

Environmental Narrative Requirements

The National Environmental Policy Act (NEPA) requires Federal agencies to assess the potential environmental impacts associated with proposed federal actions, including financial assistance.

Applicants are encouraged to contact their designated Economic Development Representative or the applicable EDA Regional Environmental Officer with questions (please see the EDA website or the applicable Federal Funding Opportunity for contact information) regarding this template and/or the appropriate level of documentation. Resources of available information are listed in many of the sections. If you are using a locally saved copy of this template, please check EDA's website to confirm this is the current version.

For further information regarding EDA's obligations under NEPA, please refer to the regulations for implementing NEPA at 40 C.F.R. 1500-1508. The Council on Environmental Quality's 2007 guidance document "A Citizen's Guide to the NEPA is another resource available online.

Several issues discussed in the environmental narrative below may require consultation with other State or Federal agencies at a later date (for example, the State Historic Preservation Office or the U.S. Fish and Wildlife Service). While EDA does not require that applicants complete such consultations before submitting an initial application, applicants should be aware that in the event their project is selected for further evaluation for funding, EDA may delegate these consultations to the applicant and expect them to be completed in an expeditious manner and prior to approval of an award.

Applicants must provide information on the following items in the environmental narrative. For any area in which the applicant asserts that an item is not applicable to a project, provide an explanation.

A. PROJECT DESCRIPTION

1. Beneficiaries

Identify any existing businesses or major developments that will benefit from the proposed project, and those that will expand or locate in the area because of the project.

Beneficiaries will include 3 businesses that have already shown interest in locating into the incubator: Slippery Soap, Mazios Fine Vinegars, and Golden Nugget Honey. It is anticipated that during the first five years of operation that the incubator will assist 10 businesses and create 75 jobs. Except for four fire impacted businesses that are temporarily housed in the space, it is anticipated that all businesses in the incubator will be scalable startups.

2. Proposed Construction

As an exhibit to this Narrative, provide a topographical map of the project area and a site map (with legend and north arrow) displaying the project location and boundaries, existing and proposed project components and location of all sites and/or companies benefiting from the proposed project. The documents should be of sufficient clarity for adequate interpretation of the Applicant's intentions.

Describe the project construction components in detailed, quantifiable terms. Describe the project location, proposed construction methods, and schedule. **It is sufficient to simply reference the Preliminary Engineering Report (PER) here if a PER containing this**

information has been submitted or will be submitted concurrently. See the mock example below for the level of specificity expected by EDA:

The Town of Anytown is proposing to renovate an existing 45,000 sq ft building into a business incubator. The project is located within Township 39N, Range 10E, Section 24 in the Town of Anytown, Gold County, California. Construction on the project will occur over an 18-month period from Mid 2021 – to late 2022 or early 2023. Construction of this project would entail removing the existing roof and replacing it, upgrading all plumbing, electrical, and mechanical systems, adding ADA upgrades, adding internal walls and fixtures, resurfacing the parking lot, and installing landscaping. Total land disturbance will be less than 1 acre.

The construction staging area would be located entirely within the parking lot. More details can be found in the Preliminary Engineering Report.

3. Need and Purpose

Provide a brief summary of the underlying need and purpose of the proposal for EDA funding.

This project was originally conceived as a catalyst to bring businesses back into the downtown area which has been in a decline for some time and as a source for new manufacturing businesses and job creation. This has become more important in the aftermath of the Zaphan Fire in 2019 which destroyed 250 commercial/industrial buildings and the Pandemic in 2020, which repeatedly shuttered businesses in attempts to control the COVID-19 virus. The need for more new businesses is now greater than before.

4. Alternatives to the Proposed Project

Based in the Need and Purpose summary above, provide a detailed description of alternative actions that were considered during the project planning but were not selected (e.g., alternative locations, designs, other projects having similar benefits, and a “no project” alternative). Explain why this project/site was selected as the preferred alternative with respect to other choices. Provide detail on why other alternatives were rejected (e.g. did not meet the purpose and need of the project, implicated more environmental impacts than the proposed action). If the selected project would impact wetlands or floodplains, please provide a detailed description of alternatives to those proposed impacts.

