

CITY OF PALMDALE

(CUP 24-0008, SPR 24-0038)
INITIAL STUDY

Prepared for

CITY OF PALMDALE
38250 SIERRA HIGHWAY
PALMDALE, CA 93550

Prepared by:



CHAMBERS GROUP, INC.
3151 Airway Ave Suite F208
Costa Mesa, CA 92626
(949) 261-5414

March 2025

DISTRIBUTION LIST

CEQA Distribution List	
Case No.	CUP 24-0008 and SPR 24-0038
Planner	Juan Lopez, Assistant Planner
Location	Northeast corner of Pearblossom Highway and Fallingstar Place (APNs: 3051-019-030 and -112)
Description	A request to construct a mini-storage facility consisting of an office and eight storage buildings totaling 90,663 square feet.
Distribution Date	

Project Applicant

Applicant
 Applicant's Representative: Joyce Bruce

City of Palmdale

Counter Copies:
 City Hall
 Library
 Planning
 Parcs & Recreations
 City Website
 Director of Public Works
 Director of Parcs & Recreations
 City Engineer
 Case Planner

State

California Department of Fish and Wildlife
 California Highway Patrol
 Caltrans
 Department of Conservation Office of Mine Reclamation
 Department of Conservation Office of State Geologist
 Lahontan Regional Water Quality Control Board
 Native American Heritage Commission
 Office of Historic Preservation
 State Clearinghouse Planning and Research
 State Mining and Geology Board

Los Angeles County Agencies

LA County Department of Public Works / Land Development
 LA County Fire Department
 LA County Regional Planning
 LA County Sanitation District No. 14
 LA County Sheriff's Department

Antelope Valley Agencies

AV Air Quality Management District
 AV Transit Authority

School District

AV Union High School District
Palmdale School District

Utilities

AT&T
Southern California Edison
Southern California Gas
Spectrum
Waste Management – Antelope Valley Landfill

Water

Little Rock Creek Irrigation District
Palmdale Water District

Other

CREED LA (Coalition for Responsible Equitable Economic Development)
Fernandeno Tataviam Band of Mission Indians
Lozeau Drury, LLP
Morongo Band of Mission Indians
Southern California Association of Governments
Tribal Historic Preservation Office
Union Pacific Railroad
Yuhaaviatam of San Manuel Nation

TABLE OF CONTENTS

DISTRIBUTION LIST	1
1. INTRODUCTION.....	5
2. PROPOSED PROJECT DESCRIPTION	5
3. ENVIRONMENTAL CHECKLIST.....	12
A. BACKGROUND.....	12
B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED	14
C. DETERMINATION.....	15
D. EVALUATION OF ENVIRONMENTAL IMPACTS.....	16
4. ENVIRONMENTAL ANALYSIS	17
I AESTHETICS.....	17
II AGRICULTURE AND FORESTRY RESOURCES.....	19
III AIR QUALITY.....	21
IV BIOLOGICAL RESOURCES.	26
V CULTURAL RESOURCES.....	30
VI ENERGY.....	33
VII GEOLOGY AND SOILS.	35
VIII GREENHOUSE GAS EMISSIONS.....	40
IX HAZARDS AND HAZARDOUS MATERIALS.	41
X HYDROLOGY AND WATER QUALITY	44
XI LAND USE AND PLANNING.....	49
XII MINERAL RESOURCES.....	50
XIII NOISE.....	51
XIV POPULATION AND HOUSING.	53
XV PUBLIC SERVICES	54
XVI RECREATION.....	56
XVII TRANSPORTATION.	57
XVIII TRIBAL CULTURAL RESOURCES.....	59
XIX UTILITIES AND SERVICE SYSTEMS.....	63
XX WILDFIRE.....	66
XXI MANDATORY FINDINGS OF SIGNIFICANCE.....	68
5. MITIGATION MEASURES	70
6. LIST OF PREPARERS.....	75
7. REFERENCES.....	76
8. PUBLIC COMMENTS AND RESPONSES	78

TABLE OF CONTENTS

FIGURES

Figure 1: Map Vicinity.....	10
Figure 2: Proposed Project.....	11

TABLES

Table 1. Annual Construction and Operational Emissions Summary	22
Table 2. Daily Construction and Operational Emissions Summary	22
Table 3. Construction Schedule	23
Table 4. Construction Equipment	23

APPENDICES

Appendix A – Air Quality Study	
Appendix B – Biological Resource Report	
Appendix C – Cultural Resources Report	
Appendix D – Geotechnical Engineering Report	
Appendix E – Hydrology Study	
Appendix F – Noise Study	
Appendix G – Sewer Area Study	

1. INTRODUCTION

A. PROJECT PURPOSE AND BACKGROUND

The Project Applicant proposes to construct a mini-storage facility on a five-acre site (Proposed Project) located at the northeast corner of Pearblossom Highway and Fallingstar Place, Assessor's Parcel Number (APN) 3051-019-030 and -112 (Project site) in the City of Palmdale (City).

B. Lead Agency

City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

2. PROPOSED PROJECT DESCRIPTION

A. PROJECT LOCATION

The Proposed Project is located at the northeast corner of Pearblossom and Fallingstar Place. The APNs are 3051-019-030 and -112 in the City of Palmdale, California. The Proposed Project site is approximately five acres in size and includes 90,663 square feet of buildings.

B. GENERAL PLAN DESIGNATION AND ZONING

The Project site consists of two contiguous parcels. The parcels are 3051-019-030 and -112, and are located within the Regional Commercial (RC) General Plan 2045 Land Use designation and zone.

The RC zone is intended to accommodate commercial/retail and service uses including: regional retail/services, entertainment, food retail/bars, and professional/medical offices.

The surrounding land uses and setting are as follows:

	Land Use	Zoning	General Plan
Project Site	Vacant / Undeveloped	Regional Commercial (RC)	Regional Commercial (RC)
North	Vacant/ Undeveloped	Single Family Residential (SFR 3)/ Utilities(U)	Single Family Residential (SFR 3)/ Utilities
South	Unincorporated Los Angeles County / Pre-	Pre-Zoned Low Density Residential (LDR PZ)	Prezone Low Density Residential (LDR)

	Zone Low Density Residential		
East	Existing Commercial Building	Regional Commercial (RC)	Regional Commercial (RC)
West	Existing Residential	Single Family Residential (SFR 3)	Single Family Residential (SFR 3)

C. PROPOSED PROJECT

The proposed development includes the construction of eight buildings for the purpose of a mini-storage facility and office totaling 90,663 square feet on an approximately five-acre site. The mini-storage facility is permissible within the RC zone with the review and approval of a Site Plan Review (SPR) and Conditional Use Permit (CUP) application.

The Proposed will include approximately 702 Storage Units, 36 American Disabilities Act (ADA) Storage Units, an office, and an employee and customer parking area. Three full-time employees are anticipated to manage the site.

The Proposed Project would include installation of a storm drainpipe to collect runoff, and will have capacity to route the ultimate runoff from the future public storm drain system. The Proposed Project would include installation of a trapezoidal channel at the north end of the Project site to collect and channel the off-site runoff into an existing City basin/channel.

Construction

Construction is anticipated to begin first quarter of 2025, and ending fourth quarter 2025. The schedule of construction activities will be done per contractor requirements and in compliance with the City of Palmdale Municipal Code (PMC) Section 8.28.030 (Construction Noise Prohibited in Residential Zones). Equipment to be used on-site includes heavy duty trucks, scrapers, backhoes, forklifts, and loaders. The existing trees within the southern portion of the property will be removed.

The following geotechnical recommendations for the Proposed Project shall be implemented based on observations from the field investigation and laboratory testing. The City’s building department shall be contacted prior to construction to assure the Project site is properly permitted and inspected during construction. Any grading performed at the site shall be in compliance with the recommendations provided in final geotechnical report, the local building code and the Earthwork and Grading Specifications for Rough Grading presented in the report. The following summarizes the recommendations to be implemented for the Proposed Project. Final review and recommendations will be reviewed, revised

and approved by the City during plan review and submittal. The applicant shall refer to the final geotechnical report for the completed list of recommendations.

Earthwork

Prior to any grading, the site should be cleared and grubbed of all vegetation. All pavements, vegetation, trash, debris, and abandoned underground utilities shall be removed from the area to be graded and should not be incorporated into engineered fill.

Remedial Grading for Building Pads

To provide a more uniform bearing for the proposed structure foundations and slab-on-grade, subsequent to clearing and grubbing of the area to be graded, the existing native soils shall be excavated to a depth of 48 inches below existing grade or finish grade, whichever is lower. The Geotechnical Consultant shall inspect the resulting surfaces prior to scarification and fill placement.

Remedial Grading for Flexible (Asphalt-Concrete) and Rigid (PCC) Pavement

Subsequent to clearing and grubbing the area to be graded, the existing native soils shall be excavated 12 inches below existing grade or finish grade, whichever is lower. The exposed surface shall be scarified (ripped) an additional six inches. The excavation shall extend a minimum of three feet beyond the limits of the proposed pavement, where obtainable. The Geotechnical Consultant shall inspect the resulting surfaces prior to fill placement.

Remedial Grading and Exterior Non-Traffic Bearing Concrete Flatwork (Sidewalks, Patios, Walkways, etc.)

Subsequent to clearing and grubbing the area to be graded, the existing native soils shall be excavated 12 inches below existing grade or finish grade, whichever is lower. The exposed surface shall be scarified (ripped) an additional six inches. The excavation shall extend a minimum of two feet beyond the limits of the proposed flatwork, were obtainable. The Geotechnical Consultant shall inspect the resulting surfaces prior to fill placement.

Fill Placement and Compaction Requirements

The excavated native soils may be used as engineered fill to backfill the excavation. Materials for engineered fill should be free of organic material,

debris, and other deleterious substances, and should not contain rocks greater than eight inches in maximum dimension.

Native Soil Shrinkage

During compaction, an additional 1/4" subsidence of the underlying soil is estimated. Losses from site clearing and grubbing operations may effect quantity calculations and should be taken into account. Actual shrinkage of the soil may vary.

Fill Slope Construction and Stability

Provided all material is properly compacted as recommended, fill slopes may be constructed at a 2:1 (horizontal to vertical) gradient or flatter. Permanent cut slopes may be constructed at 2:1 or flatter. Fill slopes constructed as recommended at a slope ratio not exceeding 2:1 (horizontal to vertical), are expected to be both grossly and surficially stable and are expected to remain so under normal conditions.

Imported Soils

If imported soils are required to complete the planned grading, these soils shall be free of organic matter and deleterious substances, meeting the following criteria:

- 100 percent passing a 2-inch sieve
- 60 percent to 100 percent passing the #4 sieve
- no more than 20 percent passing a #200 sieve

Grading Observations and Testing

The grading of the site shall be observed and tested by the Geotechnical Consultant to verify compliance with the recommendations. Any grading performed without full knowledge of the Geotechnical Consultant may render the recommendations of this report invalid.

Operation

Operations are anticipated to begin the end of 2025. Operation activities include general maintenance of the storage units, customer service at the offices, inspections, and customer use of the storage facilities. Approximately three workers will be on-site with work hours divided between the typical 8:00 a.m. to 5:00 p.m. and swing shift hours.

