

CITY OF PALMDALE
A-American Self-Storage Project
INITIAL STUDY /
MITIGATED NEGATIVE DECLARATION

Prepared for:

CITY OF PALMDALE
38250 SIERRA HIGHWAY
PALMDALE, CA 93550

Prepared by:

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August 2021

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PROJECT APPLICANT

A-American Self-Storage
37228 10th Street East
Palmdale, CA 93550

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Appendix C: Soils Engineering Investigation
Appendix D: Greenhouse Gas Data
Appendix E: Noise Monitoring Data
Appendix F: Correspondence Letters
Appendix G: Traffic/Transportation Memorandum

¹ Included herein by reference. Due to sensitive information, the complete assessment is on file with the City.

1. INTRODUCTION

A. Project Background

The purpose of the Initial Study/Mitigated Negative Declaration is to evaluate if a project would have a significant impact on the environment. The Project involves the demolition of the existing self-storage facility and the construction of a 75,929 square foot self-storage facility with a 1,733 square foot manager's unit on approximately 3.0-acres of property in the City of Palmdale.

The Project area is located within the City of Palmdale which encompasses approximately 106 square miles. The City's General Plan includes Land Use, Circulation, Environmental Resources, Public Services, Safety, Noise, Housing, Parks, Recreation and Trails, and Community Design Elements. The General Plan was adopted by the City Council on January 25, 1993. Section 15150 of the CEQA Guidelines allows the incorporation by reference of documents that are generally available to the public. This Initial Study has been prepared utilizing information from the City's General Plan, and other publicly available data. Documents used in the Initial Study are identified in Section 5 and are incorporated by reference.

B. Lead Agency

City of Palmdale
Economic and Community Development Department
Planning Division; ATTN: Mr. Justin Sauder, Associate Planner
38250 Sierra Highway
Palmdale, CA 93550

C. Technical Studies (see Appendices to this Initial Study)

- Appendix A: Air Quality Data
- Appendix B: Cultural and Paleontological Resources Assessment (July 2019 - confidential)²
- Appendix C: Soils Engineering Investigation (June 2019)
- Appendix D: Greenhouse Gas Data
- Appendix E: Noise Monitoring Data
- Appendix F: Correspondence Letters
- Appendix G: Traffic/Transportation Memorandum (August 2020)

² Included herein by reference. Due to sensitive information, the complete assessment is on file with the City.

2. PROJECT DESCRIPTION

A. Project Location

The Project Site is located at 37228 10th Street East, at the northeast corner of East Avenue S and 10th Street East. The Project is surrounded by East Avenue S to the south, 10th Street East to the west, some utilities on the lot to the east, and a residence to the north. Uses beyond those immediately adjacent to the Project Site include residential uses to the east along East Avenue S, residential uses to the south across East Avenue S, vacant land to the west across 10th Street East, and residences/vacant land to the north along 10th Street East.

B. Project Setting

The General Plan land use designation of the Project Site is CC (Community Commercial) and the property is zoned C-3 (General Commercial). Land uses surrounding the Project Site include PF (Public Facility) to the east, OC (Office Commercial) to the north, CC (Community Commercial) to the west, and MR (Medium Density Residential) to the south. Zoning surrounding the Project Site includes PF (Public Facility) to the east, C-2 (Office Commercial) to the north, C-3 (General Commercial) to the west, and R-2 (Medium Residential) to the south.

C. Project Description

The Project involves the demolition of the existing self-storage facility and the construction of a 75,929 square foot self-storage facility with a 1,733 square foot manager's unit. Access to the Project would be provided at the existing entrance along 10th Street East, see Figure 3: Site Plan.

Construction for the Project is anticipated to begin in early 2022 with completion and operation in early 2023. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition, (2) grading/foundation preparation, and (3) building construction. Demolition would occur for approximately 1 month. Grading/foundation preparation would occur for approximately 1 month. Building construction would occur for approximately 10 months and would include the construction of the proposed structures, connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the Project Site. While it is possible some construction phases may occur simultaneously or over longer periods of time, this schedule would be conservative and yields the maximum daily impacts which may occur during construction.

Construction activities are scheduled to occur Monday through Friday. Per the City of Palmdale Municipal Code, building construction hours will be restricted between the hours of 8:00 PM to 6:30 AM. Equipment to be used onsite includes concrete saws, tractors, loaders, backhoes, dozers, graders, cranes, welders, and forklifts. Staging areas for the Project will be located onsite.

D. Regulatory Requirements, Permits, and Approvals

To implement the Project, the following agreements, permits, and approvals are anticipated: Site Plan Review; Grading Permit; Air Quality Permits; Building Permits; Storm Water Pollution Prevention Plan (SWPPP) General Permit.

Figure 1
Project Vicinity

Figure 2
Aerial Photograph of the Project Site

Figure 3
Project Site Plan

3. ENVIRONMENTAL CHECKLIST

A. Background

1. **Project Title:** A-American Self-Storage Project

2. **Lead Agency Name and Address:**

City of Palmdale
Economic and Community Development Department
Planning Division
38250 Sierra Highway
Palmdale, CA 93550

3. **Contact Person and Phone Number:**

Mr. Justin Sauder, Associate Planner
City of Palmdale
Economic and Community Development Department
Planning Division
38250 Sierra Highway
Palmdale, CA 93550
(661) 267-5372

4. **Project Location:**

37228 10th Street East, Palmdale, CA 93550

5. **Project Applicant's Name and Address:**

A-American Self-Storage
37228 10th Street East
Palmdale, CA 93550

6. **Existing Land Use / Zoning / General Plan:**

	SURROUNDING LAND USE	ZONING	GENERAL PLAN
SITE	Self-Storage	General Commercial (C-3)	Community Commercial (CC)
NORTH	Single-Family Residence and vacant land	Office Commercial (C-2)	Office Commercial (OC)
SOUTH	Single-Family Residential, across Avenue S	Medium Residential (R-2)	Medium Density Residential (MR)
EAST	Utilities (gas pipeline)	Public Facility (PF)	Public Facility (PF)
WEST	Vacant, across 10 th Street East.	General Commercial (C-3)	Community Commercial (CC)

7. Description of Project:

The Project involves the demolition of the existing self-storage use, construction of a 75,929 square foot self-storage facility and a 1,733 square foot office space/residence.

B. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact”, as indicated by the checklist on the following pages. Potentially significant impacts that are mitigated to “Less Than Significant” are not shown here.

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

C. Determination

On the basis of this initial evaluation: (Select one)

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

measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.

- I find that the proposed project MAY have a significant effect on the environment, and ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a significant effect(s) 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, if the effect is a “potentially significant impact” or “potentially significant unless mitigated”. 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, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

This initial study was prepared by:

Date

Megan Taggart
Planning Manager

D. Evaluation of Environmental Impacts

Each of the responses in the following environmental checklist considers the whole action involved, including project-level, cumulative, on-site, off-site, indirect, construction, and operational impacts. A brief explanation is provided for all answers and supported by the information sources cited.

1. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone).
2. A “Less Than Significant Impact” applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
3. A “Less Than Significant Impact With Mitigation Incorporated” applies when the proposed project would not result in a substantial and adverse change in the environment after additional mitigation measures are applied.

4. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant" entries when the determination is made, an EIR is required.

4. ENVIRONMENTAL ANALYSIS

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

Project Impacts

- a) **Less Than Significant Impact.** The City of Palmdale General Plan (City of Palmdale 1993) identifies open space, landscaped corridors, and viewsheds of the surrounding Angeles National Forest as providing visual enhancement and pleasure. Specific areas identified as containing aesthetically significant resources worthy of preserving include: Lamont Oddett Vista Point, Godde Hills Road, Bouquet Canyon Road, and Juniper Hills Road. The Project Site is not in the vicinity of these identified aesthetic resources. Scenic vistas, or scenic viewsheds or backdrops as identified in the General Plan, refer to the significant ridgelines of the San Gabriel mountains, the Sierra Pelona range, and the Ritter and Portal Ridges that form the City's skyline views. The Project is located within an area mixed with vacant land and urbanized land uses. The site is not in the vicinity of any landscaped corridors or open space. Viewsheds of Angeles National Forest or the General Plan's scenic viewsheds would not be significantly altered due to implementation of the Project. There are no parks or trails located nearby the Project where it would block any views of the ridgelines. Therefore, implementation of the Project would result in a less than significant impact associated with scenic vistas.

- b) **No Impact.** Currently, no officially designated or eligible state scenic highways are near the Project Site. The nearest designated or eligible state scenic highway is State Route 2, approximately 16 miles south of the Project Site (ESRI 2017).
- c) **Less Than Significant Impact.** The General Plan land use designation of the Project Site is CC (Community Commercial) and the site is zoned C-3 (General Commercial). General Plan land use designations surrounding the Project Site include PF (Public Facility) to the east, OC (Office Commercial) to the north, CC (Community Commercial) to the west, and MR (Medium Density Residential) to the south. Zoning surrounding the Project Site includes PF (Public Facility) to the east, C-2 (Office Commercial) to the north, C-3 (General Commercial) to the west, and R-2 (Medium Residential) to the south. Specifically, the Project is surrounded by East Avenue S to the south, 10th Street East to the west, utilities to the east, and a residence to the north. Uses beyond those immediately adjacent to the Project Site include residential uses to the east along East Avenue S, residential uses to the south across East Avenue S, vacant land to the west across 10th Street East, and residential uses and vacant land to the north along 10th Street East.

The presence of construction equipment and materials during the construction phase could result in the disturbance of the existing character of the site. Construction impacts could include fencing of the Project area, signage, lighting, and transporting of equipment. However, these impacts would be short term in nature. Additionally, the project would include construction best management practices including but not limited to proper storage of equipment, Project Site maintenance and clean up, dust control measures, and limiting hours of construction within the hours mandated by the Palmdale Municipal Code (PMC) in order to minimize any impacts regarding the visual character of the area.

The proposed development would be similar to the existing uses on the Project Site. The proposed uses would be primarily one-story for the storage facility and the manager's unit would be two stories. This height increase would not be a substantial change to the Project Site compared to the existing uses. Moreover, there are no adjacent buildings to the Project Site which may be impacted due to the project's height. The proposed uses would be under the maximum allowed building height of 45 feet as specified within the C-3 zone.