Alternatives to this project include renovating other buildings, building a new building, and doing nothing. There are other buildings in downtown Anytown, but none the size of the building chosen for this project. Multiple buildings would have to be renovated to achieve the same square footage, those buildings would probably not be co-located, in addition, the project would cost more because the buildings would have to be purchased. A new building could be built for this project, unfortunately the only land the Town owns is located near the landfill, a location not suited for this business incubator, and would do nothing to revitalize downtown. The no-action alternative would leave the building as is potentially adding to downtown blight. Some benefit would derive from having businesses in their temporarily, but until it is brought up to code – no businesses can be there long term. The Town would loose out on the job creation and start-up potential

this project has to offer. The Town feels this project is the best use of this building the best option for job creation and small business start-up support.

B. HISTORIC/ARCHEOLOGICAL RESOURCES

Identify any known historic/archeological resources within the project site(s) or area of potential effect that are either listed on the National Register of Historic Places or considered to be of local or State significance and perhaps eligible for listing on the National Register. In many states, the State Historic Preservation Office (SHPO) maintains GIS databases of historic properties and cultural resources. Delineate an Area of Potential Effect (APE) for the project. The APE is the geographic area or areas within which a proposal may cause changes in the character or use of historic properties, which would include (but is not limited to) any new development or renovation by the beneficiary facilitated by the proposed EDA project. Discuss the potential impacts of the project on culturally significant resources and provide a determination as to whether there will be: no historical properties/cultural resources present; no historical properties/cultural resources adversely affected; or historical properties/cultural resources adversely impacted.

Note that the applicant is not required to contact the SHPO until directed to do so by EDA. If comments from the SHPO have already been received, they should be attached along with copies of the information provided to the SHPO. If you wish to initiate early consultation, please consult the website of the appropriate SHPO for instructions on required information.

The project is in historic downtown Anytown at the corner of Main Street and Nugget Alley (38.728229-120.802563). The building to be renovated, although more than fifty years old, is not characterized as historic and is not listed on any historic register, state or federal, nor has there ever been any mention of listing this building. The Town means to maintain the building's current façade to keep it consistent with other buildings on the street.

The site itself has been disturbed for more than 150 years, with no known reference to historical or prehistorical significance. No EIR has ever been prepared for this site, however there was an EIR done when the sewer and water lines were upgraded 20 years ago (see attached). The Town anticipates conducting an historic records search as part of the SHPO process.

There are three federally recognized tribes who are reported to have lived in the vicinity: the Maidu, the Konkow, and the Nisenan. The Town has a good working relationship with each, and recognizes that EDA will consult directly with them before and during this project.

C. AFFECTED ENVIRONMENT

For the resource areas identified below, indicate potential direct and indirect impacts from proposed project activities and specify proposed measures to mitigate probable impacts. Direct impacts are caused by the action and occur at the same time and place. Indirect impacts are those that are caused by a proposed action, but that may occur later in time or farther removed in distance, relative to the primary impacts of the proposed action (40 C.F.R. Section 1508.8) Development induced by the proposed project would be an example of an indirect impact.

1. Affected Area

Describe the general project area, including topography, historic land usages, unique geological features, and economic history. Provide site photographs if available. Identify native vegetation and wildlife found in the project area or its immediate vicinity. Describe the amount and type of vegetation in the project area and indicate the impact to vegetation if removed (e.g., 1.2 acres of early successional native hardwood forest). Identify any designated State and National Parks, National Wildlife Refuges, or National Game Preserves located on or in the vicinity of the proposed project activities. Identify any Wilderness Areas, as designated or proposed under the Wilderness Act, or wild or scenic rivers, as designated or proposed under the Wild and Scenic Rivers Act, that are located on or in the vicinity of the proposed project activities.

1. Direct effects
2. Indirect effects

The project site is in the area known as downtown in the incorporate Town of Anytown, in Gold County, California. Anytown is located 70 miles northeast of Sacramento, in the foothills of the Sierra Nevada Mountains at an elevation of 2500 ft. The downtown is a totally built environment on the southern bank of the Nugget River.

The population of Anytown was 53,462 as of the 2010 census. The Town's population had decreased by .3% according to the American Community Survey 5-year estimate in 2018 and has probably decreased even further due to relocations from survivors of the Zathan Fire. The unemployment rate is estimated to be 4.5% and the poverty rate 24%.

Surrounding land uses include retail and commercial development, some of them within historic buildings. It is not anticipated that the work associated with the proposed project will adversely impact neighboring businesses or structures.

