MAY 2023





# CITY OF SANTA CLARITA
# SANTA CLARITA COMMERCE CENTER PROJECT
## INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PREPARED FOR

City of Santa Clarita

CITY OF SANTA CLARITA
COMMUNITY DEVELOPMENT DEPARTMENT
23920 VALENCIA BOULEVARD, SUITE 302
SANTA CLARITA, CA 91355

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INITIAL STUDY

# CITY OF SANTA CLARITA

| | |
|---|---|
| **Project Title/Master Case Number:** | Santa Clarita Commerce Center Project<br>Master Case 20-091 |
| **Lead Agency Name and Address:** | City of Santa Clarita<br>23920 Valencia Boulevard, Suite 302<br>Santa Clarita, CA 91355 |
| **Contact Person and Phone Number:** | Andy Olson<br>Associate Planner<br>(661) 255-4330 |
| **Project Location:** | As shown in **Figure 1, Regional Location Map**, the Project Site is located in the southwestern portion of Santa Clarita, in the southwestern corner of the Saugus community, approximately 2 miles east of the Golden State Freeway (Interstate 5 or I-5), 3 miles northwest of the Antelope Valley Freeway (State Route 14 or SR-14), and 1.5 miles south of the Santa Clara River. As shown in **Figure 2, Project Vicinity Map**, the Project Site is situated at the northeastern corner of Railroad Avenue and Oak Ridge Drive and bounded by an existing industrial park to the north; a Metropolitan Water District (MWD)-owned property and single-family homes to the east; Circle J Ranch Park to the southeast; Oak Ridge Drive, an apartment complex, and a single-family attached condominium complex to the south; and a railroad right-of-way, Railroad Avenue, and the South Fork of the Santa Clara River to the west. |
| **Applicant's Name and Address:** | Covington Development Partners LLC<br>3 Corporate Plaza, Suite 230<br>Newport Beach, CA 92660 |
| **General Plan Designation and Zoning:** | As shown in **Figure 3, General Plan Land Use Designations**, and **Figure 4, Zoning Designations**, the Project Site General Plan land use designation and zoning are both Industrial (I), which provides for industrial districts in areas with adequate access, infrastructure, and services and is intended to accommodate the most intensive types of industrial uses allowed in the planning area. Allowable uses in this designation include storage and distribution of goods, vehicle storage, contractor's storage facilities, batch plants, heavy equipment repair and sales, wholesale sales, heavy vehicle repair, and supportive commercial uses. Heavy industrial uses that involve processing of raw materials, or generation or treatment of large amounts of hazardous substances, or that result in an excessive emission of odors, fumes, pollutants, vibration, noise, or other noxious, hazardous, or nuisance conditions, will not be allowed. Encroachment of incompatible uses, such as assembly uses and general retail, are not appropriate in Industrial areas. Coverage of the development site by buildings shall not exceed 90 percent, except as otherwise permitted by the reviewing authority pursuant to discretionary review as |

prescribed by the Unified Development Code. Allowable uses shall have a maximum Floor Area Ratio (FAR) of 1.0. Specific allowable uses and development standards shall be determined by the underlying zoning designation.

**Description of Project and Setting:**

**Existing Conditions**

Located in the southwestern corner of the Saugus community within the City of Santa Clarita, the Project Site is approximately 22.3 acres, encompassing 12 industrial lots on 10 parcels (Assessor's Parcel Numbers 2836-076-001, -016 and -017, -023 through -028, and 2836-006-029). The Project Site is generally rectangular in shape and comprises vacant land that has been graded for development. A chain-link fence has been erected along the northern, western, and southern boundaries of the Project Site. In addition, a storm drain easement and flood control channel are located along the eastern boundary of the Project Site. Eight trees, including one coast live oak, six elderberry, and one Goodding's willow, are located along the northern and eastern boundaries of the Project Site. The coast live oak is specifically located in the northeastern corner of the Project Site.

The Project Site had been previously used for agriculture from the 1920s to the mid-1950s and as a building material, recreational vehicle storage yard, and commercial truck storage yard between the late 1950s and the fall of 2019. In 2009, the City approved Master Case 06-286, Tentative Parcel Map 062646, and Oak Tree Permit 06-049 for the development of an industrial/business park on 12 industrial lots, comprising the Project Site. An Initial Study/Mitigated Negative Declaration was adopted as part of this previous project. Under these previous approvals, grading on the Project Site commenced in October 2019, which involved grading an average of 5 feet below the previous grade and excavation occurring at depths of 18 feet to allow for the installation of previously planned storm drains and debris/detention basins. In addition, Springbrook Avenue was extended north from Oak Ridge Drive and currently terminates in a cul-de-sac at the northern boundary of the Project Site. No structures were permitted for construction under these previous approvals.

**Proposed Project**

**Project Overview**

The Project would involve the construction and operation of four industrial/warehouse buildings totaling 430,407 square feet on the Project Site. Building 1, the largest of the four proposed buildings and located in the eastern portion of the Project Site, would be 262,522 square feet. Building 2, located in the southwestern corner of the Project Site, would be 49,308 square feet. Building 3, located in the northwestern corner of the Project Site, would be 78,467 square feet. Building 4, located in the northeastern corner of the Project Site, would be 40,110 square feet. Each building would contain two floors of office space for a combined total of approximately 26,000

square feet. **Figure 5, Proposed Site Plan**, provides a conceptual site plan of the Project.

Project tenants have not been identified; however, the proposed buildings would accommodate standard warehousing uses. Cold storage or storage of significant quantities of hazardous materials is not anticipated. The proposed office space is intended for the general internal office use related to the industrial/warehouse operations. The Project would be operational 24 hours per day and 7 days per week.

**Design and Architecture**

The proposed buildings have been designed to incorporate a variety of architectural treatments to create a modern, unified industrial park campus environment that is consistent with the City's Community Character and Design Guidelines (Guidelines). The proposed buildings would be built as tilt-up structures, with concrete walls and varied rooflines. Building heights would range from 41 feet to 55 feet when measured to the top of building parapets, with a maximum height of 55 feet for Building 1 and a maximum height of 50 feet for Buildings 2 through 4. As shown in **Figure 6** through **Figure 9** (**Conceptual Elevation Renderings for Buildings 1** through **4**, respectively), all four sides of each building's façade would incorporate architectural treatments, including varying reveals, texture, materials, insets, and paint changes in keeping with the 360-degree architecture encouraged in the Guidelines. The design would include concrete panels painted in brown and gray tones, horizontal line patterns, and windows made of vision or spandrel glass, as well as accents provided by anodized awnings and mullions, as shown in **Figure 10**, **Architectural Rendering of Building 1 from Springbrook Avenue and Oak Ridge Drive Looking Northeast**, **Figure 11**, **Architectural Renderings of the Project Buildings from Oak Ridge Drive at Springbrook Avenue Looking North**, and **Figure 12**, **Aerial View of the Project (Conceptual Rendering)**.

The main entrance to each building has been designed to be clearly identifiable and unique, integrating elements, such as enhanced landscaping and vertical architectural features. The entry to each building portrays an office appearance while being architecturally tied into the overall mass and building composition of each structure, which is consistent with the direction provided in the Guidelines.

**Open Space and Landscaping**

A conceptual landscaping plan has been developed for the Project. As shown in **Figure 13, Conceptual Landscaping Plan**, the Project would plant 255 trees, including Brisbane box, African sumac, California sycamore, London plane, olive, Chinese pistache, coast live oak, Engelmann oak, and Australian willow. The Project would also plant the following for groundcover, the majority of which would be placed along the eastern boundary of the Project Site: dwarf acacia, dwarf coyote bush, California meadow sedge, prostrate natal plum,

yellow day lily, yellow lantana, Hall's honeysuckle, myoporum, prostrate rosemary, star jasmine, and society garlic. The Project is required to provide approximately 97,184 square feet of landscaping but proposes a total area of approximately 174,844 square feet spread across the Project Site.

Outdoor employee patios with tables and chairs would be located throughout the Project Site, including two at the southwestern and northwestern corners of Building 1, one at the southeastern corner of Building 2, one at the northeastern corner of Building 3, and one at the southwestern corner of Building 4.

**Parking, Access, and Public Transit**

The Project is required to provide 511 automobile parking spaces but proposes 526 parking spaces, including 387 standard spaces, 14 standard Americans with Disabilities Act (ADA)-compliant spaces, 4 van ADA-compliant spaces, 21 electric vehicle (EV) standard parking spaces (EV-ready spaces), 2 EV standard ADA-compliant spaces, 4 EV van ADA-compliant spaces, and 84 spaces with conduit for future EV chargers (i.e., EV-capable spaces). Electrical infrastructure would be provided such that EV charging stations can be installed on 20 percent of the Project's total automobile parking spaces in the future as the use of EVs become more widespread. As shown in **Figure 2-5**, the majority of the parking spaces would be provided along the perimeter of Building 1. In addition, the Project is required to provide 58 bicycle parking spaces, including 29 short-term and 29 long-term parking spaces. The Project proposes 64 bicycle parking spaces, including 32 short-term and 32 long-term parking spaces.

Access to the Project Site would be provided via Springbrook Avenue off of Oak Ridge Drive, along the southern edge of the Project Site. Six driveways would be located off of Springbrook Avenue including two driveways each to access Buildings 1 and 2 and one driveway each to access Buildings 3 and 4. These driveways would range from 30 feet to 45 feet in width. Springbrook Avenue would serve as a fire lane for the Project. In addition, three fire lanes are provided in the western, eastern, and southern drive aisles for Building 1 along with one fire lane in the eastern drive aisle for Building 2, one fire lane in the northern drive aisle for Building 3, and one fire lane in the southern drive aisle for Building 4.

**Lighting**

Lighting for the Project would comprise white light-emitting diode (LED) lamps that are wall- or pole-mounted. Lighting for Building 1 would include 45 wall-mounted lamps at a height ranging from 9 feet to 30 feet on all four exterior walls of the building and 22 pole-mounted lamps, including 6 at a height of 18 feet in the parking areas to the south and southwest of the building and 16 at a height of 27.5 feet in the parking areas to the east, north, and south of the building. Lighting for Building 2 would include 15 wall-mounted lamps at a height of

9 feet or 30 feet on all four exterior walls of the building and 3 pole-mounted lamps at a height of 27.5 feet at the northeastern and northwestern corners of the parking area. Lighting for Building 3 would include 11 wall-mounted lamps at a height of 9 feet or 30 feet on all four exterior walls of the building and 7 pole-mounted lamps at a height of 27.5 feet in the parking area north of the building. Lighting for Building 4 would include 12 wall-mounted lamps at a height of 9 feet or 30 feet on the western, eastern, and southern walls of the building and 4 pole-mounted lamps at a height of 27.5 feet in the parking areas to the west and east of the building.

**Truck Courts/Loading Docks and Fencing**

Each building would feature a truck court with a loading dock, which would include 27 dock doors at Building 1, 7 dock doors at Building 2, 8 dock doors at Building 3, and 7 dock doors at Building 4. Access to each truck court/loading dock would be secured with a manually-operated metal gate, which would be equipped with a Knox box to provide access to emergency service providers. The truck court/loading dock for Buildings 1 and 2 would include 8-foot-high concrete screen walls, while the truck court/loading dock for Building 3 would include 8-foot-high wrought iron fences. Building 4 would include both a decorative screening mounted on wrought iron along the eastern boundary and a wrought iron fence along the southern boundary. In addition, an 8-foot-high wrought iron fence would be erected along the northern boundary of the Project Site and an 8-foot-high metal fence along the western boundary of the Project Site.

Loading and unloading activities would involve the use of electric-powered service equipment, such as forklifts. Yard trucks used on-site would be powered by electricity. Each truck court/loading dock would also include trash area(s) that would be enclosed in compliance with the City's standards.

**Sustainability Features**

The Project would be required to comply with the California Building Standards Code (California Code of Regulations [CCR] Title 24), which includes the California Green Building Standards (CALGreen) Code (CCR Title 24, Part 11), which requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects, as well as high-efficiency plumbing fixtures. Furthermore, the 2022 Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the California Energy Commission. These standards are specifically crafted for new buildings to result in energy-efficient performance.

In addition, the Project would include the following sustainability features:

- The Project would be designed such that each building features skylights that cover a minimum of 3 percent of the total roof area of each proposed building.

- Photovoltaic infrastructure would be provided on the rooftops of each proposed building such that a minimum of 25 percent of the total roof area of each includes photovoltaic arrays at Project buildout. Each building would also include an electrical system and other infrastructure sufficiently sized to accommodate the potential installation of photovoltaic arrays in the future up to 50 percent of the total roof area of each building. The electrical system and infrastructure would be clearly labeled with noticeable and permanent signage, which informs future occupants/owners of the existence of this infrastructure.
- All fixtures installed in restrooms and employee break areas would be U.S. Environmental Agency (USEPA) Certified WaterSense or equivalent.
- All heating, cooling, lighting, and appliance fixtures installed would be Energy Star-rated. Information on energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs would be provided to future tenants of the Project.
- Each building would be equipped with outdoor electric outlets in the front and rear of the buildings to facilitate use of electrical lawn and garden equipment.
- Non-landscaped surface areas surrounding each building would be concrete to reduce the urban heat island effect.

**Project Construction**

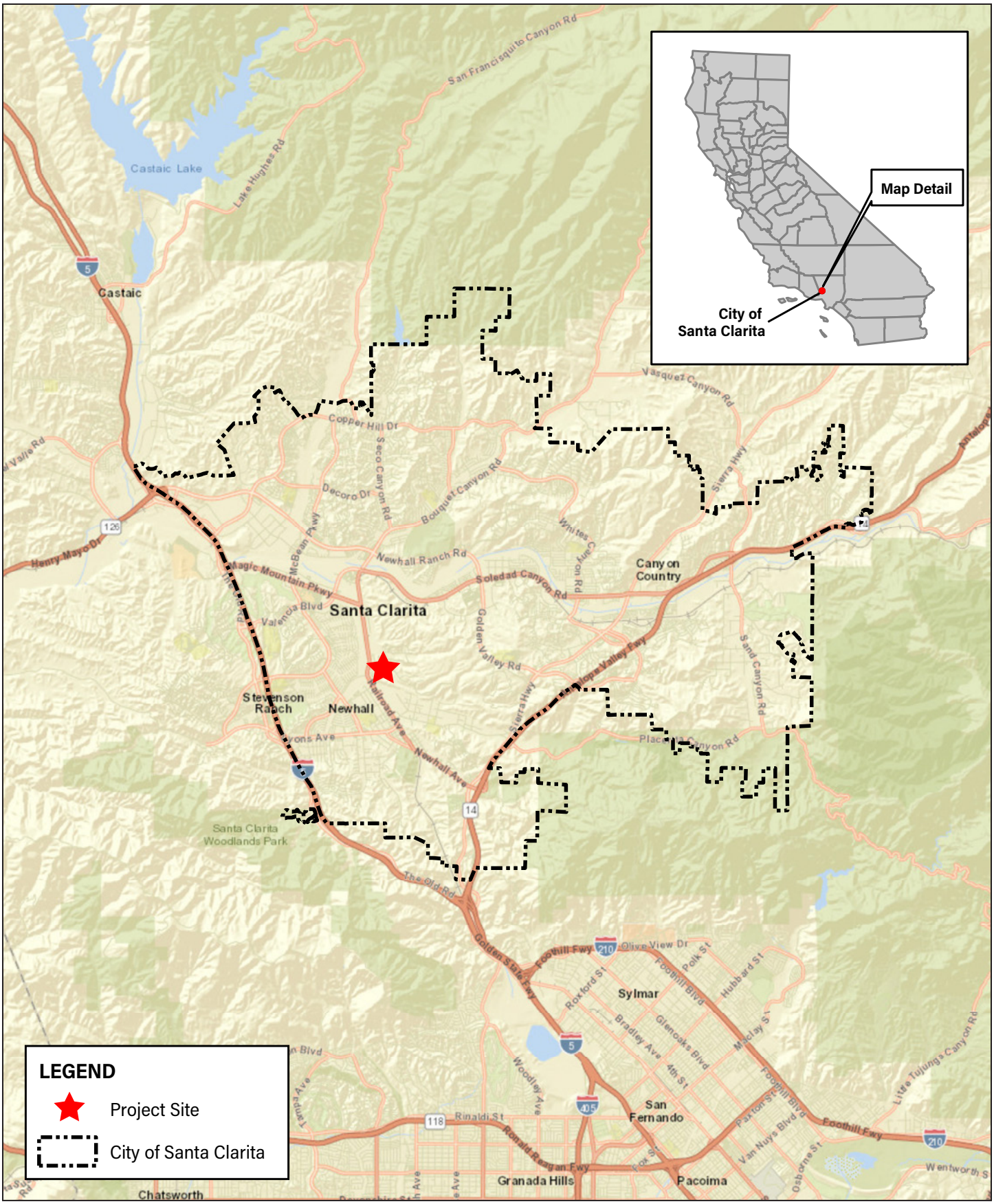
It is anticipated that the Project would be constructed in one phase lasting approximately 12 months and would begin in September 2023. Given that the Project Site has been previously graded, fine grading would be minimal and is anticipated to require approximately 2,500 cubic yards of cut and fill. No import or export is anticipated. Construction activities would also include excavation and trenching for underground utilities including installation of water lines, sewer lines, power lines, gas lines, and telecommunication lines; building construction; paving; architectural coating; and landscaping.

**Required Approvals**

Pursuant to Article 4 of the CEQA Guidelines, the City of Santa Clarita is the lead agency for this Project, taking primary responsibility for conducting environmental review and approving or denying the Project. There are no known responsible or trustee agencies with any approval authority for the Project. The entitlements, reviews, permits, and approvals required to implement the Project are as follows:

- Architectural Design Review (ADR) for all new development projects
- Development Review (DR) for all new development projects

| | |
|---|---|
| | • Landscape Plan Review to make a determination that all proposed landscaping is consistent with the standards established within the Unified Development Code<br>• Conditional Use Permit (CUP) for the development of buildings that exceed 35 feet in height<br>• Oak Tree Permit (OTP) for the encroachment into the protected zone of one coast live oak tree on-site and one valley oak tree off-site<br>• Administrative Permit (AP) for the gating of industrial properties<br>• Other discretionary and ministerial permits and approvals that may be deemed necessary to construct and operate the Project, including, but not limited to, building permits |
| **Surrounding Land Uses:** | As shown in **Figure 2**, the Project Site is surrounded by an industrial park to the north; an MWD-owned property and single-family homes to the east; Circle J Ranch Park to the southeast; Oak Ridge Drive, an apartment complex, and a single-family attached condominium complex to the south; and a railroad right-of-way, Railroad Avenue, and the South Fork of the Santa Clara River to the west. The Circle J Ranch community is located to the east of the Project Site, beyond the MWD property. Immediately adjacent properties surrounding the Project Site have General Plan land use and zoning designations of Industrial (I) to the north; Open Space (OS) and Urban Residential 2 (UR2) to the east; Neighborhood Commercial (CN), Urban Residential 4 (UR4), Urban Residential 3 (UR3), and Open Space (OS) to the south, and Public/Institutional (PI) and Open Space (OS) to the west. |
| **Other Public Agencies whose Approval is Required:** | California Public Utilities Commission, Los Angeles County Fire Department, and Southern California Regional Rail Authority |




Source: ESRI Streetmap, 2018; Los Angeles County, 2018

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# Regional Location Map

**Figure 1**




Source: Google Earth, February 2023

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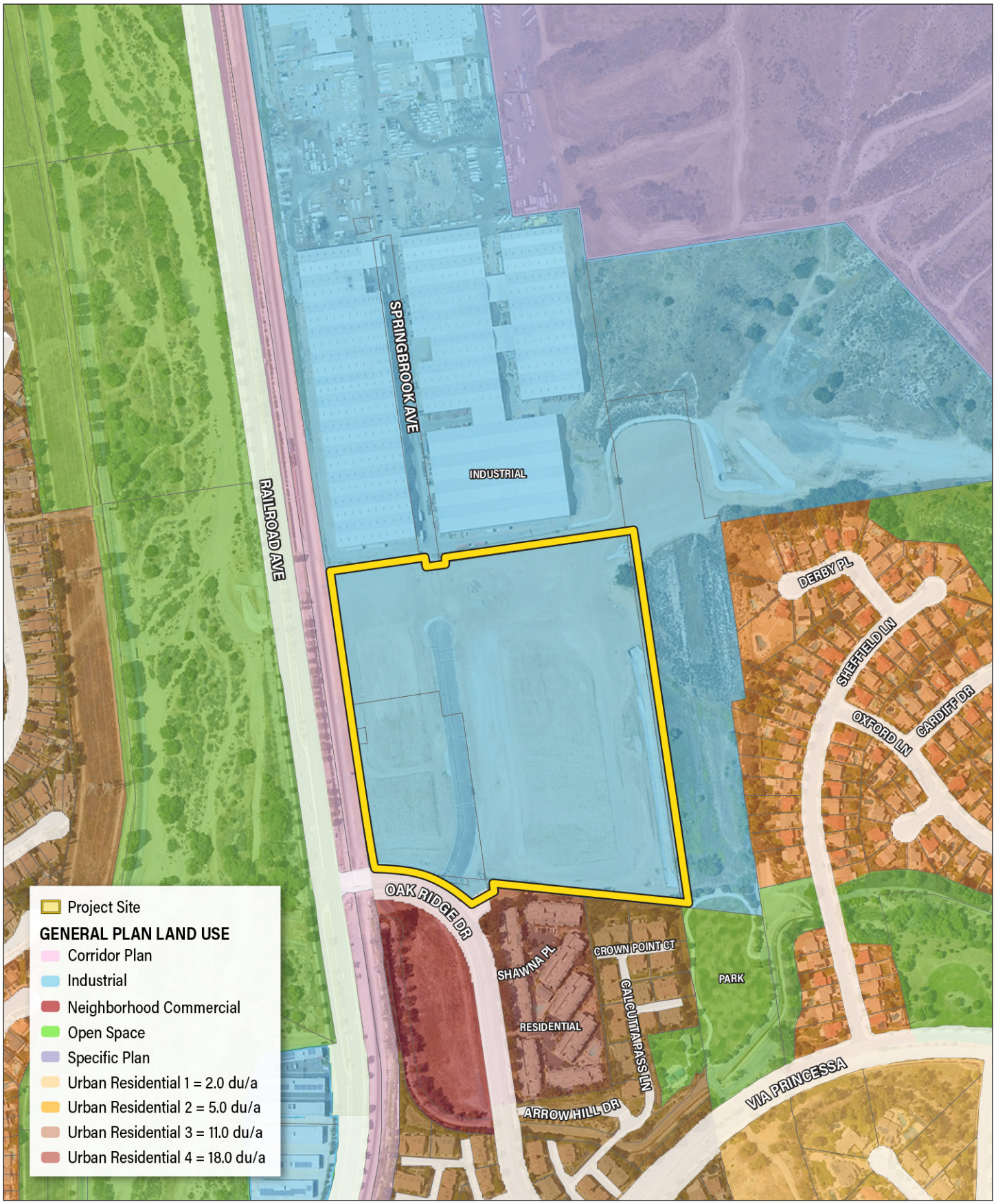
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# Project Vicinity Map

**Figure 2**




Source: Geographic Information Systems (GIS); City of Santa Clarita, CA (santa-clarita.com)

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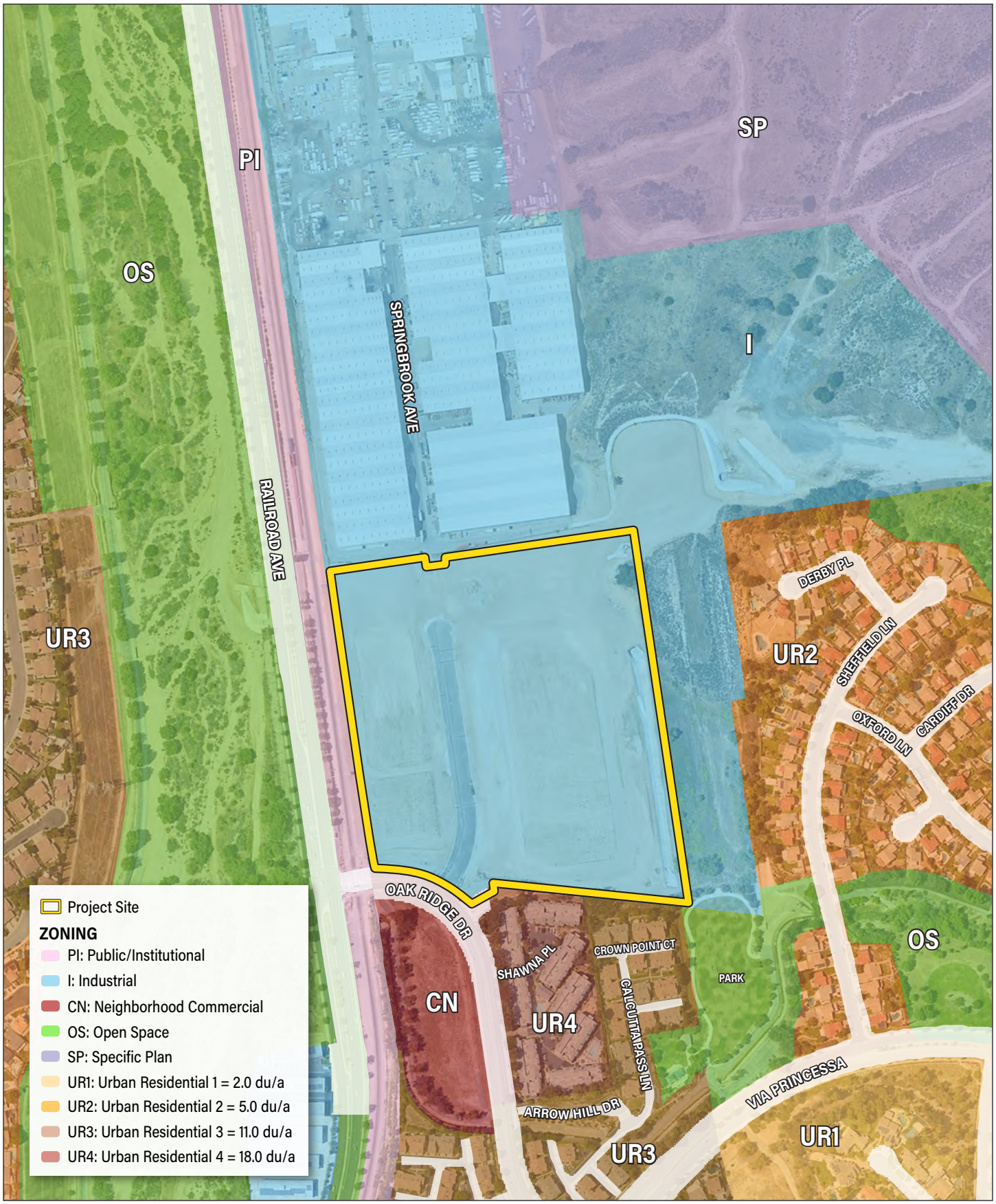
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# General Plan Land Use Designations

**Figure 3**




Source: Geographic Information Systems (GIS); City of Santa Clarita, CA (santa-clarita.com)

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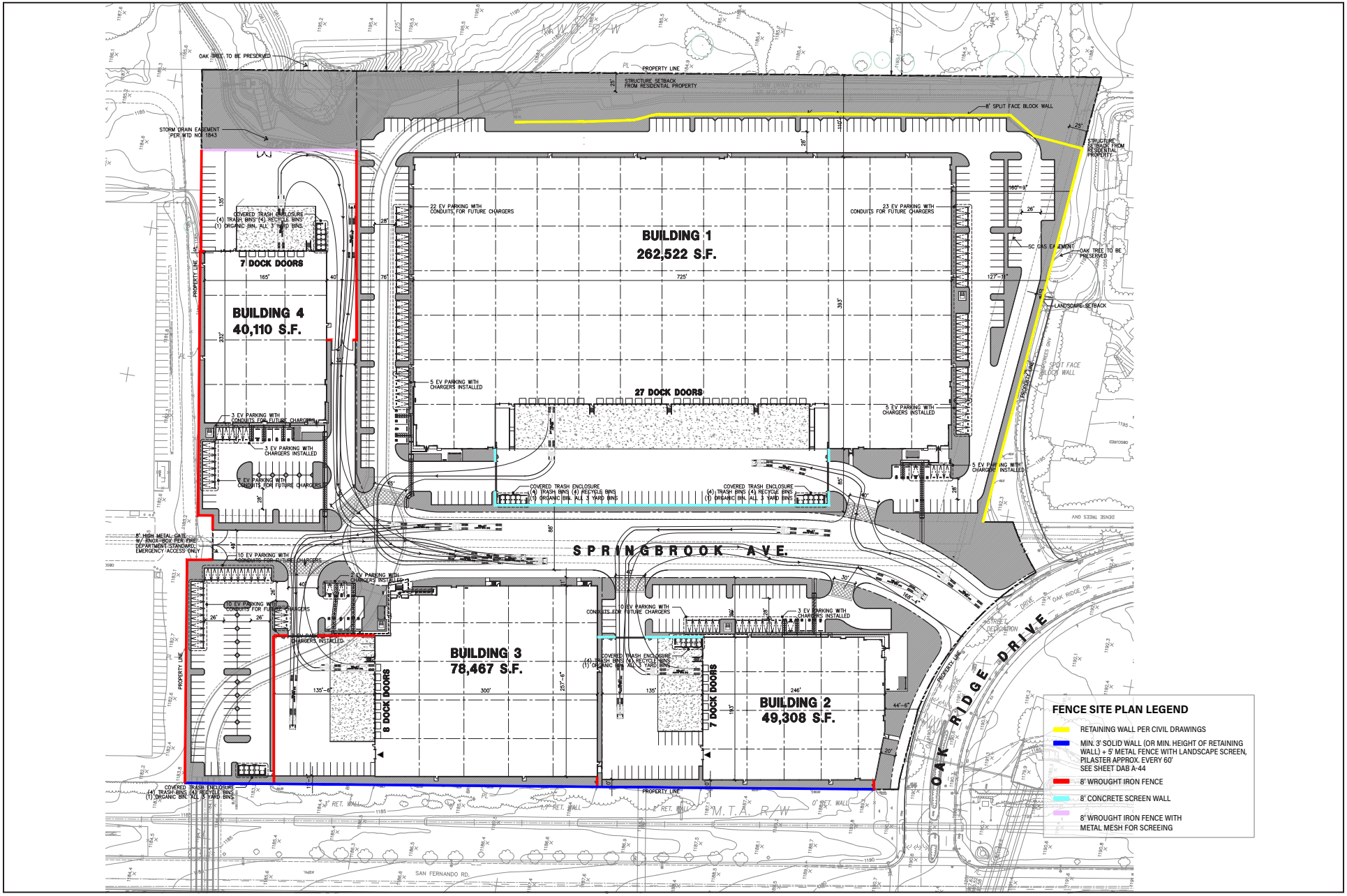
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# Zoning Designations

**Figure 4**




Source: HPA Architecture, Inc.