The project would utilize building materials that would complement the aesthetics of the existing uses in the project vicinity. Additionally, the project would comply with PMC Sections 17.86.010 and 17.87.050.H.2 which will require landscaping associated with the project to maximize the aesthetic quality on site.

Additionally, there are no resources on site that hold scenic value. Therefore, implementation of the project would result in a less than significant impact associated with visual character and scenic quality.

- d) **Less Than Significant Impact.** The Project will include temporary and permanent lighting to the project area.

During construction, the project will include temporary construction lighting for areas requiring additional lighting such as confined spaces, and any digging. The project will limit construction hours within the PMC requirement where construction activities are restricted between 8:00 PM to 6:30 AM. Other additional lighting sources would come from vehicles and other large operating equipment. Once operational, permanent lighting sources will be from outdoor lighting necessary to ensure safety.

Lighting associated with the project would be required to comply with PMC Section 17.86.030 which requires consistent illumination levels with the character and use of surrounding development; excessive illumination is not allowed. Additionally, exterior lighting would be required to be located and designed to minimize glare beyond the Project Site; glare onto adjacent properties will be minimized by using downcast, cut-off type fixtures, as necessary, that are shielded and would direct the light towards specific areas requiring illumination. For areas that are located nearby residences, the lowest allowable lighting levels will be used. Therefore, implementation of the Project would result in a less than significant impact associated with light or glare.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the Project:				
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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forestland or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

- a) **No Impact.** The Project Site does not contain any farmland and is identified as “Urban And Built-Up Land” pursuant to the Farmland Mapping and Monitoring Program (Department of Conservation 2016). The Project Site does not contain any Prime Farmland, Unique Farmland or Farmland of Statewide Importance; and implementation of the project would not result in the conversion of agricultural land to non-agricultural use. Furthermore, the site has been previously developed and disturbed with the use of an existing storage facility. No impact would occur.
- b) **No Impact.** The Project Site is not currently zoned for agricultural use and is not under a Williamson Act contract (Department of Conservation 2017). Furthermore, the site has been previously developed and disturbed with the use of an existing storage facility. No impact would occur.
- c) **No Impact.** The Project Site does not contain any forest land or timberland per the California Department of Fish and Wildlife (CDFW) Timberland Conservation

Program, California Forests and Timberlands.³ Furthermore, the site has been previously developed and disturbed with the use of an existing storage facility. No impact would occur.

- d) **No Impact.** The Project Site does not contain forestland, and the project would not result in loss or conversion of forestland. Furthermore, the site has been previously developed and disturbed with the use of an existing storage facility. No impact would occur.
- e) **No Impact.** The Project Site does not contain any farmland, and the project would not result in the conversion of any agricultural or forest land to nonagricultural or non-forest use. Furthermore, the site has been previously developed and disturbed with the use of an existing storage facility. No impact would occur.

Mitigation Measures

None required.

³ California Department of Fish and Wildlife. Habitat Conservation Planning Branch; <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109917&inline>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section relies on information from Appendix A (Air Quality Data) to this Initial Study.

Project Impacts

a) **Less Than Significant Impact.** The City of Palmdale is located within the Antelope Valley Air Quality Management District (AVAQMD). For development projects, AVAQMD states that a project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan, and that a project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast (AVAQMD 2016).

The proposed development would be similar to the existing uses on the Project Site. Moreover, the project would be consistent with the CC General Plan land use designation and the C-3 zone.

The project would not conflict with growth projections as it does not propose residential uses that would generate new population growth.

The project would comply with all AVAQMD rules and regulations that are applicable to the project; the project Applicant is not requesting any exemptions from the currently adopted or proposed AVAQMD rules. Therefore, implementation of the Project would result in a less than significant impact.

b) **Less Than Significant Impact.** Measurements of ambient concentrations of the criteria pollutants are used by the United States Environmental Protection Agency

(U.S. EPA) and the California Air Resources Board (CARB) to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment.” If the pollutant exceeds the standard, the area is classified as a “non-attainment” area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.” Attainment status of the AVAQMD is shown in Table 1, AVAQMD Designations and Classifications. As shown, the Basin is in nonattainment for ozone and PM₁₀.

**Table 1
AVAQMD Designations and Classifications**

Pollutant	Attainment Status
	NAAQS
One-hour Ozone (Federal) – standard has been revoked, this is historical information only	Proposed attainment in 2014; historical classification Severe-17
Ozone (8-Hour) (Federal 84 ppb (1997))	Subpart 2 Nonattainment; classified Severe-15
Ozone (8-Hour) (Federal 75 ppb (2008))	Nonattainment, classified Severe-15
Ozone (8-Hour) (Federal 70 ppb (2015))	Expected nonattainment; classification to be determined
Ozone (State)	Nonattainment; classified Extreme
PM ₁₀ 24-hour (Federal)	Unclassifiable/attainment
PM _{2.5} Annual (Federal)	Unclassifiable/attainment
PM _{2.5} 24-hour (Federal)	Unclassifiable/attainment
PM _{2.5} (State)	Unclassified
PM ₁₀ (State)	Nonattainment
Carbon Monoxide (State and Federal)	Attainment
Nitrogen Dioxide (State and Federal)	Attainment/unclassified
Sulfur Dioxide (State and Federal)	Attainment/unclassified
Lead (State and Federal)	Attainment
Particulate Sulfate (State)	Unclassified
Hydrogen Sulfide (State)	Unclassified
Visibility Reducing Particles (State)	Unclassified

To address potential impacts from construction and operational activities, the AVAQMD currently recommends that impacts from projects with mass daily emissions that exceed any of the thresholds outlined in Table 2, AVAQMD Thresholds of Significance, be considered significant.

**Table 2
AVAQMD Thresholds of Significance**

Pollutant	Daily Threshold (pounds)
Volatile Organic Compounds (VOC)	137
Nitrogen Oxides (NO _x)	137
Carbon Monoxide (CO)	548
Sulfur Oxides (SO _x)	137
Particulate Matter (PM ₁₀)	82
Fine Particulate Matter (PM _{2.5})	65

Regional Construction Emissions

Construction for the Project is anticipated to begin in early 2022 with completion and operation in early 2023. Construction activities associated with the Project would be undertaken in three main steps: (1) demolition, (2) grading/foundation preparation, and (3) building construction. Demolition would occur for approximately 1 month. Grading/foundation preparation would occur for approximately 1 month. Building construction would occur for approximately 10 months and would include the construction of the proposed structures, connection of utilities, laying irrigation for landscaping, architectural coatings, and landscaping the Project Site. While it is possible some construction phases may occur simultaneously or over longer periods of time, this schedule would be conservative and yields the maximum daily impacts which may occur during construction.

The construction and demolition activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment onsite and traveling to and from the Project Site) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary depending on the amount and types of construction activities occurring at the same time. The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2020.4.0) recommended by the AVAQMD to quantify the estimated daily emissions associated with project construction. The results are presented in Table 3, Estimated Peak Daily Construction Emissions, which identifies daily emissions that are estimated to occur on peak construction days for each construction phase.

As shown in Table 3, construction-related daily emissions associated with the project would not exceed any regional AVAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts are considered to be less than significant. Localized air quality emissions are addressed under Question III(d) below.

**Table 3
Estimated Peak Daily Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition Phase						
Fugitive Dust	--	--	--	--	0.21	0.03
Off-Road Diesel Equipment	1.69	16.62	13.96	0.02	0.84	0.78
On-Road Diesel (Hauling)	0.01	0.37	0.09	0.01	0.04	0.01
Worker Trips	0.05	0.04	0.47	0.01	0.15	0.04
Total Emissions	1.75	17.03	14.52	0.04	1.24	0.86
AVAQMD Thresholds	137.00	137.00	548.00	137.00	82.00	65.00
Significant Impact?	No	No	No	No	No	No
Grading/Site Preparation Phase						
Fugitive Dust	--	--	--	--	2.77	1.50
Off-Road Diesel Equipment	1.54	16.98	9.22	0.02	0.74	0.68
Worker Trips	0.04	0.03	0.36	0.01	0.11	0.03
Total Emissions	1.58	17.01	9.58	0.03	3.62	2.21
AVAQMD Thresholds	137.00	137.00	548.00	137.00	82.00	65.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase						
Building Construction Off-Road Diesel Equipment	1.86	14.60	14.35	0.03	0.70	0.67
Building Construction Vendor Trips	0.03	0.66	0.23	0.01	0.09	0.03
Building Construction Worker Trips	0.12	0.09	1.16	0.01	0.36	0.10
Architectural Coatings	16.36	--	--	--	--	--
Architectural Coating Off-Road Diesel Equipment	0.20	1.41	1.81	0.01	0.08	0.08
Architectural Coatings Worker Trips	0.02	0.02	0.22	0.01	0.07	0.02
Total Emissions	18.59	16.78	17.77	0.07	1.30	0.90
AVAQMD Thresholds	137.00	137.00	548.00	137.00	82.00	65.00
Significant Impact?	No	No	No	No	No	No
<i>Calculation sheets are provided in Appendix A.</i>						

Regional Operational Emissions

The Project Site is currently developed with existing self-storage uses. As such, air pollutant emissions are currently generated at the Project Site by area sources, energy demand, and mobile sources such as motor vehicle traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing CalEEMod 2020.4.0 recommended by the AVAQMD. As shown in Table 4, Existing Daily Operational

Emissions, motor vehicles are the primary source of air pollutant emissions associated with existing use at the Project Site.

**Table 4
Existing Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area Sources	0.23	<0.01	<0.01	0.00	0.00	0.00
Energy Demand	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.06	0.08	0.70	<0.01	0.14	0.04
Total Existing Emissions	0.29	0.08	0.70	<0.01	0.14	0.04
Wintertime (Non-Smog Season) Emissions						
Area Sources	0.23	<0.01	<0.01	0.00	0.00	0.00
Energy Demand	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.06	0.09	0.67	<0.01	0.14	0.04
Total Existing Emissions	0.29	0.09	0.68	<0.01	0.14	0.04
<i>Calculation data provided in Appendix A. Column totals may not add due to rounding from the model results.</i>						

Operational emissions generated by area sources, motor vehicles and energy demand would result from normal day-to-day activities of the Project. The analysis of daily operational emissions associated with the project has been prepared utilizing CalEEMod 2020.4.0 recommended by the AVAQMD. The results of these calculations are presented in Table 5, Estimated Daily Operational Emissions. As shown, the operational emissions generated by the project would not exceed the regional thresholds of significance set by the AVAQMD. Therefore, impacts associated with regional operational emissions from the project would be less than significant. Localized air quality emissions are addressed under Question III(d) below.