The project is to renovate an existing building in the relatively flat downtown area. No known unique geological features are in the vicinity of the site. No State or National Parks, Wildlife Refuges, or National Game Preserves Wilderness Areas, or designated wild or scenic rivers are located on or in the vicinity of the project site. The Nugget River is classified as a scenic river from 15 miles east of the site to its origins near Mt. Zulu.

It is anticipated that there will be few direct impacts on the environment during construction (see discussion on Endangered Species and Hazardous and Toxic Substances below) or during the operation of the incubator.

Indirect impacts, during construction and once the incubator is operational, will include increased foot and vehicular traffic. The later may contribute to poorer air quality in the area. It is hoped that this project will catalyze the revitalization of the downtown which will lead to more commercial activity, more businesses located in the area and the rehabilitation of the nearby homes. In the long run, it is anticipated that concentrating these activities in or near the downtown corridor will lead to improved air quality and a better quality of life for residents.

2. Coastal Zones

Indicate whether the project is located within a designated coastal zone subject to the Coastal Zone Management Act. Information on coastal zone boundaries is available on the National Oceanic and Atmospheric Administration's (NOAA) website. Identify any shorelines, beaches, dunes, or estuaries within or adjacent to the project site(s). Also indicate if there are any proposed overwater structures that could impact navigable waters.

The Project is not within a designated coastal zone.

3. Wetlands

Identify any wetlands within or adjacent to the project site(s). If available, provide an on-site wetland/waters delineation performed in accordance with the 1987 (or current version) U.S. Army Corps of Engineers Wetland Delineation Manual, as amended. Provide any correspondence from the U.S. Army Corps of Engineers (USACE), including any jurisdictional determination or permit documents.

1. Provide a determination of direct and indirect effects including the amount of jurisdictional waters affected by type (e.g. 1.1 acres of palustrine emergent wetlands would be impacted by the proposed project).
2. If any wetlands would be impacted by the project, provide an analysis of alternatives to wetland impact in this section or in the Alternatives to the Project section above.
3. Describe any mitigation plans here or in Section D below.

If wetlands, streams, or navigable waters may be impacted, it is recommended that Applicants contact USACE concerning any jurisdictional waters resources.

The project is in a developed area of Anytown and not within or adjacent to any wetlands. Refer to the National Wetlands Inventory map with the proposed project clearly marked (Attachment A).

4. Floodplains

Please state whether the project is located within a mapped 100- or 500-year floodplain. Provide a FEMA floodplain map (with the map number and effective date) displaying the project location and boundaries, existing and proposed project components, and location of all sites and/or companies benefiting from the proposed project. The document should be of sufficient clarity for adequate interpretation of the applicant's intentions.

Floodplain maps can be viewed and printed from FEMA's website. If FEMA floodplain maps do not exist in the project area, provide a letter from a Professional Engineer regarding the presence or absence of a 100-year floodplain.

- i) Describe direct and indirect effects to 100-year floodplains, if any.
- ii) If any 100-year floodplains would be impacted by the project, provide an analysis of alternatives to floodplain impact in this section or in the Alternatives to the Project section above.
- iii) Indicate whether the Applicant's community participates in the National Flood Insurance Program.
- iv) Indicate if a critical action (e.g., emergency response facility, hospital, wastewater treatment plant) is being located within the 500-year floodplain.

Project Site is on the boundary of the 100-year flood plain of Nugget River (Zone AE). Nugget River will over flow its banks during heavy rains or during spring runoff season, however, the waters have never reached this location. The Army Corps has erected flood control structure along the back of the River to contain high water levels. During flooding episodes roads next to the River are closed and traffic is routed down Main Street. This project should not impact the floodplain.

The Town does participate in the National Flood Insurance Program. The project is not a critical action. Please refer to the FEMA floodplain map with the proposed project site clearly marked (Attachment B).

5. Climate Change

Identify any current or potential risks to the project due to climate change (e.g., flooding, wildfires, sea level rise, severe weather), utilizing federal resources, including the National Climate Assessment. Describe any steps taken in the planning and design of the project to mitigate those risks, including utilizing federal resources such as the U.S. Climate Resilience Toolkit. Identify any ways in which the project may contribute to future climate risks, such as by increasing flood risks, and any potential measures for mitigating those contributions. Describe any steps taken to reduce the project's immediate and future carbon footprint (e.g., use of renewable building materials, incorporation of energy-efficient design features).