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# Proposed Site Plan

**Figure 5**




Source: HPA Architecture, Inc.

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# Conceptual Elevation Renderings for Building 1

**Figure 6**




Source: HPA Architecture, Inc.

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# Conceptual Elevation Renderings for Building 2

**Figure 7**




Source: HPA Architecture, Inc.

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# Conceptual Elevation Renderings for Building 3

**Figure 8**




Source: HPA Architecture, Inc.

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# Conceptual Elevation Renderings for Building 4

**Figure 9**



Source: Hunter Landscape

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# Architectural Rendering of Building 1 from Springbrook Avenue and Oak Ridge Drive Looking Northeast

**Figure 10**



Source: Hunter Landscape

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# Architectural Renderings of the Project Buildings from Oak Ridge Drive at Springbrook Avenue Looking North

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**Figure 11**



Source: Hunter Landscape

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**Aerial View of the Project (Conceptual Rendering)**

**Figure 12**




**TREES**

| SYMBOL | BOTANICAL/COMMON NAME | SIZE | QTY | WUCOLS | REMARKS |
|---|---|---|---|---|---|
| | Olea europaea<br>Olive | 48" Box | 26 | L | Multi |
| | Pistacia chinensis<br>Chinese Pistache | 24" Box | 3 | L | Standard |
| | Platanus acerifolia 'Columbia'<br>London Plane | 24" Box<br>36" Box | 66<br>2 | M | Standard |
| | Platanus racemosa<br>California Sycamore | 24" Box | 6 | M | Multi |
| | Quercus agrifolia<br>Coast Live Oak | 24" Box | 6<br>2 | M | Multi |
| | Platanus racemosa<br>California Sycamore | 48" Box | 8 | M | Multi |
| | Rhus lancea<br>Desert Willow | 48" Box<br>36" Box<br>24" Box | 3<br>7<br>47 | L | Standard |
| | Geijera parviflora<br>Australian Willow | 48" Box | 8 | L | Multi |
| | Tristania conferta<br>Brisbane Box | 15 Gal | 71 | M | Standard |

**GROUNDCOVER**

| SYMBOL | BOTANICAL/COMMON NAME | SIZE | SPACING | WUCOLS | REMARKS |
|---|---|---|---|---|---|
| | Acacia redolens 'Low Boy'<br>Dwarf Acacia | 1 Gal | 8" O.C. | L | |
| | Baccharis p. 'Pigeon Point'<br>Dwarf Coyote Bush | 1 Gal | 6" O.C. | L | |
| | Carex pansa<br>California Meadow Sedge | 4" Pots | 12" O.C. | M | |
| | Carissa m. 'Green Carpet'<br>Prostrate Natal Plum | 1 Gal | 36" O.C. | M | |
| | Hemerocallis hybridus-Yellow<br>Yellow Day Lily | 1 Gal | 24" O.C. | M | |
| | Lantana 'Gold Mound'<br>Yellow Lantana | 1 Gal | 36" O.C. | L | |
| | Lonicera J. 'Hallana'<br>Hall's Honeysuckle | 1 Gal | 48" O.C. | L | |
| | Myoporum parvifolium<br>Myoporum | 1 Gal | 36" O.C. | L | |
| | Rosmarinus o. 'Huntington Carpet'<br>Prostrate Rosemary | 1 Gal | 48" O.C. | L | |
| | Trachelospermum jasminoides<br>Star Jasmine | 1 Gal | 24" O.C. | M | |
| | Tulbaghia violacea<br>Society Garlic | 1 Gal | 24" O.C. | M | |

Source: Hunter Landscape

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# Conceptual Landscaping Plan

**Figure 13**

## A. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "**Potentially Significant Impact**" or "**Less Than Significant Impact With Mitigation**" as indicated by the checklist on the following pages.

| | | | | | |
|---|---|---|---|---|---|
| ☐ | Aesthetics | ☐ | Agriculture and Forestry Resources | ☒ | Air Quality |
| ☐ | Biological Resources | ☒ | Cultural Resources | ☐ | Energy Geology /Soils |
| ☒ | Geology and Soils | ☐ | Greenhouse Gas Emissions | ☐ | Hazards and Hazardous Materials |
| ☐ | Hydrology and Water Quality | ☐ | Land Use and Planning | ☐ | Mineral and Energy Resources |
| ☐ | Noise | ☐ | Population and Housing | ☐ | Public Services |
| ☐ | Recreation | ☐ | Transportation/Traffic | ☒ | Tribal Cultural Resources |
| ☐ | Utilities and Service Systems | ☐ | Wildfire | ☒ | Mandatory Findings of Significance |

## B. DETERMINATION

On the basis of this initial evaluation: *Check one*

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

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

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

☐ I find that the Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.

Signature: _____, Associate Planner — 5/30/23
Name, Title — Date

Signature: _____, Senior Planner — 5/30/23
Name, Title — Date

## C. DISCUSSION OF ENVIRONMENTAL IMPACTS AND/OR EARLIER ANALYSIS

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section I. Aesthetics** | | | | |
| Except as provided in Public Resources Code Section 21099, would the project: | | | | |
| a) Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**a) Would the project have a substantial adverse effect on a scenic vista?**

**Less Than Significant Impact.** The City of Santa Clarita lies within Southern California's Santa Clarita Valley, which is bounded by the San Gabriel Mountains to the south and east, the Santa Susana Mountains to the southwest, the Sierra Pelona to the north, and the mountains of the Angeles National Forest to the northeast. These surrounding natural mountains and ridgelines provide a visual backdrop for the City. Other scenic resources in the City include the Santa Clara River corridor, forested/vegetated land, and a variety of canyons and natural drainages throughout the City.

There is no widely accepted definition of a scenic vista; however, a scenic vista is often defined as a publicly accessible, prominent vantage point that provides expansive views of highly valued landscapes or prominent visual elements. As stated in the City's General Plan, a scenic vista may include views of scenic resources such as mountains and canyons, woodlands, water bodies, and/or specific resources (e.g., Vasquez Rocks County Park). Further, the City's General Plan states that urban development can impact the quantity, quality, and variety of scenic vistas through light pollution, development on prominent ridgelines/hillsides, aesthetically deficient development, streetscape clutter, and obstruction of scenic views along various roadways.[1]

The 22.3-acre Project Site is characterized by vacant land that has been graded for development and three ridgelines located near the southeastern and northeastern boundaries of the Project Site. These ridgelines are identified in the City's General Plan Conservation and Open Space Element Hillsides and Ridgeline Exhibit CO-1. The two ridgelines located to the southeast rise to between 1,330 and 1,390 feet above mean sea level (amsl). The ridgeline located to the northeast rises to approximately 1,430 feet amsl. The Project

[1] City of Santa Clarita, General Plan - One Valley One Vision, Conservation and Open Space Element, 2011.

would be constructed on a site that is 140-240 feet lower than these ridgelines at approximately 1,190 feet amsl. The proposed buildings would be up to 55 feet in height and would rise to approximately 1,242 feet amsl. Accordingly, the proposed buildings would not obstruct views of the top of the nearby ridgelines, except for locations immediately adjacent to the proposed buildings. In addition, there are no officially designated public vantage points in the Project vicinity that offer views of the ridgelines. Motorists and bicyclists traveling on Railroad Avenue and Oak Ridge Drive currently have partially obstructed views of the ridgelines and the open space area located northeast of the Project Site. These views are partially obstructed by existing development to the north, east, and south of the Project Site, and utility poles, commercial signs, and existing mature trees on either side of Railroad Avenue. The ridgelines located to the southeast of the Project Site are not visible from the Project area because of existing development and mature trees. The ridgeline to the northeast of Project Site is visible to motorists and bicyclists using Railroad Avenue and Oak Ridge Drive and could be obstructed by development on the Project Site; however, the view is already intermittent due to existing mature trees and commercial signs along Railroad Avenue and Oak Ridge Drive. Railroad Avenue is designed to accommodate fast-moving traffic and is not designated as a scenic viewing corridor. Because of the high speed limit (50 miles per hour) of Railroad Avenue, views of the ridgeline to the northeast of the Project Site would be fleeting.

As such, the Project would not have a substantial adverse effect on any scenic vista because there are no designated scenic overlooks oriented to the ridgelines near the Project Site, and views of the ridgelines from Railroad Avenue would be fleeting and would remain available from various vantage points in the area. Therefore, the Project would result in less-than-significant impacts on scenic vistas.

**b) Would the project substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** The closest officially designated State scenic highway to the Project Site is part of the Angeles Crest Scenic Byway, State Highway 2, from near La Cañada-Flintridge north to the San Bernardino County line. This State scenic highway is more than 30 miles from the Project Site. The significant distances and the mountainous terrain within the Santa Clarita Valley make it unlikely that the Project would be visible from a State scenic highway. State Route 126 from the City's boundary at I-5 west to State Route 150 in Ventura County is designated as an eligible State scenic highway; however, the Project Site is greater than 5 miles southeast of this eligible scenic highway and would not be visible from motorists on State Route 126. The City's General Plan Conservation and Open Space Element does not identify a scenic route or highway in the area surrounding the Project Site. As such, the Project would not adversely affect the viewshed from a State scenic highway or a locally designated scenic route. Therefore, the Project would have no impacts on scenic resources within a State scenic highway.

**c) Would the project, 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?**

**Less Than Significant Impact.** The terms "visual character" and "visual quality" are not specifically defined in the threshold language of Appendix G of the CEQA Guidelines. No applicable federal or State regulations pertain to aesthetic impact; however, for purposes of this analysis, the Project would need to comply with local regulations governing scenic quality, such as the Santa Clarita Community Character and Design Guidelines (Guidelines). The Guidelines are intended to promote development that is compatible and consistent with the surrounding community and Santa Clarita as a whole by providing guidance for new development based on location and use. The Project Site is zoned I (Industrial), and, therefore, the Project is evaluated for consistency with the Guidelines for industrial developments. The City encourages "high quality, innovative and imaginative architecture" that incorporates variation in building forms and planes, enhanced building entries, screened loading facilities and storage areas, and landscaping.

The proposed buildings would be built as tilt-up structures, with concrete walls and varied rooflines. As shown in **Figures 6** through **9**, each of the buildings' façades consists of a variety of architectural treatments, including varying reveals, texture, materials, insets, and paint changes, to create a modern, unified industrial park campus environment that is consistent with the 360-degree architecture encouraged in the Guidelines. The proposed buildings' design includes concrete panels painted in brown and gray tones, horizontal line patterns, windows made of vision or spandrel glass, and accents provided by anodized awnings and mullions. In addition, the main entrance to each building has been designed to be clearly identifiable and unique, integrating elements such as enhanced landscaping and vertical architectural features. The entry to each building portrays an office appearance while being architecturally tied into the overall mass and building composition of each structure, which is consistent with the direction provided in the Guidelines.

Even though the Project would change the existing undeveloped character of the Project Site, the proposed improvements would utilize materials and design elements that are consistent with the Guidelines and the City's zoning code requirements for industrial uses. Furthermore, the Project would provide visual buffers to soften the extent of the Project through site design and landscaping. Accordingly, the Project would not substantially degrade the visual character or quality of the site or surroundings or conflict with applicable zoning and other regulations governing scenic quality. Therefore, the Project would result in less-than-significant impacts on visual and scenic quality of the Project area.

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

**Less Than Significant Impact.** The Project would introduce industrial/warehouse buildings to a currently vacant site. As such, the Project would create a new source of light or glare. However, the area surrounding the Project Site is developed, and, as such, a variety of light sources already exist in the vicinity. These light sources include overhead security lights in industrial buildings north of the Project Site, traffic signals at the intersection of Railroad Avenue and Oak Ridge Drive, and lights at surrounding land uses, including residences east and south of the Project Site. More specifically, four light poles already exist between the southern boundary of the Project Site east of Springbrook Avenue and the multi-family residential uses (i.e., The Retreat Apartments) south of Shawna Place.

Lighting for the Project would comprise white LED lamps that would be wall- or pole-mounted and range in height from 9 feet to 30 feet. The Project would be required to demonstrate compliance with City of Santa Clarita Municipal Code (SCMC) Section 17.51.050 as part of the City's design review process, which limits potential light and glare impacts by requiring that lights be directed down and shielded to avoid light spillage onto adjacent properties. Specific lighting standards for industrial uses regulate building entrance lighting and hours of operation of outdoor lighting.

Additionally, the Project would not utilize glossy or reflective construction materials that would generate significant amounts of glare. The façades of the proposed buildings would primarily consist of concrete panels painted in brown and gray tones and would only use glass, primarily at the building entrances, as shown in **Figures 6** through **9**.

Accordingly, the Project would not generate excessive light or glare. Therefore, the Project would result in less-than-significant impacts on day or nighttime views in the Project area as a result of light or glare.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|

**Section 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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. 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 non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b) | Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| 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))? | ☐ | ☐ | ☐ | ☒ |
| d) | Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e) | Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |

**Discussion**

**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 non-agricultural use?**

**No Impact.** The Project Site is not in an area of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Farmland of Local Potential, or Grazing Land as identified by the California Department of Conservation's California Important Farmland Finder.[2] Therefore, the Project would have no impact on such resources.

[2] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed March 2, 2023.

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

**No Impact.** The Project Site is designated in the Santa Clarita General Plan Land Use Element and on the official Zoning Map as I (Industrial), which allows heavy manufacturing, less intensive industrial uses that are typically located in business parks, and research and development complexes. In addition, the Industrial land use designation allows light industrial activities, such as warehousing, wholesale trade, and some assembly. The City of Santa Clarita does not have any Williamson Act contract land within the Project Site. As such, the Project would not conflict with zoning for agricultural use or any Williamson Act contracts. Therefore, the Project would have no impact on agricultural uses.

**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))?**

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

**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 non-agricultural use or conversion of forest land to non-forest use?**

**No Impact.** Forestlands, as defined by the California Public Resources Code (PRC), include lands that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allow for the management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The Project Site is vacant and does not contain any tree stands or farmland. Further, forestland and timberland areas in Santa Clarita would be zoned as Open Space-National Forest (OS-NF). As the Project Site is currently zoned I (Industrial), the Project Site is not located within an area zoned for timberland production or farming. As such, the Project would not conflict with existing zoning for, or cause rezoning of, forestland or timberland; result in the loss of forestland or conversion of forestland to non-forest use; or result in the conversion of farmland to non-agricultural use. Therefore, the Project would have no impact on agricultural and forestry resources.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section III. Air Quality** | | | | |
| Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project: | | | | |
| a) Conflict with or obstruct implementation of the applicable air quality plan? | ☐ | ☐ | ☒ | ☐ |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ☐ | ☐ | ☒ | ☐ |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | ☐ | ☐ | ☒ | ☐ |

| | | | | |
|---|---|---|---|---|
| d) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☒ | ☐ | ☐ |
| e) Create objectionable odors affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

The analysis of Project impacts on air quality is primarily based on information contained in the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report prepared for the Project in May 2023 by Dudek and provided in **Appendix A** of this Initial Study.

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

**Less Than Significant Impact.** Santa Clarita is located within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east and by the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (South Coast AQMD). In general, the SCAB encompasses a metropolitan area with a high level of human activity. The climate characteristics of the SCAB, such as low temperature inversions, light winds, shallow vertical mixing, and extensive sunlight, in combination with topographical features, such as mountain ranges, inhibit the vertical and horizontal dispersion of air pollutants, which can result in degraded air quality within the SCAB.

While the California Air Resources Board (CARB) is responsible for the regulation of mobile emissions sources within the State, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources. The South Coast AQMD is the regional agency responsible for the regulation and enforcement of federal, State, and local air pollution control regulations in the SCAB, where the project is located. The South Coast AQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The South Coast AQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain the California and National Ambient Air Quality Standards (CAAQS and NAAQS, respectively) in the SCAB. The South Coast AQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

The 2022 AQMP was adopted on December 2, 2022, and was developed to address the 2015 national ozone standard. The 2022 AQMP provides the regional path towards improving air quality and meeting federal standards for air pollutants. The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low nitrogen oxides [$NO_X$] technologies in other applications), best management practices (BMPs), co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other Clean Air Act measures to achieve the 2015 federal ozone ($O_3$) standard.

The South Coast AQMD has established criteria for determining consistency with the AQMP. The criteria are as follows:

- **Consistency Criterion No. 1:** The project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.
- **Consistency Criterion No. 2:** The project will not exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

### *Consistency Criterion No. 1*

As shown in **Tables 1** and **2** under the response to Checklist Question III(b) below, the air pollutant emissions generated by the Project's construction activities and operation would be below the South Coast AQMD significance thresholds. Accordingly, the Project would not result in an increase in the frequency or severity of existing air quality violations. Therefore, the Project would not conflict with Consistency Criterion No. 1.

### *Consistency Criterion No. 2*

While striving for SCAB to achieve the attainment of the NAAQS for $O_3$ and fine particulate matter ($PM_{2.5}$) and the CAAQS for $O_3$, course particulate matter ($PM_{10}$), and $PM_{2.5}$ through a variety of air quality control measures, the 2022 AQMP also accommodates planned growth in the SCAB. The second criterion regarding a project's potential to exceed the assumptions in the AQMP or increments based on the year of project buildout and phase is primarily assessed by determining consistency between a project's land use designations and its potential to generate population growth. In general, projects would not conflict with or obstruct implementation of the AQMP if the growth in socioeconomic factors is consistent with the underlying regional plans used to develop the AQMP. The South Coast AQMD primarily uses demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by the SCAG for its 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS). The 2020–2045 RTP/SCS is based on general plans for cities and counties in the SCAB for the development of the AQMP emissions inventory. The 2020–2045 RTP/SCS and associated regional growth forecasts are generally consistent with the local plans; therefore, the 2022 AQMP is generally consistent with local government plans.

Since the zoning and the General Plan land use designation for the Project Site are (I) Industrial, the Project is consistent with the allowed uses in this zoning and land use designation. No housing is proposed as part of the Project. While construction activities would require construction workers, construction workers are anticipated to come from the existing workforce; therefore, the Project would not result in the need for additional workers or associated housing. In addition, as estimated in the Transportation Impact Analysis prepared for the Project **(Appendix I**, Table 4, of this Initial Study), the Project would provide 229 new jobs in a housing-rich area to contribute the reduction in home-based work vehicle miles traveled (VMT) in the City. Accordingly, the Project is consistent with the SCAG 2020–2045 RTP/SCS forecasts used in the development of the 2022 AQMP. Therefore, the Project does not propose activities that would induce additional population in the Project area. Based on these considerations, the vehicle trip generation and planned development for the Project Site were assumed to have been anticipated in the SCAG growth projections, and implementation of the Project would not result in a conflict with the 2022 AQMP.

Therefore, the Project would result in less-than-significant impacts related to its potential to conflict with or obstruct implementation of the 2022 AQMP.

**b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

**c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

**Less Than Significant Impact.** By its nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the South Coast AQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations and per South Coast AQMD guidance, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the applied significance thresholds, it would have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

In considering cumulative impacts from a project, the analysis must specifically evaluate the project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for the CAAQS and/or NAAQS. Construction and operation of the Project would result in emissions of criteria air pollutants, which may result in a cumulatively considerable increase in emissions of criteria air pollutants for which the SCAB is designated as nonattainment under the NAAQS or CAAQS. The following discussion quantitatively evaluates potential short-term construction and long-term operational impacts that would result from Project implementation.

### *Construction Emissions*

Proposed construction activities would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and volatile organic compounds [VOC] off-gassing from architectural coatings and asphalt pavement application) and off-site sources (i.e., on-road haul trucks, delivery trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emissions levels can only be estimated, with a corresponding uncertainty in precise ambient air quality impacts.

Implementation of the Project would generate criteria air pollutant emissions from entrained dust, off-road equipment, vehicle emissions, architectural coatings, and asphalt pavement application. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in $PM_{10}$ and $PM_{2.5}$ emissions. The Project would be required to comply with South Coast AQMD Rule 403 to control dust emissions generated during the grading activities. Internal combustion engines used by construction equipment, haul trucks, vendor trucks (i.e., delivery trucks), and worker vehicles would result in emissions of VOCs, $NO_x$, carbon monoxide (CO), $PM_{10}$, and $PM_{2.5}$. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of South Coast AQMD's Rule 1113 (Architectural Coatings).

Construction emissions were calculated for the estimated worst-case day over the construction period associated with each stage and reported as the maximum daily emissions estimated during each year of construction (2023 through 2024). Construction schedule assumptions, including stage type, duration, and sequencing, were based on information provided by the Project applicant and are intended to represent a reasonable scenario based on the best information available. **Table 1** presents the estimated maximum daily construction emissions generated during construction of the Project. As shown in the table, daily construction emissions would not exceed the South Coast AQMD significance thresholds for VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, or $PM_{2.5}$.

**TABLE 1**
**ESTIMATED MAXIMUM DAILY CONSTRUCTION CRITERIA AIR POLLUTANT EMISSIONS**

| Year | Pounds Per Day of Pollutants | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$** | **$PM_{2.5}$** |
| 2023 | 4.03 | 39.90 | 37.0 | 0.06 | 7.17 | 4.35 |
| 2024 | 23.40 | 18.00 | 41.90 | 0.05 | 6.27 | 1.91 |
| **Maximum Daily Emissions** | **23.40** | **39.90** | **41.90** | **0.06** | **7.17** | **4.35** |
| *South Coast AQMD Threshold* | *75* | *100* | *550* | *150* | *150* | *55* |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: VOC=volatile organic compounds; $NO_X$=oxides of nitrogen; CO=carbon monoxide; $SO_X$=sulfur oxides; $PM_{10}$=coarse particulate matter; $PM_{2.5}$=fine particulate matter.

Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

### *Operational Emissions*

Operation of the Project would generate VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$ emissions from mobile sources, including vehicular traffic generated by employees and trucks; energy sources from natural gas usage; area sources, including the use of landscaping equipment and consumer products, and from architectural coatings. **Table 2** presents the maximum daily area, energy, and mobile source emissions associated with Project operation (year 2025). As shown in the table, maximum daily operational emissions would not exceed the South Coast AQMD significance thresholds during Project operation.

**TABLE 2**
**ESTIMATED MAXIMUM DAILY OPERATIONAL CRITERIA AIR POLLUTANT EMISSIONS**

| Year | Pounds Per Day of Pollutants | | | | | |
|---|---|---|---|---|---|---|
| | **VOC** | **$NO_X$** | **CO** | **$SO_X$** | **$PM_{10}$** | **$PM_{2.5}$** |
| Area | 12.50 | 0.16 | 18.8 | <0.01 | 0.03 | 0.03 |
| Energy | 0.12 | 2.24 | 1.88 | 0.01 | 0.17 | 0.17 |
| Mobile | 1.90 | 27.6 | 38.6 | 0.29 | 6.81 | 1.70 |
| **Total** | **14.52** | **30.00** | **59.28** | **0.30** | **7.01** | **1.90** |
| *South Coast AQMD Threshold* | *55* | *55* | *550* | *150* | *150* | *55* |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

Notes: VOC=volatile organic compounds; $NO_X$=oxides of nitrogen; CO=carbon monoxide; $SO_X$=sulfur oxides; $PM_{10}$=coarse particulate matter; $PM_{2.5}$=fine particulate matter.
Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

Cumulative localized impacts would potentially occur if a construction project were to occur concurrently with another off-site project. Construction schedules for potential future projects near the Project area are currently unknown; therefore, potential construction impacts associated with two or more simultaneous projects would be considered speculative. However, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the project would exceed applied thresholds. Criteria air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the South Coast AQMD. For example, cumulative $PM_{10}$ and $PM_{2.5}$ emissions would be reduced because all future projects would be subject to South Coast AQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAB. In addition, cumulative VOC emissions would be subject to South Coast AQMD Rule 1113 (Architectural Coatings).

Accordingly, Project-generated construction and operational emissions of VOC, $NO_X$, $PM_{10}$, and $PM_{2.5}$ would not exceed the South Coast AQMD thresholds. As such, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable NAAQS or CAAQS. Therefore, the Project would result in less-than-significant impacts on air quality.

**d) Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact with Mitigation Incorporated.** Sensitive receptors refer to locations where uses and/or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions, such as residents, school children, the elderly, and hospital patients. Sensitive land uses within the vicinity of the Project Site include residential uses to the east and south and a park to the southeast of the Project Site. However, the nearest sensitive receptors are the residential uses immediately adjacent to the southern Project boundary at a distance of approximately 100 feet, where impacts were analyzed as this location represents the most conservative scenario.

### *Localized Significance Thresholds (LST) Analysis*

Construction activities associated with the Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. An LST analysis has been prepared to determine potential impacts

to nearby sensitive receptors during construction of the Project. According to the South Coast AQMD Final Localized Significance Threshold Methodology, "off-site mobile emissions from the project should not be included in the emissions compared to the LSTs." Trucks and worker trips associated with the Project are not expected to cause substantial air quality impacts to sensitive receptors along off-site roadways since emissions would be relatively brief in nature and would cease once the vehicles pass through the main streets. Nonetheless, in an effort to conservatively capture potential vehicle activity within the Project boundary (i.e., fence line), a small portion (i.e., 1,000 feet) of the off-site vehicle travel for worker vehicles, vendor trucks, and haul trucks was conservatively assumed as on-site emissions for the LST analysis.

The estimated maximum daily on-site construction emissions generated by the Project are presented in **Table 3** and compared to the applicable South Coast AQMD LSTs. As shown, before mitigation proposed construction activities would generate emissions in excess of site-specific LSTs for $PM_{10}$ and $PM_{2.5}$.

**TABLE 3**
**LOCALIZED SIGNIFICANCE THRESHOLDS ANALYSIS FOR PROJECT CONSTRUCTION–UNMITIGATED**

| | Pounds Per Day of Pollutants | | | |
|---|---|---|---|---|
| | **$NO_2$** | **CO** | **$PM_{10}$** | **$PM_{2.5}$** |
| **Maximum On-Site Daily Emissions** | **34.53** | **28.15** | **10.11** | **5.71** |
| *South Coast AQMD LST* | *191* | *1,117* | *8* | *5* |
| **LST Exceeded?** | **No** | **No** | **Yes** | **Yes** |

Notes: $NO_X$= nitrogen dioxide; CO=carbon monoxide; $PM_{10}$=coarse particulate matter; $PM_{2.5}$=fine particulate matter.
Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

Accordingly, in addition to compliance with regulatory requirements, including South Coast AQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). implementation of the following mitigation measure is required:

**MM-AQ-1:** Prior to the issuance of a grading permit, the following shall be required and incorporated into the grading plan and/or grading permit conditions:

- For off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.