As discussed above, the mass daily construction and operational emissions generated by the project would not exceed any of the thresholds of significance recommended by the AVAQMD. In addition, as discussed previously, the project would not exceed growth projections and therefore would not conflict with the AVAQMD. Therefore, the project would not contribute a cumulatively considerable increase in emissions for the pollutants which are in nonattainment. Thus, cumulative air quality impacts associated with the project would be less than significant.

**Table 5
Estimated Daily Operational Emissions**

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Summertime (Smog Season) Emissions						
Area Sources	1.64	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.02	0.02	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.46	0.50	5.05	0.01	1.16	0.32
Total Project Emissions	2.10	0.52	5.08	0.01	1.16	0.32
Less Existing Site Emissions	0.29	0.08	0.70	<0.01	0.14	0.04
Net Increase Project Emissions	1.81	0.44	4.38	0.01	1.02	0.28
AVAQMD Thresholds	137.00	137.00	548.00	137.00	82.00	65.00
Potentially Significant Impact?	No	No	No	No	No	No
Wintertime (Non-Smog Season) Emissions						
Area Sources	1.64	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.02	0.02	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.45	0.54	4.87	0.01	1.16	0.32
Total Project Emissions	2.09	0.56	4.92	0.01	1.16	0.32
Less Existing Site Emissions	0.29	0.09	0.68	<0.01	0.14	0.04
Net Increase Project Emissions	1.80	0.47	4.24	0.01	1.02	0.28
AVAQMD Thresholds	137.00	137.00	548.00	137.00	82.00	65.00
Potentially Significant Impact?	No	No	No	No	No	No
<i>Note: Column totals may not add due to rounding from the model results. Calculation sheets provided in Appendix A.</i>						

c) **No Impact.** According to the AVAQMD CEQA and Federal Conformity Guidelines, residences, schools, daycare centers, playgrounds and medical facilities are considered sensitive receptor land uses. The following project types proposed for sites within the specified distance to an existing or planned (zoned) sensitive receptor land use must be evaluated:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet; and,
- A gasoline dispensing facility within 300 feet.

As the project does not meet the above criteria, it is not considered one of the project types that the AVAQMD CEQA Guidelines require to be evaluated for potentially exposing sensitive receptors to substantial pollutant concentrations. As such, TAC emissions were not calculated, and the project was not evaluated for potential health risks to sensitive receptors. The project would serve as a self-storage development and would not include activities that would generate substantial pollutant concentrations. No impact would occur.

- d) **Less Than Significant Impact.** Construction-related sources of odors will come from construction equipment ranging from exhaust fumes to grease and oils. Impacts from construction-generated odors can be dependent upon the source, frequency of the generation of the odor, intensity, wind direction, and receptor sensitivity. The impacts from odors would be temporary and will occur only during construction. The short-term odors that would be generated by the equipment would dissipate. Additionally, the project would comply with AVAQMD Rule 403 to control fugitive dust emissions.

During the project operations, outside of normal maintenance equipment, no anticipated uses of materials would result in substantial emissions of odors and dust. Therefore, impacts would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV BIOLOGICAL RESOURCES. Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nesting sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts and Mitigation Measures

- a) **Less Than Significant Impact.** The existing Project Site is mostly developed with self-storage uses, and a small portion of the site consists of dirt and scattered weeds. As such, the Project Site is unsuitable for candidate, sensitive, or special status species. Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area (SEA) for Los Angeles County (Department of Regional Planning 2018) or Regional Habitat Linkage (RHL) for Los Angeles County (Department of Regional Planning 2014). Impacts would be less than significant.
- b) **No Impact.** The existing Project Site is mostly developed with self-storage uses, and a small portion of the site consists of dirt and scattered weeds. Review of the National Wetlands Inventory identified no protected wetlands in the vicinity of the Project Site (U.S. Fish and Wildlife Service). As stated previously, the Project is not within an SEA or RHL. Further, as the Project Site contains urban uses, the Project Site does not support any riparian or wetland habitat, as defined by Section

404 of the Clean Water Act, and does not contain any wetlands, desert washes, or riparian habitats. There are no blue line streams documented on the USGS Palmdale Quadrangle for the project area. There are no identified sensitive natural communities within the project area. Therefore, no impact would occur.

- c) **No Impact.** As previously discussed, the project area does not contain any wetlands. No impact would occur.
- d) **Less Than Significant Impact with Mitigation Incorporated.** As previously discussed, the existing Project Site is mostly developed with self-storage uses, and a small portion of the site consists of dirt and scattered weeds. As such, it is unlikely that the Project Site would attract or support native wildlife nesting locations. Moreover, the Project Site and immediately surrounding area are not within or near a designated SEA or RHL. Nevertheless, and although unlikely, the Project Site could support migratory bird species protected under the federal Migratory Bird Treaty Act (MBTA). Such migratory bird species could be affected by the demolition and removal of existing uses on-site. As such, implementation of mitigation measure **BIO-1** would ensure compliance with the MBTA and impacts would be considered less than significant.
- e) **No Impact.** The existing Project Site is mostly developed with self-storage uses, and a small portion of the site consists of dirt and scattered weeds. Therefore, the project will not conflict with any City policies and no impact would occur.
- f) **Less Than Significant Impact.** The Project is within the boundaries of the West Mojave Plan which is a habitat conservation plan (Bureau of Land Management 2005). However, while the Project is located within the geographic range of special species of concern, state listed, and federal listed species, none are expected to occur within the Project Site as it is mostly developed and there is no suitable habitat on the Project Site. The Project Site is not located within a SEA or RHL and would not interfere with the Desert Renewable Energy Conservation Plan. Impacts would be less than significant.

Mitigation Measures

- BIO-1** Project construction activities (including disturbances to vegetation) shall take place outside of the breeding bird season (February 1 to September 1), in order to avoid abandonment of active nests containing eggs and/or young species. If project construction activities cannot avoid the breeding season, nest surveys shall be conducted and active nests shall be avoided and provided with a minimum buffer consistent with the requirements of the MBTA and as determined by a biological monitor.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
V CULTURAL RESOURCES. Would the Project:					
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Cause a substantial adverse change in the significance of an archaeological resource as defined in Public Resources Code Section 21083.2 and 21084.1, and CEQA Guidelines Section 15064.5, respectively?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Disturb any Native American tribal cultural resources or human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

This section relies on information from Appendix B (Cultural and Paleontological Resources Assessment) to this Initial Study.

Project Impacts and Mitigation Measures

- a) **Less Than Significant Impact.** The Cultural and Paleontological Assessment conducted a cultural resources records search at the South Central Coastal Information Center (SCCIC). The SCCIC is part of the California Historical Resources Information System (CHRIS). The records search included a review of all recorded historic and prehistoric archaeological sites within a one-mile radius of the project area. The results of the records search at the SCCIC indicated that three previous cultural resource studies included portions of the project area, while an additional 38 cultural studies have been conducted within a one-mile radius of the project area. The results of these studies indicated that there are no cultural resources located within the project area. In addition, the Project Site has been previously disturbed with the existing storage facility. Therefore, impacts would be less than significant.
- b) **Less Than Significant Impact.** A cultural resource records search and a reconnaissance field survey were conducted but did not identify any archaeological resources within the project area. The project has a moderate sensitivity for prehistoric archaeology due to the number of cultural resources in the vicinity of the Project Site. Due to previous ground disturbance on the Project Site, it is not anticipated to encounter intact buried cultural resources and there is limited potential for impacts to archaeological resources; therefore, archaeological monitoring is not recommended. Moreover, the project does not involve any excavation work which may result in the disturbance of unknown archaeological resources.
- c) **Less Than Significant Impact with Mitigation Incorporated.** The paleontological records search did not identify any fossil localities in or near the project. A review of the available online and other published literature did not reveal

any nearby fossil localities in deposits similar to those underlying the project area. In addition, the Project Site has been previously disturbed with the existing storage facility. Due to the low paleontological sensitivity of the underlying geologic units, and the lack of documented fossil localities nearby, paleontological field monitoring is not recommended for the Project.

While there are currently no identified cultural resources and low likelihood to encounter previously unknown and unrecorded human remains, in the unlikely event that human remains, or other buried materials are encountered, the following mitigation measure will apply in order to reduce impacts to a less than significant level.

Mitigation Measures

CUL-1: If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur within 100 feet of the find until the Los Angeles County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Los Angeles County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendants(s)" for purposes of receiving notification of discovery. The most likely descendant(s) shall then make recommendations within 48 hours and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

Refer to Section XVIII Tribal and Cultural Resources for continued and additional mitigation measures pursuant to and in accordance with §15064.5 and Public Resources Code Section 21083.2 and 21084.1.

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

Project Impacts

a) **Less Than Significant Impact.** The project would result in increased use of energy (such as natural gas and electricity) during the construction phase. Energy usage would come from fuels to power construction vehicles and equipment and electricity with the use of equipment, lighting during construction, dust control, and during the production of materials such as asphalt, steel, concrete, pipes, and other materials. The energy use during construction would be temporary and cease once the project has been completed.

Once in operation, the project would result in increased use of energy for the operation and maintenance of the commercial facilities. The construction and design of the project would be required to comply with the 2019 California Energy Code Title 24 Part 6 for energy efficiency standards for nonresidential buildings, and with the City of Palmdale’s Green Building Code Checklist for Nonresidential Buildings. The project will be built in accordance with the Palmdale Green Building Code (PMC Chapter 8.04.200) of the City of Palmdale Adoption of Health, Safety and Technical Construction Codes. In addition, the City of Palmdale adopted an Energy Action Plan in 2011 providing recommendations and measures to improve energy efficiency for existing and new development (City of Palmdale 2011). Impacts would be less than significant.

b) **Less Than Significant Impact.** As noted above, the construction and operation of the Project would be required to comply with Title 24 of the California Code of Regulations. Compliance with this regulation would reduce any impact associated with an obstruction of a plan for renewable energy or energy efficiency. The impact would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII GEOLOGY AND SOILS. Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death involving?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Map issued by the State Geologist for the area or based upon on other substantial evidence of a known fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

This section relies on information from Appendix C (Soils Engineering Investigation) to this Initial Study.

