gravel base, all of which are fire resistant materials. The Open space area located on 17400 Cattle Drive will include a catch basin for water in order to provide adequate drainage facilities to ensure that people are not exposed to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Additionally, due to the defensible space, water supply, and irrigated vegetation, the project is not expected to expose populations to the uncontrollable spread of wildfire. A Condition of Approval from the Nevada County Planning Department will require vegetation clearance around structures that meets the minimum requirements of Public Resources Code Section 4291, which will provide defensible space to help prevent wildfire. Therefore, with the implementation of the recommended Conditions of Approval mentioned above, the proposed project is anticipated to have ***a less than significant*** relative to the spread of wildfire and fire risks.

Mitigation Measures: None required.

21. Mandatory Findings of Significance:

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact	Reference Source (Appendix A)
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 major periods of California's history or prehistory?		✓			
b. Does the project have environmental effects that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of the project are considered when viewed in connection with the effects of past, current, and probable future projects.)			✓		
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		✓			

Impact Discussion:

21a,c This draft Initial Study/Mitigated Negative Declaration evaluates the potential impact the proposed project could have on the environment. Compliance with existing federal, state, and local regulations and mitigation measures identified in this Initial Study will reduce all potential impacts of the proposed project to a less than significant level. As discussed in Sections 1 through 20 above, the proposed land division would comply with all local, state, and federal laws governing general welfare and environmental protection. Project implementation during construction and operation could result in potentially adverse impacts to air quality, biological resources, cultural resources, geology/soils, hazards and hazardous materials, noise, tribal cultural resources, and utilities/service systems. Due to the possible impacts to nesting birds, mitigation has been added to reduce potential impacts if construction occurs during nesting season. Although cultural, tribal cultural, and paleontological resources are not known in the project area, mitigation has been added to halt work if resources are discovered. To minimize the disruption to surrounding parcels

during the construction, mitigation has been included to limit construction to daytime hours on Monday through Saturday and mitigation has been added to reduce potentially adverse impacts related to construction waste. Each of the potential adverse impacts are mitigated to levels that are ***less than significant levels with mitigation,*** as outlined in each section.

21b A project's cumulative impacts are considered significant when the incremental effects of the project are "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. Reasonably foreseeable projects that could have similar impacts to the proposed project include other anticipated projects within the project vicinity that could be constructed or operated within the same timeframe as the project. All of the proposed project's impacts, including operational impacts, can be reduced to a less-than-significant level with implementation of the mitigation measures identified in this Initial Study and compliance with existing federal, state, and local regulations. Therefore, the proposed project would have ***less than significant*** environmental effects that are individually limited but cumulatively considerable.

Mitigation Measures: To offset potentially adverse impacts to air quality, biological resources, cultural resources, geology/soils, hazards and hazardous materials, noise, tribal cultural resources, and utilities/service systems, see Mitigation Measures 3A-3B, 4A-4F, 5A, 7A-7B, 13A, 18A-18B and 19A.

Recommendation of the Project Planner

On the basis of this initial evaluation:

_____ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

__X__ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

_____ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

_____ I find that the proposed project MAY have a "potentially significant impact" or a "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.

_____ 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.

Zachary Ruybal

Zachary Ruybal, Associate Planner

8/14/2026

Date

Appendix A – Reference Sources

A. Planning Department
B. Department of Public Works
C. Environmental Health Department
D. Building Department
E. Nevada Irrigation District
F. Natural Resource Conservation Service/Resource Conservation District
G. Northern Sierra Air Quality Management District
H. North San Juan Fire Protection District
I. Regional Water Quality Control Board (Central Valley Region)
J. North Central Information Service, Anthropology Department, CSU Sacramento
K. California Department of Fish & Wildlife
L. Nevada County Geographic Information Systems
M. California Department of Forestry and Fire Protection (Cal Fire)
N. Nevada County Transportation Commission
O. Nevada County Agricultural Advisory Commission
P. Grass Valley School District/Nevada Joint Union School District (D-1)
Q. Nevada County Connects

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2. State Department of Fish and Game. *Migratory Deer Ranges*, 1988.
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4. Cal Fire. *Fire Hazard Severity Zone Map for Nevada County*, 2007. Adopted by CalFire on November 7, 2007, and amended April 2024. Available at: <http://www.fire.ca.gov/wildland_zones_maps.php>.
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24. California Department of Toxic Substances Control. Accessed July 2026: http://www.envirotor.dtsc.ca.gov/public/.
25. USDA Soil Conservation Service. "Soil Survey of Nevada County Area, California." Soil Survey, Reissued 1993.
26. California Department of Conservation, Division of Mines & Geology. "Report 2000-19: A General Location Guide for Ultramafic Rocks in California -- Areas More Likely to Contain Naturally Occurring Asbestos." 2000.
27. California Department of Transportation. *California Scenic Highway Mapping System.* July, 2019. Scenic High https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highwaysways | Caltrans.
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34 Williamson Act Parcels, Nevada County 2017, https://nevadacountyca.gov/DocumentCenter/View/30242/2017-Parcels-Affected-By-Williamson-Act-PDF.
35. California Department of Fish and Wildlife, Biogeographic Information and Observation System https://apps.wildlife.ca.gov/bios6/?bookmark=648.
36. U.S. Fish & Wildlife Service Information for Planning and Consultation https://ipac.ecosphere.fws.gov/location/W2MLFZVNRBGCRE45TUY7KHUQ5Y/resources#endangered-species.

37. Senate Bill 743 Vehicle Miles Traveled Implementation, Nevada County Transportation Commission, July 6, 2020.
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