D. Required Permits and Approvals

As required by the California Environmental Quality Act (CEQA) Guidelines, the following is a list of all permits and approvals that will be required to implement the Proposed Project:

Approvals

- Conditional Use Permit CUP 24-0008
- Site Plan Review SPR 24-0038

Permits

- Engineering Permits
- Building Permits
- Antelope Valley Air Quality Management District Permit
- Palmdale Water District
- Los Angeles County Fire Department

Figure 1: Map Vicinity



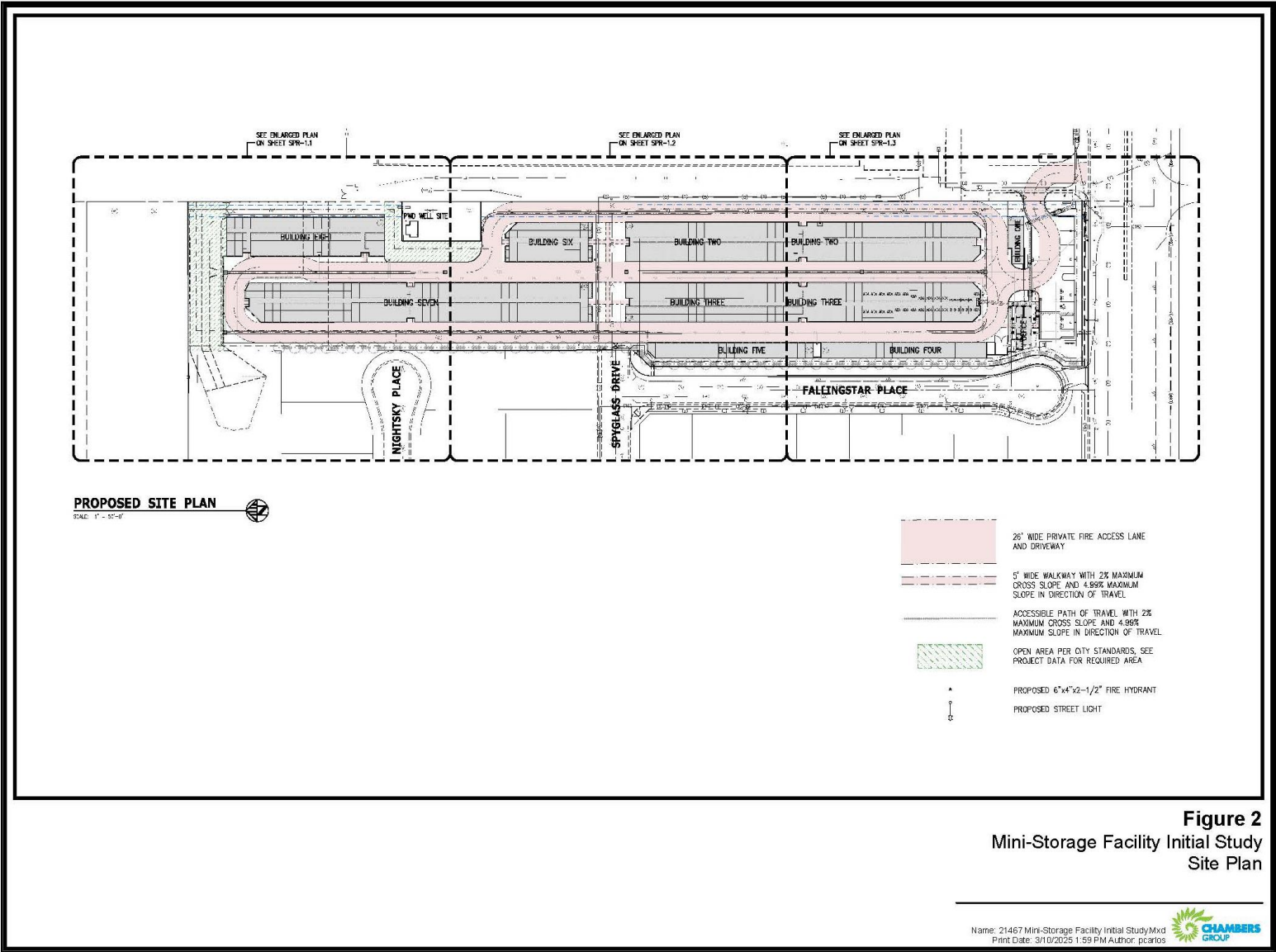


Figure 2: Proposed Project

3. ENVIRONMENTAL CHECKLIST

A. Background

1. Proposed Project Title:

Mini-Storage Facility (CUP24-0008 and SPR24-0038)

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:

Juan Lopez, Assistant Planner
City of Palmdale
Economic and Community Development Department
Planning Division
38250 Sierra Highway
Palmdale, CA 93550
(661) 267-5219

4. Proposed Project Location:

The Proposed Project is located at the northeast corner of Pearblossom Highway and Fallingstar Place. The APNs are 3051-019-030 and -112, in the City of Palmdale, California. The Proposed Project site is approximately five acres in size with 90,663 square feet of buildings.

5. Proposed Project Applicant's Name and Address:

Joyce Bruce
P.O Box 901807
Palmdale, CA 93590

6. Existing Land Use / Zoning / General Plan:

	Land Use	Zoning	General Plan
Project Site	Vacant / Undeveloped	Regional Commercial (RC)	Regional Commercial (RC)
North	Vacant/ Undeveloped	Single Family Residential (SFR 3)/ Utilities(U)	Single Family Residential (SFR 3)/ Utilities
South	Unincorporated Los Angeles County / Pre-Zone Low Density Residential	Pre-Zoned Low Density Residential (LDR PZ)	Prezone Low Density Residential (LDR)
East	Existing Commercial Building	Regional Commercial (RC)	Regional Commercial (RC)
West	Existing Residential	Single Family Residential (SFR 3)	Single Family Residential (SFR 3)

7. Description of Proposed Project:

The Applicant proposes the construction of a mini-storage facility and office consisting of eight buildings on an approximately five-acre site. The Proposed Project will include a review and approval of a CUP and SPR. The Proposed will include approximately 695 Storage Units, 35 American Disabilities Act (ADA) Storage Units, an office, and an employee and customer parking area. Three full-time employees are anticipated to manage the site.

8. Surrounding Land Uses and Setting:

The Project site characteristic consists of a highly disturbed lot located at the northeast corner of Pearblossom Highway and Fallingstar Place. The Project site is immediately west of an operating gas station, and east of a residential community. The Project site is designated as RC under the City’s General Plan 2045 Land Use designation and zoning map.

B. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Proposed 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 type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

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 Proposed Project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the Proposed Project MAY have a 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

Name
Title

Date

Brenda Magana
Planning Manager

D. Evaluation of Environmental Impacts

Each of the responses in the following environmental checklist considers the whole action involved, including Proposed 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. Would the Project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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) Would the Project have a substantial adverse effect on a scenic vista?

No Impact. The Proposed Project will not have a substantial adverse effect on a scenic vista, damage scenic resources within a scenic highway, or degrade visual character of the area. The Proposed Project is located within the RC Zone per the City of Palmdale Zoning Map (City 2022a). No designated scenic vistas are within the vicinity, nor is the Project site a scenic location. No impact would occur.

b) Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. The Proposed Project site is located at the corner of Pearblossom Highway and Fallingstar Place. No state scenic highways are within the vicinity of the Project (Caltrans 2024). According to the EIR for the City's General Plan 2045, Angeles Crest Highway (State Route 2) is designated state scenic highway (approximately 25 miles south of the City), and Interstate 210 (which is 26 miles south) is eligible for state scenic highway designation (City 2022b). While there are trees located south of the Project site, these are not protected trees and are not along a state scenic highway and can be removed without impact to trees along a scenic highway. Impacts therefore are less than significant.

- c) **In non-urbanized areas, would the Project 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?**

Less Than Significant Impact. The surrounding properties consist mostly of vacant land, residential areas, and a gas station adjacent to the Proposed Project site. The Proposed Project would not degrade the character or quality of the public views as no designated scenic vistas or key points of interest occur in the Project vicinity. Furthermore, the heights of the proposed structures will not exceed what is allowed under the PMC Section 17.48.010 (Development standards – Commercial/office zone). The RC zones permit up to 55 feet or four stories. Therefore, impacts are less than significant.

- d) **Would the Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?**

Less than Significant Impact. Existing lighting around the Project area comes from streetlights, vehicles along the highway, residential lighting, and lights from the adjacent gas station.

Any lighting required during construction will be temporary in nature. Construction activities would introduce temporary lighting and glare sources from equipment and vehicles. During operations of the Proposed Project, new lighting and glare would come from the vehicles and buildings of the storage facility.

Lighting associated with the Proposed Project would be required to comply with PMC Section 17.86.030 (Outdoor Lighting), which requires illumination levels consistent with the character and use of surrounding development; excessive illumination is not allowed. Additionally, exterior lighting would be required to be designed to minimize glare beyond the Proposed Project site; glare onto adjacent properties will be restricted. Additionally, the Proposed Project is located in a developed area with existing lighting from residences and the gas station to the east. Therefore, implementation of the Proposed 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) Would the Project 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?

No Impact. The Proposed Project will not convert Prime, Unique, or Farmland of Statewide Importance as the Project area is not designated as such according to the Department of Conservation’s Important Farmland Finder (DOC 2022a). The current site and surrounding lands are vacant with no agricultural activity. In addition, land use of the Project area is identified as RC and does not permit farming operations. No impacts will occur.

b) Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Proposed Project site is not zoned for agricultural use. The nearest prime farmland area is located approximately four miles north of the Project site. The Proposed Project does not include any properties subject to the

Williamson Act (DOC 2022b). The Proposed Project would not result in an impact associated with Williamson Act lands or agricultural zoning. No impact would occur.

- c) Would the Project 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))?**

No Impact. The Proposed Project area does not include any forest lands or timberland (DOC 2022a). The Proposed Project site is vacant and minimal vegetation occurs on-site. The existing land uses and zoning does not permit timberland uses, nor does the site condition allow for timberland production. Therefore, the Proposed Project would not result in impacts to forested areas or timberland production. No impact would occur.

- d) Would the Project result in the loss of forestland or conversion of forestland to non-forest use?**

No Impact. Implementation of the Proposed Project would not result in any change to land use on-site via conversion of forest land to non-forest use (DOC 2022a). The Proposed Project area is vacant with no forest lands. No impact would occur.

- e) Would the Project 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?**

No Impact. As previously discussed, the Project area is zoned for RC and designated for those uses. The Project area is in the high desert, on vacant land. Therefore, the Proposed Project will not involve the conversion of farmland to nonagricultural use or convert forestland to non-forest use (DOC 2022a). No impact will occur.

Mitigation Measures

None required.

	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 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) Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	<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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts

An Air Quality Study was prepared for the Proposed Project by M.S. Hatch Consulting on April 2024 (Appendix A). The Air Quality Study included the estimated criteria pollutant and greenhouse gas (GHG) emissions from the construction and operation of the Proposed Project.

a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact.

The City of Palmdale is located within the Antelope Valley Air Quality Management District (AVAQMD). National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) have been established for the following criteria pollutants: carbon monoxide (CO), ozone (O₃), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), inhalable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead. The CAAQS also set standards for sulfates, hydrogen sulfide, and visibility.

According to AVAQMD, CEQA and Federal Conformity Guidelines, a project is nonconforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project conforms if it complies with all applicable AVAQMD rules and regulations, complies with all proposed control measures that are not adopted from applicable plans, and is consistent with the growth forecasts in the applicable plan(s). 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. Tables 1 and 2 present the annual and daily emissions summaries from the construction and operation of the Proposed Project, respectively. Emissions were estimated using California Emissions Estimator

Model CalEEMod Version 2022.1. The detailed emissions model outputs are included in Attachment B of the Air Quality Study.

Table 1. Annual Construction and Operational Emissions Summary

Emissions Source	Total Emissions (tons per year)						
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}	CO _{2e}
Construction Emissions							
Year 1 Construction (2025)	0.44	1.14	1.49	<0.01	0.13	0.06	306
Operational Emissions							
Total Operational Emissions	0.83	0.66	4.53	0.01	0.89	0.24	1,568
Significant Emissions Threshold	25	25	100	25	15	12	100,000

Table 2. Daily Construction and Operational Emissions Summary

Emissions Source	Total Emissions (pounds per day)						
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}	CO _{2e}
Year 1 Construction Emissions (2025)	50.60	23.00	22.40	0.06	4.43	2.60	7,615
Operational Emissions							
Total Operational Emissions	5.37	3.93	36.00	0.07	5.64	1.51	10,709
Significant Emissions Threshold	137	137	548	137	82	65	548,000

ROG: Reactive Organic Compounds, used interchangeably with Volatile Organic Compounds (VOC); NO_x: oxides of nitrogen; CO: Carbon monoxide; SO_x: Oxides of sulfur; PM_{2.5}: particulate matter less than 2.5 micrometers in diameter; PM₁₀: particulate matter less than 10 micrometers in diameter; CO_{2e}: Carbon dioxide equivalent

Construction Emissions

Construction emissions were calculated using CalEEMod defaults and input provided by Antelope Valley Engineering. Antelope Valley Engineering reviewed the list of construction equipment and the anticipated construction schedule.