Climate change will impact Anytown primarily through changes in weather patterns. The changing climate is having a significant impact on Anystate, with the state growing progressively warmer, experiencing more severe wildfires, and undergoing a shift of seasons resulting in less snowpack and lower summer stream flows.

To mitigate this risk, the preferred action is a renovation of an existing building instead of new construction, reducing the carbon footprint of the project. According to the American Institute of Architects (AIA), renovating buildings dramatically reduces embodied carbon, which is the carbon emitted during new construction by the manufacture, transport, and assembly of materials. As a result, renovating an existing building reduces operational carbon to zero, lessening the contribution to climate change (Renovating Buildings to Protect the Climate and Rejuvenate Communities, AIA Blueprint for Better, website).

The proposed rehabilitation of the existing building would not contribute to greenhouse gas (GHG) emissions any more than other remodeling projects of similar size. Materials and methods would be selected to minimize greenhouse gas emissions and further lower the facility's carbon footprint.

6. Endangered Species

Provide a list of all threatened, endangered, and candidate species located in or near the project area, including any proposed development by the beneficiary, and the immediate vicinity. Identify these species' potential or existing habitat, and critical habitat designations in the project area. Identify the potential for direct or indirect impacts on these species. Critical habitat designations list of protected species by county, and information on effect determinations are available on the U.S. Fish and Wildlife Service's (FWS) website. The FWS' web-based Information, Planning, and Conservation System (IPaC) may also be useful for the early planning

stage of a project. If an Effect Determination or Biological Assessment has been completed for any of the species listed, please provide. Attach any correspondence with FWS that exists related to their proposal. For projects with possible impacts to fisheries and marine/coastal species, provide any correspondence with the National Marine Fisheries Service (NMFS).

The IPaC report is attached (Attachment C) for downtown Anytown. As the area is a built environment there is no critical habitat for terrestrial endangered species known to be in the area. However, there is a pair of Great Gray Owls that have been known to nest in the south eave of the building. These owls and their off-spring are very special to the Town and it has been made clear by the citizenry that every effort will be made to preserve this nesting site. The Town Council has mandated that no roof construction or work will be done around this eave while the pair is in residence from mid-March through late summer. Representatives from the local chapter of the Audubon Society will maintain a vigilant watch on the nesting pair during this period. It is not anticipated that work inside the building will bother the birds, but if it does it will be postponed until the fall when the male and owlets move out. Consultations with US Fish and Wildlife and CA Fish and Wildlife will be conducted to assure compliance with all suggested mitigation measures.

7. Land Use and Zoning

Describe the present formal zoning designation and current land use of the specific project site and adjacent land parcels. The areas include: the site of construction activities, adjacent areas, and areas affected by the primary beneficiaries. Land uses to be considered include, but are not limited to, industrial, commercial, residential, agriculture, recreational, woodlands, mines/quarries, and open spaces. Please indicate whether the project is located entirely within a city limit. Identify agriculture land parcels designated as “prime/unique agriculture lands” by the U.S. Department of Agriculture (USDA) under the Federal Farmlands Protection Act or a local equivalent. Additional information may be found at the USDA’s Natural Resources Conservation Service website.

The future use of this building is consistent with the existing zoning for this area: light industrial/commercial. No changes to zoning will need to be made. The site is wholly inside the Town’s city limits. The proposed project does not adversely impact prime/unique farmlands. A zoning map has been provided with the proposed project site clearly marked (Attachment D).

8. Solid Waste Management

Indicate the types and quantities of solid wastes to be produced by the project facilities and primary beneficiary. Describe local solid waste collection and disposal methods and the expected useful life of the disposal facility. Indicate if recycling or resource recovery programs are currently being used or will be used in the future.

The Town’s landfill, Anytown Municipal Landfill, is a municipal solid waste landfill permitted to receive household waste, commercial solid waste, nonhazardous sludge, conditionally exempt small quantity generator waste, and industrial nonhazardous solid waste. The landfill is operated by contractor Recology and is estimated to have a useful life of 15 years. The landfill was enlarged in 2016 to provide a 20-year life expectancy, but debris from the Fire in 2019 consumed 3 years of that capacity. The State of California

has enacted a zero-waste policy and is mandating that all communities find ecologically friendly and positive uses for sold waste. The Town is currently exploring waste-to-energy options as well as ag-waste uses.

It is estimated that the building renovation will generate 5 30-yard dumpsters of waste during construction. This waste stream will be comprised of construction and demolition waste. The Anytown Municipal Landfill can accept up to a 1,000 yards per day, so construction waste is not expected to have an adverse impact on the landfill.