- Before an exemption may be considered, the applicant shall be required to demonstrate that two construction fleet owners/operators in the region were contacted and that those owners/operators confirmed Tier 4 Interim or better equipment could not be located in the region. To ensure that Tier 4 construction equipment or better would be used during the Project's construction, the applicant will include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

As shown in **Table 4**, implementation of **Mitigation Measure MM-AQ-1** would reduce Project construction-generated $PM_{10}$ and $PM_{2.5}$ emissions below the South Coast AQMD site-specific LST.

**TABLE 4**
**LOCALIZED SIGNIFICANCE THRESHOLDS ANALYSIS FOR PROJECT CONSTRUCTION–MITIGATED**

| | Pounds Per Day of Pollutants | | | |
|---|---|---|---|---|
| | **$NO_2$** | **CO** | **$PM_{10}$** | **$PM_{2.5}$** |
| **Maximum On-Site Daily Emissions** | **19.6** | **41.7** | **5.46** | **2.79** |
| *South Coast AQMD LST* | *191* | *1,117* | *8* | *5* |
| **LST Exceeded?** | **No** | **No** | **No** | **No** |

Notes: $NO_X$= nitrogen dioxide; CO=carbon monoxide; $PM_{10}$=coarse particulate matter; $PM_{2.5}$=fine particulate matter.
Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

### *Toxic Air Contaminants*

As the Project consists of 432,919 square feet of /industrial warehouse use, the potential impact of Project-generated air pollutant emissions, specifically diesel particulate matter (DPM), at sensitive receptor locations has been evaluated.

A construction health risk assessment (HRA) was performed to estimate the Maximum Individual Cancer Risk and the Chronic Hazard Index for residential receptors as a result of DPM emissions during Project construction. Results of the construction HRA are presented in **Table 5**. As shown, before mitigation, Project construction activities would result in a Residential Maximum Individual Cancer Risk of 22.77 in 1 million, which exceeds the significance threshold of 10 in 1 million. Project construction would result in a Residential Chronic Hazard Index of 0.017, which is below the 1.0 significance threshold. As such, the construction HRA results from the unmitigated scenario show cancer risks exceeding the 10 in 1 million threshold and, thus, the Project would result in a potentially significant impact at the maximally exposed individual residential receptors.

**TABLE 5**
**CONSTRUCTION HEALTH RISK ASSESSMENT RESULTS–UNMITIGATED**

| Impact Parameter | Units | Project Impact | CEQA Threshold | Level of Significance |
|---|---|---|---|---|
| Maximum Individual Cancer Risk—Residential | Per Million | 22.77 | 10 | **Potentially Significant** |
| Chronic Hazard Index—Residential | Index Value | 0.017 | 1.0 | Less than Significant |

Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

Accordingly, implementation of **Mitigation Measure MM-AQ-1** is required. As shown in **Table 6**, this mitigation measure would reduce construction-generated health risks to levels below South Coast AQMD thresholds.

**TABLE 6**
**CONSTRUCTION HEALTH RISK ASSESSMENT RESULTS–MITIGATED**

| Impact Parameter | Units | Project Impact | CEQA Threshold | Level of Significance |
|---|---|---|---|---|
| Maximum Individual Cancer Risk—Residential | Per Million | 2.72 | 10 | Less than Significant |
| Chronic Hazard Index—Residential | Index Value | 0.002 | 1.0 | Less than Significant |

Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

Similarly, an HRA was performed to estimate the Maximum Individual Cancer Risk and Chronic Hazard Index for residential receptors as a result of emissions from Project operations on sensitive receptors located adjacent to the Project. The results of the operational HRA are presented in **Table 7**. As shown, the DPM emissions from Project operations would result in a Residential Maximum Individual Cancer Risk of 2.25 in 1 million and a Residential Chronic Hazard Index of 0.0006, and, as such, no mitigation measure is required.

**TABLE 7**
**CONSTRUCTION HEALTH RISK ASSESSMENT RESULTS–UNMITIGATED**

| Impact Parameter | Units | Project Impact | CEQA Threshold | Level of Significance |
|---|---|---|---|---|
| Maximum Individual Cancer Risk—Residential | Per Million | 2.25 | 10 | Less than Significant |
| Chronic Hazard Index—Residential | Index Value | 0.0006 | 1.0 | Less than Significant |
| Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information). | | | | |

Implementation of **Mitigation Measure MM-AQ-1** would reduce impacts related to localized emissions and TAC emissions during construction of the Project below the South Coast AQMD threshold. As such, with the implementation of this mitigation measure the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the Project would result in less-than-significant impacts on sensitive receptors after mitigation.

**e) Would the project create objectionable odors affecting a substantial number of people?**

**Less Than Significant Impact.** The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying and cause distress among the public and generate citizen complaints.

Odors would be generated from vehicles and/or equipment exhaust emissions during Project construction. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project Site and generally occur at magnitudes that would not affect substantial numbers of people.

Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not propose and would not engage in any of these activities or other potential activities that would generate operational odors. The Project involves industrial/warehouse uses and would not create any new sources of odors during operation.

Accordingly, the Project would not create objectionable odors affecting a substantial number of people. Therefore, the Project would result in less-than-significant impacts related to odors.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section 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 Game or U.S. Fish and Wildlife Service? | | | | |
| b) | Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| d) | Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☒ | ☐ |
| e) | Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| g) | Affect a Significant Ecological Area (SEA) or Significant Natural Area (SNA) as identified on the City of Santa Clarita ESA Delineation Map? | ☐ | ☐ | ☐ | ☒ |

**Discussion**

The analysis of Project impacts on biological resources is primarily based on information contained in the Biological Resources Technical Report and the Protected Tree Report prepared for the Project in May 2023 by Dudek and provided in **Appendix B** of this Initial Study.

**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 Game or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact**. Most of the Study Area, which comprises the Project Site and a 500-foot buffer, has been disturbed or developed. Recently, excavation and grading activities were conducted on-site to allow for the installation of previously planned and permitted storm drains and debris/detention basins and the extension of Springbrook Avenue from Oak Ridge Drive. Accordingly, most of the natural vegetation communities that are typical of undisturbed open space in the Project vicinity no longer exist on the Project Site. A general biological reconnaissance survey of the Study Area was conducted in June 2022. Adjacent to the northeastern boundary of the Project Site, small areas of California buckwheat (*Eriogonum fasciculatum*), California sagebrush (*Artemisia californica*), native clustered tarweed (*Deinandra fasciculata*), and non-native shortpod mustard (*Hirschfeldia incana*) were observed in areas where shrub density was low. Native western ragweed (*Ambrosia psilostachya*), tacky phacelia (*Phacelia viscida*), and popcorn flower (*Plagiobothrys nothofulvus*) were also observed but in very low abundance. Wild oat and

annual brome grasslands (*Avena* spp.-*Bromus* spp. Herbaceous Semi-Natural Alliance) were also identified east of the Project Site. In addition, upland mustards or star-thistle fields communities were prominent in the western and eastern portions of the Project Site and the areas east of the Project Site. There was one coast live oak (*Quercus agrifolia*) on a small knoll in the northeastern corner of the Project Site that was surrounded by shortpod mustard and one Goodding's willow (*Salix gooddingii*) and several mulefat (*Baccharis salicifolia*) within the upland mustards to the east-southeast of the Project Site, but no obvious hydrology was associated with these typical riparian associated species.

No special-status plant and wildlife species were observed within the Study area during the survey. Although three special-status plant species, including slender mariposa lily (*Calochortus clavatus var. gracilis*), Parry's spineflower (*Chorizanthe parryi var. parryi*), and mesa horkelia (*Horkelia cuneata var. puberula*), and three special-status wildlife species, including Crotch bumblebee (*Bombus crotchii*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), and mountain lion (*Puma concolor*), have a moderate potential to occur in the Study Area, none are expected to exist on the Project Site. This is primarily due to the absence of suitable habitat associated with these species that have recorded occurrences in the Project vicinity. Accordingly, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game (CDFW) or U.S. Fish and Wildlife Service (USFWS). Therefore, the Project would result in less-than-significant impacts on special-status plant or wildlife species.

**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, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**No Impact**. Riparian habitats occur along the banks of rivers and streams. Sensitive natural communities are natural communities that are considered rare in the region by the USFWS, CDFW, or local regulatory agencies, and are known to provide habitat for sensitive animal or plant species or are known to be important wildlife corridors. According to the USFWS National Wetlands Inventory, the Project Site is located near multiple riverines (e.g., Placerita Creek, Newhall Creek), which converge with multiple canyons (e.g., Lyon Canyon, Pico Canyon, Oakdale Canyon) to form the South Fork of the Santa Clara River within 250 feet of the Project Site to the west across Railroad Avenue.[3] However, the Project Site does not contain any riparian habitat or sensitive natural community. As identified above, one Goodding's willow and several mulefat were observed within the upland mustards to the east-southeast of the Project Site, but no obvious hydrology was associated with these typical riparian associated species. As such, implementation of the Project would not affect any nearby habitat or community. Accordingly, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. Therefore, the Project would have no impact related to effects on any riparian habitat or other sensitive natural community.

**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?**

**Less Than Significant Impact**. Wetlands are defined by Section 404 of the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas, such as swamps, marshes, and bogs. The Project Site is located near Placerita Creek and Newhall Creek, which converge with Lyon Canyon and Pico Canyon to form the South Fork of the Santa Clara River within 250 feet of the Project Site to the west across Railroad Avenue. However, the

[3] U.S. Fish and Wildlife Service, National Wetlands Inventory (Surface Waters and Wetlands), https://www.fws.gov/wetlands/Data/Mapper.html, accessed March 2, 2023.

Project Site does not contain any jurisdictional wetlands or waters, and no direct impact would occur with Project implementation.

Potential temporary indirect impacts to the South Fork of the Santa Clara River could result from construction activities through the generation of fugitive dust and the potential introduction of chemical pollutants (including herbicides). Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, transpiration, increased penetration of phytotoxic gaseous pollutants, and increased incidence of pests and diseases. Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/ jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. However, during construction, erosion control measures would be implemented as part of the Storm Water Pollution Prevention Plan (SWPPP) for the Project. Prior to the start of construction activities, the contractor would be required to file a Permit Registration Document with the State Water Resources Control Board (SWRCB) in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. This permit is required for earthwork that results in the disturbance of one acre or more of total land area. The required SWPPP will mandate the implementation of best management practices (BMPs) to reduce or eliminate construction-related pollutants in the runoff, including sediment. Compliance with regulatory requirements would ensure that temporary indirect impacts would be less than significant.

Accordingly, the Project would not 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. Therefore, the Project would result in less-than-significant impacts related to effects on any State or federally protected wetlands.

**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 nursery sites?**

**Less Than Significant Impact**. Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Corridors can also be aquatic resources that provide passage for fish. Habitat linkages are small patches that join larger blocks of habitat to help reduce the adverse effects of habitat fragmentation or may be continuous habitat or discrete habitat islands that function as stepping stones for wildlife dispersal.

On a regional level, the Study Area is not located within any designated wildlife corridors or habitat linkages identified in the South Coast Missing Linkages analysis conducted by South Coast Wildlands or CDFW's California Essential Habitat Connectivity Project. On a local level, the Study Area does not have any streams that would provide fish passage and provides limited connectivity for terrestrial wildlife movement. The Project Site is adjacent to Railroad Avenue and industrial development to the north and residential uses to the south. There is natural open space to the northeast of the Project Site, and the South Fork of the Santa Clara River is to the west. Historically, the Project Site has experienced limited wildlife use to connect the two areas, and, as such, the Project Site is not expected to be used as a linkage. The open space to the northeast of the Project Site has less development and provides a connection to the main fork of the Santa Clara River and would likely be used as the main route for movement. Accordingly, the Project Site does not function as a wildlife corridor or habitat linkage and is not located within any designated wildlife corridors of habitat linkages. Direct or indirect impacts to wildlife corridors and habitat connectivity are not anticipated to occur as a result of Project development.

In addition, no signs of bird rookeries (e.g., numerous nests, whitewash) or large maternal or overwintering bat roosts (e.g., large concentrations of guano or guano odors) were identified in the Study Area during the survey. The dominance of sparse ornamental vegetation and the lack of habitat to provide substantial

foraging opportunities for birds on-site or in the immediate area makes rookeries unlikely. Furthermore, the lack of typical urban roosting habitat (bridges and older buildings with structural deficiencies) makes it unlikely for the Study Area to support native wildlife nursery sites.

However, vegetation located within and adjacent to the Project Site provides suitable nesting habitat for birds. As such, the Project would be required to comply with the provisions of the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC) Sections 3503, 3503.5, and 3513 to prevent the disturbance of nesting birds during construction activities. This would generally involve clearing a project site of all vegetation outside the nesting season (from September 1 through January 31) or if construction would commence within the nesting season (which generally runs from February 1 through August 31 and as early as January 15 for raptors), conducting a pre-construction nesting bird survey to determine the presence of nesting birds or active nests at a construction site. Any active nests and nesting birds must be protected from disturbance by construction activities through buffers between nest sites and construction activities. The buffer areas may be removed only after the birds have fledged. Compliance with the MBTA and CFGC would ensure that the implementation of the Project would not interfere with the nesting of any native bird species.

Accordingly, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, the Project would result in less-than-significant impacts on wildlife movement.

**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.** A total of seven non-protected trees (six blue elderberry and one Goodding's willow) and a protected coast live oak tree and a protected valley oak tree were inventoried within the Study Area as part of the preparation of the Protected Tree Report. In total, eight trees are located on-site and one valley oak tree is located on private property to the south, adjacent to the Project Site. Of the eight trees found on-site, only the coast live oak tree, located in the northeastern corner of the Project Site, meets the City's definition of a protected tree. The single off-site valley oak tree on private property to the south, also meets the City's definition of a protected tree. A portion of the canopy of the off-site valley oak tree encroaches[4] into the southern boundary of the Project Site.

Although neither protected tree would be removed, they could be encroached upon during construction. However, based on the conceptual grading plan, grading activities would not encroach into the on-site oak tree's drip line and protected tree zone. Construction of a retaining wall along the southern boundary of the Project Site would partially encroach into the off-site valley oak tree's drip line and projected tree zone. However, construction activities associated with the retaining wall would encroach into less than 5 percent of the overall root system of the off-site valley oak tree, which is considered a minimal disturbance. In addition, prior to initiation of ground-disturbing activities in proximity to this tree, the Project applicant would be required to obtain an oak tree encroachment permit from the City.

The guidelines for tree protection identified in the Protected Tree Report would be incorporated into the conditions of the oak tree encroachment permit. These conditions would include, at a minimum, the establishment of a tree protection zone with protective fencing and signage; no operation of heavy equipment, storage of construction materials, grade changes, or trenching within the fenced tree protection zone; provisions regarding root pruning and irrigation; and monitoring by a qualified International Society

[4] Encroachment is defined as intrusion into the protected zone of an oak tree which includes, but is not limited to, intrusion by trenching, paving, pruning, dumping, and parking of commercial vehicles. The protected zone encompasses a circle with a radius equal to the greatest distance from the trunk to any overhanging foliage in the tree's canopy. Major encroachment is defined as an area between the outer edge of the trunk and 50 percent of the diameter of the protected zone, and minor encroachment is defined as an area between the outermost edge of the protected zone and 50 percent of the diameter of the protected zone.

of Arboriculture-certified arborist to ensure that Project construction is complying with the conditions of the oak tree encroachment permit.

Accordingly, with issuance of the oak tree encroachment permit and adherence to the conditions established therein, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the Project would result in less-than-significant impacts with respect to local policies or ordinances protecting biological resources.

**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?**

**g) Would the project affect a Significant Ecological Area (SEA) or Significant Natural Area (SNA) as identified on the City of Santa Clarita ESA Delineation Map?**

**No Impact.** The Project Site is not located within an area covered by any habitat conservation plan (HCP), natural community conservation plan (NCCP), or other approved local, regional, or State HCP. As such, the Project would not conflict with such plans. Similarly, the Project Site is not located within a County of Los Angeles designated SEA. Therefore, the Project would have no impacts with respect to conservation plans and SEAs.

| **Section V. Cultural Resources** | **Potentially Significant Impact** | **Less Than Significant Impact with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| Would the project: | | | | |
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | ☐ | ☐ | ☐ | ☒ |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | ☐ | ☒ | ☐ | ☐ |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?**

**No Impact**. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a "resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources"; "a resource included in a local register of historical resources (…unless the preponderance of evidence demonstrates that it is not historically or culturally significant)"; or any resource "which a lead agency determines to be historically significant…provided the lead agency's determination is supported by substantial evidence." Generally, a resource is considered "historically significant" if it is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; is associated with the lives of persons important in our past; embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values; or has yielded, or may be likely to yield, information important in prehistory or history. The Project Site was graded in October 2019 to an average of 5 feet below the previous grade and excavated to depths of 18 feet to allow for the

installation of previously planned and permitted storm drains and debris/detention basins. Currently, the Project Site is vacant and, as such, does not contain any historical resource. Accordingly, the Project would not cause any adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. Therefore, the Project would have no impact on historical resources.

**b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?**

**Less Than Significant Impact with Mitigation Incorporated**. The analysis of Project impacts on archaeological resources is primarily based on information contained in the Phase I Archaeological Survey Report prepared for the Project in May 2023 by Dudek and provided in **Appendix C** of this Initial Study. This report included the results of a California Historical Resources Information System (CHRIS) records search of the Project Site plus a 1-mile radius; results of background research, consisting of a literature, archival and historical map, and aerial photograph review; results of the intensive-level pedestrian survey of the Project Site for cultural resources; and an assessment of the cultural sensitivity of the Project Site.

The results of the records search of the CHRIS at the South Central Coastal Information Center identified 11 cultural resources that have been previously recorded within one mile of the Project Site. The resources included six prehistoric isolates, one prehistoric-era archaeological site, and four historic built environment resources. However, none of these resources were identified on the Project Site; all six were at a distance of least 600 feet from the Project Site. In addition, review of historical topographic maps and aerial photographs demonstrated that the surface area of the Project Site has been disturbed for agricultural purposes as early as the 1920s through the mid-1950s. The railroad right-of-way has been present directly west of the Project Site since at least 1903. Ground disturbances associated with the construction and demolition of structures have disturbed the soils within the Project Site since at least 1974. In October 2019, the Project Site was graded to an average of 5 feet below the previous grade and excavated to depths of 18 feet to allow for the installation of previously planned and permitted storm drains and debris/detention basins. Furthermore, no cultural resources were observed during the intensive pedestrian surface survey of the Project Site conducted in June 2022.

Based on the results of the Phase I Archaeological Survey, the potential for unknown prehistoric and historic cultural resources to exist on the Project Site is considered unlikely. Accordingly, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines 15064.5. However, it is possible that unknown cultural resources could be encountered during ground disturbance activities associated with Project construction. Therefore, the following mitigation measure is recommended to ensure that the potential for impacts to unknown archaeological resources during ground disturbing construction activities would be appropriately addressed and reduced to less-than-significant levels:

**MM-CR-1:** Prior to commencement of construction activities for all phases of Project implementation, the Project applicant/owner/developer shall retain a qualified archaeological principal investigator (Principal Investigator/Archaeologist) that meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, is approved by the City of Santa Clarita, and has experience and is well-acquainted with the history of the ancestral tribes geographically connected to the Project site to implement this mitigation measure. Additionally, the Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted and invited to be involved with the following mitigation program for the Project.

***Cultural Resource Inadvertent Discovery Plan.*** A cultural resource inadvertent discovery plan (Plan) shall be developed. The purpose of the Plan is to outline a program of treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources throughout the duration of the Project. This Plan shall define the process to be followed for the identification and management of

cultural resources on the Project Site during construction. Existence of and importance of adherence to this Plan shall be stated on all Project plans intended for use by those conducting the ground-disturbing activities.

***Worker Environmental Awareness Program (WEAP) Training.*** All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of cultural resources that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant cultural resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor who shall contact the City. This requirement shall be noted on all construction plans to ensure implementation. A qualified representative of the FTBMI shall conduct the tribal cultural resources portion of the WEAP training for construction personnel regarding the aspects of tribal cultural resources and the procedures for notifying the FTBMI should tribal cultural resources be discovered by construction staff.

***Inadvertent Discovery Clause.*** In the event that potential prehistoric or historic-era archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 60 feet of the find shall immediately stop, and the Principal Investigator/Archaeologist shall be notified immediately in order to assess the discovery and determine whether additional study is warranted. Depending on the nature of the discovery, the Principal Investigator/Archaeologist may simply record the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work, such as subsurface testing, may be warranted. If the discovery is determined significant under CEQA and avoidance is not feasible, data recovery shall be required. If archaeological resources are discovered or are suspected to be of Native American origin dating to pre-contact and/or post-contact,[5] the FTBMI should be contacted and be provided information after the archaeologist makes their initial assessment of the nature of the find so as to provide tribal input with regards to significance and treatment. The lead agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any tribal cultural resource encountered during all ground-disturbing activities. Should the find be deemed significant, as defined by CEQA, the Project applicant shall retain a professional Native American monitor procured by the FTBMI and, if necessary, an archaeological monitor, supervised by a Secretary of the Interior qualified archaeologist, to observe all remaining initial ground-disturbing activities, including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. Initial excavation is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to cultural monitoring (archaeological or Native American/tribal), this definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction.

[5] Pre-contact refers to the period before contact of indigenous people with an outside culture (i.e., European traders and settlers), and post-contact refers to the time of European visitation and settlement. The timeframes of "pre-contact" and "post-contact" were traditionally referred to as prehistoric and historic.

**c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?**

**Less Than Significant Impact**. As discussed above, the Project Site was graded in October 2019 to an average of 5 feet below the previous grade and excavated to depths of 18 feet to allow for the installation of previously planned and permitted storm drains and debris/detention basins. Based on the results of the Phase I Archaeological Survey, the potential for human remains to exist on the Project Site is considered unlikely. However, it is possible that unknown human remains could be encountered during ground disturbance activities associated with Project construction. In the event that human remains are inadvertently encountered during construction activities, the remains and associated resources must be treated in accordance with State and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County coroner must be immediately notified of the discovery. No further excavation or disturbance of the Project Site or any nearby area (within 100 feet of the find) reasonably suspected to overlie adjacent remains must occur until the County coroner has determined if the remains are potentially human in origin. If the County coroner determines that the remains are, or are believed to be, Native American, he or she is required to immediately notify the Native American Heritage Commission (NAHC). The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection and determine, in consultation with the property owner, the treatment and disposition of the human remains. Therefore, compliance with State and local regulations identified above would ensure that the Project would result in less-than-significant impacts related to the inadvertent disturbance of any human remains.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section VI. Energy** | | | | |
| Would the project: | | | | |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

The analysis of Project impacts on energy resources is primarily based on information contained in the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report prepared for the Project in May 2023 by Dudek and provided in **Appendix A** of this Initial Study.

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

**Less Than Significant Impact**. Southern California Edison (SCE), a subsidiary of Edison International, provides electricity to approximately 180 cities in 11 counties across Central and Southern California. SCE administers various energy efficiency and conservation programs that may be available to residents, businesses, and other organizations in Los Angeles County. SCE receives electric power from a variety of

sources. According to the 2021 SCE Power Content Label,[6] eligible renewable energy accounts for 33.6 percent of SCE's overall energy resources, with geothermal resources at 4.8 percent, wind power at 11.4 percent, eligible hydroelectric sources at 1 percent, and solar energy at 14.2 percent. Within Los Angeles County, annual nonresidential electricity use in 2021 was approximately 44 billion kWh per year, while residential electricity use was approximately 21 billion kWh per year. In addition, the Southern California Gas Company (SoCalGas) provides Los Angeles County with natural gas service. SoCalGas' service territory encompasses approximately 20,000 square miles and more than 500 communities. The total capacity of natural gas available to SoCalGas in 2020 was estimated to be 3.8 billion cubic feet per day. In 2024, the total capacity available is also estimated to be 3.8 billion cubic feet per day. This amount is approximately equivalent to 3.88 billion thousand British thermal units (kBTU) per day. In 2019, SoCalGas delivered approximately 304.8 billion kBTU to Los Angeles County.

According to the U.S. Energy Information Administration, California used approximately 22 billion gallons of petroleum in 2020, with the majority used in the transportation sector. In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. Petroleum usage includes petroleum products, such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. California has implemented policies to improve vehicle efficiency and to support use of alternative transportation.

The Project would develop an existing vacant site. Construction and operation of the Project would result in the consumption of energy resources (i.e., electricity, natural gas, and petroleum), as further discussed below.

### *Project Construction*

Construction of the Project would result in energy consumption primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles.

Electricity is not expected to be consumed in large quantities during Project construction as construction equipment and vehicles would not be electric but diesel- or gas-powered. Although electrical service would be established to serve construction, the amount of electricity that would be used to power as-necessary lighting and electronic equipment, such as computers inside temporary construction trailers, would be small. The electricity used for such activities would be temporary, would be substantially less than that required for Project operation, and would, therefore, have a negligible contribution to the Project's overall energy consumption.

Natural gas is not anticipated to be required during construction of the Project. Fuels used for construction would primarily consist of diesel and gasoline, as discussed below.

Petroleum would be consumed during the entire duration of Project construction. Fuel consumed by heavy-duty construction equipment of various types, transportation of construction materials, and construction worker trips. The estimated diesel fuel usage from construction equipment and vendor trucks, as well as estimated gasoline fuel usage from worker vehicles, is shown in **Table 8**.

**TABLE 8**
**CONSTRUCTION PETROLEUM DEMAND**

| Construction Year | Off-road Equipment (diesel in gallons) | Vendor Trucks (diesel in gallons) | Worker Vehicles (gasoline in gallons) |
|---|---|---|---|
| 2023 | 15,643 | 9,405 | 8,457 |
| 2024 | 16,001 | 26,894 | 37,564 |
| **Total** | **31,645** | **36,299** | **46,021** |

Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

[6] Southern California Edison, 2021 Power Content Label, https://www.sce.com/sites/default/files/custom-files/Web%20files/2021%20Power%20Content%20Label.pdf, no date.

As shown in the table, construction of the Project is conservatively anticipated to consume 46,021 gallons of gasoline and 67,944 gallons of diesel. Project construction would represent a "single-event" petroleum demand and would not require ongoing or permanent commitment of petroleum resources for this purpose. Construction contractors would be required to comply with the provisions of Sections 2449 and 2485 of CCR Title 23, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. In addition, construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Accordingly, Project construction would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Project would result in less-than-significant impacts on energy resources during construction.

***Project Operation***

The proposed operation of four industrial/warehouse buildings would result in an increase in energy consumption resulting from the Project's transportation energy demands (i.e., energy consumed by on-road vehicles traveling to and from the Project Site) and facilities energy demands (i.e., energy consumed by building operations and site maintenance activities). The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project's energy demands in total would be comparable to other projects of similar scale and configuration. Additionally, the Project is subject to Statewide mandatory energy requirements, as outlined in CCR Title 24, Part 6.

The Project's operational phase would require electricity for multiple purposes, including but not limited to building heating and cooling, lighting, appliances, electronics, equipment, and machinery. Energy would also be consumed during Project operation related to water usage/conveyance, solid waste disposal, and electric vehicle trips. **Table 9** shows the estimated annual electricity demand by land use during Project operation. As shown, the Project is anticipated to consume approximately 3,572,648 kilowatt-hours of electricity per year.

**TABLE 9**
**PROJECT ANNUAL OPERATIONAL ELECTRICITY DEMAND**

| Land Use | Annual kWh |
|---|---|
| Warehouse | 2,027,487 |
| Parking | 187,168 |
| Water/Wastewater | 1,357,993 |
| **Total** | **3,572,648** |

Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

The Project would not involve connecting the proposed buildings to the existing natural gas infrastructure. Instead, the Project's appliances and heating, ventilation, and air conditioning (HVAC) system would be electrically powered. However, future tenants, who may require the use of natural gas to serve their businesses, would be responsible for connecting to existing natural gas lines. Conservatively, should all future tenants require the use of natural gas, natural gas consumption during operation would result in a total demand of 8,350,233 kBTU of natural gas per year.

The majority of fuel consumption resulting from Project operation would involve the use of motor vehicles traveling to and from the Project site, as well as fuels for alternative modes of transportation that may be used by employees of the Project. Fuel demand estimates for the Project are provided in **Table 10**. As shown, the Project would result in an estimated annual fuel demand of 549,146 gallons. Fuel would be provided by current and future commercial vendors. Trip generation and VMT generated by the Project are

consistent with other industrial uses of similar scale and configuration. Furthermore, based on the Transportation Impact Analysis (see **Appendix I**), total home-based work VMT and VMT per employee within the City would be lower with the Project than future conditions without the Project.

**TABLE 10**
**PROJECT ANNUAL OPERATIONAL FUEL DEMAND**

| Vehicle Type | Estimated Annual Fuel Consumption (gallons) |
|---|---|
| Gasoline | 306,137 |
| Diesel | 243,009 |
| **Total** | **549,146** |

Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information).