Table 3 provides the anticipated construction schedule. The Proposed Project construction is expected to take 188 days with six-day workweeks.

Table 4 provides the anticipated number of pieces of construction equipment that will be used during each phase, the hours per day the equipment will be operated, and the horsepower of the equipment. The values in the table are based on CalEEMod default values, which assumes a more conservative number of emissions based on typical equipment.

The Proposed Project will require 50 cubic yards of material export during the *Site Preparation* phase and 5,000 cubic yards of material import during the *Grading* phase; as such, the emissions for material haul trips were included in the construction emissions. For fugitive dust emissions, CalEEMod defaults do not include any control of fugitive dust from Proposed Project construction sites.

AVAQMD Rule 403 requires that fugitive dust from any “active operation, open storage pile or disturbed surface area” be controlled so that no presence of dust remains visible beyond the property line. To meet this requirement, the standard operation is watering active sites three times per day. Although the addition of watering for dust control is listed as a mitigation measure in CalEEMod, within the AVAQMD, this is a requirement, and is therefore included as part of the model assumptions.

For architectural coating operations, volatile organic compound (VOC) emissions were calculated based on the assumption that the coatings would be compliant with the VOC content limits of AVAQMD Rule 1113.¹

Table 3. Construction Schedule

Construction Phase	Start Date	End Date	Days/week	Total Workdays
Demolition	N/A	N/A	N/A	N/A
Site Preparation	2/3/2025	2/13/2025	6	10
Grading	2/14/2025	3/11/2025	6	22
Building Construction	3/12/2025	8/5/2025	6	126
Paving	8/6/2025	8/26/2025	6	18
Architectural Coating	8/27/2025	9/9/2025	6	12

Table 4. Construction Equipment

Construction Phase	Equipment	Number of Equipment	Hours per day	Horsepower
Site Preparation	Rubber Tired Dozers	2	8	367
	Tractors/Loaders/Backhoes	2	8	84
Grading	Excavators	1	8	36
	Graders	1	8	148
	Scrapers	3	8	367
	Tractors/Loaders/Backhoes	2	8	84
Building Construction	Cranes	1	7	367
	Forklifts	3	8	82
	Generator Sets	2	8	14
	Tractors/Loaders/Backhoes	3	7	84

¹ For building coatings, assumed to be 90-percent flat paints (50 grams per liter [g/L]) and 10-percent non-flat paints (100 g/L). For the parking lot coatings, assumed to be compliant with the Traffic Marking Coating category (100 g/L). VOC limits based on AVAQMD Rule 1113.

Table 4. Construction Equipment

Construction Phase	Equipment	Number of Equipment	Hours per day	Horsepower
	Welders	1	8	46
Paving	Pavers	2	8	81
	Paving Equipment	2	8	89
	Rollers	2	8	36
Architectural Coating	Air Compressors	1	6	37

Operational Emissions

Operational emissions consist of area sources, energy use, mobile sources, stationary sources, solid waste disposal, and water and wastewater use. Annual and daily emissions calculations are provided in Tables 1 and Table 2, above.

The estimated emissions of criteria pollutants from the construction and the total operational emissions are well below the applicable AVAQMD Significant Emissions Thresholds; therefore, the Proposed Project does not have a significant air quality impact on the environment. In addition, the Proposed Project is not expected to expose sensitive receptors to substantial pollutant concentrations. Since the construction and operational emissions are below the significance thresholds, emissions mitigation measures are not required.

Per the AVAQMD conformity guidelines included in the Air Quality Study, a project is conforming if it complies with applicable rules and regulations with the district and is consistent with the growth forecast. The Proposed Project is consistent with the land uses. Therefore, the Proposed Project is consistent with air quality plans, and impacts will be less than significant. Based on the Air Quality Study, the Proposed Project is not anticipated to conflict or obstruct with implementation of an applicable air quality plan. The estimated annual and daily emissions of construction and total operational emissions are below the applicable thresholds. While the Proposed Project would involve the use of equipment during the construction and use of trucks for hauling equipment to and from the Proposed Project site, the results from the Air Quality Study indicated that emissions will be below the AVAQMD Significant Emissions Thresholds (Appendix A). Impacts would be less than significant.

b) Would the Project violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?

Less than Significant Impact. AVAQMD is designated as nonattainment for the State standard for ozone; however, the AVAQMD has adopted an Ozone Attainment Plan (State and federal) and a federal 8-Hour Ozone Attainment Plan. Emissions during construction and operation are provided above in Table 1 and 2, with no AVAQMD thresholds being exceeded.

Construction emissions are temporary and include emissions of criteria pollutants and from construction activities during site preparation, grading, paving, building construction, and architectural coating application. During construction, emissions, including fugitive dust emissions, could be generated, particularly during windy days, which may degrade the air quality. On-site watering and adjustment to earth-disturbing activities could reduce significant levels of particulates during periods of high winds. The proposed activities shall conform to PMC Chapter 8.04 for Health and Safety and Technical Construction Codes, that includes Fugitive Dust Control Measures, and with Rule 403 requiring implementation of best available dust control measures (BACM) and notification to AVAQMD for larger earthmoving operations. Operational emissions consist of area sources, energy use, mobile sources, stationary sources, solid waste disposal, and water and wastewater use. The Proposed Project's emissions for construction and operation are well below the applicable AVAQMD significant emission threshold and, therefore, will not have a significant air quality impact.

c) Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant 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
- A gasoline dispensing facility within 300 feet

According to the Air Quality Study, the Proposed Project 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. Therefore, a less than significant impact on sensitive receptors would occur.

d) Would the Project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?

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 Proposed Project would comply with AVAQMD Rule 403.

During the Proposed Project operations, aside from normal maintenance equipment, no anticipated uses of materials would result in substantial emissions of odors and dust. As part of the Proposed Project operations, various dust control measures are included as part of normal operations. These measures include use of filters, keeping raw materials wet, seals on applicable equipment, local ventilation systems, valves to prevent material from escaping, and use of plastic wrapping. 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 checked="" type="checkbox"/>	<input 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"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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

A Biological Resource Assessment was prepared in February 2024 by Mark Hagan to assess biological resources on the Project site. The results of the survey are provided in detail in the Biological Habitat Assessment provided in Appendix B.

- a) **Would the Project 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?**

Less than Significant with Mitigation Incorporated. The Proposed Project is not located within an area that has the potential to provide suitable habitat for nesting birds. No desert tortoises (*Gopherus agassizii*) or evidence of their presence were observed within the study site. No Mohave ground squirrel (*Xerospermophilus Mohavensis*) (MGS) was observed or audibly detected. No Mohave ground squirrel habitat was present within or adjacent to the study site. No burrowing owls (*Athene cunicularia*) or evidence of their presence were observed within the study site. No potential for future cover sites for burrowing owls were present. No desert kit foxes (*Vulpes macrotis*), or evidence of their presence were observed within the study site.

Three trees within a road drainage in the southeast corner of the study site offer potential nesting habitat for migratory birds. No Swainson’s hawk (*Buteo swainsoni*) has been documented within five miles of the study site. No western Joshua trees (*Yucca brevifolia*), desert cymopterus (*Cymopterus deserticola*), Barstow woolly sunflowers (*Eriophyllum mohanense*), or alkali mariposa lilies (*Calochortus straitus*) were observed within the study site. No suitable habitat for sensitive species was present within the study site. No other state or federal listed species are expected to occur within the study site. No ephemeral streams or

washes occur within the study site. A manmade road drainage was present within the study site.

Nesting season for migratory birds generally lasts from February to July. Construction would occur outside of the breeding season for migratory birds. If tree removal occurred during the nesting season, implementation of MM BIO-1 would result in a less than significant impact with mitigation incorporated for modification of a habitat by the Proposed Project. Impacts would be less than significant with mitigation incorporated.

- b) Would the Project 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?**

No Impact. The Proposed Project area does not contain any riparian habitats, nor is it located near a river or stream. As discussed in the Biological Resource Assessment, there are no ephemeral streams or washes within the site. No critical habitat was identified on-site as well (Appendix B). No impact would occur.

- c) Would the Project 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?**

No Impact. According to the U.S. Fish and Wildlife Service's (USFWS's) National Wetlands Inventory, no riparian habitat occurs within the Project site boundary. Additionally, as discussed in the Biological Resource Assessment, there were no ephemeral streams or washes found within the Project site. No impacts to wetlands, waters of the United States, or waters of the State are anticipated; therefore, no impact would occur.

- d) Would the Project 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?**

No Impact. No protection measures are anticipated for the Desert Tortoise or the MGS, as neither species were present within the study site. No western Joshua trees, desert cymopterus, Barstow woolly sunflowers, or alkali mariposa lilies were observed within the study site. No Swainson's hawks are expected to use the study site during nesting season. As discussed in the Biological Resource Assessment, the Project site is characterized as a disturbed lot with no sensitive species or habitat present (Appendix B). Therefore, no impact would occur regarding the interference with established native wildlife.

- e) **Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

Less than Significant Impact with Mitigation Incorporated. PMC Section 14.04.050 (Joshua Tree and Native Desert Vegetation Preservation) outlines the plan requirements and methodology for Western Joshua Trees and native desert vegetation preservation. PMC Section 17.100.080 (Processing Procedures and Submittal Requirements for Projects in Hillside Areas) outlines the processes for development along the hillside areas within the City. No native desert vegetation exists within the Proposed Project site and there is no development being proposed along the hillside areas of the City. Given the condition and location of the Proposed Project, it would not result in a conflict with local policies or ordinances, including the Western Joshua Tree and Native Desert Vegetation Preservation and Hillside Management of the PMC. Impacts would be less than significant.

- f) **Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

Less than Significant Impact. The Proposed Project is located within the West Mojave Plan (habitat conservation plan). The Proposed Project area provides suitable habitats for plant species, state and federal rare and endangered species including Western Joshua trees, Mohave ground squirrels, desert kit foxes, and others (Appendix B). The Proposed Project is not located within a significant ecological area identified by the Department of Regional Planning (County 2015) and is located within the Antelope Valley Area Plan and identified within a significant ecological area (County 2014). Significant Ecological Areas include Western Joshua Tree woodlands, wildlife corridors, and other sensitive habitat areas. However, the regulations associated with the Significant Ecological Areas are not applicable to the Project because the Project site does not contain suitable habitats for sensitive species and is classified as a highly disturbed lot (Appendix B). The Proposed Project does not involve the development or renewable energy, or activities that would impact or interfere with the Desert Renewable Energy Conservation Plan (DRECP; BLM 2016). A less than significant impact would occur.

Mitigation Measures

MM BIO-1: If possible, removal or ground disturbance near the three American elm trees (*Ulmus americana*) will occur outside the breeding season for migratory birds. Nesting generally lasts from February to July but may extend beyond this time frame. If activities impacting the trees occur during or close to the nesting season, a qualified biologist will survey this area as close as possible but no more than one week prior to disturbances. If active bird nests are found impacts to nests will be avoided by either delaying work or establishing initial buffer areas of a

minimum of 500 feet (160 m) around active raptor nests or a minimum of 50 feet (16m) around other migratory bird species nests. The project biologist will determine if the buffer areas should be increased or decreased based on the nesting bird response to disturbances.

	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 Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5, respectively?	<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 checked="" type="checkbox"/>	<input 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"/>

Project Impacts

On May 2024, Stantec prepared a Phase I Cultural Resources Assessment for the Proposed Project. Data collection was conducted to comply with CEQA requirements which included literature and records search of the Project site and a 0.25-mile buffer, a Native American Heritage Commission (NAHC) Sacred Lands File (SLF) record search, California Historical Resources Information System – South Central Coastal Information Center (CHRIS-SCCIC) review, and Bureau of Land Management – General Land Office (BLM-GLO). The results of the record searches and surveys are found in Appendix C.