Project Impacts and Mitigation Measures

- a) i) and ii) **Less Than Significant Impact.**

Surface Fault Rupture

The Project Site does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone or any other Earthquake Fault Zone (CGS 2019). Therefore, active fault rupture is unlikely to occur at the Project Site. While fault rupture would most likely occur along previously established fault traces, future fault rupture could occur at other locations.

Historical Seismicity

The Project Site is located within the Southern California region which is seismically active and commonly experiences strong ground shaking resulting from earthquakes along active faults. The Project Site does not lie within a currently delineated State of California, Alquist-Priolo Earthquake Fault Zone or any other Earthquake Fault Zone (CGS 2019). However, the project may still experience strong ground shaking in the event of an earthquake.

As such, design and construction of the new facilities would comply with all seismic-safety development requirements, including the Title 24 standards of the current California Building Code. Therefore, implementation of the project would result in a less than significant impact associated with strong seismic ground shaking.

iii) **Less Than Significant Impact.** The Project Site does not lie within a currently delineated State of California, Liquefaction Zone (CGS 2019). Moreover, the project's design and construction of the new facilities would comply with all seismic-safety development requirements, including the Title 24 standards of the current California Building Code. Therefore, implementation of the project would result in a less than significant impact associated with liquefaction.

iv) **No Impact.** The Project Site does not lie within a currently delineated State of California Landslide Zone (CGS 2019). Moreover, the Project Site is relatively flat is not located near slopes or hills which may experience a landslide. Therefore, no impact would occur.

- b) **Less Than Significant Impact.** Construction of the project would require the preparation of an SWPPP; the SWPPP identifies best management practices (BMPs) to reduce soil erosion and runoff from the construction site during construction. The project will also comply with the recommendations provided in Appendix C during grading, foundation, and slope construction, Compliance with the BMPs identified in the SWPPP and implementation of the recommendations would reduce any impacts associated with erosion. This impact is less than significant.
- c) **No Impact.** As noted above, the Project Site is relatively flat and would not increase on- or off-site landslide potential. Moreover, the Project Site does not lie within a currently delineated State of California Earthquake Fault Zone, Liquefaction Zone, or Landslide Zone (CGS 2019). No impact would occur.
- d) **Less Than Significant Impact.** As expansive soils absorb water they swell, and as they lose water they shrink. Expansive soils may become unstable during ground shaking and are one of the most prevalent causes of earthquake damage to buildings. The Project Site is located in an area considered to have low and very low expansion potential as defined by ASTM D 4829 (Appendix C) and thus impacts would be less than significant.

- e) **No Impact.** The Project would not involve activities that would require the installation of septic tanks or alternative wastewater disposals systems. The Project will connect to existing sewer systems that discharge to Los Angeles County Sanitation District and the Palmdale Water Reclamation Plant. No impact would occur.

- f) **Less Than Significant Impact with Mitigation Incorporated.** As discussed above in Response V(c), the paleontological records search did not identify any fossil localities in or near the Project (Appendix B). However, the undetermined potential does not preclude the possibility of undiscovered resources to be present within the Project.

Mitigation Measures

Similar to Response V(b), Mitigation Measure **CUL-1** will also be applied for paleontological resources to reduce impacts to a less than significant level.

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

This section relies on information from Appendix D (Greenhouse Gas Data) to this Initial Study.

Project Impacts

- a) **Less Than Significant Impact.** Gases that trap heat in the atmosphere are called greenhouse gases (GHGs), since they have effects that are analogous to the way in which a greenhouse retains heat. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of greenhouse gases in the atmosphere regulates the earth’s temperature. The State of California has undertaken initiatives designed to address the effects of greenhouse gas emissions, and to establish targets and emission reduction strategies for greenhouse gas emissions in California. Activities associated with the Project, including construction and operational activities, would have the potential to generate greenhouse gas emissions.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the state. Per Senate Bill 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project’s effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Assembly Bill 32 and Senate Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006, widely known as AB 32, requires CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a statewide GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The heart of the bill is the requirement that statewide GHG emissions be reduced to 1990 levels by 2020.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions. The Scoping Plan was developed by CARB with input from the Climate Action Team (CAT) and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the State economy. The GHG reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

CARB has adopted the First Update to the Climate Change Scoping Plan. This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the State as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020.

In the original Scoping Plan, CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO_{2e}. As part of the update, CARB revised the 2020 Statewide limit to 431 million metric tons of CO_{2e}, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual (BAU) forecast in the update is 509 million metric tons of CO_{2e}. The State would need to reduce those emissions by 15.3 percent to meet the 431 million metric tons of CO_{2e} 2020 limit.

CARB also aims to reduce GHG emissions significantly by 2030. As California moves closer to reaching the 2020 GHG emission reduction goal state legislation has focused on furthering GHG emission reduction targets. Executive Order B-30-15 was issued April 2015 and establishes a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030. In 2016, the Legislature passed SB 32 with the companion bill AB 197 which further mandates the 2030 target and provides additional direction to CARB on strategies to reduce GHG emissions. In response to Executive Order B-30-15 and SB 32 CARB has released California's 2017 Climate Change Scoping Plan. The plan shows California is on

track to exceed its 2020 climate target and establishes a path that will lead California to its 2030 climate goal. Per SB 32, the 2030 limit is 260 MMTCO_{2e} a year. However, known commitments are expected to result in emissions that are 60 MMTCO_{2e} above the target in 2030, and have a cumulative emissions reduction gap of about 236 MMTCO_{2e}. This means the known commitments do not decline fast enough to achieve the 2030 target. The remaining 236 MMTCO_{2e} of estimated GHG emissions reductions would not be achieved unless further action is taken to reduce GHGs. However, while there is a potential GHG emissions reduction gap of approximately 236 MMTCO_{2e}, the following paragraphs note that the California legislature passed AB 398 to extend the cap-and-trade program from January 1, 2021 through December 31, 2030 in order to achieve the necessary GHG reductions associated with SB 32.

Cap-and-Trade Program

As mentioned above, the Scoping Plan identifies a cap-and-trade program as one of the strategies the State will employ to reduce GHG emissions that cause climate change. The cap-and-trade program is implemented by CARB and “caps” GHG emissions from the industrial, utility, and transportation fuels sections, which account for roughly 85 percent of the State’s GHG emissions. The program works by establishing a hard cap on about 85 percent of total statewide GHG emissions. The cap starts at expected business-as-usual emissions levels in 2012 and declines two to three percent per year through 2020. Fewer and fewer GHG emissions allowances are available each year, requiring covered sources to reduce their emissions or pay increasingly higher prices for those allowances. The cap level is set in 2020 to ensure California complies with AB 32’s emission reduction target of returning to 1990 GHG emission levels.

The scope of GHG emission sources subject to cap-and-trade in the first compliance period (2013-2014) includes all electricity generated and imported into California (the first deliverer of electricity into the State in the “capped” entity and that one that will have to purchase allowances as appropriate), and large industrial facilities emitting more than 25,000 MTCO_{2E} per year (e.g., oil refineries and cement manufacturers). The scope of GHG emission sources subjected to cap-and-trade during the second compliance period (2015-2017) expands to include distributors of transportation fuels (including gasoline and diesel), natural gas, and other fuels. The regulated entity will be the fuel provider that distributes the fuel upstream (not the gas station). In total, the cap-and-trade program is expected to include roughly 350 large businesses, representing about 600 facilities. Individuals and small businesses will not be regulated.

Under the program, companies do not have individual or facility-specific reduction requirements. Rather, all companies covered by the regulation are required to turn in allowances in an amount equal to their total GHG emissions during each phase of the program. The program gives companies the flexibility to either trade allowances with others or take steps to cost-effectively reduce emissions at their

own facilities. Companies that emit more will have to turn in more allowances. Companies that can cut their emissions will have to turn in fewer allowances. Furthermore, as the cap declines, total GHG emissions are reduced. On October 20, 2011, CARB's Board adopted the final cap-and-trade regulation. The cap-and-trade program began on January 1, 2012, with an enforceable compliance obligation beginning with the 2013 GHG emissions.

On July 17, 2017 California legislature passed AB 398 to extend the cap-and-trade program from January 1, 2021 through December 31, 2030. AB 398 established the Compliance Offsets Protocol Task Force to provide guidance in approving new offset protocols that increase direct environmental benefits in the state. Moreover, AB 398 continues the gradual reduction in the number of allowances given to industries and reduces carbon offset credits to 4 percent from 2021 through 2025 and 6 percent from 2026 through 2030.

Executive Order B-30-15

On April 29, 2015, Governor Edmund G. Brown Jr. issued an executive order to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. This new emission reduction target of 40 percent below 1990 levels by 2030 is a step toward the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050. The executive order also specifically addresses the need for climate adaptation and directs state government to:

- Incorporate climate change impacts into the state's Five-Year Infrastructure Plan;
- Update the Safeguarding California Plan - the state climate adaptation strategy - to identify how climate change will affect California infrastructure and industry and what actions the state can take to reduce the risks posed by climate change;
- Factor climate change into state agencies' planning and investment decisions; and
- Implement measures under existing agency and departmental authority to reduce GHG emissions.

California Senate Bills 1078, 107, 2, and 100; Renewables Portfolio Standard

Established in 2002 under California Senate Bill 1078 and accelerated in 2006 under California Senate Bill 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010.

On April 2, 2011, Governor Jerry Brown signed California Senate Bill 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated

sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

SB 100 was signed September 10, 2018 and requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, in accordance with the RPS, to 44 percent by 2024 and 52 percent by 2027.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Sustainable Communities and Climate Protection Act (SB 375)

California's Sustainable Communities and Climate Protection Act, also referred to as Senate Bill (SB) 375, became effective January 1, 2009. The goal of SB 375 is to help achieve AB 32's GHG emissions reduction goals by aligning the planning processes for regional transportation, housing, and land use. SB 375 requires CARB to develop regional reduction targets for GHGs and prompts the creation of regional plans to reduce emissions from vehicle use throughout the State. California's 18 Metropolitan Planning Organizations (MPOs) have been tasked with creating Sustainable Community Strategies (SCS) in an effort to reduce the region's vehicle miles traveled (VMT) in order to help meet AB 32 targets through integrated transportation, land use, housing and environmental planning. Pursuant to SB 375, CARB set per-capita GHG emissions reduction targets from passenger vehicles for each of the State's 18 MPOs. On September 23, 2010, CARB issued a regional eight percent per capita reduction target for the planning year 2020, and a conditional target of 13 percent for 2035.