Enhanced fuel economies realized pursuant to federal and State regulatory actions and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely reduce future gasoline fuel demands per VMT. Location of a project proximate to regional and local roadway systems tends to reduce VMT within the region, which, in turn, would reduce regional vehicle energy demands. The Project would install sidewalks, facilitating and encouraging pedestrian access. In compliance with the California Green Building Standards (CALGreen) Code, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. Facilitating pedestrian and bicycle access for employees would reduce VMT and associated energy consumption.

Prior to Project approval, the applicant would ensure that the Project would meet Title 24, including CALGreen Code, requirements applicable at that time. Accordingly, Project operation would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Project would result in less-than-significant impacts on energy resources during operation.

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

**Less Than Significant Impact**. Construction and operation of the Project would result in increased energy consumption when compared to existing conditions. The Project would be subject to and would comply with, at a minimum, the California Building Energy Efficiency Standards (24 CCR Part 6). Part 6 of Title 24 establishes energy efficiency standards for non-residential buildings constructed in California with the goal of reducing energy demand and consumption.

Part 11 of Title 24 sets forth voluntary and mandatory energy measures that are applicable to the Project under the CALGreen Code, which institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, high-rise residential, State-owned buildings, schools, and hospitals, as well as certain residential and non-residential additions and alterations. In addition, energy consumed by Project operation is calculated to be comparable to energy consumed by other industrial uses of similar scale and intensity that are constructed and operating in California. Accordingly, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, the Project would result in less-than-significant impacts related to a State or local plan for renewable energy or energy efficiency.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section VII. Geology and Soils** | | | | |
| Would the project: | | | | |
| a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | ☐ | ☐ | ☐ | ☒ |
| ii) Strong seismic ground shaking? | ☐ | ☐ | ☒ | ☐ |
| iii) Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☒ | ☐ |
| iv) Landslides? | ☐ | ☐ | ☒ | ☐ |
| b) Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | ☐ | ☐ | ☐ | ☒ |
| f) Result in a change in topography or ground surface relief features? | ☐ | ☐ | ☐ | ☒ |
| g) Result in earth movement (cut and/or fill) of 10,000 cubic yards or more? | ☐ | ☐ | ☒ | ☐ |
| h) Involve development and/or grading on a slope greater than 10% natural grade? | ☐ | ☐ | ☐ | ☒ |
| i) Result in the destruction, covering, or modification of any unique geologic or physical feature? | ☐ | ☐ | ☐ | ☒ |
| j) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☒ | ☐ | ☐ |

**Discussion**

The analysis of Project impacts on geology and soils is primarily based on information contained in the numerous geologic and geotechnical engineering reports (geotechnical reports) prepared by Geosoils Consultants, Inc. for the Project Site from September 2011 through February 2022 and provided in **Appendix D** of this Initial Study.

**a.i) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**

**No Impact.** The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazards of surface faulting and fault rupture by establishing regulatory zones around active faults. These zones extend from 200 feet to 500 feet on each side of the known fault and identify areas where a potential surface rupture could be hazardous for buildings used for human occupancy. Development projects located within these zones are required to prepare special geotechnical studies to characterize the effects from any potential surface ruptures. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. In addition, there are no known active or potentially active faults on the Project Site. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects involving rupture of a known earthquake fault. Therefore, the Project would have no impact related to fault rupture.

**a.ii) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**

**Less Than Significant Impact**. As the Project Site is located in the seismically active region of Southern California, the Project Site and, consequently, the Project itself could be subject to strong ground shaking during seismic events. However, the type and magnitude of seismic hazards that may affect the Project Site are dependent on both the distance to causative faults and the intensity and duration of the seismic event. Ground-shaking hazards posed by earthquakes occurring along regional active faults exist and would be considered in the design and construction of the proposed buildings on the Project Site. The Project in itself would not exacerbate potential ground shaking. The origin of potential seismic ground shaking would be located off-site at one of several regional faults. In addition, Project development on the Project Site would have no effect on regional faults or the intensity of seismic ground shaking that could occur during the lifetime of the Project. The nearest major fault, the San Gabriel Fault, is located less than 1 mile northeast of the Project Site and would be considered the causative fault and expected to generate the most significant ground shaking at the Project Site. A portion of this fault is inactive; however, the active portion of this fault represents the closest known active fault to the Project Site.

The Project would be required to adhere to the 2022 California Building Standards Code, which provides procedures for earthquake-resistant structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure, including the structural system and height. Design standards specific to the Project (e.g., grading amounts, foundation bearing materials, building pad design, footing design, structure fill compaction, depth and makeup of fill materials) have also been provided in the geotechnical reports, provided in **Appendix D** of this Initial Study. The Project's Grading Plan would be required to be consistent with the recommendations provided in the Geotech Study, which would be verified by the City in its plan check and grading permit process. In addition, the Project would be subject to building inspection by the City during and after construction to ensure compliance with 2022 California Building Standards. Accordingly, compliance with these required standards would ensure that the Project would not directly or indirectly cause potential adverse effects, including the risk of loss, injury, or death, related to strong seismic ground shaking. Therefore, the Project would result in less-than-significant impacts related to seismic ground shaking.

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

**Less than Significant Impact.** Liquefaction occurs when saturated soils lose their strength and behave like a liquid as a result of strong ground shaking. The three geologic conditions that must be present in order for liquefaction to occur are (1) strong ground shaking; (2) shallow groundwater, generally less than 50 feet in depth; and (3) the presence of unconsolidated sandy alluvium, typically Holocene in age. Based on conclusions in a site-specific liquefaction analysis prepared for the Project Site, the potential for liquefaction exists on the Project Site. The layer of potentially liquefiable material was located approximately 45 feet below existing ground level and was approximately 5 feet thick. However, due to the fact that only one layer of potentially liquefiable material was encountered in the subsurface exploration and based on the depth of that layer, the analysis determined that neither liquefaction nor any related phenomena would pose a significant risk to site development. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Therefore, the Project would result in less-than-significant impacts related to liquefaction.

**a.iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?**

**Less than Significant Impact.** Landslides are believed to result from the combined influence of water-saturated soils and grading activities associated with development. Water saturation might result from rainfall, over-irrigation, and sewage effluent discharge. Rainfall could loosen soil cohesion or trigger soil erosion and result in hillside slope failure. Landslides are not considered a hazard at the Project Site because overly steep slopes or unfavorable bedding conditions do not exist on-site. In addition, to ensure the stability of slopes immediately adjacent to the Project Site, the Project proposes to install a retaining wall along the majority of the eastern boundary of the Project Site and along the southern boundary east of Springbrook Drive. Accordingly, the Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving landslides. Therefore, the Project result in less-than-significant impacts related to landslides.

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

**Less Than Significant Impact.** The Project Site was previously graded; therefore, fine grading would be minimal and would be limited to approximately 2,500 cubic yards of cut and fill. No import or export of soil would be required. However, soils within the 22.3-acre Project Site may become exposed and, thus, subject to erosion from wind and water. Erosion could allow for soil particles to be carried off-site, where they can affect water quality, cause sedimentation (buildup of soil in waterways), and reduce the soil stability on-site.

To reduce wind and water erosion during earth-moving activities, the Project would be required to comply with South Coast AQMD Rule 403 regarding fugitive dust, which, as described in Section III, Air Quality, of this Initial Study, would reduce the potential for wind-driven erosion/loss of topsoil. Similarly, water erosion during construction would be reduced through compliance with the requirements of the NPDES Construction General Permit, which is mandatory for construction sites that disturb more than 1 acre of land. The Construction General Permit requires construction sites to implement stormwater controls and develop an SWPPP, which controls the amount of sediment and other pollutants discharged from the construction site. The details of the Construction General Permit are discussed in further detail in Section X, Hydrology and Water Quality, of this Initial Study. Therefore, the potential loss of topsoil resulting from the increase in erosion during any construction activity would be substantially reduced through required compliance with existing regulations.

The Project would result in the creation of impervious surfaces from the proposed buildings, driveways, and other paved surfaces (e.g., outdoor employee patios). These impervious surfaces would stabilize underlying soils, thereby providing protection from rain- or wind-driven loss of topsoil. In addition, pervious surfaces on the Project Site, including landscaped areas, would reduce the amount of bare soil and, thus, would anchor the topsoil. Operation of the proposed industrial/warehouse buildings would not cause wind

or water erosion or the loss of topsoil. Because the developed Project Site would reduce erosion potential compared to existing conditions, the Project would not result in substantial soil erosion, or the loss of topsoil. Therefore, the Project would result in less-than-significant impacts related to 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, the potential for liquefaction exists on the Project Site. Potential impacts from unstable geologic units or soils would be reduced through regulatory compliance and incorporating recommended design features in the geotechnical reports prepared for the Project (see **Appendix D**). The majority of the recommendations have already been implemented as part of the previously approved and permitted grading of the Project Site and the installation of infrastructure improvements, including the extension of Springbrook Avenue from Oak Ridge Drive, curbs, gutters, sidewalks, storm drains, and desilting/detention basins. After construction, the Project would not create site conditions that could exacerbate liquefaction or settlement hazards on the Project Site. Additionally, the Project would include a comprehensive storm drainage system throughout the developed areas to capture and treat surface water runoff within a series of catch basins and infiltration basins, as discussed further in Section X, Hydrology and Water Quality, of this Initial Study. Therefore, the Project would not be located on a geologic unit or soil that is unstable or would become unstable as a result of Project development that would potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Therefore, the Project would result in less-than-significant impacts related to unstable soils.

**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.** Expansive soils are prone to change in volume because of the presence or absence of moisture. Expansive soils decrease in volume when dry and increase when wet (shrink-swell). Expansive soils typically have high percentages of certain kinds of clay particles, which can expand 10 percent or more as they become wet. Soils composed of mostly sand and gravel do not absorb much water. Expansive soils can cause structural damage, cracked driveways and sidewalks, heaving of roads and highway structures, and disruption of pipelines and other utilities. However, surficial soils on the Project Site were identified as having a low expansion potential. Accordingly, the Project would not be located on expansive soil to create substantial direct or indirect risks to life or property. Therefore, the Project would result in less-than-significant impacts related to expansive soils.

**e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** The Project Site is located within a community served by existing public sewer systems. As such, the Project would not require the use of septic tanks or alternative wastewater disposal system, and soil suitability for septic tanks or alternative wastewater disposal systems is not applicable to the Project. Therefore, the Project would have no impacts related to soils incapable of supporting septic tanks or alternative wastewater disposal systems.

**f) Would the project result in a change in topography or ground surface relief features?**

**No Impact.** The Project Site has been previously graded and is relatively flat without any ground surface relief features. Accordingly, the Project would not result in a change in topography or ground surface relief features. Therefore, the Project would have no impact on the site's topography.

**g) Would the project result in earth movement (cut and/or fill) of 10,000 cubic yards or more?**

**Less Than Significant Impact.** The Project Site has been previously graded; therefore, fine grading would be minimal and would be limited to approximately 2,500 cubic yards of cut and fill. No import or export would be required. Accordingly, the Project would not involve more than 10,000 cubic yards of earthwork and there would be no substantial landform changes as a result of the Project. Therefore, the Project would result in less-than-significant impacts related to earth movement.

**h) Would the project involve development and/or grading on a slope greater than 10% natural grade?**

**No Impact.** As discussed above, the Project Site has been previously graded and is relatively flat without any slope greater than 10 percent natural grade. Accordingly, the Project would not involve development and/or grading on a slope greater than 10 percent natural grade. Therefore, the Project would have no impacts related to slope grading.

**i) Would the project result in the destruction, covering, or modification of any unique geologic or physical feature?**

**No Impact.** As discussed above, the Project Site has been previously graded. The proposed buildings would be located on a relatively flat site. The Project Site does not contain any ridgelines or other regionally notable topographic features that would be affected by the Project. Accordingly, the Project would not result in the destruction, covering, or modification of any unique geologic or physical feature. Therefore, the Project would have no impacts on unique geologic or physical features.

**j) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant With Mitigation Incorporated.** The analysis of Project impacts on paleontological resources is primarily based on information contained in the Paleontological Resources Inventory Report prepared for the Project in May 2023 by Dudek (see **Appendix D** of this Initial Study). Paleontological resources are the remains or traces of plants and animals that are preserved in Earth's crust and, per the Society of Vertebrate Paleontology guidelines, are older than written history or older than approximately 5,500 years. They are limited, nonrenewable resources of scientific and educational value and are afforded protection under state laws and regulations.

To determine the paleontological sensitivity of the Project Site, a paleontological resources inventory was conducted in May 2022, and consisted of a Natural History Museum of Los Angeles County (LACM) paleontological records search and review of geological mapping and geological and paleontological literature. The results of the paleontological records search were negative for paleontological resources within the Project Site; however, the LACM reported five fossil localities near the Project Site from geological units that underlie the Project Site at unknown depths. Of these localities, three are from the Saugus Formation, which crops out nearby but is not anticipated to be impacted by implementation of the Project since it was not reported in geotechnical borings conducted on the Project Site. Fossil locality LACM VP (Vertebrate Paleontology) 5745, collected near Magic Mountain in fill dirt, consisted of mastodon (*Mammut*) and horse (*Equus*). A fossil bison (*Bison*) (LACM VP 3397) was reported from the spillway of the Van Norman Reservoir from 75 feet below the ground surface.

Pleistocene alluvial deposits mapped in the northeastern corner of Project Site have high paleontological sensitivity; Holocene alluvial deposits have low paleontological sensitivity on the surface, increasing with depth; and artificial fill has no paleontological sensitivity. Based on the records search results and map and literature review, the Project Site has high potential to produce paleontological resources during Project construction in areas underlain by Pleistocene deposits and Holocene deposits at depth. In the event that intact paleontological resources are discovered on the Project Site, ground-disturbing activities associated with Project construction, such as grading and augering during site preparation and trenching for utilities, have the potential to destroy a unique paleontological resource or site. Accordingly, the potential damage

to paleontological resources during construction would be a potentially significant impact. However, with implementation of the recommended mitigation measure identified below, the Project would result in less-than-significant impacts on paleontological resources.

**MM-GEO-1:** Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project that is consistent with the SVP (2010) guidelines and outlines requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project Site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. A qualified paleontological monitor shall be on-site during ground-disturbing activities, including augering, in areas underlain by Pleistocene gravel deposits and below a depth of five feet below the ground surface in areas underlain by Holocene alluvium to determine if these areas are old enough to preserve scientifically significant paleontological resources. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall allow grading to recommence in the area of the find.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section 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? | ☐ | ☐ | ☒ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

The analysis of Project impacts related to GHG emissions is primarily based on information contained in the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report prepared for the Project in May 2023 by Dudek and provided in Appendix A of this Initial Study.

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

**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**. The California State Legislature passed the Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32) to provide initial direction to limit California's GHG emissions to 1990 levels by 2020 and initiate the State's long-range climate objectives. Since the passage of AB 32, the State has

adopted GHG emissions reduction targets for future years beyond the initial 2020 horizon year. For the Project, the relevant GHG emissions reduction targets include those established by Senate Bill (SB) 32 and AB 1279, which require GHG emissions be reduced to 40 percent below 1990 levels by 2030, and 85 percent below 1990 levels by 2045, respectively. In addition, AB 1279 requires the State to achieve net zero GHG emissions by no later than 2045 and achieve and maintain net negative GHG emissions thereafter.

As defined by AB 32, CARB is required to develop a Scoping Plan, which provides the framework for actions to achieve the State's GHG emission targets. The Scoping Plan is required to be updated every five years and requires CARB and other State agencies to adopt regulations and initiatives that will reduce GHG emissions Statewide. CARB adopted its first Scoping Plan in 2008, with updates in 2014, 2017, and most recently in 2022. While the Scoping Plan is not directly applicable to specific projects or intended to be used as the sole basis for project-level evaluations, it is the official framework for the measures and regulations that will be implemented to reduce California's GHG emissions in alignment with the adopted targets. As such, a project would be found to not conflict with the statutes if it would meet the Scoping Plan policies and would not impede attainment of the goals therein.

CARB's 2017 Climate Change Scoping Plan update was the first to address the State's strategy for achieving the 2030 GHG reduction target set forth in SB 32, and the most recent CARB 2022 Scoping Plan for Achieving Carbon Neutrality update outlines the State's plan to reduce emissions and achieve carbon neutrality by 2045 in alignment with AB 1279 and assesses progress toward the 2030 SB 32 target. As such, given that SB 32 and AB 1279 are the relevant GHG emission targets, the 2017 and 2022 Scoping Plan updates that outline the strategy to achieve those targets are the most applicable to the Project.

The 2017 Scoping Plan included measures to promote renewable energy and energy efficiency, increase stringency of the Low Carbon Fuel Standards, measures identified in the Mobile Source and Freight Strategies, measures identified in the proposed Short-Lived Climate Pollutant Plan, and increase stringency of SB 375 targets; please refer to **Appendix A** of this Initial Study for a description of these regulations. The 2022 Scoping Plan builds upon and accelerates programs currently in place, including moving to zero-emission transportation; phasing out use of fossil gas use for heating homes and buildings; reducing chemical and refrigerants with high global warming potential (GWP); providing communities with sustainable options for walking, biking, and public transit; and displacement of fossil-fuel fired electrical generation through use of renewable energy alternatives (e.g., solar arrays and wind turbines). Many of the measures and programs included in the Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project level.

The Project would be designed and constructed to incorporate features above and beyond applicable requirements, including, but not limited to, the California Building Standards Code, which includes the CALGreen Code and the 2022 Building Energy Efficiency Standards, to support and promote environmental sustainability. The following project design features (PDF) would be implemented by the applicant during the design phase, construction phase, and operational phase:

**PDF-GHG-1:** The Project applicant will implement the following to reduce operational mobile source emissions:

- Only haul trucks meeting model year 2010 engine emission standards will be used for the on-road transport of materials to and from the Project site.
- Legible, durable, weather-proof signs will be placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign will include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and (3) telephone numbers of the building facilities manager and CARB to report violations. Prior to the issuance of an occupancy permit,

the City of Santa Clarita will conduct a site inspection to ensure that the signs are in place.

- Tenants will train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. Staff in charge of keeping vehicle records will be trained in diesel technologies and compliance with CARB regulations by attending CARB-approved courses, as well as maintaining on-site records demonstrating compliance.
- Leasing preference will be given to prospective tenants with a facility-owned and operated fleet that is alternative/zero-emissions.
- Prior to tenant occupancy, the developer or successor(s) in interest will provide documentation to the City of Santa Clarita demonstrating that occupants/tenants of the Project have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
- The minimum number of automobile electric vehicle (EV) charging stations required by CCR Title 24 will be provided prior to issuance of a Certificate of Occupancy. In addition, the proposed buildings will include electrical infrastructure sufficiently sized to accommodate the potential installation of additional automobile EV charging stations in the future. Electrical infrastructure will be provided such that EV charging stations can be installed on 20 percent of the Project's total automobile parking spaces. Proposed buildings will include an electrical system and other infrastructure sufficiently-sized to accommodate the potential expanded installation of EV charging stations in the future. The electrical system and infrastructure must be clearly labeled with noticeable and permanent signage to inform future occupants/owners of the existence of this infrastructure.
- Tenants will be in, and monitor, compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.

**PDF-GHG-2:** The Project applicant will implement the following to reduce operational energy source emissions:

- The Project will be designed such that each building will feature clerestory windows and skylights that cover a minimum of 3 percent of the total roof area of the Project.
- Photovoltaic infrastructure will be provided on the rooftops of the proposed buildings such that a minimum of 25 percent of the total roof area of the Project will include photovoltaic arrays at Project buildout. Proposed buildings will include an electrical system and other infrastructure sufficiently sized to accommodate the potential installation photovoltaic arrays in the future up to 50 percent of the total roof area of the Project. The electrical system and infrastructure will be clearly labeled with noticeable and permanent signage to inform future occupants/owners of the existence of this infrastructure.
- Any yard trucks and service equipment (e.g., forklifts) used on-site will be powered by electricity.
- Project building plans will specify that all fixtures installed in restrooms and employee break areas will be USEPA-certified WaterSense or equivalent.
- Project building plans will specify that all heating, cooling, lighting, and appliance fixtures installed be Energy Star-rated. Information on energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs will be provided to future tenants of the Project.

- Prior to the issuance of permits related to landscaping, the City of Santa Clarita will review and approve landscaping plans for the Project that will incorporate (1) a plant palette emphasizing drought-tolerant plants; (2) the use of water-efficient irrigation techniques; and (3) sufficient shade trees to shade at least 30 percent of the automobile parking areas within 15 years after Project construction is complete. The City of Santa Clarita will inspect for adherence to these requirements after landscaping installation.
- Structures will be equipped with outdoor electric outlets in the front and rear of the structures to facilitate use of electrical lawn and garden equipment.

The following discussions analyze how the Project would not conflict with the performance-based standards included in the regulations outlined in the 2022 Scoping Plan, 2017 Scoping Plan, 2008 Scoping Plan, and AB 32 and the policies established in the SCAG 2020–2045 RTP/SCS and the City's General Plan.

**Table 11** analyzes the Project's consistency with the measures from the 2022 Scoping Plan that are relevant and applicable to the Project. As shown in the table, the Project would not conflict with the applicable measures and actions in the 2022 Scoping Plan.

**TABLE 11**
**CONSISTENCY ANALYSIS – 2022 SCOPING PLAN**

| Sector | Action | Potential to Conflict |
|---|---|---|
| GHG Emissions Reductions Relative to the SB 32 Target | 40% below 1990 levels by 2030 | ***No conflict.*** While the SB 32 GHG emissions reduction target is not an action that is analyzed independently, it is included in Table 2-1 of the 2022 Scoping Plan for reference. The Project would not obstruct or interfere with agency efforts to meet the SB 32 reduction goal. Specifically, the Project would include Project Design Features PDF-GHG-1 and PDF-GHG-2 (as presented above), which would reduce GHG emissions from both on-site and off-site mobile GHG sources. Furthermore, the Transportation Impact Analysis determined that the Project would reduce the City's home-based work VMT relative to baseline conditions from 1,701,590 VMT to 1,591,499 VMT as a result of the new jobs provided by the Project in a housing-rich area. |
| Smart Growth/VMT | VMT per capita reduced 25% below 2019 levels by 2030 and 30% below 2019 levels by 2045 | ***No conflict.*** The Project would not obstruct or interfere with agency efforts to meet this regional VMT reduction goal, including through implementation of SB 375. As detailed below, the Project would be consistent with the SCAG 2020–2045 RTP/SCS, which is the regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the Southern California region pursuant to SB 375. Additionally, per the Transportation Impact Analysis, the baseline home-based work VMT for the City was shown to decrease from 1,701,590 VMT to 1,591,499 VMT as a result of the Project. This is due to the provision of employment opportunities in a housing-rich area (where a majority of the City's residents have to leave the City for work) to lower the VMT per employee. |
| Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs) | 100% of LDV sales are ZEV by 2035 | ***No conflict.*** As this action pertains to LDV sales within California, the Project would not obstruct or interfere with its implementation. Furthermore, the Project would support the transition from fossil fuel LDV to ZEV through its provision of EV chargers (Project Design Feature PDF-GHG-1). |

**TABLE 11**
**CONSISTENCY ANALYSIS – 2022 SCOPING PLAN**

| Sector | Action | Potential to Conflict |
|---|---|---|
| Truck ZEVs | 100% of medium-duty vehicle (MDV)/heavy-duty vehicle (HDV) sales are ZEV by 2040 | ***No conflict.*** As this action pertains to MDV and HDV sales within California, the Project would not obstruct or interfere with its implementation. Furthermore, the Project would comply with the requirements of the 2022 CALGreen Code. |
| Electricity Generation | Sector GHG target of 38 million metric tons of carbon dioxide equivalent ($MMTCO_2e$) in 2030 and 30 $MMTCO_2e$ in 2035<br>Retail sales load coverage<br>20 gigawatts (GW) of offshore wind by 2045<br>Meet increased demand for electrification without new fossil gas-fired resources | ***No conflict****.* As this action pertains to the Statewide procurement of renewable energy, the Project would not obstruct or interfere with its implementation. However, per Project Design Feature PDF-GHG-2, the Project would support increased usage of renewable electricity through the installation of on-site solar panels that cover at least 25 percent of the Project's total roof area. |
| New Residential and Commercial Buildings | All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030 | ***No conflict.*** The Project would not obstruct or interfere with CARB's efforts to meet the all-electric appliance and heat pump goals. As designed, the Project would not involve connecting the proposed buildings to the existing natural gas infrastructure. Instead, the Project's appliances and heating, ventilation, and air conditioning (HVAC) system would be electrically powered. However, future tenants, who may require the use of natural gas to serve their businesses, would be responsible for connecting to existing natural gas lines. |
| Construction Equipment | 25% of energy demand electrified by 2030 and 75% electrified by 2045 | ***No conflict.*** As this action pertains to the electrification of off-road equipment across California, the Project would not obstruct or interfere with its implementation. However, the Project would support the action through the requirement that all cargo handling and landscaping equipment be zero-emission (Project Design Feature PDF-GHG-2). |
| Low Carbon Fuels for Transportation | Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen | ***No conflict****.* The Project would not obstruct or interfere with CARB's efforts to increase the provision of low carbon fuels for transportation. The development and use of biofuels in trucks and automobiles would occur at the State and regional level. Project Design Feature PDF-GHG-1 also includes a leasing preference for tenants with a facility-owned fleet that utilizes alternative and/or ZEVs. |
| Low Carbon Fuels for Buildings and Industry | In 2030s biomethane blended in pipeline<br>Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040<br>In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters | ***No conflict.*** The Project would not obstruct or interfere with CARB's efforts to increase the provision of low carbon fuels for use in buildings and industry. The blending of biomethane and use of renewable hydrogen in existing natural gas pipelines would happen at the scale of the utility provider and without action required by the Project. |

**TABLE 11**
**CONSISTENCY ANALYSIS – 2022 SCOPING PLAN**

| Sector | Action | Potential to Conflict |
|---|---|---|
| High GWP Potential Emissions | Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions | ***No conflict.*** The Project would not obstruct or interfere with agency efforts to introduce low global warming potential (GWP) refrigerants. The State has established a prohibition on the sale or distribution of bulk hydrofluorocarbons (HFC) identified as having a high GWP through SB 1206. |
| Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information). | | |

**Table 12** highlights measures that were developed under the 2017 Scoping Plan and presents the Project's potential to conflict with the applicable 2017 Scoping Plan measures. As shown, the Project would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the Project and would not conflict with the applicable strategies and measures in the 2017 Scoping Plan.