- a) Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Public Resources Code Section 21084.1 and CEQA Guidelines Section 15064.5, respectively?**

Less than Significant Impact. During the pedestrian field survey conducted at the Project site in April 2024, results of the survey were documented in the Phase I Cultural Resources Assessment (Appendix C). No historic resources eligible for the California Register of Historical Resources (CRHR) were found to be on-site. Because the Proposed Project would not cause a substantial adverse change in the significance of a historical resource, impacts to historic resources would be less than significant.

- b) Would the Project 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?**

Less than Significant Impact with Mitigation Incorporated. The results of the SCCIC records search indicate that there are zero previously recorded archaeological sites within the Project site and four within a quarter mile. Moreover, no archaeological resources (precontact or historic-era) were identified during an intensive pedestrian survey of the Project site.

Although there is no evidence of subsurface archaeological deposits, the Project site could contain buried deposits, such as precontact cultural materials, refuse deposits, or architectural features (e.g., foundations, walls, etc.) that were present prior to development. Although agricultural development in the late 19th and early 20th centuries likely disturbed upper soil layers and any possible surficial deposits, intact archaeological deposits could be preserved in deeper layers. The Proposed Project will involve ground disturbance, which could result in the inadvertent discovery and/or disturbance of an archaeological resource. Any previously unrecorded cultural resources encountered during construction would be potentially eligible for the CRHR and thus a potential historical resource under CEQA. In such a situation, the Proposed Project could cause a substantial adverse change in its significance, thereby impacting a historical resource. This impact is considered potentially significant but would be reduced to a less than significant level by implementing mitigation CR-1.

Implementation of mitigation measures CR-1 would avoid impacts during construction if archaeological resources are discovered during excavation and grading activities, as all work activities in the area (within approximately 100 feet) of the discovery would be halted until a qualified archaeologist has evaluated the find, coordinated with appropriate Native American representatives, and developed an Archaeological Resources Treatment Plan for the resource(s) in consultation with the City. Therefore, with the implementation of mitigation measures, impacts on archaeological resources would be less than significant.

c) Would the Project disturb any Native American tribal cultural resources or human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact with Mitigation Incorporated. There is no evidence of cemeteries or burials in the historical records for the Project site. While no formal cemeteries, burial grounds, or other places of human interment are known to occur within the immediate vicinity, there is always a possibility that human remains could be encountered during construction. In the event of discovery, compliance with the regulatory requirements outlined in CR-2 would reduce potential impacts to a less than significant level.

In the unlikely event that human remains are discovered during construction, compliance with the regulatory requirements outlined in CR-2 would reduce

potential impacts to a less than significant level. Therefore, with the implementation of mitigation measures impacts to human remains would be less than significant.

Mitigation Measures

MM CR-1: Inadvertent Discoveries

If buried cultural resources (such as chipped or ground stone, historic debris, or building foundations) are encountered during ground-disturbing activities, work shall stop in that area and within a 100-foot radius of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology can assess the significance of the discovery and, if necessary, develop a response plan with appropriate treatment measures, in consultation with the City and other relevant agencies. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) and Morongo Band of Mission Indians (MBMI), and Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted. If necessary, the evaluation may require the preparation of a treatment plan and Phase II archaeological testing to determine CRHR eligibility. Preservation in place (avoidance, open space, capping, easement) shall be the preferred treatment method per State CEQA (CCR Tit 14. § 15126.4[b]). If the discovery proves significant under CEQA and cannot be avoided by the project, data recovery may be warranted to exhaust the resource's data potential, thereby reducing any impact to a less-than-significant level. Construction shall not resume until a qualified archaeologist has conferred with the City on the significance of the resource and the recommendations made by the Qualified Archaeologist have been implemented to the reasonable satisfaction of the archaeologist. The archaeologist shall monitor the remainder of the Project and implement the Plan accordingly.

MM CR-2: Inadvertent Discovery of Human Remains:

If previously unknown human remains are found during excavation, the Project will follow procedures as detailed in the California Health and Safety Code (CHSC) § 7050.5. If human remains of Native American origin are discovered during construction, the Project shall comply with State laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) relating to the disposition of Native American burials (PRC § 5097).

Upon discovery of human remains, all work within a minimum of 200 feet of the find must cease immediately, and the County Coroner must be notified and allowed to examine the remains pursuant to State Health and Safety Code §7050.5. If the Coroner determines the remains to be of Native American origin, he or she shall notify the NAHC. The NAHC shall then identify the most likely descendants (MLD) to be consulted regarding treatment and/or repatriation of the remains. The MLD shall be granted access to examine the remains and has 48 hours to provide recommendations for the treatment or reburial of the remains. If the MLD fails to

make a recommendation within 48 hours of being granted access to the remains, the land manager/owner can rebury the remains in a location not subject to further disturbance. If the Coroner determines that no investigation of the cause of death is required and that the human remains are not Native American, then ground-disturbing activities may resume after the Coroner informs the County of Los Angeles of such determination. According to State law, six or more human burials at one location constitute a cemetery, and disturbance of Native American cemeteries is a felony.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI ENERGY. Would the Project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use 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

Energy analyses and fuel consumption calculations by the Proposed Project have been incorporated in the updated Air Quality Study by M.S. Hatch Consulting (Appendix A) with a summary provided below.

- a) **Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?**

Less than Significant Impact. The Proposed Project involves the construction and operation of a mini-storage facility on an undeveloped parcel. The Proposed Project’s estimated energy consumption is summarized in the CalEEMod sheets provided in Appendix A.

During construction, the Proposed Project would consume energy in the form of fuel consumed by construction vehicles and equipment. Operational energy use will result primarily from one building energy demand, and two transportation energy demand.

The Proposed Project would result in use of energy sources during the construction phase. It is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete as it will be provided by the contractors; therefore, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable

energy conservation practices in the interest of minimizing the cost of doing business. Substantial reductions in energy usage may also be accomplished by selecting building materials composed of recycled materials that require less energy to produce. The Proposed Project's petroleum consumption will be subject to state and federal regulations regarding fuel efficiency standards for on-road vehicles and off-road equipment. Furthermore, the energy use during construction would be temporary and cease once the Proposed Project has been completed.

Prior to project operations, the proposed buildings will be required to comply with the 2022 California Energy Code Title 24 Part 6 for energy efficiency requirements. The Proposed Project will be built in accordance with the Palmdale Green Building Code, PMC Section 8.04.200 (Adoption of Administrative Provisions for the Palmdale Building Code, Plumbing Code, Mechanical Code, Electrical Code, Residential Code and Green Building Code) 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 2011). Therefore, project compliance with existing state and local requirements would result in less than significant impacts associated with energy consumption.

b) Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. The operation of the Proposed Project is consistent with the land use and zoning of the parcel and will not conflict with the implementation of the City's Energy Action Plan. As noted in Appendix A, energy demands will be served by Southern California Edison. The construction and operation of the Proposed Project would be required to comply with Title 24 of the California Code of Regulations to meet building energy efficiency requirements in addition to State and local energy standards. The Proposed Project will comply with the City's Construction Waste Management Plan which will identify the waste materials and diversion methods. Waste reduction and energy conservation are key goals outlined in the Energy Action Plan. Impacts, therefore, 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:				
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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Project Impacts

A Geotechnical Engineering Report was prepared for the Proposed Project by Bruin Geotechnical Services in June 2024. The report presents the results of the field investigation and laboratory testing, along with recommendations pertaining to the Proposed Project. The complete report can be found in Appendix D.

A Conceptual Hydrology Study and Sewer Area Study was prepared by Antelope Valley Engineering in July 2024 to analyze the drainage and verify sewer lateral capacities of the Project site. The complete reports can be found in Appendix E and F respectively.

- a) i) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death involving 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?

Less than Significant Impact. Southern California is known to be a seismically active region. According to the United States Geological Survey (USGS) Quaternary Faults map, the Proposed Project is not underlain by any known active fault; and no active faults have been mapped across the Proposed Project. However, the Proposed Project is located approximately 4.3 miles northeast of the San Andreas Fault, known to be an active fault (USGS 2019). The City of Palmdale's General Plan 2045 provides goals and policies within its Safety Element. It includes goals within the City to have minimal public health, safety, and welfare impacts from seismic hazards.

The results of the Geotechnical Engineering Report indicate that no known active faults have been mapped across the Project site and potential hazards due to active fault ground rupture would be minimal. Additionally, the Project site is not located within the Alquist-Priolo special studies zone (Appendix D).

The Safety Element of the General Plan 2045 outlines goals and policies to provide seismic safety for new development in the City which are highlighted in Goal SE-1 (City 2022b). It establishes development standards to protect residents, property, and infrastructure systems from potential damage as a result of seismic activity. The City also implements the Alquist-Priolo Earthquake Fault Zoning Act, which requires the appropriate structural setbacks for properties nearby active faults (City 2022b). Compliance with the City land use plans, grading plans, and recommendations provided in Geotechnical Report (Appendix D) would result in less than significant impacts.

- ii) **Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death involving strong seismic ground shaking?**

Less than Significant Impact. Although no known faults lie beneath the Proposed Project site, the San Andreas Fault, an active fault, is located approximately 4.3 miles southwest of the Proposed Project site. Compliance with The City of Palmdale Seismic Safety Goal SE-1 would reduce impacts associated with strong seismic ground shaking (City 2022b). Therefore, implementation of the Proposed Project would result in less than significant impacts associated with strong seismic ground shaking.

- iii) **Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage or death involving seismic-related ground failure, including liquefaction?**

Less than Significant Impact. Soil liquefaction is a state of soil particle suspension caused by a complete loss of strength when the effective stress drops

to zero. Liquefaction normally occurs under saturated conditions in soils such as sand, in which the strength is purely frictional, and occurs under vibratory conditions such as those induced by seismic events. Information presented in Appendix D states that the potential for liquefaction is negligible on the Project site. While liquefaction is negligible, the upper four feet of soil were found to be non-uniform based on the geotechnical investigation, with some areas of the site soils subject to hydro-consolidation that would not provide uniform soil support system without remediation through re-compaction. With the implementation of soil stabilization procedures and re-compaction, impacts would be less than significant.

iv) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of injury, damage, or death involving landslides?

No Impact. The Proposed Project site is flat and does not include any significant slopes. The Geotechnical Report identifies the site topography to be flat, and hazards from landslides are considered negligible. No impact would occur.

b) Would the Project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The Project site's drainage occurs by minor sheet flow and erosion could occur. On-site grading and drainage design, landscaping, and site maintenance would minimize the sheet flow erosion potential.

Construction activities associated with the Proposed Project would be required to comply with PMC regulations and the requirements of the National Pollution Discharge Elimination System (NPDES) permit. PMC Section 8.04.265 (Excavation and Grading) establishes regulations for the control of excavation, grading, and earthwork construction, including fills and embankments, and for the control of grading-site runoff, including erosion, sediment, and construction-related pollutants. The NPDES permit implements the City of Palmdale grading permit regulations that include compliance with erosion control measures, including grading and dust control measures. Construction associated with the Proposed Project would require the preparation and approval of an erosion control plan by the City of Palmdale Engineering Division. Additionally, preparation of a Storm Water Pollution Prevention Plan (SWPPP) will be required for the Proposed Project. These plans would identify Best Management Practices (BMPs) to be implemented during construction. BMPs would be designed to reduce soil erosion, construction site pollutant, and sediment runoff to the maximum extent feasible. Further, all construction activities would be required to comply with AVAQMD Rule 403 regarding the control of fugitive dust; Rule 403 requires actions to prevent and reduce fugitive dust emissions.

Compliance with PMC Section 8.04.265 Adoption of the Palmdale Existing Building Code, the NPDES permit, and AVAQMD Rule 403 would ensure impacts associated with soil erosion would be less than significant during construction. In addition, the Proposed Project would implement appropriate landscaping as noted

in the City of Palmdale's Landscaping and Irrigation Standards, PMC Chapter 14.05 (Water Efficient Landscape) and hardscape plans to limit on-site and off-site erosion during ongoing operation of the Proposed Project. Therefore, implementation of the Proposed Project would result in a less than significant impact associated with soil erosion.