Use of the building for its intended purpose is expected to generate enough waste to fill a 20-yard dumpster on a weekly basis. On-site recycling and reuse programs will target a 15% reduction in waste generation.

9. Hazardous or Toxic Substances

Describe any toxic, hazardous, or radioactive substances that will be utilized or produced by the proposed project facilities and primary beneficiaries. Describe the manner in which these substances will be stored, used, or disposed. Complete and sign one “Applicant Certification Clause” for each co-applicant (see Appendix A). Indicate if hazardous or toxic substances have been or must be remediated prior to construction, demolition, or renovation. If a recent Phase I or Phase II Environmental Site Assessment has been performed, please provide a copy of the executive summary (a full copy may be requested at a later date).

The existing roof of the facility leaks and is known to contain asbestos (see the provided Asbestos Survey, Attachment E) and during this project will need to be removed by a licensed contractor and replaced with new materials. This will be done following all applicable federal and state guidelines, with all required permits in place and under the guidance of the State Department of Toxic Substances, EDA and all other applicable regulatory boards. It is important to the Town’s leadership and residents that this substance is removed in the safest and least disruptive manner possible. Asbestos-containing materials removed during renovation will be disposed in a properly permitted facility. The Town will keep all records pertaining to the identification, removal, and disposal of asbestos-containing materials.

The proposed project building has also been surveyed for lead-based paint (see report provided as Attachment F). No lead-based paint was found in the building.

It is not anticipated that any product developed in the incubator will utilize or be a toxic, hazardous or radioactive substance.

10. Water Resources

Describe surface and underground water resources at or near the project site(s) and any impacts of the project to these. If groundwater will be used, is the aquifer in overdraft and /or adjudicated? If there will be discharges to surface water, is the receiving surface water body listed on the U.S. Environmental Protection Agency’s (EPA) Section 303(d) list of impaired waters? Is a National Pollution Discharge Elimination System (NPDES) permit required for any discharges to surface waters? Indicate if the proposed project is located within an area mapped by the EPA as sole source aquifer recharge area (maps and further information are available on EPA’s

website). Describe any induced changes in local surface water runoff patterns, and the status of storm water discharge permit processes (if applicable).

The project site is located within 1800 feet of the Nugget River within the Nugget River watershed. The Clean Water Act's Section 303(d) list identifies the Nugget River as impaired for nutrients, pathogens, and sediment as "medium priority" pollutants, and diazinon and nickel as "low priority" pollutants (see surface water quality reports, Attachment G). The project would not alter the Nugget River and does not discharge directly into it. The Town's existing stormwater collection and conveyance facilities would address runoff generated within the project site. The project site is not underlain by a groundwater basin. No groundwater is anticipated to be used for the project. The project site is not located within an area mapped by the EPA as a sole source aquifer recharge area.

11. Water Supply and Distribution System

Indicate the source, quality, and supply capacity of local domestic and industrial/commercial water resources, and the amount of water that project facilities and primary beneficiaries are expected to utilize. Note whether the water that is being supplied is in compliance with the Safe Drinking Water Act, and if not, what steps are being taken to ensure compliance.

The Town of Anytown purchases surface water from the Nugget Irrigation District. The specific amount of water demand for the incubator has not yet been estimated as some value-added processing uses more water than others. However, based on similar facilities, it is assumed the building will use 18 gallons per square foot per day. The project will likely result in an increase in demand for water in the downtown area, but not for the Town as a whole. Prior to the Zathan Fire the Town of Anytown's Water Management Plan indicated that the Town's water supply would exceed demand through the year 2035 under the multiple-dry year condition. Due to the loss of water customers the Town may to revisit its purchase agreement with NID until use can return to pre-fire levels, however the increased requirements from more businesses located in downtown will be considered. It is anticipated that the Town will have enough water supply capacity to meet current and future demands, including the demands of the project.

In order to ensure that tap water is safe to drink, the U.S. Environmental Protection Agency (U.S. EPA) and the State Water Resources Control Board (State Board) prescribe regulations that limit the number of certain contaminants in water provided by public water systems. Based on the Anytown Public Works and Utilities Annual Water Quality Report for Reporting Year 2019 (Attachment H), the Town's water supply is in compliance with the Safe Drinking Water Act and other regulations applicable to public water systems.