**TABLE 12**
**CONSISTENCY ANALYSIS – 2017 SCOPING PLAN GHG EMISSION REDUCTION STRATEGIES**

| Scoping Plan Measure | Measure Number | Potential to Conflict |
|---|---|---|
| ***Transportation Sector*** | | |
| Advanced Clean Cars | T-1 | ***No conflict.*** The Project would not obstruct or interfere with CARB's efforts to implement this measure because the Project's employees and customers would purchase vehicles in compliance with CARB vehicle standards that are in effect at the time of vehicle purchase. |
| Low Carbon Fuel Standard | T-2 | ***No conflict.*** The Project would not obstruct or interfere with CARB's Low Carbon Fuel Standard because motor vehicles driven by the Project's employees and customers would use compliant fuels. |
| Last-Mile Delivery | N/A | ***No conflict****.* The Project would not obstruct or interfere with CARB's efforts to implement this measure. Per Project Design Feature PDF-GHG-1, the Project will require that all on-road trucks meeting 2010 model year emission standards will be used. Project Design Feature PDF-GHG-1 also includes a leasing preference for tenants with a facility owned fleet that utilizes alternative and or ZEVs. Both these PDFs would help to reduce GHG and air pollutant emissions associated with the last-mile of goods delivery. |
| Reduction in VMT | N/A | ***No conflict.*** The Project would not prevent CARB from implementing this measure. Additionally the Project would support this measure through siting of a warehouse project near a housing-rich area. Additionally, the Transportation Impact Analysis determined that the baseline home-based work VMT for the City would decrease from 1,701,590 VMT to 1,591,499 VMT as a result of the Project. This is due to the provision of employment opportunities in a housing-rich area (where a majority of the City's residents have to leave the City for work) to lower the VMT per employee. |
| Goods Movement Efficiency Measures<br>1. Port Drayage Trucks | T-6 | ***No conflict.*** The Project would not prevent CARB from implementing this measure. Furthermore, the Project would not include cold storage, and, per Project Design Feature PDF-GHG-2, the Project will include all-electric cargo handling equipment, including yard trucks and forklifts. The Project will also implement anti-idling measures, including increased |

**TABLE 12**
**CONSISTENCY ANALYSIS – 2017 SCOPING PLAN GHG EMISSION REDUCTION STRATEGIES**

| Scoping Plan Measure | Measure Number | Potential to Conflict |
|---|---|---|
| 2. Transport Refrigeration Units Cold Storage Prohibition<br>3. Cargo Handling Equipment, Anti-Idling, Hybrid, Electrification<br>4. Goods Movement Systemwide Efficiency Improvements<br>5. Commercial Harbor Craft Maintenance and Design Efficiency<br>6. Clean Ships<br>7. Vessel Speed Reduction | | signage on-site and training of logistic staff to reduce trucking queuing times on-site per Project Design Feature PDF-GHG-1. The Project would not prevent CARB or other agencies from implementing the other measures related to goods movement. |
| Heavy-Duty Vehicle GHG Emission Reduction<br>▪ Tractor-Trailer GHG Regulation<br>▪ Heavy-Duty Greenhouse Gas Standards for New Vehicle and Engines (Phase I) | T-7 | ***No conflict***. The Project would not obstruct or interfere with agency efforts to implement this measure. The Tractor Trailer GHG regulation and Heavy-Duty Truck GHG standards set GHG emission standards for truck engines for a given model year. Phase I sets GHG emission and fuel economy standards for heavy-duty trucks for model years 2014–2018. Phase II sets standards for model years for 2019–2027. Project Design Feature PDF-GHG-1 will require that all heavy-duty trucks utilize engines that meet the emission standards for 2010 trucks. Over the life of the Project, the truck fleet would turn over and utilize newer engines with stricter emissions standards. Additionally, as a part of Project Design Feature PDF-GHG-1, the Project will include a leasing preference for tenants that utilize a truck fleet that includes alternative/ZEVs. |
| Medium and Heavy-Duty GHG Phase 2 | N/A | ***No conflict***. This measure sets GHG emission and vehicle fuel standards for model years 2018-2027 for certain trailers and model years 2021-2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. Project Design Feature PDF-GHG-1 will require that all heavy-duty trucks utilize engines that meet the emission standards for 2010 trucks. Over the life of the Project, the truck fleet would turnover and utilize newer engines with stricter emissions standards. Additionally, as a part of Project Design Feature PDF-GHG-1, the Project will include a leasing preference for tenants that utilize a truck fleet that includes alternative/ZEVs. |
| ***Electricity and Natural Gas Sector*** | | |
| Energy Efficiency Measures (Electricity) | E-1 | ***No conflict***. The Project would be constructed in accordance with the Title 24 building standards, which includes the CALGreen Code. Title 24 requirements for nonresidential projects include high efficiency indoor and outdoor lighting requirements, thermostat, and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, per Project Design Feature PDF-GHG-2, the Project would also go beyond Title 24 requirements to include on-site solar photovoltaic system that would cover 25 percent of the total roof area and could be expanded to 50 percent of the total roof area at later date. |
| Energy Efficiency (Natural Gas) | CR-1 | ***No conflict***. The Project would be constructed in accordance with the Title 24 building standards, which includes the CALGreen Code. |

**TABLE 12**
**CONSISTENCY ANALYSIS – 2017 SCOPING PLAN GHG EMISSION REDUCTION STRATEGIES**

| Scoping Plan Measure | Measure Number | Potential to Conflict |
|---|---|---|
| Renewables Portfolio Standard (33% by 2020) | E-3 | ***No conflict.*** The Project would procure electricity from SCE, which is in compliance with the Renewables Portfolio Standard for 2020. |
| Renewables Portfolio Standard (50% by 2050) | N/A | ***No conflict.*** The Project would procure electricity from SCE, which is on trajectory to be compliance with the Renewables Portfolio Standard for 2050. |
| ***Water Sector*** | | |
| Water Use Efficiency | W-1 | ***No conflict.*** The Project would be constructed in accordance with the Title 24 building standards, which includes the CALGreen Code. The CALGreen Code requires that plumbing fixtures do not exceed established flow rates and outlines requirements for water-efficient landscaping design. Per Project Design Feature PDF-GHG-2, the Project will include a plant palette emphasizing drought-tolerant plants and use of water-efficient irrigation techniques. |
| Green Building Standards Code (Greening New Public Schools, Residential and Commercial Buildings) | GB-1 | ***No conflict.*** The Project would be constructed in accordance with the Title 24 building standards, which includes the CALGreen Code. Title 24 requirements for nonresidential projects include high efficiency indoor and outdoor lighting requirements, thermostat and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, per Project Design Feature PDF-GHG-2, the Project will also go beyond Title 24 requirements to include on-site solar photovoltaic system that would cover 25 percent of the total roof area and could be expanded to 50 percent of the total roof area at later date. The CALGreen Code requires that plumbing fixtures do not exceed established flow rates and outlines requirements for water-efficient landscaping design. Per Project Design Feature PDF-GHG-2, the Project will include a plant palette emphasizing drought-tolerant plants and use of water-efficient irrigation techniques. |
| Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information). | | |

Similarly, as shown in **Table 13**, the Project would not conflict with the applicable Statewide regulatory programs designed to reduce GHG emissions consistent with the 2008 Scoping Plan and AB 32.

**TABLE 13**
**CONSISTENCY ANALYSIS – 2008 SCOPING PLAN AND AB 32 REGULATORY PROGRAMS**

| Regulatory Program | Potential to Conflict |
|---|---|
| ***Construction*** | |
| CARB In-Use Off-Road Regulation | ***No conflict.*** Off-road equipment used for construction of the Project would utilize equipment in compliance with CARB Airborne Toxic Control Measures. |
| ***Mobile Sources*** | |
| California Assembly Bill 1493 (Pavley Standards) | ***No conflict.*** This regulatory program applies to vehicle manufacturers and not directly to land use development. However, the vehicles operated by future occupants of and visitors to the Project would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet for model years 2017 through 2025. |
| Advanced Clean Cars Program | ***No conflict.*** This regulatory program applies to vehicle manufacturers and not directly to land use development. However, the vehicles operated by |

**TABLE 13**
**CONSISTENCY ANALYSIS – 2008 SCOPING PLAN AND AB 32 REGULATORY PROGRAMS**

| Regulatory Program | Potential to Conflict |
|---|---|
| | future occupants of and visitors to the Project would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet for model years 2017 through 2025. |
| Low Carbon Fuel Standard Regulation | ***No conflict***. This regulatory program applies to fuel suppliers and not directly to land use development. However, the vehicles operated by future occupants of and visitors to the Project would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet. |
| Heavy-Duty Vehicle GHG Emission Reduction Regulation | ***No conflict***. This regulatory program is intended to reduce fuel use and GHG emissions from medium- and heavy-duty vehicles, semi-trucks, pickup trucks and vans, and all types and sizes of work trucks and buses in between. The Project construction and operational analyses include the benefit of reductions from these programs. |
| CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation | ***No conflict***. This regulatory program applies to vehicle manufacturers and not directly to land use development. However, the vehicles operated during Project construction and operations would benefit from and be consistent with this regulatory program in the form of reduced GHG emissions from the vehicle fleet. |
| ***Energy Use*** | |
| California Title 20 Standards Appliance Energy Efficiency Standards | ***No conflict***. The Project would result in new land use development that would be outfitted with appliances that comply with Title 20 standards. |
| California Title 24, Part 6 Standards Building Energy Efficiency Standards | ***No conflict***. The Project would be designed and construct buildings in compliance with Title 24 standards. Title 24 requirements for non-residential projects include high efficiency indoor and outdoor lighting requirements, thermostat, and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, per Project Design Feature PDF-GHG-2, the Project will also go beyond Title 24 requirements to include on-site solar photovoltaic system that would cover 25 percent of the total roof area and could be expanded to 50 percent of the total roof area at later date. |
| California Title 24, Part 11 Standards Green Building Standards Code | ***No conflict***. The development proposed by the Project would comply with the CALGreen Code, which requires that plumbing fixtures do not exceed established flow rates. The CALGreen Code also outlines requirements for water efficient landscaping design. Per Project Design Feature PDF-GHG-2, the Project will include a plant palette emphasizing drought-tolerant plants and use of water-efficient irrigation techniques. |
| California Senate Bill X1-2 Renewable Portfolio Standards | ***No conflict***. This regulatory program applies to investor-owned utilities, electric service providers, and community choice aggregators and not directly to land use development. However, the Project would benefit from and be consistent with this regulatory program because electricity would be purchased from SCE, which is required to procure 45 percent and 50 percent of retail sales from renewable energy resources by 2027 and 2030, respectively. |
| ***Water Supply, Treatment, and Distribution*** | |
| Senate Bill X7-7 Water Use Efficiency Program | ***No conflict***. This regulatory program is implemented through the California Department of Water Resources and urban water suppliers and not land use developers. The Project would be consistent with water conservation objectives through use of the latest water-efficiency technologies, including those relating to water-conserving plumbing fixtures, weather-sensitive irrigation controls, and drought-tolerant landscaping palettes. |
| Executive Order B-29-15 | ***No conflict***. Mandatory water reductions are implemented via Executive Order B-29-15 and a regulatory framework developed by the SWRCB. These regulatory programs apply to urban water suppliers and not land use developers. The Project would be consistent with water conservation objectives through use of the latest water-efficiency technologies, including |

**TABLE 13**
**CONSISTENCY ANALYSIS – 2008 SCOPING PLAN AND AB 32 REGULATORY PROGRAMS**

| Regulatory Program | Potential to Conflict |
|---|---|
| | those relating to water-conserving plumbing fixtures, weather-sensitive irrigation controls, and drought-tolerant landscaping palettes. |
| California Title 24, Part 11 Standards Green Building Standards Code | ***No conflict***. The Project would be required to comply with the CALGreen Code. The use of water-saving design elements, such as water-efficient toilets/urinals and faucets, would allow the Project to meet the required 20-percent reduction in indoor potable water use. |
| Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information). | |

At the regional level, the SCAG 2020–2045 RTP/SCS is a regional growth management strategy that targets per capita GHG reduction from passenger vehicles and light trucks in the Southern California region pursuant to SB 375. In addition to demonstrating the region's ability to attain the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

The following strategies are intended to be supportive of implementing the 2020–2045 RTP/SCS and reducing GHG emissions: focus growth near destinations and mobility options; promote diverse housing choices; leverage technology innovations; support implementation of sustainability policies; and promote a green region. The strategies that pertain to residential development and SCAG's support of local jurisdiction sustainability efforts would not apply to the Project. The Project's compliance with the remaining applicable strategies is presented below.

- ***Focus Growth Near Destinations and Mobility Options.*** One of the strategies in the 2020–2045 RTP/SCS is to expand job opportunities near transit and along center-focused main streets and to promote the redevelopment of underperforming sites and other outmoded nonresidential uses. The Project would not conflict with this strategy as the Project is located immediately adjacent to Railroad Avenue and supports the development of an underdeveloped parcel with a new warehouse facility, which would also expand job opportunities. The Project is also directly adjacent to a bus stop at the intersection of Railroad Avenue and Oak Ridge Drive, which provides a connection to the Jan Heidt Newhall Metrolink Station. Furthermore, based on the results of the VMT analysis in the Transportation Impact Analysis, the baseline home-based work VMT for the City was shown to decrease from 1,701,590 VMT to 1,591,499 VMT as a result of the Project's provision of employment opportunities in a housing-rich area (where a majority of the City's residents have to leave the City for work) to lower the VMT per employee.
- ***Leverage Technology Innovations.*** One of the technology innovations identified in the 2020–2045 RTP/SCS that would apply to the Project is the promotion and support of low emission technologies for transportation, such as alternative fueled vehicles to reduce per capita GHG emissions. All-electric forklifts would be used during operation, and parking spaces designated for EV and clean air vehicle parking would be provided in compliance with the CALGreen Code requirements. Approximately 20 percent of the total parking spaces would be equipped with the necessary infrastructure for the future installation of EV parking spaces.
- ***Promote a Green Region.*** The third applicable strategy in the 2020–2045 RTP/SCS for individual developments, such as the Project, involves promoting a green region through efforts to reduce GHG emissions, such as supporting local policies for renewable energy production and promoting more resource-efficient development (e.g., reducing energy consumption). The Project would support this measure by complying with the 2022 Title 24 building standards, which include requirements for high

efficiency indoor and outdoor lighting, thermostat and HVAC energy efficiency requirements, and electrical metering requirements. Additionally, Project Design Feature PDF-GHG-2 will require the Project to install photovoltaic infrastructure that covers 25 percent of the total roof area at Project buildout and allow for up to 50 percent of the total roof area in the future.

Based on the analysis above, the Project would not conflict with the SCAG 2020–2045 RTP/SCS.

At the local level, the City's General Plan Goal CO 8 focuses on development designed to improve energy efficiency, reduce energy, and natural resource consumption to reduce GHG emissions. **Table 14** evaluates the Project's potential to conflict with the City's General Plan policies for reducing GHG emissions. As shown in the table, the Project would not conflict with applicable policies.

**TABLE 14**
**CONSISTENCY ANALYSIS – CITY OF SANTA CLARITA GENERAL PLAN**

| Goal/Objective/Policy | Potential to Conflict |
|---|---|
| **Goal CO 8:** Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases. | ***No conflict.*** The Project would be designed in compliance with the 2022 Title 24 standards, which incorporate energy efficiency solar readiness. Further, Project Design Feature PDF-GHG-2 will require the installation of clerestory windows and skylights that account for 3 percent of the total roof area, which would reduce electricity consumption associated with lighting. Project Design Feature PDF-GHG-2 will also require all-electric cargo handling equipment, eliminating the need for equipment powered by internal combustion engines. Additionally, Project Design Feature PDF-GHG-2 will require the installation of on-site solar photovoltaic systems covering 25 percent of the total roof area. Reducing energy usage by increasing the availability of natural light via skylights and clerestory windows and installing on-site photovoltaic solar systems would directly promote energy efficiency, reduce energy usage and natural resource consumption, and reduce GHG emissions. While electric cargo handling equipment would still require energy consumption, as the electric grid becomes less carbonized, the use of electric cargo equipment would lead to reduced natural resource consumption and GHG emissions. |
| **Objective CO 8.3:** Encourage the following green building and sustainable development practices on private development projects, to the extent reasonable and feasible. | ***No conflict.*** This measure is implemented at the municipal level and not directly related to individual projects. However, the Project would be designed and built to be energy efficient and consistent with current 2022 Title 24 standards, which includes the CALGreen Code. |
| **Policy CO 8.3.2:** Promote construction of energy efficient buildings through requirements for LEED certification or through comparable alternative requirements as adopted by local ordinance. | ***No conflict.*** The Project would be built to meet the 2022 Title 24 standards, which includes the CALGreen Code, and will include additional reductions measures, such as on-site solar and electric cargo handling equipment as established in Project Design Features PDF-GHG-1 and PDF-GHG-2. |
| **Policy CO 8.3.4:** Encourage new residential development to include on-site solar photovoltaic systems, or pre-wiring, in at least 50% of the residential units, in concert with other significant energy conservation efforts. | ***No conflict.*** While not a residential project, the Project, as a part of Project Design Feature PDF-GHG-2, will include on-site solar photovoltaic systems covering 25 percent of the Project's available rooftop area. |
| **Policy CO 8.3.5:** Encourage on-site solar generation of electricity in new retail and office commercial buildings and associated parking lots, carports, and garages, in concert with other significant energy conservation efforts. | ***No conflict.*** While not a commercial project, the Project, as a part of Project Design Feature PDF-GHG-2, will include on-site solar photovoltaic systems covering 25 percent of the Project's available rooftop area. |
| **Policy CO 8.3.6:** Require new development to use passive solar heating and cooling techniques in building design and construction, which may include but are not limited to | ***No conflict.*** The exact sustainable features to be incorporated into the Project are still being refined; however, the Project will include, as a part of Project Design Feature PDF-GHG-2, clerestory windows, skylights that account for 3 percent of the total roof area, |

**TABLE 14**
**CONSISTENCY ANALYSIS – CITY OF SANTA CLARITA GENERAL PLAN**

| Goal/Objective/Policy | Potential to Conflict |
|---|---|
| building orientation, clerestory windows, skylights, placement and type of windows, overhangs to shade doors and windows, and use of light-colored roofs, shade trees, and paving materials. | and on-site solar photovoltaic systems covering 25 percent of the total roof area. |
| **Policy CO 8.3.7:** Encourage the use of trees and landscaping to reduce heating and cooling energy loads, through shading of buildings and parking lots. | ***No conflict.*** As outlined in Project Design Feature PDF-GHG-2, the Project will plant trees and groundcover as part of the proposed development's landscaping to provide shade to at least 30 percent of the automobile parking areas to reduce heating and cooling energy loads. |
| **Policy CO 8.3.8:** Encourage energy-conserving heating and cooling systems and appliances, and energy-efficiency in windows and insulation, in all new construction. | ***No conflict.*** The Project would include energy-efficient appliances, high-efficiency lighting, and solar panels. The Project will be built to meet the requirements of the 2022 CALGreen Code. |
| **Policy CO 8.3.9:** Limit excessive lighting levels and encourage a reduction of lighting when businesses are closed to a level required for security. | ***No conflict.*** The Project would include high-efficiency lighting, and outdoor lighting would be used minimally to illuminate the Project site for safety and security. |
| Source: Dudek, Air Quality, Greenhouse Gas Emissions, and Energy Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix A** of this Initial Study for more detailed information). | |

As discussed above, the Project would increase employment opportunities in the area to help the jobs/housing balance in the City, thereby reducing VMT. The Project would comply with California building code standards, which require the incorporation of increasing building energy efficiency standards, renewable energy in the form of solar photovoltaics, and EV infrastructure. In addition, based on the consistency analyses above, the Project would not conflict with the 2022 Scoping Plan, 2017 Scoping Plan, 2008 Scoping Plan, AB 32, SCAG 2020–2045 RTP/SCS and the City's General Plan. As such, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the GHG emissions. Therefore, the Project would result in less-than-significant impacts related to GHG emissions.

In accordance with CEQA Guidelines Section 15064.4(c), the Project's construction and operational GHG emissions have been quantified for disclosure purposes only, as presented in **Appendix A** of this Initial Study. As shown in Table 24 of the Air Quality, Greenhouse Gas Emissions, and Energy Technical Report in **Appendix A**, estimated annual Project-generated GHG emissions would be approximately 7,038 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year as a result of Project operation; with amortized construction emissions of approximately 37 $MTCO_2e$ per year, total Project emissions would be approximately 7,075 $MTCO_2e$ per year.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section IX. Hazards and Hazardous Materials** | | | | |
| Would the project: | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |

| | | | | | |
|---|---|---|---|---|---|
| b) | Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | ☐ | ☐ | ☒ | ☐ |
| c) | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| e) | For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| f) | For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| g) | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| h) | Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ☐ | ☐ | ☒ | ☐ |
| i) | Expose people to existing sources of potential health hazards (e.g., electrical transmission lines, gas lines, oil pipelines)? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

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

**Less Than Significant Impact.** Materials are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). A hazardous material is defined in the California Health and Safety Code as any material that poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment because of its quantity, concentration, or physical or chemical characteristics. The California Health and Safety Code also states that a hazardous material becomes a hazardous waste once it is abandoned, discarded, or recycled.

The transportation, use, and disposal of hazardous materials, as well as the potential release of hazardous materials to the environment, are regulated by State and federal laws. These laws, such as the California Hazardous Materials Release Response Plans and Inventory law and the California Hazardous Waste Control law, are incorporated into the California Health and Safety Code. Other regulations pertaining to hazardous waste are promulgated by federal, State, and regional agencies, such as the USEPA, California Department of Toxic Substances Control (DTSC), California Division of Occupational Safety and Health

(OSHA), Los Angeles Regional Water Quality Control Board (LARWQCB), and Los Angeles County Department of Public Works.

Construction of the Project would involve the temporary use of potentially hazardous materials, including vehicle fuels, oils, transmission fluids, lubricants, paints, concrete, solvents, and adhesives. However, all potentially hazardous materials used during Project construction would be used and disposed of in accordance with manufacturers' specifications and instructions, which would reduce the hazards associated with their transport, use, or disposal. In addition, existing regulations are aimed at establishing specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. The Project would comply with all applicable federal, State, and local requirements related to the use, storage, and management of hazardous materials. More specifically, routine construction control measures would be implemented, including spill prevention/containment, sedimentation and erosion controls, and irrigation controls, to prevent conditions that would release hazardous materials into the environment during Project construction.

The Project involves operation of industrial/warehouse buildings and office space for administrative, sales or other office-oriented activities associated with the future tenants. It is anticipated that there would be some limited transport, handling, and disposal of hazardous substances that are typically associated with industrial/warehouse types of uses. This may include, but is not limited to, the use of small quantities of common chemical substances, such as toners, batteries, paints, lubricants, restroom cleaners, and other maintenance products. Transport, storage, use, and disposal of these materials is commonplace in businesses of all types and does not represent a significant threat to the environment or public health. In addition, as with construction, the Project would comply with all applicable federal, State, and local requirements related to the use, storage, and management of hazardous materials during operation.

Accordingly, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction and operation. Therefore, the Project would result in less-than-significant impacts related to hazardous materials.

**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.** The Project Site was used for agriculture activities from the 1920s to the mid-1950s and then as a building material, recreational vehicle storage yard, and commercial truck storage yard between the late 1950s and the fall of 2019. A Phase I Environmental Site Assessment (Phase I ESA) was conducted for the Project Site in 2021 by Partner Engineering and Science, Inc. and is provided in **Appendix F** of this Initial Study. The Phase I ESA did not reveal any evidence of recognized environmental conditions (RECs) in connection with previous activities on-site. Although the Phase I ESA identified several underground storage tanks (USTs) located south and west of the Project Site, no evidence of significant residual contamination or unauthorized releases from any of the USTs was identified or represents a material threat of an REC in connection with the Project Site. Because Project-related ground disturbance would be limited to the Project Site, which is not listed on hazardous waste disposal or cleanup databases maintained by the State, the Project would not result in reasonably foreseeable upset of any hazardous materials in the Project vicinity.

Construction activities could include refueling and minor maintenance of construction equipment on-site which could lead to small fuel and oil spills. However, as discussed above, routine construction control measures would be implemented to prevent conditions that would release hazardous materials into the environment during Project construction, including upset and accident conditions. Furthermore, Project operation would not result in substantial use, transport, or disposal of hazardous materials, as described above. Accordingly, the Project would not result in any reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, the Project would result in less-than-significant impacts related to hazardous materials.

**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?**

**No Impact.** As discussed above, Project-related construction and operation activities would involve the transport, use, or disposal of hazardous materials. The closest school to the Project Site is Valencia Valley Elementary School, which is located more than 0.5 mile northwest of the Project Site. Accordingly, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, the Project would have no impact related to hazardous emissions in proximity to schools.

**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?**

**No Impact.** The Project Site is vacant, graded, and undeveloped. The Phase I ESA prepared for the Project Site revealed no evidence of RECs or environmental issues in connection with the Project Site. In addition, the Project Site is not located on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Accordingly, the Project would not be located on such a site. Therefore, the Project would have no impact related to such hazards.

**e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

**f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

**No Impact.** The Project is not located within an airport land use plan or within 2 miles of a public airport, public use airport, or a private airstrip. The nearest public airport is Van Nuys Airport, which is located approximately 13 miles south of the Project Site. The nearest private airstrip is Whiteman Airport, which is located approximately 11 miles south of the Project Site. Accordingly, the Project would not have the potential to result in a safety hazard for people residing or working in the area. Therefore, the Project would have no impact related to airport/airstrip hazards.

**g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** The County of Los Angeles designates Railroad Avenue, which is located immediately west of the Project Site, as a primary disaster route. The Project would intensify land uses in the Project vicinity and generate additional traffic on the local street network, including Railroad Avenue. The Project would have four ingress/egress points onto Springbrook Avenue which connects to Oak Ridge Drive and then connects to Railroad Avenue.

The City's Hazard Mitigation Plan (HMP), updated in 2021, provides a framework for communications, decisions, and actions by emergency response personnel for emergencies requiring evacuation. The command structure would assess local conditions in an ongoing manner to identify locations and severity of threats to life and property. Based on those assessments, decisions would be made on where to focus hazard response efforts, initiate calls for backup assistance and assignment of additional resources, and when/where to implement emergency evacuations if no other options are deemed viable. This existing emergency response system would be sufficient to address emergency evacuation scenarios for hazard events in the Project area that would require evacuation of some or all of the Project. The Project's proposed emergency access would also be evaluated as part of the development review process, including whether the Project would have adequate driveway widths to accommodate access by fire trucks. Accordingly, with compliance with the City's emergency access evaluation through the development review process and the existing HMP, the Project would not impair implementation or physically interfere with an adopted

emergency response plan or emergency evacuation plan. Therefore, the Project would result in less-than-significant impacts related to emergency response and evacuation.

**h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

**Less Than Significant Impact.** The Santa Clarita Valley is susceptible to wildland fires because of its hilly terrain; dry, hot, and sometimes windy weather conditions; and the presence of flammable vegetation, particularly in more remote areas with limited vehicular access and no water infrastructure. Areas near or adjacent to the Project Site are characterized by native and non-native vegetation and are located within a Very High Fire Hazard Severity Zone/Local Responsibility Area, where fire protection is the responsibility of the Los Angeles County Fire Department (LACoFD).[7] The area to the northeast of the Project Site is characterized by hilly, undeveloped terrain and is located within a VHFHSZ/LRA. This area may be susceptible to wildfire that could spread toward the Project Site under the right weather conditions.

Impacts associated with wildfire, as well as a discussion of Project access, water flow, and proposed fuel modification strategies, are provided in Section XX, Wildfire, of this Initial Study. As discussed in therein, The Project would be required to comply with the 2022 California Fire Code, which has been adopted by reference in the Los Angeles County Fire Code and the Santa Clarita Municipal Code. The proposed structures on the Project Site would be constructed pursuant to the 2022 California Building Code. Code-required fire features that would be implemented include ignition-resistant construction materials; interior fire sprinklers; fire apparatus access that would provide unobstructed travel lanes, lengths, turnouts, turnarounds, and clearances; fire staging and temporary refuge areas throughout the developed Project area and along roadways and open space; and reliable water source for operations and during emergencies requiring extended fire flow. Accordingly, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Therefore, the Project would result in less-than-significant impacts related to wildfire.

**i) Would the project expose people to existing sources of potential health hazards (e.g., electrical transmission lines, gas lines, oil pipelines)?**

**Less Than Significant Impact.** Hazards associated with overhead transmission lines range from exposure to electrical magnetic fields to live wires and flashovers when a person or equipment gets too close to an overhead line. Surface or subsurface-level natural gas or other fuel lines can pose risks when improper contact is made, resulting in leaks, fire, and/or explosions.

The Project Site is located in an urbanized area with major utilities running underneath nearby roadways, such as Railroad Avenue. As the Project Site is currently undeveloped, there is no existing development requiring electric power, and there is no existing electricity infrastructure on the Project Site. Similarly, as there are no existing structures on the Project Site requiring natural gas service, no natural gas infrastructure is located on the Project Site. The nearest natural gas transmission line is located within Oak Ridge Drive to the south of the Project Site. Further, the U.S. Department of Transportation's National Pipeline Mapping System shows that the nearest hazardous liquid pipeline to the Project Site is located within Newhall Avenue and McBean Parkway, which is approximately 0.75 mile west of the Project Site and outside of the Project's area of ground disturbance.[8]

Since the majority of these utility lines are located underground, potential hazards would be reduced with standard construction precautions, such as identifying the location of utility lines before any Project-related

[7] California Department of Forestry and Fire Prevention, Very High Fire Hazard Severity Zones in the LRA, Los Angeles County, 2011.