- c) **Would the Project 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?**

Less Than Significant Impact. As discussed above in threshold (a)(iv), the Proposed Project would not result in an impact associated with landslides. As discussed above in threshold (a)(iii), the Proposed Project would result in a less than significant impact associated with liquefaction. Lateral spreading is a result of liquefaction of soil on gently sloping ground during an earthquake. Considering the Proposed Project site is not identified as an area prone to liquefaction, the Proposed Project would result in a less than significant impact associated with lateral spreading. According to the Geotechnical Report, potential hazards associated with liquefaction include lateral spreading and slow slides, foundation bearing failure, and ground surface settlement. Considering the upper native soils are not likely to liquefy, these hazards are not considered to be design factors for this project.

During the geotechnical investigation, the upper four feet of soil were found to be non-uniform, with some areas of the site soils subject to hydro-consolidation that would not provide uniform soil support system without remediation through re-compaction. The contractor shall contact the Department of Building Safety to ensure that the Proposed Project is properly permitted and inspected during construction, and all grading shall be in compliance with the local building code and Earthwork and Grading Specifications for Rough Grading. The Proposed Project will incorporate the geotechnical recommendations for earthwork, remedial grading, fill and compaction requirements, native soil shrinkage, fill slope construction and stability, imported soils, and grading observation and testing to ensure that soil stability. Post-grading considerations include pad drainage, and foundation designs. Compliance with the building code safety and standards and geotechnical recommendations would result in a less than significant impact.

- d) **Would the Project 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?**

Less than Significant Impact with Mitigation Incorporated. The potential of soil to expand when wet and shrink when dry depends on the clay compositions. Certain types of clay tend to swell or expand when water content increases and shrink disproportionately when dry.

During the Geotechnical investigation, native alluvial materials were encountered within all exploratory trenches. The native materials were noted to be dry to moist and loose to dense. The soil strata encountered consisted primarily of silty sands, fine- to coarse-grained, with gravel. Recomposition of the soils would create a uniform soil support to minimize potential for settlement. Therefore, implementation of the Proposed Project would not result in an impact associated with expansive soils. Impacts would be less than significant with mitigation incorporated.

- e) **Would the Project 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?**

No Impact. Septic tanks will not be constructed at the Project site. Additionally, the Proposed Project would tie to existing wastewater disposal and sewer lines. A proposed sewer lateral would be connected to an existing sewer main in Fallingstar Place (Appendix F). Based on results of the Geotechnical Engineering Report, implementation of recommendations from the report would prevent any issues with collapsing soil. No impact would occur.

- f) **Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Less than Significant Impact with Mitigation Incorporated. The Project site is within a region underlain with Qa (alluvial gravel, sand, silt) of Holocene age which is considered low probability for paleontological resources. The Proposed Project site consists of highly disturbed vacant land in an undeveloped portion of the city; therefore, an inadvertent discovery of a paleontological resource has the potential to occur. However, because such resources are often buried and not easily identifiable, the Proposed Project will be subject to a condition of approval requiring any resources discovered would require work to be halted and review by a qualified paleontologist.

Mitigation Measures

MM GEO-1: In the event paleontological resources are encountered, work in the immediate area shall be halted and a qualified paleontologist shall be contacted immediately to evaluate the find. Construction activities shall be temporarily redirected to another location on-site so that the monitor can recover any specimens encountered during excavation. All fossils/specimens collected shall be deposited in a City approved museum repository for curation and storage.

	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"/>

Project Impacts

Analysis of GHG emissions has been incorporated in the updated Air Quality Study by M.S. Hatch Consulting (Appendix A).

a) Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The Air Quality Study estimated the emissions of criteria pollutants and GHGs for each year of construction as well as total operational emissions of the Proposed Project. GHG emissions are presented in units of carbon dioxide equivalent (CO_{2e}) in Table 1 and Table 2 in Section III of Appendix A. Increases in long-term operational GHG emissions are not anticipated to occur as a result of the Proposed Project. As per the Air Quality Study, the estimated emissions of criteria pollutants and GHGs for the construction and operation of the Proposed Project are well below the applicable AVAQMD Significant Emissions Thresholds. Therefore, implementation of the Proposed Project would result in a less than significant impact associated with GHG emissions.

b) Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. Neither Los Angeles County nor AVAQMD have any specific plans, policies, or regulations adopted for reducing the emissions of GHGs. The City of Palmdale adopted an Energy Action Plan to provide guidance for reducing GHGs, including goals and reduction measures. The Proposed Project’s construction-related emissions are short-term and anticipated to be insignificant. The operation of the Proposed Project would not create a significant increase in GHG emissions; therefore, implementation of the Proposed Project would result in a less than significant impact associated with an applicable plan, policy, or regulation adopted for reducing the emissions of GHGs.

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 reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

The Proposed Project site was analyzed to determine the potential for hazards or hazardous materials to occur on-site. Background research included an evaluation of the Geotracker and EnviroStor websites, operated by the State Water Resources Control Board (SWRCB) and the Department of Toxic Substances Control (DTSC).

- a) Would the Project create a significant hazard to the public or the environment through the routine transport, use, emission or disposal of hazardous materials?**

Less than Significant Impact. The Proposed Project involves construction of a mini-storage facility. The Proposed Project will not create a significant hazard to

the public or environment, as the Project will not involve the routine transport or utilization of hazardous materials in significant quantities. Use of any potentially hazardous materials during construction such as use, storage, and disposal of fuels, oils, and lubricants, will be stored and disposed of according to the City, County, State, and federal regulations. Operation of the Proposed Project would involve storing vehicles and individual property. The mini-storage property would not permit storage of significant quantities of hazardous materials, nor would it permit vehicle maintenance that could result in the release of hazardous materials. Impacts will be less than significant.

- b) Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

Less than Significant Impact. As previously discussed in Section IX threshold (a), the Proposed Project is not anticipated to create a significant hazard to the public or environment with regards to routine transport of hazardous materials. According to the Geotracker and EnviroStor databases, the Project site does not include areas containing hazardous sites (SWRCB 2024; DTSC 2024) where construction could release hazardous materials.

The Proposed Project will not create a significant hazard to the public or environment with the accidental release of hazardous materials. The Proposed Project would be used as a storage facility for personal and commercial goods. The units will not be permitted to house potentially hazardous materials. Use of any potentially hazardous materials during construction such as use, storage, and disposal of fuels, oils, and lubricants, will be stored and disposed of according to the City, County, State, and federal regulations. Operations would involve the use of cleaners and other maintenance equipment. The use, storage, and disposal of these materials shall be done in compliance with the manufacturer guidelines and City, County, State, and federal regulations. Impacts will be less than significant.

- c) Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less than Significant Impact. The Project area is not located within one-quarter mile of an existing or proposed school. The nearest school is Cimarron Elementary School, located approximately one mile northwest of the Project Area. In addition, routes for transport of the construction equipment and material will not be along the roads adjacent to the schools. Therefore, impacts will be less than significant.

- d) Would the Project 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?**

Less than Significant Impact. The Proposed Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65862.5 (SWRCB 2024; DTSC 2024); therefore, implementation of the Proposed Project would not result in a less than significant impact associated with known hazardous materials on-site.

- 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?**

No Impact. The nearest airport to the Project area is Palmdale Regional Airport and the United States Air Force Plant 42, located approximately six miles northwest from the Project area. Both airports are separate facilities but utilize the same runway space (County 2022). The Proposed Project will not result in a safety hazard for residents or workers within the Project area, as the project area is not located near a public or private airport and is not within the Plant 42 Air Installation Compatible Use Zone (County 2022). No impact will occur.

- f) **Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than Significant Impact. The City of Palmdale's Emergency Operations Plan (EOP) is a multi-hazard document that addresses the City's planned response to emergency/disaster situations associated with natural, technological, and national security emergencies. The most significant transportation routes in the area are State Highway 14 and State Route 138 (City 2012). According to the General Plan 2045 Safety Element Exhibit S-1, Pearblossom Highway is a designated evacuation route.

While the Proposed Project is located along Pearblossom Highway, its construction and operation would not interfere with the EOP or traffic flow of the highway. Construction staging areas would occur within the Project site and not require interruption, such as closure, of Pearblossom Highway.

Prior to the development of the Project site, submittal and review of the plans with the City's Building Department, review by the Los Angeles County Fire Department (LACoFD), and an Engineering and Plan Check to ensure construction and operations would not impair the EOP and evacuation routes, will be required. Submittal and approval through the City and County would ensure impacts would be less than significant.

- g) **Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

Less than Significant Impact. The Project area is not located within a Fire Hazard Zone according to the City of Palmdale Very High Fire Hazard Severity Zone Map (City 2015); however, lands south of Pearblossom Highway are designated as a high fire hazard zone.

The Project area is within land use for RC within an urbanized area. While there are partially developed lands to the south, these are residences that contain minimal vegetation (City 2015). Therefore, impacts regarding potential exposure of people or structures to wildland fires will be less than significant.

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:				
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 off-site?	<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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impeded or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Conceptual Hydrology Study and Sewer Area Study was prepared by Antelope Valley Engineering in July 2024 to analyze the drainage and verify sewer lateral capacities of the Project site. The complete reports can be found in Appendix E and F respectively.

Project Impacts

- a) **Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Less than Significant Impact. The Proposed Project is not anticipated to violate any water quality standards or waste discharge requirements. Water quality and waste discharge would be temporarily impacted during construction. Construction related work that could impact water quality standards and waste discharge requirements include handling, storing, and disposal of construction materials involving the use of pollutants as well as use, maintenance, and leaks from construction equipment and other ground disturbing activities, such as grading and excavation. The Proposed 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 NPDES requirements. These requirements regulate activities that could affect water quality. BMPs that would be included during construction include, but are not limited to, utilization of barriers, soil stabilizers, filters, and silt fences. Compliance with a General Permit as required by the water boards would result in less than significant impacts during construction.

Operational use of the Project site is primarily for storage purposes and would incur minimal uses dealing with water and waste discharge. Wastewater demand would be minimal and associated only with the office use. The facility would not permit washing vehicles which could affect runoff. Additionally, according to the Geotechnical Report, groundwater was not encountered during the exploratory trenches up to 15 feet below surface level (Appendix D). Therefore, impacts will be less than significant.

- b) **Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

Less than Significant Impact. As discussed in the Geotechnical Report in Appendix D, the borings did not encounter groundwater at the Project site. The report reviewed the historically highest groundwater contours prepared by State of California Department of Water Resources. This showed that the historically highest groundwater levels in the immediate site vicinity indicate that groundwater level are over 50 feet below ground surface (bgs). Additionally, portions of the Project site have been previously covered with asphalt grindings.

The Proposed Project will not result in the depletion of groundwater supplies by lowering levels of the water table. The Project Applicant will coordinate with Littlerock Creek Irrigation District and Palmdale Water District for the Project's water uses and connect to the existing utility connections along Pearblossom Highway. Any additional grading/excavation that would be required will not pass aquifer levels. The Proposed Project would comply with the MS4 permit by employing BMPs for on-site detention/retention of stormwater runoff erosion events. Additionally, the Proposed Project would comply with the goals and policies as noted in the Land Use and Community Design of the General Plan 2045 update to minimize impacts of urban development on groundwater supplies such as the following:

CON-6.2: Reduce landscaping irrigation needs

CON-6.3: Reduce street runoff

CON-6.4: New construction water conservation

CON-6.5: Monitoring and coordination with local agencies

Impacts therefore would be less than significant.

- c) ***i) Would the Project 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 result in substantial erosion or siltation on- or off-site?***

Less than Significant Impact. The Proposed Project is not located near a stream or river and would not result in altering the course through addition of impervious surfaces. The Project site consists of dirt and asphalt grindings. The Proposed Project would require additional grading and excavation which could cause erosion and siltation on and off-site.

The Project site's drainage occurs by minor sheet flow and erosion could occur. On-site grading and drainage design, landscaping, and site maintenance would minimize the sheet flow erosion potential. The Proposed Project would be required to comply with the City NPDES permit, PMC Section 8.04.265 (Excavation and Grading) to establish control of erosion, sediments, and other construction-related pollutants and SWPPP BMPs.