California Green Building Standards (CALGreen) Code

Although not originally intended to reduce greenhouse gases, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The 2016 Title 24 standards (effective as of January 1, 2017) were revised and adopted in part to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2017 are subject to the mandatory planning and design, energy efficiency, water efficiency

and conservation, material conservation and resources efficiency, and environmental quality measures of the 2016 California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11).

GHG Significance Threshold

To address potential impacts from GHG emissions, the AVAQMD currently recommends that impacts from projects with annual emissions that exceed 100,000 tons of CO₂e per year be considered significant.

Construction GHG Emissions

Construction emissions represent an episodic, temporary source of GHG emissions. Emissions are generally associated with the operation of construction equipment and the disposal of construction waste. Emissions of GHGs were calculated using CalEEMod 2020.4.0 for construction of the Project and the results of this analysis are presented in Appendix D. As shown in Appendix D, total construction GHG emissions would be 343.77 metric tons per year which is well below the AVAQMD threshold for GHGs of 100,000 tons of CO₂e per year.

Operational GHG Emissions

The Project Site is currently developed with existing self-storage uses. As such, GHG emissions are currently generated by the use of on-road motor vehicles, energy, water, and generation by the use of solid waste and wastewater. The GHG emissions generated by the existing uses at the Project Site have been estimated utilizing CalEEMod 2020.4.0 recommended by the AVAQMD and are shown in Table 6, Existing GHG Emissions. As shown, GHG emissions generated by existing conditions at the Project Site are approximately 45.95 tons of CO₂e per year.

**Table 6
Existing GHG Emissions**

Emissions Source	Estimated CO₂e Emissions (Metric Tons per Year)
Energy Demand	7.61
Mobile (Motor Vehicles)	24.52
Solid Waste Generation	4.93
Water Demand	8.89
Existing Project Site Total	45.95
<i>Calculation sheets are provided in Appendix D.</i>	

The Project involves the demolition of the existing self-storage uses and the construction of a 75,929 square foot self-storage use and a 1,733 square feet of office space. The operations of the Project would generate GHG emissions from

the usage of on-road motor vehicles, electricity, natural gas, water, and generation of solid waste and wastewater. Emissions of operational GHGs are shown in Table 7, Project Operational GHG Emissions.

Table 7
Project Operational GHG Emissions

Emissions Source	Estimated CO ₂ e Emissions (Metric Tons per Year)
Energy Demand	60.16
Mobile (Motor Vehicles)	182.42
Solid Waste Generation	36.70
Water Demand	66.16
Project Total	345.45
Less Existing Project Site	45.95
Project net Increase	299.50
<i>Calculation sheets are provided in Appendix D.</i>	

As shown, the GHG emissions generated by the Project would be approximately 299.50 tons of CO₂e per year which is well below the AVAQMD threshold for GHGs of 100,000 tons of CO₂e per year. Therefore, implementation of the project would result in a less than significant impact associated with greenhouse gas emissions.

- b) **Less Than Significant Impact.** Neither the County nor AVAQMD have any specific plans, policies, or regulations adopted for reducing the emissions of GHGs. The Project's construction-related emissions are short-term and anticipated to be insignificant. While the project would result in an increase of GHG emissions, the results of the Air Quality Study indicate that the emissions would be well below the applicable AVAQMD threshold. Impacts would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, emission or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

a) **Less Than Significant Impact.** The project will utilize potentially hazardous materials during the construction phase such as the storage, use, and disposal of fuels, oils, lubricants, cements, petroleum-based products, and other construction-related materials. The handling of these chemicals has the potential to accidentally release hazardous materials to the environment. The handling and disposal of potentially hazardous materials will be done in compliance with the products' Safety Data Sheets and applicable federal, State, and local regulations and would be managed by a licensed provider. The use of these materials will be limited during the construction phase. Storage, handling, and disposal of these materials would be required to comply with regulations set forth by State and federal agencies regarding hazardous materials, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title

22. Adherence to these regulations would reduce impacts related to routine transport, use, or disposal of hazardous materials to a level less than significant.

During the project operation, use of hazardous materials by the project would be limited to minor amounts used for maintenance, building repair, cleaning, and landscaping. In the unlikely event that the project would generate hazardous materials, it is not anticipated that they would be acutely hazardous and would be transported, used, and disposed of consistent with applicable regulations. This impact is less than significant.

- b) **Less Than Significant Impact.** As described above, adherence to regulations set forth by State and federal agencies regarding storage, handling, and disposal of hazardous materials would reduce the potential for impacts associated with accident conditions during construction to a less than significant level. The project would not routinely use substantial amounts of hazardous materials that would result in a significant risk of release into the environment. Furthermore, new structures associated with the project would be constructed consistent with all applicable safety regulations and would not introduce accident conditions that could result in the release of hazardous materials into the environment. Impacts would be less than significant.
- c) **No Impact.** The nearest school to the Project Site is Tumbleweed Elementary School, which is located approximately 0.55 miles to the north of the Project Site; the school is located at 1100 East Avenue R-4. Given that the school is more than 0.25 miles away from the Project Site, implementation of the project would not result in hazardous emissions within 0.25 mile of a school. No impact would occur.
- d) **No Impact.** A review of federal and state standard and supplemental databases indicated that the Project Site is not located within any identified hazardous material site pursuant to Government Code Section 65962.5. No hazardous materials sites are located within one-quarter mile of the Project Site (SWRCB 2019, DTSC 2019). The project would not create a significant hazard to the public or environment. No impacts would occur.
- e) **No Impact.** The nearest airport to the Project Site is Palmdale Regional Airport and Air Force Plant 42, located approximately 3.2 miles north from the Project Site. The airports are separate facilities but utilize the same runway space. The Project Site is not located within a Clear Zone or Accident Potential Zone (City of Palmdale 1993). No impact would occur.
- f) **Less Than Significant Impact.** State Route 14, 10th Street West, and West Avenue O-8 are identified as evacuation routes according to the City General Plan Exhibit S-1 (City of Palmdale 1993). However, implementation of the Project would not result in direct impacts to these roadways. The construction of the Project does not include any roadway maintenance or widening along identified evacuation routes that would interrupt their use. Additionally, the Los Angeles County Fire

Department will review proposed emergency access for the Project Site prior to operation. Therefore, implementation of the project would not result in an impact associated with an emergency evacuation plan. Impacts would be less than significant.

- g) **No Impact.** The Project Site is not located in an area identified as a Very High Fire Hazard Severity Zone (ESRI 2019). No impact would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
X HYDROLOGY AND WATER QUALITY. Would the Project:					
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces, in a manner that would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts

a) **Less Than Significant Impact.** The construction activities will include site grading and other groundwork activities that could expose soils to construction materials and constituents and potential erosion due to wind and stormwater runoff which would impact water quality. The construction of the structures and parking spaces would result in an increase in impervious surfaces that could increase runoff and potentially degrade water quality.

Implementation the project’s SWPPP would reduce potential impacts in degradation of water quality. The project would be designed and constructed in accordance with the stormwater pollution control requirements of the Lahontan Region of the California Regional Water Quality Control Board (RWQCB) and comply with applicable National Pollution Discharge Elimination System (NPDES) requirements. Impacts would be less than significant.

- b) **Less Than Significant Impact.** The project would comply with local ordinances, including General Plan Policies, in protecting the quality and quantity of water resources as highlighted in Goal ER4 (City of Palmdale 1993). The project would comply with Title 24 Building Code requirements for the use of efficient appliances and fixtures. The proposed landscaping would comply with the Water Efficient Landscape Ordinance PMC 14.05 by including low water use plans to reduce water consumption. The Project does not include the installation of any wells or processes that would require extraction of significant amounts of water supplies. Therefore, impacts would be less than significant.
- c) **(i) Less Than Significant Impact.** The existing Project Site is mostly developed with self-storage uses, and a small portion of the site consists of dirt and scattered weeds. Thus, the Project Site is mostly developed with impervious surfaces and would be fully developed with impervious surfaces after implementation of the project. While the project could result in erosion during site grading, the implementation of SWPPP, BMPs, NPDES requirements, and other erosion control measures would minimize substantial soil erosion or siltation on- or off-site. The project would comply with PMC Chapter 3.38 that requires projects to mitigate impacts on the City's drainage facilities. Impacts would be less than significant.
- (ii) Less Than Significant Impact.** As indicated above, the project would not introduce an increase in impervious surfaces to the area that could increase the surface runoff. Moreover, the proposed project would connect with the existing storm drain systems that currently serve the existing uses onsite. Impacts would be less than significant.
- (iii) Less Than Significant Impact.** As indicated above, the project would not introduce an increase in impervious surfaces to the area that could increase the surface runoff. Implementation of BMPs per the Project's SWPPP during construction will also reduce the likelihood for runoff to be polluted. Impacts would be less than significant.
- (iv) No Impact.** The Project is not located within a 100-year flood hazard area (City of Palmdale 1993). No impact could occur.
- d) **Less Than Significant Impact.** The Project is located in the City of Palmdale, which is located inland in the high desert of Southern California. The Project area is located approximately 44 miles northeast of the nearest coastline. The Project is located approximately 0.4 miles northeast of Lake Palmdale and is within an inundation area for Lake Palmdale (City of Palmdale 1993). However, the Palmdale Lake is continually monitored by the State Department of Water Resources, Division of Dams which regulates dams to prevent failure, safeguard life, and protect property. The Division of Dams is responsible for dam enlargements, repairs, alterations, and removals to ensure that the dam appurtenant structures are designed to meet minimum requirements. As such, flooding from dam failure would be unlikely. Moreover, the most recent inspection

of the Palmdale Lake found that the current condition of the dam is satisfactory (CDWR 2018). The Project area is relatively flat and vacant. Therefore, the Project would not be at risk of being inundated by mudflow. Impacts would be less than significant.