12. Wastewater Collection and Treatment Facilities

Describe the wastewater treatment facilities available for processing the additional effluent including usage by the beneficiary(s). Indicate design capacities and current loading (both daily average and peak), and adequacy in terms of degree and type of treatment required. Describe all domestic class or process wastewater or other discharges associated with the project facilities and its primary beneficiaries, and the expected composition and quantities to be discharged either to a municipal system or to the local environment. Indicate all discharges that will require on-site pre-

treatment. Note whether the wastewater treatment plant is in violation of the Clean Water Act, and if so, what steps are being taken to ensure compliance. If local treatment and sewer systems are or will be inadequate or overloaded, describe the steps being taken for necessary improvements and their completion dates.

The Foothills Sewage Treatment District collects and processes all wastewater from Anytown. The District upgraded and expanded its capacity in 2012 to accommodate growth until 2032. Due to the loss of customers because of the Fire, the District projects that it will be unable to service its debt and has petitioned the State Revolving Loan Fund for a reprieve from payments for 5 -10 years, to allow for time for rebuilding the District's customer base, including the incubator.

The Sewer Treatment Plant is permitted for 1 million gallons per day. It is currently at 275,000 gallons, well below its limit. The facility is permitted and is meeting all regulatory obligations.

13. Environmental Justice (Executive Order 12898)

Describe whether the proposed project will result in disproportionate adverse human health or environmental impacts relative to minority and low-income populations. Sufficient detail should be provided to enable EDA to determine whether the project will comply with Executive Order 12898.

It is not anticipated that this project will have any adverse human health or environmental impacts relative to minority and low-income populations. On the contrary, it is anticipated that this project will help revitalize the Town's downtown by transforming an existing underutilized building into a small business hub, attract more businesses downtown, and help bring the neighborhoods in the vicinity back to life. Part of the Anytown's Downtown Revitalization Plan calls for small grants to downtown residents to help spruce up their homes along with a five-year property tax reduction if current residents stay in their homes to counteract any potential displacement risks.

14. Transportation (Streets, Traffic and Parking)

Briefly describe the local street/road system serving the project site(s) and describe any new traffic patterns that may arise because of the project. Indicate if land use in the vicinity, such as residential, hospital, school, or recreational, will be affected by these new traffic patterns. Indicate if any existing capacities of these transportation facilities will be exceeded as a direct or indirect result of this project implementation, particularly in terms of car and truck traffic, and what the new Level of Service designation will be.

The project is located on Main Street in Anytown, the primary north/south street through the center of town. We anticipate increased traffic during construction and once in operation. This is however desirable for other businesses in our downtown core. We do not anticipate any new traffic patterns. The building has its own parking lot at the rear of the building, so we do not see that parking in the area will be negatively impacted as a direct result. We do not anticipate that the Level of Service designation will change.

Certain construction activities may require temporary lane closures. To reduce traffic impacts, these activities will be scheduled during lighter traffic hours or traffic will be rerouted through temporary detours.

15. Air Quality

Indicate types and quantities of air emissions (including odors) to be produced by the project facilities **and its primary beneficiaries**, and any measures proposed to mitigate adverse impacts. Indicate the impact that the project would have on greenhouse gas emissions. Is the proposed project site classified as a “non-attainment” area for any criteria pollutants? If so, what are those pollutants? Indicate any local topographical or meteorological conditions that hinder the dispersal of air emissions.

The Town anticipates that there will be, from time to time, pleasant and enticing odors emanating from the incubator as small businesses housed within are testing new products or making batches of existing products. It is not anticipated that the facility will increase greenhouse gas emissions significantly. The Town is generally an attainment area under the National Ambient Air Quality Standards (NAAQS), however, when a wildfire is burning upwind of the Town, smoke has been known to settle creating Unhealthy to Hazardous conditions due to particulate matter.

Temporary emissions will be generated during construction activities. These emissions will mainly be particulates due to use of heavy equipment and dust. It is not anticipated that these emissions would have a lingering adverse impact to air quality in the area. Best Management Practices (BMPs) will be implemented to reduce emissions and dust generation.

The licensed asbestos removal contractor will provide a plan to ensure that asbestos fibers are not released into the air during roof removal.

16. Noise

Will operation of project facilities or primary beneficiaries’ facilities increase local ambient noise levels? If yes, indicate the estimated levels of increase, and the areas and sensitive receptors (e.g., residences) to be affected.