Therefore, impacts will be less than significant.

- ii) Would the Project 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**

Less than Significant Impact. As discussed in the previous Section X threshold (b) and (c(i)), the Proposed Project will not result in substantially altering existing drainage patterns or altering the course of a stream or river.

The Proposed Project includes installation of a storm drain system to collect runoff from the site and route it to a detention basin at the north end of the site. The basin will reduce the runoff discharge from the site to 85 percent of the pre-developed runoff. There will also be a separate storm drain pipe that will collect the off-site runoff from Pearblossom Highway and route it thru the site to the existing basin/channel at the northwest corner of the site. The north end area also includes a trapezoidal channel to collect and route off-site runoff across the site into the existing basin/channel. The existing basin/channel off-site was constructed during the development of residential tracts 46356 and 52029.

Construction and operation of the Proposed Project would introduce new paved/impervious areas to the Project site that would increase runoff such as parking lots, access roads, and walkways. The Proposed Project would comply with the goals and policies as noted in the Land use and Community Design of the General Plan 2045 update to minimize impacts of urban development for reducing street runoff and implementing water conservation measures. The preparation of the SWPPP and implementation of BMPs during construction and operation of the Project will minimize surface runoff, maintain water quality, and water discharge standards. Impacts will be less than significant.

- iii) Would the Project 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 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?**

Less than Significant Impact. As discussed in the previous Section VII threshold (d), while the Proposed Project would expand existing impermeable surfaces that may increase surface runoff, implementing City policies on flood control, drainage management, and the SWPPP and BMPs during construction and operation of the Project will minimize potential impacts contributing to surface water runoff. Privately maintained retention basins will be used to address stormwater runoff from the site. In addition, filtering of the first flush (3/4") of runoff from the site would be implemented to address stormwater runoff. The Project site would utilize catch

basin filters installed in the various catch basins to address stormwater runoff. Impacts will be less than significant.

iv) Would the Project 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 impeded or redirect flood flows?

No Impact. See previous response in Section VII threshold (g); as discussed in Section c)i), the Project area is not located within a flood area zone. The Project site is located on flood zone 'X' per the Hydrology Study and therefore, is not located in a special flood hazard area. Therefore, the Proposed Project would not result in altering drainage patterns for flood flows. No impact would occur.

d) Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The City of Palmdale is located inland in the high desert with the coastline located approximately 45 miles south of the City (Google 2024). The Project area is located approximately five miles east of Lake Palmdale. No inundation by seiche or tsunami will occur in the Project area, as it is not within a coastline and is not within the inundation area of Lake Palmdale. The Project area is flat and is not anticipated to be inundated by mudflow. While the Project area experiences floods, on-site detention basins would mitigate potential flood impacts. Therefore, no impact would occur.

e) Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. An Urban Water Management Plan (UWMP) was prepared for the Palmdale Water District in 2020. The plan identifies the demand projections for industrial facilities, which are 4.06 acre-feet per year per acre, which equates to approximately 1.3 million gallons per year per acre (approximately 39.7 million gallons per year for a 30-acre site). The construction and operational phases of the Proposed Project do not include activities that could obstruct the implementation of the UWMP. Additionally, the Proposed Project is a permitted use and has been accounted for in the development of the growth forecast (Palmdale Water District [PWD] 2021). 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts

a) Would the Project physically divide an established community?

No Impact. The Proposed Project will be located on a parcel that is currently vacant and graded. The Proposed Project design and configuration would not interfere with existing access to adjoining properties or the existing street circulation pattern; therefore, the Proposed Project would not require the expansion of existing roads or extension of new roads. No impact will occur.

b) Would the Project 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?

Less than Significant Impact. The Project area is zoned as RC. A mini-storage facility is permissible within the RC zone with the review and approval of a CUP SPR. Although the Proposed Project will require a CUP for to permit operations, it is still consistent with development type for the surrounding land uses, including the adjacent gas station. Impacts therefore 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
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) Would the Project 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?

No Impact. The Proposed Project does not involve any mineral resource extraction. Sections of the Project site has been previously covered with asphalt grindings, is not zoned for mining work, and would not result in loss of availability of known mineral resources. No impact would occur.

b) Would the Project 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?

No Impact. See previous Section XII (a); the Proposed Project is not zoned for or permitted to conduct work involving mineral resource extraction. The Project site is not a mineral resource zoned area according to the General Plan 2045 (City 2022b). Development of a mini-storage facility would not result in loss of availability of locally important mineral resource. 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Project Impacts

A Noise Impact Study was prepared by MD Acoustics, LLC in February 2024 (Appendix F) that includes a discussion of the existing community noise environment and the recommendations for control of the Proposed Project noise impacts upon the surrounding land uses.

- a) Would the Project result in the 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?**

Less than Significant Impact.

Transportation Noise Impacts:

The main source of noise due to traffic near the Project site is due to traffic from Pearblossom Highway. The Project trip generation estimates the project will generate 194 daily trips. It takes a change in noise level of three decibel (dB) for the human ear to perceive a difference. An additional 194 daily trips will increase the existing traffic noise due to Pearblossom Highway by a maximum of 0.1 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL). The impact is not perceptible, and the impact is less than significant.

Stationary Noise Sources:

Stationary noise impacts would be considered significant if they result in exceedances of 65 dBA CNEL at residential uses according to Table N-3 of the General Plan 2045 Noise Element. Implementation of the Proposed Project may result in stationary noise related to heating, ventilation, air conditioning (HVAC) Systems. The future worst-case noise level projections were modeled using

references of sound level data for the various stationary on-site sources. The model assumes that the noise will, in reality, be intermittent and lower in noise level. The projected Project-only noise level at the nearest residential uses will be 62 dBA CNEL and will be below the City's residential noise standard. Thus, the impact is less than significant.

Construction Noise and Vibration:

Construction is anticipated to occur during the permissible hours as described in the PMC Section 8.28.030 (Construction Noise Prohibited in Residential Zones). Construction noise is considered a short-term impact and would be considered significant if construction occurs outside the allowable times as described in the PMC.

The grading and building phases of on-site construction activities will generate the highest temporary noise levels. The loudest construction equipment on the site will be tractors, graders, scrapers, rollers, and dozers. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three or four minutes at lower power settings. Construction at the nearest residential uses will be up to 82 dBA equivalent continuous sound (Leq). The construction noise will occur during the allowable times. Thus, impacts are less than significant.

b) Would the Project result in the generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact. Construction vibration will be significant if vibration exceeds levels that would result in structural damage to existing buildings. Construction activity is not anticipated to occur within 15 feet of neighboring buildings. At a distance of 15 feet, the nearest building to the project property line, a vibrational roller would yield a worst-case 0.368 PPV (in/sec), which will be perceptible but is below the threshold of any risk of damage. Therefore, impacts regarding a generation of excessive groundborne vibration or groundborne noise levels would be less than significant.

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?

No Impact. The Proposed Project is not located within an airport land use plan, or within two miles of a public airport. No impact would occur.

Mitigation Measures

None required.

	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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts

- a) **Would the Project 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)?**

Less than Significant Impact. The Proposed Project will not induce substantial population growth in the area directly or indirectly. The Project activities do not involve the development of new housing or extension of roads or other new infrastructure that would attract population to the area. While the Proposed Project may create new employment opportunities within the community, the employment availability will not be significant enough to warrant an increase in available housing. Any potential population increase would be less than significant. Additionally, the Proposed Project will be minimally staffed, and its use is for storage purposes which would serve the existing community. Impacts will be less than significant.

- b) **Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

Less than Significant Impact. As stated in the previous threshold (a), the Proposed Project will not displace existing housing or necessitate the construction of replacement housing, as new employment opportunities from the facility will not be significant enough to warrant an increase in available housing. Impacts will be less than significant.

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"/>

Project Impacts

- a) **Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?**

Less than Significant Impact. The nearest fire station to the Project area is located at 5624 East Avenue R, Los Angeles County Fire Station No.93, approximately two miles northeast from the Project site (LACoFD 2022). PMC Chapter 3.42, Fire Facilities Impact Fee Requirements, requires new development to pay a fire facilities impact fee. The intent is to require development to mitigate the impacts of that development on the City’s public facilities. Therefore, the City requires developers to pay a fire facilities impact fee that would be used to meet the demand for fire protection facilities created by development. The Proposed Project will need to be reviewed by the fire department to ensure it can adequately service the site. Review will include comments from the Building Plan Check for review and approval. Impacts will be less than significant.

- b) **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 police protection?**

Less than Significant Impact. The Proposed Project will not result in substantial impacts or interruption of police protection services. The City of Palmdale contracts with the Los Angeles County Sheriff’s Department for law enforcement services and crime deterrence within the City (City 2022c). All new projects are reviewed by the City for law enforcement needs. The law enforcement services for the

Proposed Project would be based out of the Palmdale Sheriff Station, located at 750 East Avenue Q, approximately 5.5 miles northwest of the Project site. The introduction of the Proposed Project could increase the demand for police services to the site when compared to existing conditions. The Project Applicant would be required to comply with any specific conditions related to safety and security, including compliance with PMC Chapter 3.45 (Public Facility Development Impact Fee Requirements). The Proposed Project would not require the need for new or physically altered police facilities in order to maintain acceptable service ratios, response times, or other performance objectives. The Project would be minimally staffed, and security systems would be installed to support law enforcement/security needs. Impacts would be less than significant.

- c) **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 schools?**

No Impact. The Proposed Project consists of the construction of a storage facility that would be minimally staffed. The Proposed Project will not result in degrading the performance, quality, or access to nearby schools, as the Proposed Project does not involve the use of schools or school property. The nearest school is Cimarron Elementary School, located approximately one mile northwest of the Project Area (Google 2024). No impact will occur.

- d) **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 parks?**

No Impact. The nearest park to the Proposed Project is Sam Yellen Park & Dog Park, and Sam Yellen Community Park, approximately one mile north of the Project site (Google 2024). The Proposed Project will not alter the quality or access to nearby parks in the area as the work would occur within the Project boundary, and its use would not create an increase in population. No impact will occur.

- e) **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 other public facilities?**

No Impact. The Proposed Project would not alter the quality of, or access to, any other public facilities such as libraries, hospitals, or recreational trails as there is no anticipated population increase that could affect other governmental facilities. No impacts will occur.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI RECREATION. Would the Project:				
a) 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) 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) **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?**

No Impact. The Proposed Project would not increase the use of recreational facilities as its operations would not introduce additional population to the area. The Proposed Project would be minimally staffed and would utilize the local workforce creating no additional demand for recreational facilities. It will not alter the quality or access of any neighborhood, regional parks, or other recreational facilities. No impact will occur.

- 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?**

No Impact. The Proposed Project consists of the construction of a mini-storage facility on an approximately five-acre site. The Proposed Project would utilize the local workforce and not create additional use of recreational facilities. The Proposed Project will not require the construction or expansion of recreational facilities in the area. No impact will 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, roadways, bicycle lanes and pedestrian paths?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a 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"/>

Project Impacts

- a) **Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?**

Less than Significant Impact. Pearblossom Highway is designated as a regional street type. Characteristics of this street contain limited commercial frontage, may overlap with existing or planned truck routes, and is a principal network for regional travel connecting the City to other communities. Design elements of this street type focus on through traffic and vehicle capacity and primarily serve vehicles. Bicycle and/or transit facilities would be designed with separate facilities. There are no transit, bicycle, or pedestrian facilities adjacent to the Project site. The nearest sidewalk is located to the west along the residential community. The nearest bus stop to the Project site is located along Pearblossom Highway and Fort Tejon road to the east. According to the General Plan 2045 Update, while Senate Bill (SB) 743 (which was signed into law to update the guidelines on how transportation impacts are analyzed) does not preclude using Level of Service for local traffic

operations analysis, this method may no longer be used as a metric for evaluating a project's potential transportation impacts (City 2022b).