- e) **Less Than Significant Impact.** The Project Site is within the Los Angeles County Waterworks District No. 40, Antelope Valley. A 2015 Urban Water Management Plan was prepared for District 40 and found that the District has adequate water supplies to meet projected demands in all types of water to the year 2035 (County of Los Angeles 2017). The Project does not include activities that could obstruct the future water projects. Impacts would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

- a) **No Impact.** Implementation of the Project would not physically divide an established community because the Project is proposing a new storage facility to replace an existing storage facility. And, because the existing development on the Project Site does not physically divide an established community, the Project would not have the potential to divide an established community. Furthermore, the Project would not prevent any residents near the Project Site from utilizing the public space in the Project vicinity. No impact would occur.

- b) **No Impact.** The General Plan land use designation of the Project Site is CC and the property is zoned C-3. The project would not include a zone change or general plan amendment. Moreover, the project involves the construction of self-storage uses which already occur onsite. The project would be approved through submittal of a site plan review application. Submittal of these documents and compliance with the applicable development standards would result in no impact.

Mitigation Measures

None Required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII MINERAL RESOURCES. Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

- a) **No Impact.** According to the California Geological Survey, the Project Site is mapped within Mineral Resource Zone 3 (MRZ-3), which is identified as potentially having resources present (CGS 1983). The MRZ-3 classification identifies areas where mineral deposits have the potential to exist; however, the significance of the deposits cannot be evaluated from available data. Although the Project Site has the potential to contain mineral resources, implementation of the project would not result in the loss of availability of known mineral resources as no mineral extraction activities are proposed on-site. Additionally, according to the General Plan Land Use Map, the project is not designated as a Mineral Resource Extraction (MRE) area. No impact would occur.

- b) **No Impact.** As noted above, the Project Site is mapped within MRZ-3 (CGS 1983); however, no mineral resource extraction or other mining operations currently occur within or adjacent to the Project Site. The project area does not contain any industrial activities or facilities that would require extraction of mineral resources. The project area's land use is not designated for MRE according to the General Plan. No impact would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII NOISE. Would the Project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section relies on information from Appendix E (Noise Data) to this Initial Study.

Project Impacts and Mitigation Measures

a) **Less Than Significant Impact with Mitigation Incorporated.**

Construction Noise

The Noise Element of the General Plan contains the City's primary policies and requirements in regards to noise. The City specifies outdoor and indoor noise limits for various land uses. The City's noise compatibility criteria by land use are presented in Table 8, City of Palmdale Noise Guidelines.

**Table 8
City of Palmdale Noise Guidelines**

Land Use	Maximum Acceptable Exterior Noise Levels	Maximum Acceptable Interior Noise Levels
Residential	65 dBA CNEL	45 dBA CNEL
Commercial	A noise level which does not jeopardize health, safety, and welfare of visitors.	55 L _{eq}
Institutional	A noise level which does not jeopardize health, safety, and welfare of visitors.	45 L _{eq}
Industrial	A noise level which does not jeopardize health, safety, and welfare of visitors.	65 L _{eq}

PMC Section 8.28.030 allows construction Monday through Saturday (excluding holidays) and regulates the impact of offensive noise from sources such as loud parties.

The U.S. EPA has compiled data regarding the noise generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Site are presented in Table 9, Noise Range of Typical Construction Equipment, and Table 10, Estimated Project Construction Noise Levels, respectively, at a distance of 50 feet from the noise source (i.e., reference distance).

**Table 9
Noise Range of Typical Construction Equipment**

Construction Equipment	Noise Level in dBA L _{eq} at 50 Feet ^a
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88
^a Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table. (1971 U.S. EPA)	

The noise levels shown in Table 10 represent composite noise levels associated with the construction activities that will be carried out by the project, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction in a development such as the project. As shown in Table 10, construction noise during the heavier initial periods of construction is presented as 86 dBA Leq when measured at a reference distance of 50 feet from the center of construction activity. These noise levels would diminish rapidly with distance from the construction site at a rate of approximately 6 dBA per doubling of distance. For example, a noise level of 84 dBA Leq measured at 50 feet from the noise source to the receptor would reduce to 78 dBA Leq at 100 feet from the source to the receptor, and reduce by another 6 dBA Leq to 72 dBA Leq at 200 feet from the source to the receptor.

**Table 10
Estimated Project Construction Noise Levels**

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 60 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	80	76	70
Excavation, Grading	86	84	80	74
Foundations	77	75	71	65
Structural	83	81	77	71
Finishing	86	84	80	74
<i>(1971 U.S. EPA)</i>				

To identify the existing ambient noise levels in the general vicinity of the Project Site, noise measurements were taken with a 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1. The measured noise levels are shown in Table 11, Existing Ambient Daytime Noise Levels. See Appendix E for the location of the noise measurements and nearest sensitive receptors. The project would operate as a self-storage facility. As such, no noise sensitive receptors would be located onsite. The nearest noise sensitive receptors to the Project Site are an adjacent residential use (from property line to property line) to the north, residences to the south (135 feet), and residences to the east (195 feet).

**Table 11
Existing Ambient Daytime Noise Levels**

No.	Location	Primary Noise Sources	Noise Levels^a		
			L_{eq}	L_{max}	L_{min}
1	Northwest corner of the Project Site, along 10 th Street East.	Traffic activity along 10th Street East.	61.8	76.6	45.8
2	East of the Project Site, along Avenue S.	Traffic activity along Avenue S.	70.6	92.2	46.1
<i>^a Noise measurements were taken on June 18, 2019 at each location for a duration of 15 minutes. See Appendix E for noise data.</i>					

Due to the use of construction equipment during the construction phase, the project would expose surrounding off-site receptors to increased ambient exterior noise levels comparable to the previously listed noise level above in Table 9. Specifically, based on the data provided in Table 10, construction noise levels at the residences within 50 feet could reach 86 dBA compared to the existing measured noise levels of 61.8 dBA and 70.6 dBA for the area. It should be noted, however, that any increase in noise levels at off-site receptors during construction of the project would be temporary in nature, and would not generate continuously high noise levels, although occasional single-event disturbances from construction are possible. In addition, the construction noise during the heavier initial periods of construction (i.e., demolition and foundation work) would typically be reduced in

the later construction phases (i.e., interior building construction at the proposed building) as the physical structure of the proposed structure would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors.

While the project would generate noise impacts during construction, construction would occur in conformance with PMC Section 8.28.030, which allows construction Monday through Saturday (excluding holidays) from 6:30 AM to 8:00 PM, which would limit the potential adverse effects of the Project. Additionally, the Project would implement mitigation measure **NOI-1** (see below) for construction-related activities which would reduce impacts to less than significant.

Operational Noise

As previously discussed, the Noise Element considers the maximum acceptable exterior noise levels for a commercial use as a noise level which does not jeopardize health, safety, and welfare of visitors.

As shown in Section XVII below, the project would not result in a substantial number of new vehicle trips which may increase roadway noise conditions to a level of significance. The project currently functions as a self-storage facility and will continue to do so after project implementation. Noise sources currently generated onsite includes but is not limited to: vehicle loading/unloading, parking noise, waste collection, and HVAC equipment. These noise sources would be consistent with the proposed project and are typical noise sources associated with commercial development. As such, the project would not jeopardize health, safety, and welfare of visitors. Moreover, as a self-storage facility, the Project would not generate high volumes of visitors which may be onsite at one time. Additionally, the project would be vacant during non-operational hours.

Additionally, the project would be subject to PMC Section 8.18.010, which states that it shall be unlawful for any person to willfully make or continue, or cause or permit to be made or continued, any loud, unnecessary, or unusual noise which unreasonably disturbs the peace and quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. This impact would be less than significant.

b) **Less Than Significant Impact with Mitigation Incorporated.**

Construction

Vibration impacts from construction activities associated with the project would be a function of the vibration generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The nearest noise sensitive receptors to the Project Site are: an adjacent residential use to the north (zero feet measured from property line

to property line, and 175 feet to nearest structure), residences to the south (135 feet), and residences to the east (195 feet). Exposure to vibration can range from no perceptible effects at low levels, to rumbling sounds and detectable vibration at moderate levels, to slight damage at very high levels. Groundborne vibration levels decrease with distance. Moreover, according to the FTA, ground vibration from construction activities do not often reach the levels that can damage structures (FTA 2006). Project construction would also occur in conformance with PMC Section 8.28.030, which allows construction Monday through Saturday (excluding holidays) from 6:30 AM to 8:00 PM, which would limit the potential adverse effects of the project. Moreover, as discussed above and detailed below, the project would implement mitigation measure **NOI-1** which, in addition to reducing construction noise levels, would also serve to reduce construction vibration levels. As such, impacts would be less than significant.

Operation

Once in operation, the project would consist of daily commercial activities. These activities are not anticipated to generate groundborne vibration that would be felt by the nearby residences. These activities could include maintenance and vehicle loading/unloading. Impacts would be less than significant.

- c) **No Impact.** The Project Site is not located in the vicinity of a private airstrip. The nearest airport to the Project Site is Palmdale Regional Airport and Air Force Plant 42, located approximately 3.2 miles north from the project Site. The airports are separate facilities but utilize the same runway space. In addition, the project Site is not located within an airport land use plan. As such, the project would not expose people to excessive aircraft noise levels. Therefore, no impact would occur.

Mitigation Measures

NOI-1: For all construction-related activities, noise attenuation techniques shall be employed, as appropriate, to reduce noise levels to the extent feasible during the construction phase. The following noise attenuation techniques shall be incorporated to reduce potential impacts of construction noise:

- Ensure that construction equipment is equipped with properly operating and maintained mufflers consistent with manufacturer's standards;
- Place noise-generating construction equipment and locate construction staging areas away from sensitive receptors, where feasible;
- Schedule high noise-producing activities between the hours of 7:00 a.m. and 5:00 p.m. to minimize disruption to sensitive receptors;
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise

- blankets around stationary construction noise sources;
- Use electric air compressors and similar power tools rather than diesel equipment, where feasible;
 - All stationary construction equipment (air compressor, generators, impact wrenches, etc.) shall be operated as far away from residential uses as possible and shall be shielded with temporary sound barriers, sound aprons or sound skins;
 - Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes;
 - During all construction activities, the job superintendent shall limit all construction-related activities to between the hours 6:30 a.m. and 8:00 p.m. Monday through Saturday (excluding holidays); and,
 - Clearly post construction hours, allowable workdays, and the phone number of the job superintendent at all construction entrances to allow the surrounding property owners/occupants to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective actions and report the actions to the complainant.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV POPULATION AND HOUSING. Would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

- a) **No Impact.** The project would not generate new residents. No impact would occur.
- b) **No Impact.** The Project Site is currently used as self-storage and implementation of the Project would not result in the displacement of people or housing. No impact would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section relies on information from Appendix F (Correspondence Letters) to this Initial Study.