[8] U.S. Department of Transportation, National Pipeline Mapping System, https://pvnpms.phmsa.dot.gov/PublicViewer/, accessed May 17, 2023.

ground disturbance occurs. The overhead electrical powerlines are located off-site and would not pose a significant risk to construction workers or Project employees and visitors. Accordingly, the Project would not expose people to existing sources of potential health hazards. Therefore, the Project would result in less-than-significant impacts related to existing sources of potential health hazards.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section X. Hydrology and Water Quality** | | | | |
| Would the project: | | | | |
| a) Violate any water quality standards or waste discharge requirements? | ☐ | ☐ | ☒ | ☐ |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted? | ☐ | ☐ | ☒ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | ☐ | ☐ | ☒ | ☐ |
| e) 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? | ☐ | ☐ | ☒ | ☐ |
| f) Otherwise substantially degrade water quality? | ☐ | ☐ | ☒ | ☐ |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? | ☐ | ☐ | ☐ | ☒ |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | ☐ | ☐ | ☒ | ☐ |
| i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam? | ☐ | ☐ | ☐ | ☒ |
| j) Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☐ | ☒ |

| | | | | | |
|---|---|---|---|---|---|
| k) | Result in changes in the rate of flow, currents, or the course and direction of surface water and/or groundwater? | ☐ | ☐ | ☒ | ☐ |
| l) | Other modification of a wash, channel creek, or river? | ☐ | ☐ | ☐ | ☒ |
| m) | Impact stormwater management in any of the following ways? | | | | |
| | i) Potential impact of project construction and project post-construction activity on stormwater runoff? | ☐ | ☐ | ☒ | ☐ |
| | ii) Potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas? | ☐ | ☐ | ☒ | ☐ |
| | iii) Significant environmentally harmful increase in the flow velocity or volume of stormwater runoff? | ☐ | ☐ | ☒ | ☐ |
| | iv) Significant and environmentally harmful increases in erosion of the Project Site or surrounding areas? | ☐ | ☐ | ☒ | ☐ |
| | v) Stormwater discharges that would significantly impair or contribute to the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits (e.g., riparian corridors, wetlands, etc.)? | ☐ | ☐ | ☒ | ☐ |
| | vi) Cause harm to the biological integrity of drainage systems, watersheds, and/or water bodies? | ☐ | ☐ | ☒ | ☐ |
| | vii) Does the Project include provisions for the separation, recycling, and reuse of materials both during construction and after project occupancy? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**a) Would the project violate any water quality standards or waste discharge requirements?**

**Less Than Significant Impact.** The Project Site was previously graded; therefore, fine grading would be minimal and would be anticipated to require approximately 2,500 cubic yards of cut and fill. No import or export would be anticipated. Soils on the 22.3-acre Project Site may become exposed to wind and water and, thus, subject to erosion and conveyance of other pollutants into waters. In addition, Project operations would introduce new land uses that could affect the quality of surface water and groundwater.

Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter-Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the SWRCB are required to develop water quality objectives that ensure their region meets the requirements of Section 303.

Santa Clarita is within the jurisdiction of the LARWQCB. The LARWQCB adopted water quality objectives in its Stormwater Quality Management Plan, which is designed to ensure stormwater achieves compliance with receiving water limitations. Stormwater generated by a development that complies with the Stormwater Quality Management Plan is considered to not exceed the limitations of receiving waters and to not exceed water quality standards.

Section 402 of the Clean Water Act, known as the NPDES program, regulates point source and non-point source discharges to surface waters. Under Section 402, municipalities are required to obtain permits for

the water pollution generated by stormwater in their jurisdiction, which are known as Municipal Separate Storm Sewer Systems (MS4) permits. Stormwater and non-stormwater flows enter and are conveyed through an MS4 and discharged to surface water bodies of the Los Angeles region. These water discharges are regulated under countywide waste discharge requirements contained in Order No. R4-2012-0175 (NPDES Permit No. CAS004001), which was adopted November 8, 2012. Any proposed grading activities must comply with requirements of the NPDES, which are prescribed in SCMC Chapter 17.90.

The MS4 permit requires low impact development (LID) practices to be implemented and requires submittal of a comprehensive LID plan and analysis to demonstrate compliance with Los Angeles County's LID Standards Manual. As such, the applicant is required to prepare a LID plan for review and approval by the City that includes (1) feasibility of infiltration including a percolation report; (2) source control measures; (3) calculation of the Stormwater Quality Design Volume, which must be retained on-site; (4) discussion of the feasibility of stormwater runoff harvest and use; (5) stormwater quality control measures; and (6) proposed operation and maintenance plan.

During construction, short-term impacts could occur when sediment may run off the Project Site during site grading or other site preparation activities and when hydrocarbon or fossil fuel remnants/spills occur from construction equipment and construction worker vehicles. Watering activities occurring on-site to reduce airborne dust could also contribute to pollutant loading in surface runoff. The Project would be required to comply with all applicable conditions and requirements of the City's grading permit to reduce sediment and erosion. Because the Project Site is greater than 1 acre in size, the Project would be required to obtain coverage under the NPDES Construction General Permit with the State and be required to implement an SWPPP with erosion and sediment control measures to eliminate or control pollutants discharged from the Project Site. Implementation of the SWPPP and compliance with the City's permitting process would ensure that construction of the Project would not significantly alter the drainage on the Project Site or result in discharges from the Project Site that would impact water quality.

Potential pollutants during Project operation would involve typical pollutants from urban land uses and could include runoff from impervious surfaces, which may contain sediment from vehicles using the Project Site, debris from landscaped and hillside areas, and oils/leakage from vehicles and maintenance equipment. Stormwater runoff from the Project Site could result in the discharge of these potential pollutants into the City's storm drain system. As discussed above, stormwater discharges containing urban pollutants would be regulated by the countywide MS4 permit. The Project would include BMPs to treat the Project's stormwater runoff prior to discharge, such as biofiltration. Stormwater runoff on the Project Site would be directed to existing detention/desilting and storm drain systems (public and private), which would include an off-site desilting/detention basin, series of catch basins, inlets, pipelines, outlets, ripraps, trapezoidal channel with a vehicle access road and ramp, and a reinforced concrete box connecting to the downstream river. The drainage facilities tie the flow directly into the South Fork of the Santa Clara River.

A hydrology study was prepared for the Project Site in 2009 by Sikand Engineering and is provided in **Appendix G** of this Initial Study. The report indicated that with the installation of the previously planned and permitted storm drains and off-site desilting/detention basins, stormwater flows resulting from the Project during a 50-year or 2-year storm event would not increase. Runoff from the Project Site would be collected through the new storm drain system for conveyance to the South Fork of the Santa Clara River. As with existing conditions, the runoff would outlet at the northeastern corner of the Project Site. The new storm drain systems are sized to accommodate the required Stormwater Quality Design Volume. With these Project features, as well as compliance with MS4 permit and NPDES permit requirements, the Project would not violate any water quality standards or waste discharge requirements. Therefore, the Project would result in less-than-significant impacts on water quality.

**b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would**

**drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

**Less Than Significant Impact.** The Project Site is located within the Santa Clara River Valley Subbasin of the Santa Clara River Valley Groundwater Basin, which is replenished by the Santa Clara River and its tributaries and by stormwater percolation. The Project would not install any groundwater wells and would not directly withdraw any groundwater. In addition, there are no known aquifer conditions on the Project Site or in the surrounding area that could be affected by Project development. Accordingly, the Project would not physically interfere with any groundwater supplies.

The Santa Clara River and its tributaries are the primary groundwater recharge areas for the Santa Clarita Valley. Development of the Project Site, which is currently undeveloped, would increase the amount of impervious surface area. The reduction in pervious surface area could reduce the percolation of rainwater that may potentially affect groundwater recharge. In addition, the Project would alter the existing drainage pattern of the Project Site by adding impervious surfaces and collecting/conveying on-site stormwater to a storm drain. However, the landscaped areas of the Project Site would continue to allow stormwater to percolate into the substrate, and stormwater in the development area would be conveyed to desilting/detention basins, which would allow the stormwater to percolate into the substrate. As such, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. Therefore, the Project would result in less-than-significant impacts related to groundwater supplies.

**c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

**Less Than Significant Impact.** Development projects that increase the volume or velocity of surface water can result in an increase in erosion and siltation. Increased surface water volume and velocity cause an increase in siltation and sedimentation by increasing both soil/water interaction time and the sediment load potential of water.

The Project Site does not include any discernable drainage courses; however, Project development would alter the drainage of the Project Site. The Project would not channelize any drainage courses and would not focus surface water flows into areas of exposed soil. In addition, the on-site drainage system, in accordance with the NPDES requirements, included BMPs to reduce erosion and siltation to the maximum extent practicable. These BMPs consist of desilting inlets, catch basins with insert filters designed to physically screen pollutants (e.g., trash, debris), and infiltration basins. In addition, the hydrology study prepared for the Project Site found that with the installation of the previously planned and permitted storm drains and off-site desilting/detention basins, stormwater flows resulting from the Project during a 50-year or 2-year storm event would not increase. Runoff from the Project Site would be collected through the new storm drain system for conveyance to the South Fork of the Santa Clara River. As with existing conditions, the runoff would outlet at the northeastern corner of the Project Site and would not be discharged at a rate that could lead to siltation or scouring of a natural channel. With the application of standard engineering practices, NPDES requirements, and City standards, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Therefore, the Project would result in less-than-significant impacts on erosion.

**d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or 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 above, drainage features run along the eastern boundary of the Project Site. The Project would also introduce impervious surfaces to a currently vacant site and may alter existing drainage patterns. As discussed in response to Checklist Questions X(a) and X(c) above, the

Project would direct stormwater flows to an existing drainage system that would comply with the MS4 permit to handle the increased runoff resulting from the Project's impervious surfaces on-site. Accordingly, the Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Therefore, the Project would result in less-than-significant impacts related to flooding.

**e) Would the project 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.** Existing drainage features run along the eastern boundary of the Project Site. The Project would also introduce impervious surfaces to a currently vacant site and may potentially 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. As discussed in response to Checklist Questions X(a), X(c), and X(d) above, the Project would not substantially increase stormwater runoff discharged from the Project Site. The Project would comply with all applicable City grading permit regulations and NPDES requirements and would implement BMPs to reduce and treat stormwater runoff from the Project Site. The Project would be required to comply with the City's engineering standards for volume of water discharged in the storm drain system and would comply with the City's stormwater ordinance to ensure that stormwater flows are properly treated before entering the storm drain system. The existing stormwater infrastructure in the Project vicinity has been determined to have sufficient capacity to serve the Project Site. Accordingly, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, the Project would result in less-than-significant impacts related to stormwater drainage systems or sources of polluted runoff.

**f) Would the project otherwise substantially degrade water quality?**

**Less Than Significant Impact.** The Project Site was previously graded; therefore, fine grading would be minimal and would be anticipated to require approximately 2,500 cubic yards of cut and fill. No import or export would be anticipated. As such, soils may become exposed to wind and water and, thus, subject to erosion and conveyance of other pollutants into waters. In addition, Project operations would introduce new land uses that could affect the quality of surface water and groundwater.

No water features exist on the Project Site and the nearest water feature is the South Fork of the Santa Clara River to the west of the Project Site across Railroad Avenue. Development of the Project Site would not alter the South Fork of the Santa Clara River or any other water sources in the surrounding area. The Project would not be a point-source generator of water pollutants, and compliance with the City's stormwater ordinance would ensure that the Project would not generate stormwater pollutants that would substantially degrade water quality.

However, as described above, the Project has the potential to generate short-term water pollutants during construction activities, including sediment, trash, construction materials, and equipment fluids. The countywide MS4 permit requires construction sites to implement BMPs to reduce the potential for construction-induced water pollutant impacts, which include methods to prevent contaminated construction site stormwater and construction-induced contaminants from entering the drainage system. The MS4 identifies the following minimum requirements for construction sites in Los Angeles County:

1. Sediments generated on the Project Site shall be retained using adequate treatment control or structural BMPs;
2. Construction-related materials, wastes, spills, or residues shall be retained at the Project Site to avoid discharge to streets, drainage facilities, receiving waters, or adjacent properties by wind or runoff;

3. Non-stormwater runoff from equipment and vehicle washing and any other activity shall be contained at the Project Site; and
4. Erosion from slopes and channels shall be controlled by implementing an effective combination of BMPs (as approved in Regional Board Resolution No. 99-03), such as the limiting of grading scheduled during the wet season; inspecting graded areas during rain events; planting and maintenance of vegetation on slopes; and covering erosion-susceptible slopes.

As discussed above in Checklist Question X(a), the Project would be developed on a site that is greater than 1 acre in size and would be required to obtain coverage under the NPDES Construction General Permit and submit to the SWRCB a Notice of Intent that includes an SWPPP that describes the BMPs to be implemented during construction to minimize construction-induced water pollutants by controlling erosion and sediment, establishing waste handling/disposal requirements, and providing non-stormwater management procedures.

Compliance with both the MS4 construction site requirements and the NPDES Construction General Permit, as well as implementing an SWPPP, would ensure that construction activities on the Project Site would not significantly impact water quality. Therefore, the Project would result in less-than-significant impacts on water quality.

**g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

**No Impact.** A portion of the Project site is located within a FEMA Zone AO floodplain. Zone AO areas have a 1-percent annual chance of shallow flooding, which is also called the 100-year flood. However, the Project would not develop housing and, as such, would not place housing within a 100-year flood hazard area. The Project would have no impact related to flooding.

**h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

**Less Than Significant Impact.** The Project would place structures within a FEMA Zone AO floodplain. Although the proposed industrial/warehouse buildings could impede or redirect flood flows, the Project Site would be designed to direct water flows to newly installed storm drain system, including an off-site desilting/detention basin, which was designed and sized to sufficiently accommodate the Project Site's increased flows as a result of the Project. Stormwater generated by the Project would not exceed existing conditions or be discharged at a rate that could lead to flooding beyond a 100-year event or impede or redirect flood flows. Therefore, the Project would result in less-than-significant impacts related to flooding.

**i) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?**

**No Impact.** According to the City's General Plan Safety Element, dams within the Santa Clarita Valley are located at the Castaic Reservoir and the Bouquet Reservoir. If the Castaic Reservoir Dam were to rupture from a seismic event, potential flooding could occur in Castaic, Val Verde, and Valencia. Failure of the two dams at the Bouquet Reservoir could result in flooding downstream in Saugus and Valencia.[9] However, the Project Site is located over 14 miles from the Bouquet Reservoir and separated from the reservoir with ridges and valleys; as such, the Project Site is not located in a potential dam inundation area of the Bouquet Reservoir. In addition, there are no levees in the vicinity of the Project Site. Accordingly, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Therefore, the Project would have no impact related to flooding.

[9] City of Santa Clarita, General Plan Safety Element, June 2011.

**j) Would the project result in inundation by seiche, tsunami, or mudflow?**

**No Impact.** A seiche is the creation of large waves on a lake or reservoir due to earthquake shaking. A seiche can be triggered by long-period ground motion from distant earthquakes or from ground displacement beneath the body of water. In reservoirs, seiches can generate short-term flooding of downstream areas. In addition, earthquake-induced landslides can cause seiche-like waves. As the Castaic Dam/Reservoir is located approximately 10 miles northwest of the Project Site and Bouquet Dam/Reservoir is approximately 16 miles northeast of the Project Site, the Project Site is not considered to be subject to potential flooding from a seiche event. In addition, according to the National Oceanic and Atmospheric Administration, a tsunami is a series of giant waves caused by earthquakes or undersea volcanic eruptions. Because the Pacific Ocean lies approximately 24 miles to the south of the Project Site, the Project Site is not considered to be subject to potential flooding from a tsunami event.

Mudslides are believed to result from the combined influence of water-saturated soils and grading activities associated with development. Water saturation might result from rainfall, over-irrigation, and sewage effluent discharge. Rainfall could loosen soil cohesion or trigger soil erosion and result in hillside slope failure. Mudslides are not considered a hazard at the Project Site because overly steep slopes or unfavorable bedding conditions do not exist on-site or nearby. Therefore, the Project would not be affected by inundation by mudflow.

Accordingly, the Project would not result in inundation by seiche, tsunami, or mudflow. Therefore, the Project would have no impacts related to inundation.

**k) Would the project result in changes in the rate of flow, currents, or the course and direction of surface water and/or groundwater?**

**Less Than Significant Impact.** The Project would alter the Project Site's drainage patterns as compared to existing conditions by introducing impervious surfaces to a currently vacant site. As discussed in the responses to Checklist Questions X(c) and X(d) above, compliance with City engineering requirements and the City's stormwater ordinance would ensure proper design of the proposed drainage system. Grading of the Project Site would not extend into the groundwater table and would not place any subterranean structures or foundations that would encroach into groundwater aquifer. Therefore, groundwater flows would not be affected. Further, there are no surface water features on the Project Site that would be impacted by the Project. Accordingly, the Project would not result in substantially change the rate of flow, currents, or the course and direction of surface water or groundwater. Therefore, the Project would result in less-than-significant impacts related to surface water or ground water flow.

**l) Would the project result in other modification of a wash, channel creek, or river?**

**No Impact.** The Project Site is located across Railroad Avenue from Newhall Creek, which converges with the South Fork of the Santa Clara River within 0.5 mile of the Project Site. In addition, existing drainage features run along the eastern boundary of the Project Site. The Project, however, would not modify a wash, channel creek, or river. Therefore, the Project would have no impacts related to the modification of a wash, channel creek, or river.

**m.i) Would the project impact stormwater management as a result of project construction and project post-construction activity on stormwater runoff?**

**m.ii) Would the project impact stormwater management as a result of potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas?**

**m.iii) Would the project impact stormwater management as a result of significant environmentally harmful increase in the flow velocity or volume of stormwater runoff?**

**m.iv) Would the project impact stormwater management as a result of significant and environmentally harmful increases in erosion of the Project Site or surrounding areas?**

**m.v) Would the project impact stormwater management as a result of stormwater discharges that would significantly impair or contribute to the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits (e.g., riparian corridors, wetlands, etc.)?**

**m.vi) Would the project impact stormwater management in a way that would cause harm to the biological integrity of drainage systems, watersheds, and/or water bodies?**

**m.vii) Would the project impact stormwater management as a result of the provisions for the separation, recycling, and reuse of materials both during construction and after project occupancy?**

**Less Than Significant Impact.** The Project Site was previously graded; therefore, fine grading would be minimal and would be anticipated to require approximately 2,500 cubic yards of cut and fill. As discussed previously, the Project would be required to comply with the City's stormwater ordinance, the countywide MS4 permit, and the NPDES Construction General Permit and is required to implement a SWPPP. Compliance with these requirements would ensure the Project would not significantly impact stormwater management. The Project's construction and operational activities would be typical of those conducted for industrial developments and would include areas for materials storage, vehicle or equipment fueling or maintenance, waste handling, hazardous materials handling or storage, delivery area, loading docks, and other outdoor work areas. In addition, the Project would be required to comply with the City's Construction and Demolition Recycling Ordinance (05-09) as well as required City recycling programs during operation. Furthermore, existing stormwater facilities, including an off-site desilting/detention basin, have been determined to sufficiently accommodate the Project's increased flows.

Based on the above and the responses to Checklist Questions X(a) through X(l), the Project would not impact stormwater management (i) as a result of project construction and project post-construction activity; (ii) because of potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance, waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas associated with operation of warehouse uses; (iii) as a result of significant environmentally harmful increases in the flow velocity or volume of stormwater runoff; (iv) as a result of significant and environmentally harmful increases in erosion of the Project Site or surrounding areas; (v) as a result of stormwater discharges that would significantly impair or contribute to the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits (e.g., riparian corridors, wetlands, etc.); (vi) in a way that would cause harm to the biological integrity of drainage systems, watersheds, and/or water bodies; or (vii) as a result of the provisions for the separation, recycling, and reuse of materials both during construction and after project occupancy. Therefore, the Project would result in less-than-significant impacts related to stormwater.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XI. Land Use and Planning** | | | | |
| Would the project: | | | | |
| a) Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☒ | ☐ |

| | | | | |
|---|---|---|---|---|
| c) Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the project | ☐ | ☐ | ☐ | ☒ |

**Discussion**

**a) Would the project physically divide an established community?**

**No Impact.** A significant impact could occur if a project would be sufficiently large or configured in such a way so as to create a physical barrier within an established community. A physical division of an established community can be caused by a street vacation that blocks through travel or a physical barrier, such as a new freeway. The Project would not involve any street vacation or closure, and it would not result in development of new thoroughfares or highways. The proposed development would occur within the boundaries of the Project Site, with the exception of possible connections to existing utility infrastructure in the adjacent street rights-of-way. Furthermore, the Project would not result in any changes to the surrounding areas. The Project would not divide an established community in terms of use. The Project Site is located within a fully urbanized area with a complete street and utility network, sidewalks, bus stops, and a mixture of land uses and has previously been utilized as a building material, recreational vehicle storage yard, and commercial truck storage yard. As shown in **Figure 2**, the Project Site, which has a General Plan land use and zoning designation of Industrial (I), is surrounded by an industrial park to the north; an MWD-owned property and single-family homes to the east; Circle J Ranch Park to the southeast; Oak Ridge Drive, an apartment complex, and a single-family attached condominium complex to the south; and a railroad right-of-way, Railroad Avenue, and the South Fork of the Santa Clara River to the west. The Circle J Ranch community is located to the east of the Project Site, beyond the MWD property. Immediately adjacent properties surrounding the Project Site have General Plan land use and zoning designations of Industrial (I) to the north; Open Space (OS) and Urban Residential 2 (UR2) to the east; Neighborhood Commercial (CN), Urban Residential 4 (UR4), Urban Residential 3 (UR3), and Open Space (OS) to the south; and Public/Institutional (PI) and Open Space (OS) to the west, as shown in **Figures 3** and **4**.

Therefore, developing the Project Site with an industrial distribution/warehouse facility is consistent with zoning, past uses on-site, and surrounding uses. As such, the Project would not physically divide an established community. Therefore, the Project would have no impact related to the physical division of an established community.

**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.** A significant impact may occur if a project is inconsistent with the applicable general plan or zoning designation(s) of a project site and, as a result, would cause adverse environmental effects, for which the general plan and zoning ordinance are designed to avoid or mitigate.

The Project Site has a General Plan land use and zoning designation of Industrial (I) and is not included within any specific plan area. The Industrial (I) land use designation is intended to accommodate the most intensive types of industrial uses allowed in the City. One of the allowable uses in this designation is the storage and distribution of goods, which the Project proposes to develop. Furthermore, building heights within the Industrial (I) designation are limited to a maximum of 35 feet without a conditional use permit. As such, the Project would require a conditional use permit to allow for the proposed buildings to be developed with a maximum height of 55 feet. While the Project requests a CUP to exceed the zoning code's height standard for the Project Site, the Project would be consistent with the underlying zoning and General Plan land use designation.

The Project Site is not within an area where special land use policies, zoning standards, or a local coastal program have been created for the purpose of avoiding or mitigating environmental effects. However, as discussed in Checklist Question IV(e) above, the Project would be required to comply with the City's existing Oak Tree Preservation regulations. Although no oak trees would be removed, the Project involves construction of a retaining wall along the southern boundary of the Project Site that would partially encroach

into the off-site valley oak tree's drip line and projected tree zone; this encroachment would be less than 5 percent of the overall root system of the off-site valley oak tree, which is considered a minimal disturbance. In addition, prior to initiation of ground-disturbing activities in proximity to this tree, the Project applicant would be required to obtain an oak tree encroachment permit from the City. The guidelines for tree protection identified in the Protected Tree Report (**Appendix B** of this Initial Study) would be incorporated into the conditions of the oak tree encroachment permit. Accordingly, with issuance of the oak tree encroachment permit and adherence to the conditions established therein, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Accordingly, the Project would be consistent with the Project Site's General Plan and zoning designation and would not 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. Therefore, the Project would result in less-than-significant land use impacts.

**c) Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the project?**

**No Impact.** The Project Site is not located within an area covered by any HCP, NCCP, or other policies by agencies with jurisdiction over the Project. As such, the Project would not conflict with such plans or policies. Therefore, the Project would have no impacts with respect to conservation plans.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section 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? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| c) Use nonrenewable resources in a wasteful and inefficient manner? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**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?**

**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.** The Project Site is not located within an existing Mineral Extraction Area or a Mineral Resource Zone, as identified in the City of Santa Clarita General Plan Conservation and Open Space Element's Exhibit CO-2 (Mineral Resources).[10] According to the City's General Plan, as well as the California Geologic Energy Management Division's Well Finder database, there are no producing, idle, or abandoned oil or

[10] City of Santa Clarita, General Plan Conservation and Open Space Element, June 2011.

natural gas wells, or any other types of mineral extraction activities within the Project Site.[11] Furthermore, the Project Site is governed by the provisions of the Industrial (I) zone, which does not permit mineral recovery uses. Accordingly, the Project would not 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 or of locally-important mineral resource recovery site delineated in the City's General Plan. Therefore, the Project would have no impact related to mineral resources.

**c) Would the project use nonrenewable resources in a wasteful and inefficient manner?**

**Less Than Significant Impact.** A discussion of Project-related impacts associated with consumption of energy resources during construction and operation is included in Section VI, Energy, of this Initial Study. Beyond fossil fuel consumption, the Project would utilize building materials and energy resources for construction of the Project, many of which would be nonrenewable, including sand, gravel, earth, iron, steel, and hardscape materials. Other construction resources, such as lumber, are slowly renewable. In addition, the Project would commit energy and water resources as a result of the construction, operation, and maintenance of the Project. However, as discussed in Section VI, Energy, of this Initial Study, Project construction would represent a "single-event" demand on nonrenewable resources and would not require ongoing or permanent commitment of such resources.

Similarly, the energy and water resources that would be utilized by the Project would be supplied by regional utility purveyors, which participate in various conservation programs. In addition, there are no unique conditions that would require excessive use of nonrenewable resources on-site, and the Project is expected to utilize energy or water resources in the same manner as typical modern development. Furthermore, the Project would be required to comply with CCR Title 24, California Building Standards Code, which includes the California Building Energy Efficiency Standards and CALGreen Code requirements. Accordingly, based on mandatory compliance with energy efficiency measures, an increasing concentration of renewable energy sources used by electricity providers, and with general market conditions encouraging the efficient use of materials and energy for cost-saving purposes, the Project would not use nonrenewable resources in a wasteful and inefficient manner. Therefore, the Project would result in less-than-significant impacts on nonrenewable resources.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XIII. Noise** | | | | |
| Would the project: | | | | |
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☐ | ☒ | ☐ |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |

[11] City of Santa Clarita, General Plan Conservation and Open Space Element, June 2011; California Department of Conservation Geologic Energy Management Division, Well Finder, https://www.conservation.ca.gov/calgem/Pages/Wellfinder.aspx, accessed May 15, 2023.

| | | | | |
|---|---|---|---|---|
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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? | ☐ | ☐ | ☐ | ☒ |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

**Discussion**

The analysis of Project impacts on noise is primarily based on information contained in the Noise Technical Report prepared for the Project in May 2023 by Dudek and provided in **Appendix H** of this Initial Study.

**a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less Than Significant Impact.** Noise is defined as loud, unexpected, or annoying sound. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receptor determine the sound level and characteristics of the noise perceived by the receptor.

A logarithmic scale is used to describe sound pressure level in terms of decibels (dB). However, the decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by the characteristics of the human ear. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Accordingly, the A-weighting network has been developed to approximate the frequency response of the average young ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels (dBA) of those sounds.

Noise in our daily environment fluctuates over time at varying rates. Various noise descriptors have been developed to describe time-varying noise levels. The Equivalent Sound Level ($L_{eq}$) represents an energy average of the sound level occurring over a specified period; $L_{eq}$ is not an arithmetic average of varying dB levels over a period of time, but instead accounts for greater sound energy represented by higher decibel contributions. The Maximum Sound Level ($L_{max}$) is the highest instantaneous sound level measured during a specified period. The Day-Night Level ($L_{dn}$) is the energy average of A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to sound levels occurring during nighttime hours between 10 p.m. and 7 a.m. The Community Noise Equivalent Level (CNEL), similar to $L_{dn}$, is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to sound levels occurring between 10 p.m. and 7 a.m., and a 5-dB penalty applied to sound levels between 7 p.m. and 10 p.m.

The Project was evaluated to determine if it would result in excessive noise from construction and operational activities. The introduction of new land uses within the Project Site would generate additional traffic volumes and stationary noise sources, which were evaluated to determine if they result in exposure of persons or generation of noise levels in excess of standards. The results of these analyses are discussed below. Sensitive receptors are located to the east (single-family homes) and to the south (apartment complex and a single-family attached condominium complex).

### *Project Construction*

On-Site Construction Activities

Project construction, which would involve site preparation, fine grading, and building construction, would occur for approximately 12 months. Given that the Project Site has been previously graded, fine grading would be minimal and is anticipated to require approximately 2,500 cubic yards of cut and fill. No import or export is anticipated.

The types of construction equipment that would be used to construct the Project include standard equipment, such as graders, tractors, loaders, cranes, rubber-tired bulldozers, generators, and paving equipment. No blasting, on-site rock crushing, or pile driving would be necessary. The range of maximum noise levels for various types of construction equipment at a distance of 50 feet is shown in **Table 15**. The noise values represent maximum noise generation or full-power operation of the equipment. The average noise level during construction activities is generally lower (typical levels of approximately 88 dBA $L_{eq}$ at a distance of 50 feet) since maximum noise generation may only occur up to 50 percent of the time. Noise levels from construction operations decrease at a rate of approximately 6 dBA per doubling of distance from the source.