The Project proposes the development of a mini-storage facility. The facility will be used for storage purposes and would have minimal staff present on-site. The City's Office of Traffic & Transportation Engineer provided a memorandum addressing potential transportation concerns of the Project site. Based on the plans reviewed, and use of the TREDLite tool to evaluate the amount of traffic and vehicle miles of travel (VMT) anticipated, the results indicated that the Project will not have a significant VMT impact, and no further traffic analysis would be required. Therefore, construction and operation of the Proposed Project would not conflict with the existing circulation system or affect pedestrian and bicycle facilities.

b) Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

Less than Significant Impact. As discussed in threshold a) above, SB 743 was enacted to create a better method of measuring actual transportation-related environmental impacts for a project. According to the City guidelines, and results of the Traffic/Transportation Engineer memorandum, the Proposed Project would not result in a significant VMT impact, and no further traffic analyses would be required. Impacts would be less than significant.

c) Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g. farm equipment)?

Less than Significant Impact. The Proposed Project would not introduce incompatible uses as the operation of a mini-storage facility is an allowable use with submittal of a CUP and SPR. The Proposed Project would not provide access directly through Pearblossom Highway. Access to the site would be through reciprocal access from the adjacent property to the east. Incorporation of this design would not introduce a geometric design feature that would increase hazards on the Project area. Impacts therefore would be less than significant.

d) Would the Project result in inadequate emergency access?

Less than Significant Impact. The Proposed Project consists of operating a mini-storage facility which would be minimally staffed. The Proposed Project would require submittal and approval through the City and County for developing along Pearblossom Highway, which is a designated evacuation route. The Proposed Project will be constructed in compliance with the Los Angeles County Fire Department (LACofD) standards regarding emergency access. The Proposed Project would not interfere substantially with an adopted emergency or evacuation plan. 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)?	<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"/>

Project Impacts

Refer to the Cultural Resources Section V for discussion on the Phase I Cultural Resources Inventory prepared for the Proposed Project.

- a) **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 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)?**

Less than Significant Impact with Mitigation Incorporated. The Proposed Project site does not contain any structures listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). As discussed in Section V. Cultural Resources, the results of the SCCIC records search indicated that there are zero previously recorded archaeological sites within the Project site. However, there is the possibility of cultural resources being discovered on the Project site as determined during tribal consultation. Therefore, implementation of mitigation measures CR-1 and TRC-1 through TCR-5 would

result in a less than significant impact associated with the unanticipated discoveries of tribal cultural resources.

- b) **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 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.**

Assembly Bill 52 requires public agencies to consult with tribes that may have a traditional affiliation to a project area to gather information on a site's sensitivity and identify if any mitigation measures would be required to preserve discovered or undiscovered tribal cultural resources. The City sent letters to their list of tribes on September 12, 2024 to conduct consultation.

The City received responses from the Morongo Band of Mission Indians (MBMI), Yuhaaviatam of San Manuel Nation (YSMN) and Fernandeno Tataviam Band of Mission Indians (FTBMI).

Mitigation measures from the Yuhaaviatam of San Manuel Nation (YSMN), Morongo Band of Mission Indians (MBMI), Fernandeno Tataviam Band of Mission Indians (FTBMI) have been requested to be incorporated to the Project.

As discussed in Section V Cultural Resources, mitigation measure CR-1 shall be implemented to ensure that potential impacts to sensitive resources remain less than significant. Additionally, based on the history and sensitivity of the Project area discussed with the Tribes during consultation, mitigation measures TCR 1 through TCR-5 shall be incorporated into the Project. Implementation of the mitigation measures will reduce the potential for adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074, to less than significant.

Mitigation Measures

TCR-1: Tribal Monitoring Services Agreement

Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Services Agreement with the Morongo Band of Mission Indians (MBMI) for the Project. The Tribal Monitor shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources.

TCR-2: Cultural Resource Management Plan

Prior to any ground-disturbing activities the project Archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the consulting Tribe[s] and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.

TCR-3: Inadvertent Discovery of Cultural Resources

In the event that previously unidentified cultural resources are unearthed during construction, the Qualified Archaeologist and the Tribal Monitor shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist and Tribal Monitor[s]. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and the Tribal Monitor, shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and the Tribal Monitor[s] and be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance.
- B. If avoidance is not feasible, Preservation in place.
- C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.
- D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)

TCR-4: Inadvertent Discovery of Human Remains

The MBMI, FTBMI and Yuhaaviatam of San Manuel Nation requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. No photographs are to be taken except by the coroner, with written approval by the consulting Tribe[s].

A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.

B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5 and that code enforced for the duration of the Project.

C. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98

D. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (MLD), the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.

TCR-8: FINAL REPORT: The final report[s] created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe[s] for review and comment. After approval of all

parties, the final reports are to be submitted to the appropriate Information Center, and the Consulting Tribe[s].

	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 stormwater drainage, electric power, natural gas, or telecommunication, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) 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) Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication, the construction or relocation of which could cause significant environmental effects?**

Less than Significant Impact. The Proposed Project site is within the service area of the Palmdale Water District (PWD). The Proposed Project, while vacant, is surrounded by existing development ranging from residential to industrial uses. The Project would connect to existing gas, electric, telecommunications, water, sewer and wastewater connections provided and located along Pearblossom Highway. The Proposed Project would not require construction of new or expanded utility systems as the area is currently being serviced due to existing development. Additionally, the Proposed Project consists of a mini-storage facility that would be minimally staffed.

There would be no significant increase in users on-site that would warrant expansion of existing utilities. Additionally, the Proposed Project would be required to demonstrate compliance with Goals PSFI-2 of the Public Facilities, Services, and Infrastructure Element of the General Plan 2045. Goals PSFI-3 and CON-5 outlines waste, water, and wastewater goals to ensure that there is adequate water service to meet the increased service needs generated by the development and protects the quality and quantity of these resources (City 2022b). Compliance with this regulation would ensure that impacts associated with water supply are alleviated. The Proposed Project will not result in the relocation or construction of new utility connections. Impacts will be less than significant.

b) Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. The Proposed Project would operate as a mini-storage facility with minimal staff. PWD receives its water resources from the California Aqueduct, Littlerock Dam, and through the District's water wells. According to the City's UWMP, the demand projections for industrial facilities are 4.06 acre-feet per year per acre, which equates to approximately 1.3 million gallons per year per acre (approximately 39.7 million gallons per year for a 30-acre site). Due to the nature of the Proposed Project operations, water usage would be minimal. Impacts therefore would be less than significant, as the Project would be adequately serviced by existing water service providers.

c) Would the Project 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?

Less than Significant Impact. The Palmdale Water Reclamation Plant processes all wastewater solids generated within its service area and provides treatment of 12 million gallons of wastewater per day. The capacity of the plant along with the water district has been developed based on the forecasted growth within the City. The Project site would be minimally staffed and would not introduce a substantial population that would create an increase in wastewater generation. The Proposed Project would include one office building with three full-time employees anticipated, and therefore, the additional flow would be insignificant to the overall flow in the existing sewer system (Appendix F). Impacts would be less than significant.

d) Would the Project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?

Less than Significant Impact. The Antelope Valley region's waste and recycling collection services are provided by Waste Management, Inc. Antelope Valley Public Landfill receives the waste generated by the City. The remaining capacity

of Antelope Valley Landfill is estimated at 12.9 million tons and a remaining life of 23 years, as of 2016 according to the Los Angeles Integrated Waste Management Plan. The Proposed Project construction and operational wastes would be diverted to recycling facilities or made available for reuse when appropriate to reduce waste. The Proposed Project would comply with the City's General Plan's (2045) solid waste goals (Goal SCR-5) to increase resource capture and reduce waste sent to landfills (City 2022b). During operations, the Proposed Project would not generate excessive solid waste as its operations would be for storage of personal items and vehicles. Impacts would be less than significant.

e) Would the Project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?

Less than Significant Impact. The Proposed Project would comply with the Solid Waste Management Plan (SWMP) and with PMC Chapter 5.52 (Solid Waste Handling and Recycling Service) to ensure that facilities and programs would accommodate solid waste and hazardous waste collection, handling, and disposal. Compliance with the code would ensure source reduction of the solid waste stream and diversion of solid waste from landfills. The code is implemented to ensure compliance with Assembly Bill (AB) 341, which establishes reduction goals. The Proposed Project would also comply with the City's General Plan 2045 goals for waste reduction and recycling. Impacts would be less than significant.

f) Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. The City of Palmdale has a franchise agreement with Waste Management, Inc. that requires all residential, commercial, and industrial developments within the City of Palmdale to maintain trash service with Waste Management, Inc. The Proposed Project would be required to participate in reduction and recycling programs to reduce the amount of solid waste delivered to the Antelope Valley Public Landfill.

The Proposed Project will comply with the City's General Plan 2045 goals and policies to ensure provision of adequate facilities and programs to accommodate solid waste disposal (Goal SCR-5). Compliance with these goals, and with Goals PSFI-6 which requires coordination with "utility providers to support adequate provision of critical utilities," would minimize impacts associated with solid waste regulations (City 2022b). Therefore, implementation of the Proposed Project would result in a less than significant impact associated with regulations related to solid waste.

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) 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 uncontrolled spread of wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

Project Impacts

- a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project impair an adopted emergency response plan or emergency evacuation plan?**

Less than Significant Impact. As stated in Section IX threshold (g), the Proposed Project is not located within a Very High Fire Hazard Severity Zone (City 2015). However, the land south of Pearblossom Highway is within a high fire hazard zone. However, the properties south are currently developed.

According to the General Plan 2045, goals and policies related to emergency planning and response include:

Goal SE-2: Minimize public health, safety, and welfare impacts resulting from wildfire hazards.

Policy SE-2.7: Emergency Access Routes for Wildfire Hazard Zones. Require all new development in or near designated wildfire hazard zones to identify multiple evacuation/emergency access routes and file with City.

Policy SE-2.8: LAFCD Coordination. Continue to coordinate with the LAFCD to provide emergency evacuation support and address fire hazards (City 2022a).

Implementation of the Proposed Project would not result in affecting the goals and policies for emergency and evacuation plans. While Pearblossom Highway is a designated evacuation route, the Proposed Project would not provide direct access to the highway that would cause or impair its use during evacuation. Access to the facility would be permitted via reciprocal access from the property to the east. Additionally, the operations of the Project would not generate significant traffic/VMT as it would be minimally staffed and visited by its customers.

No roads would be permanently closed as a result of the construction or operation of the Project, and no structures would be developed that could potentially impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The Project would not prohibit subsequent programs or plans from being established or prevent the goals and objectives of existing plans from being conducted. Thus, impacts would be less than significant.

- b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of wildfire?**

Less than Significant Impact. While the properties south of Pearblossom Highway is within a high fire hazard zone, as stated in threshold (a) above, the Proposed Project is not within a Very High Fire Hazard Severity Zone and is located within a flat, low-lying area of the city with minimal elevation changes or steep slopes. Construction of the Proposed Project would implement fire prevention and fire watch procedures as typically required by state and federal guidelines during construction to prevent or exacerbate wildfire risks, especially during high heat months. Additionally, the properties south of the Project site are currently developed with minimal vegetation. Therefore, impacts would be less than significant.

- c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project, require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water resources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

Less than Significant Impact. As stated in threshold (a) above, the Proposed Project is not within a Very High Fire Hazard Severity Zone and would not exacerbate wildfire risks. The Project is located within a rural area and would involve the partial development of the majority of the Project site with structures. Fuel breaks are not expected to be required as part of the Project. Construction BMPs, such as ensuring equipment has spark arresters installed, would ensure temporary construction does not exacerbate fire risks in the area and within

adjacent areas such as the properties south of Pearblossom Highway. Impacts would be less than significant.