Project Impacts

a) **Less Than Significant Impact.** The nearest fire station to the Project Site is approximately 1.3 miles north; the Los Angeles County Fire Department Station #37 is located at 38318 9th St East in the City of Palmdale. The City of Palmdale works with the Los Angeles County Fire Department to identify the fire protection needs and secure new sites for fire facilities.

Compliance with Chapter 3.42 of the PMC would reduce impacts associated with fire protection. Chapter 3.42 requires the Applicant to pay a fire facility impact fee to fund increased fire protection associated with proposed growth. Additionally, the project would be required to provide fire hydrants which comply with the Los Angeles Fire Department fire flow standards. Therefore, the project would result in less than significant impacts associated with fire protection.

b) **Less Than Significant Impact.** The City of Palmdale is contracted with Los Angeles County for various emergency services, including the Sheriff’s Department. Police protection is provided by the Los Angeles County Sheriff’s Department North Patrol Division. The nearest station to the Project Site is approximately 2.1 miles north of the Project Site. The Palmdale Sheriff’s Station is located at 750 East Avenue Q in the City of Palmdale. The design of the project would be consistent with applicable safety requirements. The project would not physically impact the Sheriff station nearby and does not include construction or operational activities that would require the construction of new or alterations of existing police protection facilities. Impacts would be less than significant.

c) **No Impact.** The project would not generate new students that would utilize schools in the Project area. No impact would occur.

d) **No Impact.** The project would not generate new residents that would utilize

recreational facilities in the Project area. Therefore, the Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Moreover, the Project will be required to pay development impact fees for parks and other public facilities to ensure that parks and public facilities will be adequate to service new growth to the area. No impact would occur.

- e) **No Impact.** The project would not generate new residents that would utilize any other facilities in the project area such as medical or library facilities. Therefore, no impact would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI RECREATION				
a) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

- a) **No Impact.** The project would not generate new residents that would utilize recreational facilities in the Project area. Therefore, the Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Moreover, the Project will be required to pay development impact fees for parks and other public facilities to ensure that parks and public facilities will be adequate to service new growth to the area. No impact would occur.

- b) **No Impact.** The Project does not include the development of recreational facilities for public use or require expansion of existing recreational facilities since the Project would not generate new residents. As stated above, the Project will be required to pay development impact fees for parks and other public facilities to ensure that parks and public facilities will be adequate to service new growth to the area. No impact would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII TRANSPORTATION. Would the Project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)(1)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

This section relies on information from Appendix G (Traffic/Transportation Memorandum) to this Initial Study.

Project Impacts

- a) **Less Than Significant Impact.** The County of Los Angeles Department of Public Works states in their Traffic Impact Analysis Report Guidelines that a traffic report is generally needed if a project generates over 500 trips per day (County of Los Angeles 1997). Trip generation factors for the Project were obtained from the Institute of Transportation Engineers (ITE) Trip Generation manual, 10th Edition. For this analysis, it is assumed the proposed self-storage uses best fit under the ITE Land Use Code 151: Mini-Warehouse. Per the ITE Trip Generation Manual, ITE Land Use Code 151 will generate an ADT of 1.51 trips per every 1,000 square feet. As shown in Table 12, Project Trip Generation, the project would result in 132 vehicle trips per day.

Objective C1.4 of the General Plan adopts policies and standards for street design and construction which would promote safety, convenience, and efficiency. Policy C1.4.1 states the following goal in order to provide safe and efficient movement while minimizing impacts on the community.

Policy C1.4: Strive to maintain a Level of Service (LOS) C or better to the extent practical; in some circumstances, a LOS D may be acceptable for a short duration during peak periods.

Based on the results of the Project trip generation analysis, the project generates 10 and 15 AM/PM peak hour trips, both less than the 100 peak-hour-trip threshold. As such, the project would not generate enough peak hour trips which would worsen the LOS of nearby streets to a level of significance. In addition, the following project has been identified to be located near the Project area and that

could occur within the same timeframe according to the City of Palmdale 2018 Ten-Year Capital Improvement Plan (City of Palmdale 2018):

- o STR-009: 10th Street East Improvements (Ave R to Ave S).

The project will coordinate with the City to ensure that potential impacts would not be cumulatively considerable such as compliance and coordination to ensure traffic control plans for multiple projects are consistent with each other. Impacts would be less than significant.

**Table 12
Project Trip Generation^a**

Land Use	Size	Daily Trip Ends ^b Volumes	AM Peak Hour Volumes			PM Peak Hour Volumes		
			In	Out	Total	In	Out	Total
Proposed Project								
Mini-Warehouse ^c	75,929 GSF	115	5	3	8	6	7	13
Office ^d	1,733 GSF	17	2	0	2	0	2	2
Proposed Project Trips	--	132	7	3	10	6	9	15
^a See Table 1 in Appendix G to this Initial Study. Trip rates based on ITE "Trip Generation Manual," 10 th Edition, 2017. ^b Trips are one-way traffic movements, entering or leaving. ^c ITE Land Use Code 151 (Mini-Warehouse) trip generation average rates. - Daily Trip Rate: 1.51 trips/1,000 SF of floor area; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 0.10 trips/1,000 SF of floor area; 60% inbound/40% outbound - PM Peak Hour Trip Rate: 0.17 trips/1,000 SF of floor area; 47% inbound/53% outbound ^d ITE Land Use Code 710 (General Office Building) trip generation average rates. - Daily Trip Rate: 9.74 trips/1,000 SF of floor area; 50% inbound/50% outbound - AM Peak Hour Trip Rate: 1.16 trips/1,000 SF of floor area; 86% inbound/14% outbound - PM Peak Hour Trip Rate: 1.15 trips/1,000 SF of floor area; 16% inbound/84% outbound								

- b) **Less Than Significant Impact.** CEQA Guidelines Section 15064.3 provides consideration whether a project's vehicle miles traveled may result in a significant impact. The VMT analysis contained in Appendix G to this Initial Study has been conducted to identify and evaluate the potential impacts of the proposed project based on the VMT methodology set forth in the Los Angeles County Public Works Transportation Impact Analysis Guidelines, July 2020. According to the screening criteria in the County's Guidelines, the proposed self-storage project can be presumed to result in a less than significant VMT impact since it would reduce VMT by shortening trip lengths, similar to those of local-serving retail establishments. Moreover, projects that are located within one half mile of transit, or nearby existing transit stops would be considered less than significant. The project is located at the northeast corner of the East Avenue S and 10th Street East intersection which has designated public transport stops (Route 3) provided by Antelope Valley Transit Authority (AVTA 2019).

In December 2018, the California Natural Resources Agency certified and adopted amendments to the CEQA Guidelines implementing SB 743 with a target implementation date of July 1, 2020, which has now passed. The updated CEQA

Guidelines allow for Lead Agency discretion in establishing methodologies and thresholds provided there is substantial evidence to demonstrate that the established procedures promote the intended goals of the legislation. Where quantitative models or methods are unavailable, Section 15064.3 allows agencies to assess VMT qualitatively using factors such as availability of transit and proximity to other destinations. The Los Angeles County Public Works *Transportation Impact Analysis Guidelines, July 2020*, provides considerations regarding methodologies and thresholds with a focus on office, residential, and retail developments as these projects tend to have the greatest influence on VMT.

The project-related VMT impact has been assessed qualitatively based on guidance set forth in the Los Angeles County Public Works *Transportation Impact Analysis Guidelines, July 2020*. The County's *Guidelines* provides the following potential screening criteria for certain land development projects that may be presumed to result in a less than significant VMT impact:

- Local-serving retail less than 50,000 square feet, including schools, daycare, student housing, etc.;
- Small projects generating less than 110 trips per day;
- Residential and office projects located in areas with low-VMT;
- Projects near transit stations or a major transit stop that is located along a high-quality transit corridor; and,
- Residential projects with a high percentage of affordable housing.

As mentioned in the County's *Guidelines*, new retail development typically redistributes and reroutes existing shopping trips rather than create new trips. By adding retail opportunities into the urban fabric and thereby improving destination proximity, local-serving retail tends to shorten trips and reduce VMT. It is also noted that lead agencies may presume such local serving retail development creates a less than significant transportation impact. The proposed Project would improve the proximity of self-storage facilities serving the local community, thereby shortening travel distances and reducing VMT.

Figure 3 in the Traffic Memo (see Appendix G) shows a map of existing self-storage facilities in the Project vicinity. As shown in therein, the majority of existing self-storage facilities are located north the Project Site, near Sierra Highway and north of State Route 138. The proposed Project is located further south and will improve proximity of self-storage facilities for the community located near East Avenue S and to the east of the Project Site. Therefore, the proposed self-storage facility is expected to shorten trip lengths and is expected to exhibit VMT characteristics similar to that of a local-serving retail use.

Although the proposed self-storage Project is more than 50,000 square feet, as representative of self-storage facilities, most of the space would be utilized as passive space for storage, and as such, the Project is anticipated to generate significantly fewer trips than a typical 50,000 square feet of retail use. As

summarized in Table 1 in the Traffic Memo (see Appendix G), the proposed Project is forecast to generate approximately 1,756 fewer weekday daily vehicle trips, 37 fewer weekday AM peak hour trips and 176 fewer weekday PM peak hour trips than that expected to be generated by a 50,00 square-foot local serving retail development. Thus, the proposed Project can be presumed to result in a less than significant VMT impact based on State guidance because it would reduce VMT by shortening trip lengths, similar to local-serving retail developments. A less than significant impact would occur.