**TABLE 15**
**TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS**

| Equipment | Typical Sound Level (dBA) 50 Feet from Source |
|---|---|
| Air compressor | 81 |
| Backhoe | 80 |
| Compactor | 82 |
| Concrete mixer | 85 |
| Concrete pump | 82 |
| Concrete vibrator | 76 |
| Crane, mobile | 83 |
| Dozer | 85 |
| Generator | 81 |
| Grader | 85 |
| Impact wrench | 85 |
| Jackhammer | 88 |
| Loader | 85 |
| Paver | 89 |
| Pneumatic tool | 85 |
| Pump | 76 |
| Roller | 74 |
| Saw | 76 |
| Truck | 88 |
| Source: Dudek, Noise Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix H** of this Initial Study for more detailed information). | |

**Table 16** shows the predicted noise exposure levels by each construction phase at the nearest noise-sensitive receptor locations. Project construction noise exposure levels at other receivers farther away from the Project Site would be less due primarily to natural distance-dependent attenuation (decreasing) factors, such as geometric divergence, air and ground surface absorption, and intervening structures and topography. As shown in the table, typical construction noise levels at the nearest noise-sensitive land uses (multi-family residences and a park to the south) measured from the center of the Project Site are estimated to range from approximately 51 dBA $L_{eq\ 8\text{-}hr}$ during the architectural coating phase to approximately 66 dBA $L_{eq\ 8\text{-}hr}$ during the grading phase. **Table 16** also presents the construction noise level predictions at distances between the noise-sensitive receptor position and the anticipated nearest boundary associated with a construction phase,

which are shorter than those from the center of the Project Site for the same phase; however, these scenarios assume that equipment would be operating at a range of distances (because not all equipment for a phase would be operating at the same distance simultaneously) and would result in noise levels that range from approximately 63 dBA $L_{eq\ 8\text{-}hr}$ during the architectural coating phase to approximately 79 dBA $L_{eq\ 8\text{-}hr}$ during the site preparation and grading phase. These noise levels would not exceed the 80 dBA $L_{eq\ 8\text{-}hr}$ suggested threshold for construction noise by the Federal Transit Administration (FTA).

**TABLE 16**
**CONSTRUCTION NOISE MODEL RESULTS SUMMARY**

| Receptor | Off-Site Receptor Location | Distance from Construction Activity to Noise Receptor (feet) | Estimated Construction Noise Levels (dBA $L_{eq\ 8\text{-}hr}$)[a,b] | | | | |
|---|---|---|---|---|---|---|---|
| | | | Site Preparation | Grading | Building Construction | Paving | Architectural Coating |
| Residential and Park | South of the Project | 600–625 (typical) | 64 | 66 | 61 | 61 | 51 |
| | | 50–150 (nearest) | 79 | 79 | 67 | 75 | 63 |
| Residential | East of the Project | 800–850 (typical) | 62 | 63 | 59 | 58 | 48 |
| | | 350–450 (nearest) | 65 | 67 | 61 | 62 | 54 |

Notes:

[a] Typical construction noise levels are calculated based on the acoustic center distances between the nearest sensitive receptors and the construction phase.

[b] The estimated noise levels are generally lower than those shown in Table 15 (at a reference distance of 50 feet) because the noise levels in this table represent an 8-hour average with varying duty cycles, and not all equipment would be operating for the full 8 hours or at a distance of 50 feet.

Source: Dudek, Noise Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix H** of this Initial Study for more detailed information).

The next-nearest noise-sensitive receivers (the single-family residences to the east) would experience lower estimated construction noise levels, ranging from approximately 48 dBA $L_{eq\ 8\text{-}hr}$ during the architectural coating phase to approximately 63 dBA $L_{eq\ 8}$-hr during the grading phase under typical conditions. During the relatively brief periods of time when construction would be focused near the eastern Project boundary, noise levels are estimated to range from approximately 54 to 67 dBA $L_{eq\ 8\text{-}hr}$. Similarly, these noise levels would not exceed the 80 dBA $L_{eq\ 8\text{-}hr}$ FTA threshold for construction noise.

SCMC Section 11.44.080 does not permit construction work within 300 feet of a residential-zoned property between the hours of 7:00 p.m. and 7:00 a.m., 6:00 p.m. and 8:00 a.m. on Saturdays, at any time on Sundays or on designated public holidays. The Project would not conduct noisy construction activities between the specified hours or days, and the estimated noise levels would not exceed the FTA's advisory threshold of 80 dBA $L_{eq\ 8\text{-}hr}$. Accordingly, the Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies. Therefore, the Project would result in less-than-significant impacts on noise during construction.

Off-Site Construction Activities

The Project would result in local, short-term increases in roadway noise as a result of construction traffic. Based on information developed as part of the Project's air quality analysis, Project-related traffic would include workers commuting to and from the Project Site, as well as vendor and haul trucks bringing or removing materials. The highest number of average daily worker trips would be 348 trips, occurring during the building construction phase. The highest number of average daily vendor truck trips would be 136 trips, also occurring during the building construction phase. No haul truck trips would occur during Project construction because no soil would be imported or exported from the Project site.

Based upon available data provided as part of the Project's Transportation Impact Analysis, Oak Ridge Drive carries approximately 8,300 daily trips in the Project vicinity, and Railroad Avenue carries approximately 32,200 daily trips in this area. Comparing the maximum number of daily construction-related trips (348 worker trips and 136 vendor trips) to the average daily traffic volume of the lowest-volume street (8,300 daily trips on Oak Ridge Drive), the additional vehicle trips would amount to an increase of approximately 6 percent. Based

upon the fundamentals of acoustics, a doubling of trips (i.e., a 100-percent increase) would be needed to result in a 3-dB increase in noise levels, which is the level corresponding to an audible change to the typical human listener. An increase in traffic volumes (all other things being equal) would amount to an increase of well under 1 dBA. Accordingly, traffic related to construction activities would not result in 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. Therefore, the Project would result in less-than-significant impacts related to construction traffic noise.

***Project Operation***

On-Site Operational Activities

*Outdoor Mechanical Equipment*

The proposed warehouse spaces overall would not be served by HVAC equipment. However, the floor plans includes office spaces at designated corners of each of the four buildings. Office space within each building would range from approximately 2,000 to 5,000 square feet, for a total of 26,000 square feet (13,000 square feet on the buildings' first floors and 13,000 square feet on the buildings' second floors). For the analysis of noise from HVAC equipment operation, a York Model ZF-048 package HVAC unit was used as a reference. Based upon the square footage of the office and mezzanine spaces (8,000 square feet total), it was assumed that two such units would be required for each office area. The York Model ZF-048 package HVAC unit has a sound power rating of 80 dBA. Based on the warehouse roof design, there would be a minimum 2.8-foot-high parapet extending along the perimeter of the roof, which would minimize sound from the HVAC units at nearby noise-sensitive land uses.

The combined noise levels from the HVAC equipment at the Project property lines were calculated and are presented in **Table 17**. As shown, the maximum hourly noise level (assuming the equipment would run continuously) for the HVAC equipment operating at each examined location would range from approximately 20 dBA $L_{eq}$ at the northern property boundary to 27 dBA $L_{eq}$ at the Project's eastern property boundary. These levels are less than the SCMC noise standards and are well below the measured ambient noise levels in the Project area.

**TABLE 17**
**MECHANICAL EQUIPMENT (HVAC) NOISE LEVELS**

| Location | Average Noise Level at Specified Location (dBA $L_{eq}$) | Noise Standard[a] (dBA $L_{eq}$) – Daytime (7 a.m. to 10 p.m.)/ Nighttime (10 p.m. to 7 a.m.) | Noise Standard Exceeded? |
|---|---|---|---|
| Northern Property Boundary | 20 | 80/70 | No |
| Southern Residential Property Boundary | 22 | 65/55 | No |
| Eastern Residential Property Boundary | 27 | 65/55 | No |
| Western Property Boundary | 26 | 80/70 | No |

Note:

[a] Applicable noise standard per City of Santa Clarita Municipal Code Section 11.44.040.

Source: Dudek, Noise Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix H** of this Initial Study for more detailed information).

*Parking Lot Activity*

A comprehensive study of noise levels associated with surface parking lots was published in the *Journal of Environmental Engineering and Landscape Management*.[12] The study found that average noise levels

[12] Pranas Baltrënas, Dainius Kazlauskas and Egidijus Petraitis, "Testing on Noise Level Prevailing at Motor Vehicle Parking Lots and Numeral Simulation of its Dispersion," *Journal of Environmental Engineering and Landscape Management*, 2004.

during the peak period of use of the parking lot (generally in the morning with arrival of commuters and in the evening with the departure of commuters) was 47 dBA at 1 meter (3.28 feet) from the outside boundary of the parking lot. The parking area would function as a point source for noise, which means that noise would attenuate at a rate of 6 dBA with each doubling of distance. The employee parking lot adjacent to the nearest noise-sensitive receivers (residences and a park to the south) is proposed to be situated on the south side of Building 1, no closer than 55 feet from the center of the drive-aisle to the residential property boundary. At a distance of 55 feet, parking lot noise levels would be approximately 23 dBA $L_{eq}$. Parking lot activity noise levels at each of the four property boundary locations are summarized in **Table 18**.

**TABLE 18**
**COMBINED ON-SITE NOISE SUMMARY OF RESULTS**

| Location | Zoning | Noise Levels (dBA $L_{eq}$) at Property Boundaries | | | | | |
|---|---|---|---|---|---|---|---|
| | | Noise Standard[a] (dBA $L_{eq}$) – Daytime (7 a.m. to 10 p.m.)/ Nighttime (10 p.m. to 7 a.m.) | HVAC | Parking Lot Activity | Truck Loading Dock Activity | Combined | Noise Standard Exceeded? |
| Northern Property Boundary | Commercial/ Manufacturing | 80/70 | 20 | 23 | 66 | 66 | No |
| Southern Residential Property Boundary | Residential | 65/55 | 22 | 23 | 35 | 35 | No |
| Eastern Residential Property Boundary | Residential | 65/55 | 27 | 4 | 50 | 50 | No |
| Western Property Boundary | Commercial/ Manufacturing | 80/70 | 26 | 24 | 66 | 66 | No |

Note:

[a] Applicable noise standard per City of Santa Clarita Municipal Code Section 11.44.040.

Source: Dudek, Noise Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix H** of this Initial Study for more detailed information).

*Truck Loading Dock/Truck Yard Activity*

The same parking lot study also examined noise levels associated with cargo truck delivery activity. The study concluded that average noise levels from truck loading/unloading areas was 96 dBA at 1 meter (3.28 feet) from the boundary of the truck activity area. Truck loading docks as part of Building 1 would be located no closer than 450 feet from the nearest noise-sensitive receivers (residences to the south). Using the outdoor attenuation rate of 6 dBA with each doubling of distance, this truck load activity would produce noise levels of approximately 50 dBA $L_{eq}$ at the residences to the south. However, the proposed design of Building 1 would provide a substantial amount of noise reduction by blocking the direct line-of-sight between the truck loading dock area and the residences. Accounting for this acoustical shielding, the truck loading dock noise at the southern residential boundaries is estimated to be approximately 35 dBA $L_{eq}$. Perimeter noise barriers 8 feet in height would also be constructed as part of the Project design at the loading dock areas for Buildings 1 and 2, as shown in **Figure 5**. At Building 4, a loading dock area with 7 bays is proposed facing east. Although the loading docks would be over 600 feet from the nearest noise-sensitive uses (residences to the east), the residences would have a direct view of the loading docks because they are elevated relative to the Project Site; as such, no acoustical shielding was assumed for this location. Accounting for the noise reduction from distance, the truck loading dock noise level at the residences to the east is estimated to be approximately 50 dBA $L_{eq}$. At the northern and western property boundaries, the estimated noise levels would be approximately 66 dBA $L_{eq}$; however, there are no noise-sensitive receivers at these locations, which are zoned as commercial/manufacturing uses. Truck loading dock activity noise levels are summarized in **Table 18** and combined with the other on-site noise sources.

As shown in **Table 18**, the noise levels at the four property boundaries resulting from combined on-site activities would be below the applicable City of Santa Clarita noise exposure limits. Based on these results,

on-site operational activities would not result in 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. Therefore, the Project would result in less-than-significant impacts related to on-site operational noise.

Off-Site Operational Noise

The Project would result in additional vehicle trips on local roadways (i.e., Oak Ridge Drive, Railroad Avenue, Via Princessa/Wiley Canyon Road, Magic Mountain Parkway), which could increase traffic noise levels at adjacent noise-sensitive land uses. Potential noise effects from vehicular traffic were assessed for the following conditions: existing, existing plus Project, future (Year 2024) without Project, and future (Year 2024) with Project traffic volumes. Noise levels were modeled at representative noise-sensitive receivers ST1 through ST5, as well as an additional modeled-only locations (M1 through M3), as shown in Figure 3 of the Noise Technical Report. The receivers were modeled at 5 feet above the local ground elevation. The noise model results are summarized in **Table 19**. As shown, the maximum noise level increase would be 1 dB (when rounded to whole numbers), occurring at receivers ST1, ST4, and ST5. At receivers ST2 and ST3, traffic noise levels are predicted to decrease somewhat because the proposed industrial/warehouse buildings would obstruct the direct noise path (i.e., the line-of-sight) between roadway traffic and the receiver. An increase of 1 dB or less would typically not be a perceptible change in the context of community noise. The Project would not result in an increase in noise levels of 5 dB or more in locations with an ambient noise level of less than 60 dBA CNEL, 3 dB or more in locations with an ambient noise level of 60 to 65 dBA CNEL, or 2 dB or more in locations with an ambient noise level greater than 65 dBA CNEL. Based on these results, off-site operational activities would not result in 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. Therefore, the Project would result in less-than-significant impacts related to off-site operational noise.

**TABLE 19**
**OFF-SITE TRAFFIC NOISE MODELING RESULTS**

| Modeled Receptor | Existing Noise Level (dBA CNEL) | Existing Plus Project Noise Level (dBA CNEL) | Noise Level Increase (dB) | Future Noise Level (dBA CNEL) | Future Plus Project Noise Level (dBA CNEL) | Noise Level Increase (dB) |
|---|---|---|---|---|---|---|
| ST1 | 56 | 57 | 1 | 57 | 57 | 0 |
| ST2 | 50 | 48 | -2 | 50 | 49 | -1 |
| ST3 | 46 | 42 | -4 | 46 | 43 | -3 |
| ST4 | 54 | 55 | 1 | 54 | 55 | 1 |
| ST5 | 63 | 64 | 1 | 64 | 64 | 0 |
| M1 | 64 | 64 | 0 | 64 | 64 | 0 |
| M2 | 62 | 62 | 0 | 62 | 62 | 0 |
| M3 | 64 | 64 | 0 | 64 | 64 | 0 |

Source: Dudek, Noise Technical Report for Santa Clarita Commerce Center Project, May 2023 (see **Appendix H** of this Initial Study for more detailed information).

**b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

**Less Than Significant Impact.** Construction activities that might expose persons to excessive ground-borne vibration or ground-borne noise could cause a potentially significant impact. Groundborne vibration from construction activities is typically attenuated over short distances. The heavier pieces of construction equipment used at a construction site could include graders, tractors, loaders, cranes, rubber-tired bulldozers, generators, and paving equipment. Based on published vibration data, the anticipated heavy construction equipment would generate a vibration level of approximately 0.089 inches per second (ips)

peak particle velocity (PPV) at a distance of 25 feet from the source; lighter construction equipment, such as a small bulldozer, would generate a substantially lower vibration level of approximately 0.003 ips PPV at a distance of 25 feet from the source. Although heavy equipment would be operated throughout the Project Site at various construction stages, it is anticipated that heavy equipment would occasionally operate as close as approximately 50 feet from the existing residences to the south. At this distance, the PPV vibration level would be approximately 0.032 ips. As such, vibration levels would be less than the thresholds published by the California Department of Transportation (Caltrans) for human annoyance of 0.20 ips PPV and for the prevention of building damage to typical residential buildings of 0.3 ips PPV. Because groundborne vibration from Project construction would not exceed recognized standards, and due to the temporary and intermittent occurrence of vibration levels, the Project would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Therefore, the Project would result in less-than-significant vibration impacts during Project construction.

During Project operation, no major sources of groundborne vibration are anticipated. Project-related trucks would enter and exit the Project Site from the access road at a distance of more than 150 feet from the nearest sensitive receptor immediately to the south of the Project Site. As groundborne vibration typically attenuates relatively rapidly with distance from the source, Project-related truck traffic would generate minimal vibration at the nearest sensitive receptor. Because groundborne vibration from Project operation would not exceed recognized standards, and due to the temporary and intermittent occurrence of vibration levels, the Project would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. Therefore, the Project would result in less-than-significant vibration impacts during Project operation.

**c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

**d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

**Less Than Significant Impact.** As discussed in the response to Checklist Question XIII(a) above, noise generated during Project construction and operation would be below applicable noise thresholds. Accordingly, the Project would not result in substantial temporary or permanent increases in ambient noise levels in the Project vicinity above levels existing without the Project. Therefore, the Project would result in less-than-significant impacts on noise.

**e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?**

**f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The Project is not located within an airport land use plan or within 2 miles of a public airport, public use airport, or private airstrip. The nearest public airport is Van Nuys Airport, which is located approximately 13 miles south of the Project Site. The nearest private airport is Whiteman Airport, which is located approximately 11 miles south of the Project Site. Given the distance between these noise sources and the Project Site, the Project would have no noise impact related to the exposure of people residing or working in such areas to excessive noise levels. Therefore, the Project would have no impact related to airport or airstrip noise.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section 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)? | ☐ | ☐ | ☐ | ☒ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (especially affordable housing)? | ☐ | ☐ | ☐ | ☒ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |

**Discussion**

**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)?**

**No Impact.** Since the zoning and the General Plan land use designation for the Project Site are (I) Industrial, the Project is consistent with the allowed uses in this zoning and land use designation. No housing is proposed as part of the Project, and no new or expanded urban infrastructure would be constructed that could foster increased development in the Project area. Accordingly, the planned development of the Project Site that is consistent with its zoning and land use designation was assumed to have been anticipated in the SCAG growth projections. Accordingly, the Project would not induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Therefore, the Project would have no impact related to induced growth.

**b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (especially affordable housing)?**

**c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

**No Impact.** As the Project Site is currently vacant, the Project would not displace existing housing or people, necessitating the construction of replacement housing elsewhere (especially affordable housing). Therefore, the Project would have no impact related to the displacement of housing and people.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XV. Public Services** | | | | |
| 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 any of the public services: | | | | |
| i) Fire protection? | ☐ | ☐ | ☒ | ☐ |
| ii) Police protection? | ☐ | ☐ | ☒ | ☐ |
| iii) Schools? | ☐ | ☐ | ☒ | ☐ |
| iv) Parks? | ☐ | ☐ | ☒ | ☐ |
| v) Other public facilities? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**a.i) 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.** Fire protection services for the Project Site and the surrounding area are provided by the Los Angeles County Fire Department (LACoFD). The nearest fire station to the Project Site is LACoFD Station 73, which is located less than 1 mile south of the Project Site at 24875 Railroad Avenue.

***Project Construction***

Project construction has the potential to result in accidental on-site fires by exposing combustible materials to fire risks from machinery and equipment. Accordingly, construction activities could temporarily result in an incrementally increased demand for LACoFD fire protection services. However, all construction activities would be subject to compliance with the regulations enforced by the federal and State OSHAs. Construction-related regulations would include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; and keeping storage sites free from accumulation of unnecessary combustible materials.

In addition, as discussed in Section IX, Hazards and Hazardous Materials, of this Initial Study, although construction activities would involve the limited transport, storage, use, and disposal of hazardous materials, such activities would be temporary in nature. The storage, handling, and disposal of these materials would be regulated by the DTSC, USEPA, OSHA, LACoFD, and the Los Angeles County Department of Public Health. Furthermore, the LACoFD's Land Development Unit would review specific fire and life safety requirements for the construction phase during its building plan check review.

Project construction may result in temporary sidewalk and lane closures that may affect evacuation routes. However, emergency access for the LACoFD to the Project Site would be maintained at all times, and construction would not impede the LACoFD from maintaining its response times. Furthermore, construction activities are temporary in nature and full access to all roadways to and within the Project Site would be restored upon completion of Project construction.

***Project Operation***

The Project would develop industrial/warehousing uses on vacant land, thus generating an employee population on-site and increasing demand for services from the LACoFD. The LACoFD's response time goals in urban areas are 5 minutes or less for the first responding unit for fire and emergency medical responses, and 8 minutes or less for advanced life support from the paramedic unit. As LACoFD Station 73 is located

less than 1 mile on Railroad Avenue to the south of the Project Site, it can be expected that the LACoFD would be able to meet its response time goal for the Project.

The Project would be designed in accordance with the California Fire Code, which establishes minimum requirements for fire protection and prevention; the County's Title 32 Fire Code, which contains more stringent building standards related to fire safety; and the City's Title 22 City Fire Code, which establishes fire-related standards at the local level. The Project would also comply with any additional and applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants, as required by the LACoFD's Land Development Unit. The Land Development Unit would review the Project design during its building plan check review to ensure adequate fire safety and access.

Additionally, the City's HMP, described above in Section IX, Hazards and Hazardous Materials, of this Initial Study, provides a framework for communications, decisions, and actions by emergency response personnel during emergencies. The command structure would assess local conditions in a dynamic, ongoing manner to identify locations and severity of threats to homes and businesses and any other land uses that are associated with man-made or natural incidents. Based on those assessments, decisions would be made at a local level regarding when and/or where to implement emergency evacuations. The City's existing emergency response system would be sufficient to address emergency evacuation scenarios in the event of natural or man-made incidents, such as a fire in the Project area, that result in a need to evacuate some or all of the existing residents of the adjacent communities and future Project employees.

With employment of the City's HMP; compliance with federal, State, and local regulations; and upon approval of required reviews and permits by the LACoFD, the Project would not 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. Therefore, the Project would result in less-than-significant impacts to fire protection services during Project construction and operation.

**a.ii) 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 City contracts with the Los Angeles County Sheriff's Department (LASD) for police protection and law enforcement services. The Santa Clarita Valley Sheriff's Station, which opened in 2021, is located at 26201 Golden Valley Road less than 2 miles east of the Project Site. This new station is an upgrade to the old station at 23740 Magic Mountain Parkway and includes a vehicle maintenance building; communications tower; 9-1-1 dispatch equipped with additional desks compared to the old station; a large helipad specifically assigned for LASD aero bureau to land; more office space to accommodate different specialized teams and detective bureau, improving staff communications; and an integrated technology throughout the site.

***Project Construction***

The Project would require consultation with the LASD during the plan check process before construction. Construction activities would also be subject to applicable federal, State, and local regulations to reduce impacts on police protection services, such as the California Building Standards Code, which includes site access requirements and other relevant safety precautions for emergency providers. As discussed above, although Project construction would result in temporary sidewalk and lane closures that may affect evacuation routes, emergency access to the Project Site for emergency service providers, including the LASD, would be maintained at all times. Therefore, construction would not impede the LASD from maintaining its response

times. Furthermore, construction activities are temporary in nature and full access to all roadways to and within the Project Site would be restored upon completion of Project construction.

***Project Operation***

Project implementation would result in an increase in demand on existing LASD services due to the generation of an employee population on-site. However, as discussed in Section XIV, Population and Housing, of this Initial Study, the Project would not include residential uses and, thus would not induce unplanned population growth in the Project area.

In addition, as required by the County and the City's Law Enforcement Facilities Fee, the Project would be required to pay all applicable development and law enforcement mitigation fees prior to the issuance of a building or similar permit. The payment of such fees would ensure that the LASD has sufficient funding for future personnel, assets, and facility space.

Upon approval of required reviews and permits by the LASD and due to the recent opening of the new station, the Project would not 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. Therefore, the Project would result in less-than-significant impact to police protection services during Project construction and operation.

**a.iii) 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?**

**Less Than Significant Impact.** As previously described, the Project does not include residential uses. Therefore, Project operation would not result in a direct increase in the number of students within the service areas of the Newhall School District and William S. Hart Union High School District. Although some new Project employees may be anticipated to relocate to the Project vicinity, the Project itself would not result in a significant associated demand for new or expanded school facilities. Both school districts would make appropriate decisions based on existing resources and facilities if enrollment pressures rise. In addition, both school districts assess development impact fees to help finance new and expanded facilities needed to accommodate population growth and increasing enrollments. The fees change over time and are collected by the City at the time of issuance of building permit. Pursuant to California Government Code Section 65995, the Project would be required to pay fees in accordance with SB 50. Payment of such fees is intended for the general purpose of addressing the construction of new school facilities, whether schools serving the Project area are at capacity or not. Pursuant to California Government Code Section 65995(h), payment of such fees is deemed full mitigation of a project's development impacts. Accordingly, the Project would not 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 or other performance objectives for schools. Therefore, the Project would result in less-than-significant impacts to schools.

**a.iv) 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?**

**Less Than Significant Impact.** According to the City of Santa Clarita General Plan Conservation and Open Space Element, there is a citywide shortage of local parkland in the City. The City's General Plan states that

the City offers approximately 1.5 to 2 acres of developed parkland per 1,000 residents through 20 city parks.[13] However, the Project would not include residential uses and would not generate a new residential population that would regularly use nearby parks and recreational facilities. Although it is possible for some of the Project employees to use local parks and recreational facilities, the Project itself would not result in a significant associated demand for new or expanded parks and recreational facilities. Accordingly, the Project would not 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 or other performance objectives for parks. Therefore, the Project would result in less-than-significant impacts to parks.

**a.v) 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?**

**Less Than Significant Impact.** As previously described, although the Project does not include residential uses, the Project would directly generate employment opportunities. While some new Project employees may be anticipated to relocate to the Project vicinity, the majority are expected to already reside in the region, and, as such, the Project would not result in a significant associated demand for other new or expanded public facilities, including libraries. Not all Project employees would be expected to use the City's library facilities, and use of such facilities would be spread out among the three existing libraries within the City (i.e., employees would likely use the branch closest to their residence) and not concentrated in one location.

In addition, the City of Santa Clarita undergoes an annual review of budget and need for capital improvement projects. The Capital Improvement Program (CIP) ensures that the City has adequate funding for public facility improvements, such as the public library system. The City also conducts a comprehensive needs assessment and facility study for the library through the CIP. In fiscal year 2021-22, approximately $7,662,192 of funding was allocated to improvements of the public library.[14] As such, taxes and funding would continue to support current and future needs for the public library and associated infrastructure. Accordingly, the Project would not 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 or other performance objectives for other public facilities, including libraries. Therefore, the Project would result in less-than-significant impacts to libraries and other public facilities.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XVI. Recreation** | | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☒ | ☐ |

[13] City of Santa Clarita, General Plan Conservation and Open Space Element, May 2011.
[14] City of Santa Clarita, Operating Budget and Capital Improvement Program FY 2021-22, 2021.

| | | | | |
|---|---|---|---|---|
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

**b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

**Less Than Significant Impact.** As previously discussed, the Project would not include residential uses or recreational facilities and would not generate a new residential population that would regularly use existing nearby neighborhood and regional parks or other recreational facilities. Although it is possible for some of the Project employees to use local parks and recreational facilities, the Project itself would not result in a significant associated demand for existing nearby neighborhood and regional parks or other recreational facilities. Accordingly, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated, or require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, the Project would result in less-than-significant impacts to recreation.

| | **Potentially Significant Impact** | **Less Than Significant Impact with Mitigation Incorporated** | **Less Than Significant Impact** | **No Impact** |
|---|---|---|---|---|
| **Section XVII. Transportation/Traffic** | | | | |
| Would the project: | | | | |
| a) Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | ☐ | ☐ | ☒ | ☐ |
| b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? | ☐ | ☐ | ☒ | ☐ |
| c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☒ | ☐ |
| d) Result in inadequate emergency access? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

The analysis of Project impacts on transportation is primarily based on information contained in the Transportation Impact Analysis prepared for the Project in May 2023 by Dudek and provided in **Appendix I** of this Initial Study.

SB 743 required the Governor's Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service (LOS), to a new measurement that better addresses the State's goals on reduction of GHG emissions, development of multimodal transportation networks, and promotion of a diversity of land uses. CEQA Guidelines Section 15064.3 describes specific considerations for evaluating a project's transportation impacts. Generally, VMT is identified as the most appropriate measure of transportation impacts, replacing LOS, and referring to the amount and distance of automobile travel attributable to a project. Accordingly, the VMT analysis for the Project is presented in the response to Checklist Question XVII(b) below.

However, in addition to a VMT analysis required under CEQA, a local agency may require a transportation impact assessment (TIA) to include a LOS analysis to identify infrastructure improvements required to provide acceptable operations, consistent with the acceptable LOS in the local agency's general plan. The City requires an LOS consistency with its General Plan by identifying traffic levels at intersections. LOS is commonly used as a qualitative description of intersection operations and roadway segments and is based on the design capacity of the intersection configuration and roadway facility, compared to the volume of traffic using the facility. Based on the City's TIA Guidelines, the LOS for six study area intersections were analyzed for the Project. These intersections are Bouquet Canyon Road at Soledad Canyon Road, Valencia Boulevard at Magic Mountain Parkway, Railroad Avenue at Magic Mountain Parkway, Railroad Avenue at Drayton Street, Railroad Avenue at Oak Ridge Drive, and Oak Ridge Drive at Via Princessa. Accordingly the LOS analysis for these intersections is presented in the response to Checklist Question XVII(a) below for information purposes only.