No. There should be no increase in ambient noise levels when the incubator is up and running. There might be increased noise levels during construction, which will be limited to 7am to 7 pm M-F.

17. Permits

Identify any Federal, State, or local permits of an environmental nature needed for the project (e.g., USACE, US Environmental Protection Agency (EPA), Coastal Zone Management/Shoreline Management, Air Quality, State Environmental Policy Act, NPDES, etc.) and the status of any such permits. Attach copies of any such permits and all associated correspondence, including the permit applications.

As this is a building renovation it is not anticipated that any federal or state permits will be required. All local and county building permits will be applied for at appropriate time in the construction/inspection process.

The proposed project qualifies for an exemption under the California Environmental Quality Act (CEQA) process.

18. Public Notification/Controversy

Provide evidence of the community's awareness of the project, such as newspaper articles or public notification and/or public meetings, as applicable. If a formal public hearing has been held, attach a copy of the minutes. Fully describe any public controversy or objections which have been made concerning this proposed project and discuss steps taken to resolve such objections.

This project has been vetted and approved by the Town Council. Two Public Hearings were conducted, one as an amendment to the General Plan and one just for this project in regard to the owls. Attached (Attachment H) are copies of all those minutes as well as the Council resolution in support of the incubator and the negotiated measures to protect the owls.

19. Direct, Indirect, and Cumulative Effects

Please list projects (public and private, whether or not directly related to the proposed project described above) that have occurred or will occur in the past, present, and future in and around the project area that could result in significant cumulative impacts when considered in aggregate with the proposed EDA project. Cumulative impacts result from the incremental impacts of a proposed action when added to other past, present and reasonably foreseeable future actions (40 C.F.R. Section 1508.7). In other words, cumulative impacts can result from individually minor but collectively significant impacts. Based on the direct and indirect impacts identified in Sections C1-18, identify which resources, ecosystems, and human communities are affected; and which effects on these resources are important from a cumulative effects' perspective.

This project is part of an overall downtown revitalization project that will find new uses for empty and abandon buildings, and in doing so increase the number of people traveling to the downtown corridor that runs parallel to the Nugget River from the highway off ramp on 5th Street to the north, south to Prospect Lane. It is anticipated that as abandoned buildings find new uses, even more businesses will want to locate in this corridor and that homes in the vicinity will be rehabbed for sale or new tenants. The cumulative impacts from all of this activity will include: less over all air pollution as people will be making shorter trips in their cars overall and with fewer trips to the outskirts of town; buildings will be reused instead of allowed to deteriorate to the point they have to be torn down and the debris sent to the landfill; the population of vermin and other disease laden pests will be diminished; the Town will become more economically resilient with new businesses and more jobs. More importantly, this project will help Anytown start building its employment base back. This project will begin to replace jobs and livelihoods lost in the Fire.

D. MITIGATION

Describe methods to be employed to reduce impacts to any and all adverse impacts identified in Section C. List all mitigation measures that would be implemented to minimize impacts to environmental resources from project implementation.

Mitigation measures to be deployed will include:

- **the work arounds that will be implemented for the Great Grey Owl in residence at the site described above,**
- **the containment measures to be implemented during the removal of the asbestos on the roof,**
- **Best Management Practices to manage noise and traffic during construction activities**

E. LIST OF ATTACHMENTS

The following checklist is a list of required and optional attachments to the Environmental Narrative as described in the sections above. The items listed in the optional section may be required by EDA at a later date to complete the project review and selection process, so it is recommended that you provide them now if they are currently available. While the documents listed below are the most frequently required for scoping determinations, EDA reserves the right to request additional items that are not listed below when necessary.

Applicants are not required to contact other governmental agencies for environmental or historical resources consultation until directed by EDA, though any interagency coordination letters that may be currently available should be provided. **EDA expects that all Applicants whose projects are selected for further evaluation will proceed with consultations in an expeditious manner. As such, Applicants should have the required information prepared for submission immediately upon notification of selection by EDA.** If you determine prior to application that your project may affect environmental or historical resources, you may contact the appropriate Regional Environmental Officer to determine if early interagency consultation is appropriate.

Please refer to the applicable Federal Funding Opportunity for unique requirements for each individual grant competition and a list of documents required for submittal with the application.