- d) **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project, 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?**

Less than Significant Impact. As stated in threshold (a) and (b) above, the Proposed Project is not within a Very High Fire Hazard Severity Zone and is located in a flat, low-lying area with minimal chance for downstream impacts. The Proposed Project would introduce additional impervious surfaces, which would increase the volume of stormwater runoff from the site. This increase in runoff volume would increase the rate of surface runoff and flooding on- or off-site. However, landscaping of the Project area would reduce off-site flows and reduce runoff volumes and rates. Furthermore, the Project would comply with all National Pollution Discharge Elimination System (NPDES) requirements, Los Angeles County’s Municipal Separate Storm Sewer System (MS4) Permit, and the City’s runoff requirements and would therefore not significantly increase the rate of surface runoff and flooding on- or off-site. The Project site is flat and does not contain any slopes that pose a risk of landslide or slope instability. 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
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,	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	the effects of other current projects, and the effects of probable future projects)?				
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"/>

Discussion

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

- 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?**

Less than Significant Impact with Mitigation Incorporated. As discussed throughout this Initial Study, the Project does not have the potential to substantially degrade the quality of the environment or result in significant environmental impacts that cannot be reduced to a less than significant level with compliance with the established regulatory framework and implementation of mitigation measures.

As discussed in Section IV, Biological Resources, the Project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The Project would be required to implement BIO-1 to address the potential for burrowing owl and nesting migratory birds within the trees proposed to be removed as part of the Project, which would reduce potential impacts to a less than significant level.

As discussed in Section V, Cultural Resources, there were no archaeological resources eligible under the California Register. Resources, however, could be uncovered during ground disturbing activities. Should resources be uncovered, mitigation measure CR-1 and GEO01 would be implemented to address the potential for resources to be uncovered, which would reduce potential impacts to a less than significant level.

- 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)?**

Less than Significant Impact. Based on the analysis contained in this Initial Study, the Proposed Project would not have cumulatively considerable impacts with implementation of Project mitigation measures. Compliance with the regulatory requirements and implementation of mitigation measures at the Project-level would reduce the potential for the incremental effects of the Proposed Project to be considerable when viewed in connection with the effects of past projects, current projects, or future projects. According to the City's Capital Improvement Plan for 2022 to 2027, the projects that would occur within the vicinity of the Project site involve modifying traffic signals and the widening of Avenue T (City 2022d). These projects would occur outside of the time of the Proposed Project and would not require or involve the Project site. Impacts therefore would be less than significant.

c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. Based on the results of the technical studies and analysis of the IS, the Proposed Project will not result in substantial adverse effects on human beings. The Project area would be utilized for storage purposes, which would be consistent with the General Plan 2045 zoning and uses with the submittal of a CUP and SPR. The Project area and Project vicinity at present are currently developed. The Proposed Project would be consistent with the existing uses of the area. Impacts would be less than significant.

Direct and indirect impacts to human beings typically originate from air quality, GHG, noise, hazardous materials, transportation design features, ground shaking, and wildfire. As discussed in this study, it was found that impacts would be less than significant to these environmental areas with compliance with City and building guidelines and in implementation of the geotechnical recommendations. Impacts would be less than significant.

5. MITIGATION MEASURES

MM BIO-1: If possible, removal or ground disturbance near the three American elm trees (*Ulmus americana*) will occur outside the breeding season for migratory birds. Nesting generally lasts from February to July but may extend beyond this time frame. If activities impacting the trees occur during or close to the nesting season, a qualified biologist will survey this area as close as possible but no more than one week prior to disturbances. If active bird nests are found impacts to nests will be avoided by either delaying work or establishing initial buffer areas of a minimum of 500 feet (160 m) around active raptor nests or a minimum of 50 feet (16m) around other migratory bird species nests. The project biologist will determine if the buffer areas should be increased or decreased based on the nesting bird response to disturbances.

MM CR-1: Inadvertent Discoveries

If buried cultural resources (such as chipped or ground stone, historic debris, or building foundations) are encountered during ground-disturbing activities, work shall stop in that area and within a 100-foot radius of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology can assess the significance of the discovery and, if necessary, develop a response plan with appropriate treatment measures, in consultation with the City and other relevant agencies. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) and Morongo Band of Mission Indians (MBMI), and Fernandeano Tataviam Band of Mission Indians (FTBMI) shall be contacted. If necessary, the evaluation may require the preparation of a treatment plan and Phase II archaeological testing to determine CRHR eligibility. Preservation in place (avoidance, open space, capping, easement) shall be the preferred treatment method per State CEQA (CCR Tit 14. § 15126.4[b]). If the discovery proves significant under CEQA and cannot be avoided by the project, data recovery may be warranted to exhaust the resource's data potential, thereby reducing any impact to a less-than-significant level. Construction shall not resume until a qualified archaeologist has conferred with the City on the significance of the resource and the recommendations made by the Qualified Archaeologist have been implemented to the reasonable satisfaction of the archaeologist.

MM CR-2: Inadvertent Discovery of Human Remains:

If previously unknown human remains are found during excavation, the Project will follow procedures as detailed in the California Health and Safety Code (CHSC) § 7050.5. If human remains of Native American origin are discovered during construction, the Project shall comply with State laws, which fall within the jurisdiction of the Native American Heritage Commission (NAHC) relating to the disposition of Native American burials (PRC § 5097).

Upon discovery of human remains, all work within a minimum of 200 feet of the find must cease immediately, and the County Coroner must be notified and allowed to examine the remains. If the Coroner determines the remains to be of Native American origin, he or she shall notify the NAHC. The NAHC shall then identify the most likely descendants (MLD) to be consulted regarding treatment and/or repatriation of the remains. The MLD shall be granted access to examine the remains and has 48 hours to provide recommendations for the treatment or reburial of the remains. If the MLD fails to make a recommendation within 48 hours of being granted access to the remains, the land manager/owner can rebury the remains in a location not subject to further disturbance. If the Coroner determines that no investigation of the cause of death is required and that the human remains are not Native American, then ground-disturbing activities may resume after the Coroner informs the County of Los Angeles of such determination. According to State law, six or more human burials at one location constitute a cemetery, and disturbance of Native American cemeteries is a felony.

MM GEO-1: In the event paleontological resources are encountered, work in the immediate area shall be halted and a qualified paleontologist shall be contacted immediately to evaluate the find. Construction activities shall be temporarily redirected to another location on-site so that the monitor can recover any specimens encountered during excavation. All fossils/specimens collected shall be deposited in a City approved museum repository for curation and storage.

TCR-1: Tribal Monitoring Services Agreement

Prior to the issuance of grading permits, the applicant shall enter into a Tribal Monitoring Services Agreement with the Morongo Band of Mission Indians (MBMI) for the Project. The Tribal Monitor shall be on-site during all ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind). The Tribal Monitor shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources.

TCR-2: Cultural Resource Management Plan

Prior to any ground-disturbing activities the project Archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan shall be written in consultation with the consulting Tribe[s] and shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.

TCR-3: Inadvertent Discovery of Cultural Resources

In the event that previously unidentified cultural resources are unearthed during construction, the Qualified Archaeologist and the Tribal Monitor shall have the authority to temporarily divert and/or temporarily halt ground-disturbance operations in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed.

If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. All work shall be diverted away from the vicinity of the find, so that the find can be evaluated by the Qualified Archaeologist and Tribal Monitor[s]. The Archaeologist shall notify the Lead Agency and consulting Tribe[s] of said discovery. The Qualified Archaeologist, in consultation with the Lead Agency, the consulting Tribe[s], and the Tribal Monitor, shall determine the significance of the discovered resource. A recommendation for the treatment and disposition of the Tribal Cultural Resource shall

be made by the Qualified Archaeologist in consultation with the Tribe[s] and the Tribal Monitor[s] and be submitted to the Lead Agency for review and approval. Below are the possible treatments and dispositions of significant cultural resources in order of CEQA preference:

- A. Full avoidance.
- B. If avoidance is not feasible, Preservation in place.
- C. If Preservation in place is not feasible, all items shall be reburied in an area away from any future impacts and reside in a permanent conservation easement or Deed Restriction.
- D. If all other options are proven to be infeasible, data recovery through excavation and then curation in a Curation Facility that meets the Federal Curation Standards (CFR 79.1)

TCR-4: Inadvertent Discovery of Human Remains

The Morongo Band of Mission Indians, FTBMI and Yuhaaviatam of San Manuel Nation requests the following specific conditions to be imposed in order to protect Native American human remains and/or cremations. No photographs are to be taken except by the coroner, with written approval by the consulting Tribe[s].

- A. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.
- B. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
- C. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98
- D. If the Morongo Band of Mission Indians has been named the Most Likely Descendant (MLD), the Tribe may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial will not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations will be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.

TCR-8: FINAL REPORT: The final report[s] created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe[s] for review and comment. After approval of all parties, the final reports are to be submitted to the appropriate Information Center, and the Consulting Tribe[s].

6. LIST OF PREPARERS

City of Palmdale

Chambers Group – Environmental Document

Mark Hagan – Biological Resource Assessment

MD Acoustics – Noise Impact Study

Bruin Geotechnical Services, Inc. – Geotechnical Engineering Report

MS Hatch Consulting – Air Quality Study

Stantec – Phase I Cultural Resources Assessment

7. REFERENCES

Bureau of Land Management (BLM)

- 2016 Desert Renewable Energy Conservation Plan (DRECP). Available at: <https://www.blm.gov/programs/planning-and-nepa/plans-in-development/california/desert-renewable-energy-conservation-plan>.

California Department of Transportation (Caltrans)

- 2024 California Scenic Highway Mapping System. Accessed March 2022. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

City of Palmdale (City)

- 2011 Energy Action Plan. Accessed March 2022. <https://www.cityofpalmdale.org/DocumentCenter/View/195/Palmdale-Energy-Action-Plan-PEAP-PDF>.
- 2012 Emergency Operations Plan (EOP). Available at: https://bof.fire.ca.gov/media/vc5jdv3y/rpc-3-b-i-city-of-palmdale-emergency-operations-plan-online-only-_ada.pdf
- 2015 Very High Fire Hazard Severity Zone. Accessed March 2022. Available at: <https://www.cityofpalmdale.org/DocumentCenter/View/514/Very-High-Fire-Hazard-Zones-PDF>.
- 2022a Zoning Map. Available at: <https://www.cityofpalmdale.org/DocumentCenter/View/516/Zoning-with-street-labels-PDF>.
- 2022b 2045 General Plan Update Available at: https://palmdale2045gp.org/wp-content/uploads/2023/05/PalmdaleGPU_FinalDraft_Revised_041823.pdf
- 2022c Law Enforcement. Available at: <https://cityofpalmdale.org/263/Law-Enforcement>.
- 2022d Public works Capital Improvement Plan. Available at: <https://www.cityofpalmdaleca.gov/Archive.aspx?AMID=36>

County of Los Angeles (County)

- 2014 Regional Habitat Linkages. Available at: https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-2_Regional_Wildlife_Linkages.pdf.
- 2015 Significant Ecological Areas and Coastal Resource Areas Policy Map. Available at: https://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf
- 2022 Airport Land Use Commission Site. Available at: <https://lacounty.maps.arcgis.com/apps/webappviewer/index.html?id=acf2e87194a54af9b266bf07547f240a>.

Department of Conservation (DOC)

1984 Mineral Land Classification Map. Available at:
<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>.

2022a Important Farmland Finder. Available at:
<https://maps.conservation.ca.gov/DLRP/CIFF/>.

2022b Williamson Act Status Report. Available at:
https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf.

Department of Toxic Substances Control

2024 Envirostor Database. Accessed June 2024. Available online at:
<https://www.envirostor.dtsc.ca.gov/public/>

Google

2022 Google Earth Pro. Available at: <https://earth.google.com/web/>.

Los Angeles County Fire Department (LACoFD)

2022 Station Locator. Available at:
<https://locator.lacounty.gov/fire/Search?find=&near=Palmdale&cat=&tag=&loc=&lat=34.552144928000075&lon=-118.00909021999996>.

Palmdale Water District (PWD)

2021 Urban Water Management Plan. Available at:
https://wuedata.water.ca.gov/public/uwmp_attachments/3636411368/PWD%20Final%202020%20UWMP.pdf.

State Water Resources Control Board

2024 Geotracker Database. Accessed June 2024. Available at:
<https://geotracker.waterboards.ca.gov/>

United States Geological Survey (USGS)

2019 U.S. Quaternary Faults. Accessed March 2022. <https://usgs.maps.arcgis.com>.

8. PUBLIC COMMENTS AND RESPONSES