- c) **Less Than Significant Impact.** The project would not result in hazards due to a geometric design feature or incompatible uses. New structures associated with the project would be constructed consistent with relevant building and fire codes, including access requirements into and out of the Project Site. All proposed roadway improvements would be designed and constructed in conformance with applicable City design standards. As such, they would not introduce any hazardous design features. A less than significant impact would occur.
- d) **Less Than Significant Impact.** State Route 14, 10th Street West, and West Avenue O-8 are identified as evacuation routes according to the City General Plan Exhibit S-1 (City of Palmdale 1993). However, implementation of the project would not result in direct impacts to these roadways. The construction of the project does not include any roadway maintenance or widening along identified evacuation routes that would interrupt their use. Additionally, the Los Angeles County Fire Department will review proposed emergency access for the Project Site prior to operation. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
XVIII TRIBAL CULTURAL RESOURCES. Would the Project 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:					
a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b)	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) to Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

This section relies on information in Appendix B (Cultural and Paleontological Resources Assessment)⁴ to this Initial Study.

Consistent with Public Resources Code Sections 21080.3.1 and 21080.3.2, the City, as Lead Agency, conducted tribal consultation in a manner consistent with all requirements under CEQA. As a result of the consultation process, the City consulted directly with two California Native American tribes: the San Manuel Band of Mission Indians (SMBMI) and the Fernandeño Tataviam Band of Mission Indians (FTBMI). The City, SMBMI and FTBMI are in agreement with the implementation of Mitigation Measures TCR-1 and TCR-2 presented below.

Project Impacts and Mitigation Measures

- a-b) **Less Than Significant Impact With Mitigation Incorporated.** As discussed in Cultural Resources Response V(c) pg. 29, there are currently no identified Native American cultural resources and there is a low likelihood to encounter previously unknown and unrecorded human remains (Appendix B). However, in the unlikely event that human remains, or other buried materials are encountered, the following mitigation measures will apply in order to reduce impacts to a less than significant level.

⁴ Included herein by reference. Due to sensitive information, the complete assessment is on file with the City.

Mitigation Measures

TCR - 1: If a pre-contact cultural resource is discovered during project implementation, ground disturbing activities shall be suspended 60 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. A research design shall be developed by the lead agency that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from the San Manuel Band of Mission Indians Cultural Resources Department (SMBMI), the Fernandño Tataviam Band of Mission Indians (FTBMI), the applicant and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the archaeological significance of the resource, its potential as a Tribal Cultural Resource (TCR) and avoidance (or other appropriate treatment) of the discovered resource. Should any significant resource and/or TCR not be a candidate for avoidance or preservation in place, and the removal of the resource(s) is necessary to mitigate impacts, the research design shall include a comprehensive discussion of sampling strategies, resource processing, analysis, and reporting protocols/obligations. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribes, unless otherwise decided by SMBMI or FTBMI. All plans for analysis shall be reviewed and approved by the applicant, SMBMI, and FTBMI prior to implementation, and all removed material shall be temporarily curated on-site. It is the preference of SMBMI and FTBMI that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during project implementation not be feasible, then a reburial location for future reburial shall be decided upon by SMBMI, FTBMI, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, SMBMI, and FTBMI. All reburials are subject to a reburial agreement that shall be developed between the landowner, SMBMI, and FTBMI outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts (vis a vis project plans, conservation/preservation easements, etc.).

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with SMBMI and FTBMI to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections

and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

All draft records/reports containing the significance and treatment findings and data recovery results shall be prepared by the archaeologist and submitted to the Lead Agency, SMBMI, and FTBMI for their review and comment. After approval from all parties, the final reports and site/isolate records are to be submitted to the local CHRIS Information Center, the Lead Agency, SMBMI, and FTBMI.

TCR – 2: In the event that any human remains are inadvertently discovered within the project area, ground disturbing activities shall be suspended 100 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. The on-site lead/foreman shall then immediately who shall notify SMBMI, FTBMI, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete its inspection and make recommendations within forty-eight (48) hours of the site visit, as required by California Public Resources Code § 5097.98.

Reburial of human remains and/or funerary objects (those artifacts associated with any human remains or funerary rites) shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the landowner, shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects on or near the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The

applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties.

It is understood by all Parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts

- a) **Less Than Significant Impact.** The project will not require installation of new utility services such as electric, gas, water, telecommunications, and drainage since the existing Project Site is currently developed with self-storage uses that already utilize these utilities. Moreover, the project also proposes self-storage uses which would require similar utility services as the existing self-storage uses. Impacts would be less than significant.

- b) **Less Than Significant Impact.** The City is served by the Los Angeles County Sanitation District, Palmdale Water district, and a number of local mutual water companies. The project will be serviced by Los Angeles County Waterworks District No. 40. A 2015 Urban Water Management Plan was prepared for District 40 and found that the District has adequate water supplies to meet projected demands in all types of water year to the year 2035 (County of Los Angeles 2017). The project does not include activities that could obstruct the future water projects. Impacts would be less than significant.

- c) **Less Than Significant Impact.** As the project involves the construction of self-storage uses, it would not produce substantial amounts of wastewater which is more typical of residential and retail uses. As the Project is already currently developed with self-storage uses, it will connect to existing sewer systems that

discharge to Los Angeles County Sanitation District and the Palmdale Water Reclamation Plant. Additionally, a connection fee will be paid for connecting to the Districts' sewage system for increasing the strength and/or quantity of wastewater discharged from the connected facilities. Impacts would be less than significant.

- d) **Less Than Significant Impact.** The AB 32 Scoping Plan written in 2008 provided the process of identifying ways to achieve GHG reductions from the Waste Management sector such as controlling landfill methane emissions as one of the early action measures. The 2008 Scoping Plan also included mandatory commercial recycling, recycling, reuse and remanufacturing of recovered materials, composting, and other alternatives to using landfills.

The Antelope Valley region's waste and recycling collection services are provided by the Waste Management Inc. Antelope Valley Public Landfill receives the waste generated by the City. The remaining capacity of Antelope Valley Landfill is estimated at 12.4 million tons and the landfill has a remaining life of 22 years as of 2017 according to the Los Angeles Integrated Waste Management Plan (County of Los Angeles 2017). The project's construction and operational wastes would be diverted to recycling facilities or made available for reuse when appropriate to reduce waste. The Project will comply with AB 32 and the City's General Plan Policy ER5.5.2 to require citizens and businesses to recycle to the extent possible and comply with the Solid Waste Management Plan (SWMP) (City of Palmdale 1993). Impacts would be less than significant.

- e) **Less Than Significant Impact.** The project will comply with AB 32 and the City's General Plan goals and policies for reduction of waste and implementing recycling standards so that facilities and programs could accommodate solid waste disposal. Impacts would be less than significant.

Mitigation Measures

None Required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX WILDFIRE - If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

- a) **Less Than Significant Impact.** The Project Site is not located in an area identified as a Very High Fire Hazard Severity Zone (ESRI 2019). State Route 14, 10th Street West, and West Avenue O-8 are identified as evacuation routes according to the City General Plan Exhibit S-1 (City of Palmdale 1993). However, implementation of the Project would not result in direct impacts to these roadways. The construction of the project does not include any roadway maintenance or widening along identified evacuation routes that would interrupt their use. Additionally, the Los Angeles County Fire Department will review proposed emergency access for the Project Site prior to operation. Therefore, implementation of the Project would not result in an impact associated with an emergency evacuation plan within or near a state responsibility area or land classified as Very High Fire Hazard Severity Zone. Less than significant impact.
- b) **No Impact.** The Project Site is not located in an area identified as a Very High Fire Hazard Severity Zone (ESRI 2019). Additionally, the Project Site mostly developed, relatively flat, and devoid of significant amounts of vegetation that could increase fire risk. No impact would occur.
- c) **No Impact.** The Project Site is not located in an area identified as a Very High Fire Hazard Severity Zone (ESRI 2019). Additionally, the Project Site mostly developed, relatively flat, and devoid of significant amounts of vegetation that could

increase fire risk. The project does not require the installation of any infrastructure to reduce the risk associated with wildfires. No impact would occur.

- d) **No Impact.** The Project Site is not located in an area identified as a Very High Fire Hazard Severity Zone (ESRI 2019). Additionally, the Project Site is relatively flat and is not susceptible to post fire drainage and/or slope issues. The Project is mostly developed and devoid of significant amounts of vegetation. No impact would occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a) **Less Than Significant with Mitigation Incorporated.** The existing Project Site is mostly developed and does not contain any wetlands, desert washes, or riparian habitats. Moreover, the Project Site does not contain any trees onsite. As such, it is unlikely that the Project Site would attract or support candidate, sensitive, or special status species. Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area (SEA) for Los Angeles County (Department of Regional Planning 2018) or Regional Habitat Linkage (RHL) for Los Angeles County (Department of Regional Planning 2014). Nevertheless, migratory bird species could be affected by the demolition and removal of existing uses on-site. As such, implementation of mitigation measure **BIO-1** would ensure compliance with the MBTA.

Paleontological monitoring would occur per Mitigation Measure **CUL-1** to ensure appropriate levels of effort in the identification of all Native American cultural resources. If any buried cultural materials are encountered during earth-altering operations associated with the Project, all work in that area will be halted or diverted until a qualified archaeologist or paleontologist can evaluate the nature and significance of the finds. With the implementation of Mitigation Measure **CUL-1**, and compliance with the Palmdale Municipal Code the Project would result in a less than significant impact with mitigation incorporated.

As discussed in Cultural Resources Response V(c) pg. 29, there are currently no identified Native American cultural resources and there is a low likelihood to encounter previously unknown and unrecorded human remains (Appendix B). However, in the unlikely event that human remains, or other buried materials are encountered, mitigation measures **TCR-1** and **TCR-2** would ensure impacts would remain less than significant.

- b) **Less Than Significant Impact.** The following project has been identified to be located near the Project area and that could occur within the same timeframe according to the City of Palmdale 2018 Ten-Year Capital Improvement Plan (City of Palmdale 2018):

- o STR-009: 10th Street East Improvements (Ave R to Ave S).

The project will coordinate with the City to ensure that potential impacts would not be cumulatively considerable such as compliance and coordination to ensure traffic control plans for multiple projects are consistent with each other. Impacts would be less than significant.

- c) **Less Than Significant Impact with Mitigation Incorporated.** The project could have the potential to impact humans during construction of the self-storage facility with regard to potential exposure to emissions, hazardous materials, noise, and traffic. However, with the implementation of project BMPs, substantial adverse impacts would be minimized during construction and operation of the Project. The implementation of mitigation measure **NOI-1** would reduce impacts to a less than significant level.

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