Checklist of Optional Environmental Documents that should be submitted with Application if available (will expedite review and selection process):

- SHPO/THPO and Tribal leader comments and copy of submittals (see Section B)
- Site photographs (see Section C1)
- Coastal Zone consistency determination (see C2)
- Wetland delineation and/or Jurisdictional Determination (see C3)
- Preliminary wetland info (see C3)
- U.S. Army Corps of Engineers comments, Section 404 Permit, Section 10 Permit, and/or Water Quality Certification (401 approval) (see C3)
- Biological Assessment and/or survey for federally protected species (see C5)
- Correspondence with US Fish and Wildlife Service and/or National Marine Fisheries Service (see C5)
- Natural Resources Conservation Service determination of Prime Farmland, Form AD-1006, if applicable (see C6)
- Phase I and II Environmental Site Assessment (see C8)
- Sole Source Aquifer review by US Environmental Protection Agency, if applicable (see C9)
- Other federal, state and local environmental permits (see C16)

- o Copies of public notices, public hearing minutes, etc. (see C17)

Appendix A: Applicant Certification Clause

The applicant represents and certifies that it has used due diligence to determine that the description of the project site described herein is accurate with respect to the presence or absence of contamination from toxic and hazardous substances. The term “site” includes the entire scope of the project, including future phases of the project and all areas where construction will occur.

- 1. Is the site currently, or has it in the past 50 years, been used for any of the following operations or activities:
 - a. Generation of hazardous substances or waste?
 Yes No
 - b. Treatment, storage (temporary or permanent), or disposal of solid or hazardous substances or waste?
 Yes No
 - c. Storage of petroleum products?
 Yes No
 - d. Used/waste oil storage or reclamation units?
 Yes No
 - e. Research or testing laboratory?
 Yes No
 - f. Ordinance research, testing, production, use, or storage?
 Yes No
 - g. Chemical manufacturing or storage?
 Yes No
 - h. Weapons or ammunition training, use, or testing?
 Yes No
 - i. Iron works/foundry?
 Yes No
 - j. Railroad yard?
 Yes No
 - k. Industrial or manufacturing operation?
 Yes No

If any of the above operations ever occurred at the site, and if appropriate cleanup or other mitigation actions were performed in accordance with the local, State, and federal laws, please attach documentation of these actions.

- 2. Do wells draw from an underlying aquifer to provide the local domestic water supply?

Appendix A: Applicant Certification Clause

_____ Yes No

3. Has a federal, State, or local regulatory authority ever conducted an environmental assessment, environmental impact statement, or a preliminary assessment/site inspection, or similar environmental surveyor inspection report at the site? If yes, please list here and attach copies of these reports or results.

Yes _____ No

1) Building inspection report from 2012

2) EIR for the sewer upgrades done in 1999

3)

4)

5)

4. Have any environmental or OSHA citations or notices of violation been issued to a facility at the site? If yes, please attach copies.

_____ Yes No

5. Have any unauthorized releases of hazardous substances occurred at any facility at the site which resulted in notification of the EPA’s National Response Center?

_____ Yes No

6. Is any material containing asbestos or lead paint located at the site? If yes, please attach information concerning State and federal regulatory compliance.

Yes _____ No

7. Is there any equipment (electrical transformers, etc.) containing polychlorinated biphenyls (PCB) on the site? If yes, please attach a description of the equipment.

_____ Yes No

8. Are there underground or above ground storage tanks on the site? If yes, please attach a detailed description, including the number of underground storage tanks on the site, whether the tanks have been inspected (or removed) and the results of such inspections.

_____ Yes No

9. Has the site been tested for radon? If yes, please attach results.

Yes _____ No

10. Have there been, or are there now any environmental investigations by federal, State or local government agencies that could affect the site in question? If yes, please attach available information.

_____ Yes No

Appendix A: Applicant Certification Clause

The applicant acknowledges that this certification regarding hazardous substances and/or waste is a material representation of fact upon which EDA relies when making and executing an award. EDA reserves the right to terminate any award made in conjunction with the representations contained herein if, at any time during the useful life of the project, EDA becomes aware of the presence of hazardous materials or waste at the site, or that hazardous materials or waste have been inappropriately handled thereon.

Further, if it is determined at any time that the presence of hazardous materials or waste, or handling thereof, has been misrepresented, EDA may pursue other available legal remedies against the applicant.

Town of Anytown
Applicant's Name

John R. Smith, Town Manager
Name and Title of Applicant's Authorized Representative

Signature of Applicant's Authorized Representative

Date