**a) Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities?**

**Less Than Significant Impact.** Compliance criteria identified in the City's General Plan Circulation Element and the City's TIA Guidelines were used to evaluate the Project's potential contribution to traffic conditions on the six study area intersections identified above. The City's General Plan Circulation Element contains the following objective and policy related to transportation compliance and LOS targets:

**Objective C 2.2:** Adopt and apply consistent standards throughout the Santa Clarita Valley for street design and service levels, which promote safety, convenience, and efficiency of travel.

**Policy C-2.2.4:** Strive to maintain a Level of Service (LOS) D or better on most roadway segments and intersections to the extent practical; in some locations, a LOS E may be acceptable, or LOS F may be necessary, for limited durations during peak traffic periods.

Based on the City's TIA Guidelines, unsatisfactory traffic congestion occurs when the LOS is degraded by project-added trips from LOS D to LOS E or F, or, if an intersection is already operating at LOS D or worse, when a project increases delay of more than 4 seconds for an intersection operating at LOS D and more than 2 seconds for an intersection operating at LOS E or F. These criteria would be applied to determine if intersection improvements are needed to accommodate the Project and avoid any conflict with the City's General Plan objective and policy addressing the City's circulation system.

The Highway Capacity Manual, 6th Edition, methodology, established by the Transportation Research Board, was used to analyze the operation of the six signalized study area intersections. **Table 20** and **Table 21** summarize the results of the Existing plus Project and Opening Year (2024) plus Project intersection analyses, respectively, for the AM and PM peak hours. As shown in the tables, with the addition of Project traffic to existing and Opening Year conditions, all study area intersections are forecast to operate at satisfactory LOS (LOS D or better), except for the intersection of Bouquet Canyon Road at Soledad Canyon Road in the PM peak hour. However, since the Project would not result in any increase in delay at this intersection, the Project would not

exceed the City's LOS criteria. Similarly, with all other intersections operating at LOS D, the Project would add less than 4.0 seconds of delay. Accordingly, no improvements would be required as a result of the Project.

**TABLE 20**
**EXISTING PLUS PROJECT PEAK HOUR INTERSECTION LOS**

| Intersection | Existing | | | | Existing Plus Project | | | | Change in Delay (seconds) | |
|---|---|---|---|---|---|---|---|---|---|---|
| | AM Peak | | PM Peak | | AM Peak | | PM Peak | | | |
| | Delay[a] | LOS[b] | Delay[a] | LOS[b] | Delay[a] | LOS[b] | Delay[a] | LOS[b] | AM | PM |
| Bouquet Cyn Rd/ Soledad Cyn Rd | 41.7 | D | **78.9** | **E** | 41.7 | D | **78.9** | **E** | 0.0 | 0.0 |
| Valencia Bl/ Magic Mtn Pkwy | 34.8 | C | 43.0 | D | 34.8 | C | 43.1 | D | 0.0 | 0.1 |
| Railroad Av/ Magic Mtn Pkwy | 29.8 | C | 36.7 | D | 30.2 | C | 37.0 | D | 0.4 | 0.3 |
| Railroad Av/ Drayton St | 16.0 | B | 18.2 | B | 16.1 | B | 18.3 | B | 0.1 | 0.1 |
| Railroad Av/ Oak Ridge Dr | 18.0 | B | 18.2 | B | 18.7 | B | 19.4 | B | 0.7 | 1.2 |
| Oak Ridge Dr/ Via Princessa | 14.6 | B | 20.6 | C | 14.8 | B | 20.7 | C | 0.2 | 0.1 |

Notes:
[a] Delay in seconds per vehicle
[b] LOS = Level of Service
Source: Dudek, Transportation Impact Analysis for Santa Clarita Commerce Center Project, May 2023 (see **Appendix I** of this Initial Study for more detailed information).

**TABLE 21**
**OPENING YEAR 2024 PLUS PROJECT PEAK HOUR INTERSECTION LOS**

| Intersection | Opening Year (2024) | | | | Opening Year (2024) Plus Project | | | | Change in Delay (seconds) | |
|---|---|---|---|---|---|---|---|---|---|---|
| | AM Peak | | PM Peak | | AM Peak | | PM Peak | | | |
| | Delay[a] | LOS[b] | Delay[a] | LOS[b] | Delay[a] | LOS[b] | Delay[a] | LOS[b] | AM | PM |
| Bouquet Cyn Rd/ Soledad Cyn Rd | 47.7 | D | **96.3** | **F** | 47.7 | D | **96.3** | **F** | 0.0 | 0.0 |
| Valencia Bl/ Magic Mtn Pkwy | 37.0 | D | 54.8 | D | 37.0 | D | 54.9 | D | 0.0 | 0.1 |
| Railroad Av/ Magic Mtn Pkwy | 32.4 | C | 38.9 | D | 32.8 | C | 39.2 | D | 0.4 | 0.3 |
| Railroad Av/ Drayton St | 17.8 | B | 20.5 | C | 18.0 | B | 20.6 | C | 0.2 | 0.1 |
| Railroad Av/ Oak Ridge Dr | 18.1 | B | 18.3 | B | 18.7 | B | 19.4 | B | 0.6 | 1.1 |
| Oak Ridge Dr/ Via Princessa | 14.8 | B | 21.1 | C | 15.0 | B | 21.3 | C | 0.2 | 0.2 |

Notes:
[a] Delay in seconds per vehicle
[b] LOS = Level of Service
Source: Dudek, Transportation Impact Analysis for Santa Clarita Commerce Center Project, May 2023 (see **Appendix I** of this Initial Study for more detailed information).

In addition, the Project would construct pedestrian facilities (e.g., curb and gutter) along Springbrook Avenue and connect to the existing sidewalk on Oak Ridge Drive. The nearest bicycle facility is located approximately 700 feet west of the Project Site, where it traverses along the west side of the dry creek channel generally parallel to Railroad Avenue. The path connects to several paths to the north and south

of the Project Site. A Class I bike path is also proposed along the east side of the creek channel, adjacent to Railroad Avenue. Although the Project does not include plans to add bicycle infrastructure, it would not conflict with the bicycle facilities identified in the City's Non-motorized Transportation Plan.

Furthermore, as discussed above, one of the strategies in the SCAG 2020–2045 RTP/SCS is to expand job opportunities near transit and along center-focused main streets and to promote the redevelopment of underperforming sites and other outmoded nonresidential uses. The Project would not conflict with this strategy as the Project is located immediately adjacent to Railroad Avenue and supports the development of an underdeveloped parcel with a new warehouse facility, which would also expand job opportunities in a housing-rich area. The Project is also directly adjacent to a bus stop at the intersection of Railroad Avenue and Oak Ridge Drive, which provides a connection to the Jan Heidt Newhall Metrolink Station.

Accordingly, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, taking into account all modes of transportation including transit, roadways, bicycle and pedestrian facilities. Therefore, the Project would result in less-than-significant impacts on transportation.

**b) Would the project conflict with CEQA Guidelines Section 15064.3, subdivision (b)?**

**Less Than Significant Impact.** The City's TIA Guidelines provide details on appropriate "screening thresholds" that can be used to identify when a proposed land use project is anticipated to result in a less-than-significant VMT impact without conducting a more detailed analysis. A land use project needs to meet only one of the following screening thresholds to result in a less-than-significant impact: (1) project screening size, which applies to projects that generate 110 or less net daily vehicle trips; (2) Transit Priority Area screening, which applies to projects that are located within 0.5 mile of a major transit stop or a transit stop along a high quality transit corridor with a frequency of service interval of 15 minutes or less; or (3) affordable housing screening, which applies to affordable housing projects. As the Project does not meet any of these screening thresholds, a Project-specific VMT analysis was conducted based on the City's TIA Guidelines and recent studies prepared for similar land uses in the City. The analysis was conducted using the SCAG Regional Transportation Plan Model. Since the Project is an employment-generating use, whereas a majority of the City residents currently have to leave the City for work, the metric of net change in work VMT was applied to the Project.

**Table 22** summarizes the findings of the VMT analysis. The baseline home-based work VMT for the City was calculated to be 1,701,590 miles without the Project, which was shown to decrease to 1,591,499 miles with the Project. Accordingly, the analysis shows that the Project reduces the home-based work VMT for the City, and, as such, the Project would not conflict with CEQA Guidelines Section 15064.3(b). Therefore, the Project would result in less-than-significant impacts on VMT.

**TABLE 22**
**PROJECT VMT SUMMARY**

| 2020 | City of Santa Clarita Home-Based Work VMT without the Project | City of Santa Clarita Home-Based Work VMT with the Project | Change |
|---|---|---|---|
| Total Employment | 85,458 | 85,687 | 229 |
| Total Home-Based Work VMT | 1,701,590 | 1,591,499 | *(110,091)* |
| VMT per Employee | 19.9 | 18.6 | *(1.3)* |
| **Significant Impact?** | **No** | | |
| Source: Dudek, Transportation Impact Analysis for Santa Clarita Commerce Center Project, May 2023 (see **Appendix I** of this Initial Study for more detailed information). | | | |

In addition, based on the City's TIA Guidelines, if a less-than-significant impact is determined under baseline conditions, a less-than-significant impact would also occur under cumulative conditions. Therefore, the Project would result in less-than-significant cumulative impacts on VMT.

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

**Less Than Significant Impact.** The Project would develop the Project Site consistent with the existing industrial/warehousing development immediately to the north and would utilize the existing roadway network, which does not contain sharp curves or dangerous intersections due to design features. Vehicular access to the proposed buildings would be via the extension of Springbrook Avenue from Oak Ridge Drive. The Project driveways would conform to the City's design standards and would provide adequate sight distance, sidewalks, and pedestrian movement controls meeting the City's requirements to protect pedestrian safety. The Project's driveways would also conform to applicable emergency access requirements as set forth by the LACoFD. Furthermore, the Project design would be reviewed by the City to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses, such as farm equipment, to the Project Site, and all Project-generated traffic would be of a typical type and amount for an industrial/warehousing use. Accordingly, the Project would not substantially increase hazards due to a design feature or incompatible uses. Therefore, the Project would result in less-than-significant impacts related to dangerous road conditions or incompatible uses.

**d) Would the project result in inadequate emergency access?**

**Less Than Significant Impact.** As previously described, the Project would develop industrial uses on a currently vacant site and would result in a new access and circulation system on-site. The Project's ingress/egress and circulation are required to meet LACoFD standards to ensure that the new development provides adequate access for emergency vehicles. The Project Site and surrounding roadway network do not pose any unique conditions that raise concerns for emergency access, such as narrow, winding roads or dead-end streets. Thus, standard engineering practices are expected to achieve the LACoFD's standards. Furthermore, final Project plans are subject to review and approval by the LACoFD to ensure that the Project's access points comply with all LACoFD requirements. With compliance with all LACoFD requirements, the Project would not result in inadequate emergency access. Therefore, the Project would result in less-than-significant impacts related to emergency access.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XVIII. Tribal Cultural Resources** | | | | |
| 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: | | | | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or | ☐ | ☒ | ☐ | ☐ |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code | ☐ | ☒ | ☐ | ☐ |

Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

**Discussion**

The analysis of Project impacts on tribal cultural resources is primarily based on information contained in the Phase I Archaeological Survey Report prepared for the Project in May 2023 by Dudek and provided in **Appendix C** of this Initial Study, as well as on information provided by the FTBMI during the AB 52 consultation process.

**a.i) 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)?**

**a.ii) 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) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Less Than Significant Impact with Mitigation Incorporated**. In compliance with AB 52, a notification letter was sent on April 21, 2023, to the FTBMI. On April 25, 2023, the City received a request from Sarah Brunzell, the manager of the Cultural Resources Management Division of the Tribal Historic and Cultural Preservation Department of the FTBMI, for the Project's cultural resources assessment and geotechnical report. The City sent a copy of the Phase I Archaeological Survey Report to Ms. Brunzell on April 25, 2023, and the geotechnical report on April 27, 2023. The City received a response on May 3, 2023, stating that the Project Site has low sensitivity for tribal cultural resources due to previous soil disturbance on the Project Site and that a consultation meeting was not required. However, the FTBMI stated that the information and mitigation measures provided in the correspondence served as consultation.

According to the Phase I Archaeological Survey Report, the Project Site falls within the ethnographic boundary of the Tataviam, whose territories included the upper reaches of the Santa Clara River drainage east of Piru Creek, the Sawmill Mountains to the north, and the southwestern portion of the Antelope Valley. Tataviam territory is bounded by various branches of Chumash to the north and west (including the Ventureño to the west and Castaic and Emigdiano to the northwest), Kitanemuk to the northeast, Serrano to the east, and Gabrielino to the south.

One of several Tataviam settlements was the village of *tsawayung* (also referred to as *Chaguayabit, Chaguayanga, takuyama'm*), which some believe was located near Castaic Junction at the site of Rancho San Francisco. Other Tataviam villages mapped outside of the Project area include *tikatsing*, located on upper Castaic Creek, and *pi'ing*, located where Castaic Creek meets Elizabeth Lake Canyon. The village of *Tochonaga* was recorded on an 1843 land grant map. This site appears to be located to the southeast of Newhall, but its precise location has also never been confirmed. Other villages and seasonal camp sites included *akure'eng*, which was located at the original Newhall town site; *apatsitsing*, located on upper

Castaic Creek; *naqava'atang,* located east of Townsend Peak; and *Tobimonga*, located near the present-day junction of I-5 and SR-14. Piru Creek also contained several village and rancheria sites, located on the northern edge of Tataviam territory.

Although the Project Site was determined to have low sensitivity by the FTBMI during the AB 52 consultation, the Project Site is located in proximity to a number of tribal cultural resources. The South Fork of the Santa Clara River to the west of the Project Site was a resource to the upstream village of *Chaguayanga.* A burial site was also discovered within a few miles of the Project Site as a result of a Caltrans highway widening project for SR-126. In addition, according to the FTBMI, tribal cultural resources are scattered throughout the hillside northeast of the Project Site. Accordingly, the FTBMI requested that measures be included to ensure that the potential for impacts to unknown tribal cultural resources during ground-disturbing activities would be appropriately addressed and reduced to less-than-significant levels. **Mitigation Measure MM-CR-1**, identified in Section V, Cultural Resources, of this Initial Study, incorporates the FTBMI's requested mitigation. As such, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource. Therefore, the Project would result in less-than-significant impacts to tribal cultural resources with mitigation incorporated.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XIX. Utilities and Service Systems** | | | | |
| Would the project: | | | | |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | ☐ | ☐ | ☒ | ☐ |
| b) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | ☐ | ☐ | ☒ | ☐ |
| e) 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? | ☐ | ☐ | ☒ | ☐ |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | ☐ | ☐ | ☒ | ☐ |
| g) Comply with federal, state, and local statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

**a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

**b) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**e) 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 City's Public Works Department manages the sanitary sewer collection system, which serves a population of approximately 213,000 residents and consists of about 450 miles of gravity sewer lines and a total of 3 pump stations.[15] The City contracts with the Consolidated Sewer Maintenance District (CSMD), managed by the County of Los Angeles Department of Public Works, for the maintenance of its sanitary sewer system and field operations. The CSMD provides sewage collection services to over 2 million customers in unincorporated County areas, 37 member cities, and 2 contracted cities. The CSMD system includes over 4,600 miles of sanitary sewers, 155 pump stations, and 4 wastewater treatment plants.[16]

The City's local sewers discharge into the Los Angeles County Sanitation Districts (LACSD) facilities for conveyance, treatment, and disposal. The LACSD consists of 24 independent special districts serving about 5.5 million people in Los Angeles County. The LACSD's service areas cover approximately 850 square miles, containing 78 cities and unincorporated areas in the County. The LACSD operates and maintains the regional wastewater collection system, which includes approximately 1,400 miles of sewers, 49 pumping plants, and 11 wastewater treatment plants that transport and treat about half the wastewater in Los Angeles County.[17]

The City's sewer system conveys wastewater and wastewater solids from the local sewer lines, which are either owned by the City of Santa Clarita or Los Angeles County, to the Saugus and Valencia Water Reclamation Plants (WRPs).[18] The Saugus WRP is located at 26200 Springbrook Avenue in the City of Santa Clarita and has the capacity to provide primary, secondary, and tertiary treatment for 6.5 million gallons per day (mgd) of wastewater. The Valencia WRP is located at 28185 The Old Road in the community of Valencia, in Los Angeles County unincorporated area, and has the capacity to provide primary, secondary, and tertiary treatment for 21.6 mgd of wastewater. The Valencia WRP also has solids processing facilities and processes all wastewater solids generated in the Santa Clarita Valley Sanitation District.[19]

The Project would connect new sewer pipelines from the proposed buildings to the existing 12-inch vitrified clay pipe sewer line in Oak Ridge Drive that extends north of Shawna Place and east of Springbrook Avenue.[20] Wastewater from the Project Site would be conveyed to and treated at the Saugus and Valencia

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15 City of Santa Clarita, Sewer System Management Plan, 2020.

16 Los Angeles County Department of Public Works, "About Us," https://pw.lacounty.gov/SMD/SMD/Page_08.cfm, accessed March 30, 2023.

17 Los Angeles County Department of Public Works, Our Agency, https://www.lacsd.org/about-us/who-we-are/our-agency, accessed March 30, 2023.

18 Los Angeles County Department of Public Works, Wastewater Collection Systems, https://www.lacsd.org/services/wastewater-sewage/facilities/wastewater-collection-systems, accessed March 30, 2023.

19 Los Angeles County Department of Public Works, Saugus Water Reclamation Plant, accessed March 30, 2023, https://www.lacsd.org/services/wastewater-sewage/facilities/saugus-water-reclamation-plant; Valencia Water Reclamation Plant, accessed March 30, 2023, https://www.lacsd.org/services/wastewater-sewage/facilities/valencia-water-reclamation-plant.

20 Consolidated Sewer Maintenance District, LA County Sanitary Sewer Network, https://dpw.lacounty.gov/smd/sewernetwork/, accessed May 16, 2023.

WRPs. According to the LACSD, these WRPs (combined) currently treat 19.6 mgd of wastewater; however, these facilities have the combined capacity to treat 28.1 mgd of wastewater at the primary, secondary, and tertiary levels. As such, the remaining capacity of the WRPs to treat wastewater is 8.5 mgd.

While the Project would require a conditional use permit to allow for increased building heights, the Project is consistent with the underlying zoning and General Plan land use designation of Industrial (I) for the Project Site. In addition, the Project would not generate atypical wastewater, such as manufacturing or agricultural effluent. All wastewater generated by the Project is expected to be wastewater generated by the Project employees. Since the Project would not generate atypical wastewater and is consistent with the City's General Plan and zoning, the Project would not exceed wastewater treatment requirements, result in the relocation or construction of new or expanded wastewater treatment facilities, or result in the determination by the LACSD that it does not have adequate capacity to serve the Project's wastewater generation.

In addition, the Project would be subject to a development impact fee, payment of which would be considered the Project's fair-share contribution to any needed improvement and/or expansion of wastewater utility infrastructure. Accordingly, the Project would not require the relocation or construction of a new or expanded wastewater treatment facility as the LACSD has adequate capacity to process and treat wastewater generated by the Project. Therefore, the Project would result in less-than-significant impacts related to wastewater.

**c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

**Less Than Significant Impact.** As discussed in Section X, Hydrology and Water Quality, of this Initial Study, the Project would not substantially increase stormwater runoff discharged from the Project Site. The Project would comply with all applicable City grading permit regulations and NPDES requirements and would implement BMPs to reduce and treat stormwater runoff from the Project Site. The Project would be required to comply with the City's engineering standards for volume of water discharged in the storm drain system and would comply with the City's stormwater ordinance to ensure that stormwater flows be properly treated before entering the storm drain system. The existing stormwater infrastructure in the Project vicinity has been determined to have sufficient capacity to serve the Project Site. Accordingly, the Project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. Therefore, the Project would result in less-than-significant impacts related to stormwater drainage facilities.

**b) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

**Less Than Significant Impact.** The Project Site is served by the Santa Clarita Valley Water Agency (SCV Water). The Project would create a new demand for water service as a result of the development of a vacant site. However, similar to the discussion above, while the Project would require a conditional use permit to allow for increased building heights, the Project is consistent with the underlying zoning and General Plan land use designation of Industrial (I) for the Project Site. In addition, the Project would not result in atypical water usage, such as those associated with a manufacturing plant or agricultural field. The majority of the water demand by the Project is expected to be from consumption by Project employees and landscaping irrigation.

SCV Water adopted its 2020 Urban Water Management Plan (UWMP) in 2021. The 2020 UWMP includes water supply and demand forecasts that are based on the population projections in the general plans of the jurisdictions within the SCV Water service area. Specifically, the 2020 UWMP provides water supply

planning for a 30-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands. In order to estimate demand through 2050, population and water use projections were made based on existing land uses and planned land use development compiled for the service area, including the City of Santa Clarita and County of Los Angeles land use plans. Accordingly, since the Project would not create atypical water usage and is consistent with the City's General Plan and zoning, water demand by the Project has been accounted for in SCV Water's projections. As such, SCV Water would have sufficient water supplies available to serve the Project from existing entitlements and resources. Therefore, the Project would result in less-than-significant impacts related to water supply.

**f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

**g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?**

**Less Than Significant Impact.** The City of Santa Clarita's commercial franchised waste hauler is Burrtec Waste Industries, Inc., which provides waste collection services, including organics recycling, mixed recycling, and green waste collection, to all commercial and industrial locations within the City. The City is served primarily by three landfills—Chiquita Canyon, Antelope Valley, and Sunshine Canyon.

Chiquita Canyon Landfill is a 639-acre landfill located at 29201 Henry Mayo Drive in the unincorporated community of Castaic. The Chiquita Canyon Landfill has a maximum permitted throughput of 12,000 tons per day, with a remaining capacity of 60,408,000 cubic yards as of August 24, 2018.[21] Antelope Valley Landfill is a 185-acre landfill located at 1200 West City Ranch Road in the City of Palmdale. Antelope Valley Landfill has a maximum permitted throughput of 5,548 tons per day, with a remaining capacity of 17,911,225 cubic yards as of October 31, 2017.[22] Sunshine Canyon Landfill is a 1,036-acre landfill located at 14747 San Fernando Road in the City of Los Angeles. Sunshine Canyon Landfill has a maximum permitted throughput of 12,100 tons per day, with a remaining capacity of 77,900,000 cubic yards as of May 31, 2018.[23]

Based on the daily rates provided by the California Department of Resources Recycling and Recovery (CalRecycle) of 5 pounds per 1,000 square feet of industrial space and 6 pounds per 1,000 square feet of office space, the Project is estimated to generate approximately 2,190 pounds of solid waste per day or approximately 1.1 tons per day.[24]

The closest landfill to the Project Site is Sunshine Canyon Landfill, which has a maximum permitted throughput of 12,100 tons per day. The Project's solid waste generation of 1.1 tons per day would represent less than 0.01 percent of the landfill's daily permitted capacity. In the unlikely event that Sunshine Canyon Landfill closed or reached capacity, Chiquita Canyon Landfill, located northwest of the Project Site, has a maximum permitted throughput of 12,000 tons per day and would have adequate capacity to accommodate the Project.

All non-hazardous solid waste generated from the Project Site (e.g., plastic and glass bottles and jars, paper, newspaper, metal containers, cardboard) would be recycled per local and State regulations, with a diversion goal of 75 percent, in compliance with the Integrated Waste Management Act. Remaining non-hazardous solid waste would be disposed of at one of the nearby landfills. The City would review building plans and ensure that adequate space is set aside to allow for the collection and storage of recyclable materials on the Project Site prior to issuance of building permits. Accordingly, the Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and would comply with

[21] CalRecycle, Chiquita Canyon Sanitary Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037, accessed January 12, 2023.

[22] CalRecycle, Antelope Valley Public Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3458?siteID=1364, accessed January 12, 2023.

[23] CalRecycle, Sunshine Canyon City/County Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702, accessed January 12, 2023.

[24] CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Service, accessed May 16, 2023.

federal, State, and local statutes and regulations related to solid waste. Therefore, the Project result in less-than-significant impacts related to solid waste.

**b) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**Less Than Significant Impact.** The Project would include connections to the existing electric power infrastructure maintained by SCE. The Project would be required to coordinate with SCE regarding the extension of its electric power infrastructure to the Project Site and comply with site-specific requirements set forth by SCE. Project contractors would notify and coordinate with SCE to identify the locations and depth of power lines and avoid disruption of electric service to other properties. Furthermore, the Project would implement any necessary connections and upgrades required by SCE to ensure that SCE would be able to adequately serve the Project. As such, operation of the Project is not anticipated to adversely affect the electric power infrastructure serving the surrounding uses or utility system capacity and would not result in the construction of new energy facilities or expansion of existing facilities. Therefore, the Project would result in less-than-significant impacts on electric power infrastructure.

The Project would not include connections to the existing natural gas infrastructure. However, future tenants, who may require the use of natural gas to serve their businesses, would be responsible for connecting to existing natural gas lines. It is not anticipated that future connection needs would require any major reconstruction or relocation of off-site natural gas infrastructure. Future tenants would be conditioned to implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve their businesses. Thus, operation of the Project by future tenants would not result in an increase in demand for natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities. Therefore, the Project would result in less-than-significant impacts on natural gas infrastructure.

The Project would install underground cables to enable connections to telecommunications facilities from one of the local providers in the City. The expansion of existing internet, telephone, or cable service infrastructure is not anticipated as a result of the Project, other than to construct connection points to serve the Project. Thus, operation of the Project would not require the construction of new telecommunications infrastructure or expansion of existing facilities. Therefore, the Project would result in less-than-significant impacts on telecommunication facilities.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section XX. Wildfire** | | | | |
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | ☐ | ☐ | ☒ | ☐ |

| | | | | |
|---|---|---|---|---|
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |

**Discussion**

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

**Less Than Significant Impact.** Portions of the Santa Clarita Valley is susceptible to wildland fires because of the area's hilly terrain; dry, hot, and sometimes windy weather conditions; and the presence of flammable vegetation, particularly in more remote areas with limited vehicular access and no water infrastructure.

Although the California Department of Forestry and Fire Protection did not identify the Project Site to be within a state responsibility area or a Very High Fire Hazard Severity Zone (VHFHSZ),[25] portions of the Project Site have been identified as being located within the Los Angeles County Fire Hazard Severity Zone in a local responsibility area (LRA), in which fire protection is the responsibility of the LACoFD, and within the City's fire zone.[26] The area to the northeast of the Project Site is characterized by hilly, undeveloped terrain and is located within a VHFHSZ/LRA. This area may be susceptible to wildfire that could spread toward the Project Site under the right weather conditions.

As discussed in Section IX, Hazards and Hazardous Materials, of this Initial Study, the City's HMP provides a framework for communications, decisions, and actions by emergency response personnel during emergencies. During an emergency evacuation, the Santa Clarita Valley has freeway access along three routes—I-5 and SR-14 going north and south and SR-126 going east and west. Detour routes can be established through the Santa Clarita Valley if the local freeways are closed. The City's General Plan also contains policies that support the City's HMP, including Policy LU 3.3.2, Policy LU 3.3.5, and Policy S.3.2.5, which would ensure that all land uses and new development have adequate emergency access routes. The City's existing emergency response system would be sufficient to address emergency evacuation scenarios in the event of natural or man-made incidents in the Project area that result in a need to evacuate some or all existing residents of the adjacent communities and future Project employees. In addition, the Project Site's circulation and access would conform with LACoFD requirements to ensure that adequate emergency access is provided throughout the Project Site.

Accordingly, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, the Project result in less-than-significant impacts related to wildfire response and evacuation.

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[25] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones in State Responsibility Area, https://osfm.fire.ca.gov/fire-hazard-severity-zones-maps-2022/, November 21, 2022.

[26] Esri, Los Angeles County Fire Hazards Severity Zone Map – Local Responsibility Area, https://www.arcgis.com/home/webmap/viewer.html?useExisting=1; City of Santa Clarita, Geographic Information System, Mapping Your City, https://www.santa-clarita.com/city-hall/departments/administrative-services/technology-services/geographic-information-systems-gis, accessed April 11, 2023.

**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 the uncontrolled spread of a wildfire?**

**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 sources, 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 discussed above, areas to the northeast of the Project Site are characterized by hilly, undeveloped terrain and are located within a VHFHSZ/LRA where fire protection is the responsibility of the LACoFD. This hilly, undeveloped terrain may be susceptible to wildfire that could spread toward the Project Site under the right weather conditions.

The Project would be required to comply with the 2022 California Fire Code, which has been adopted by reference in the Los Angeles County Fire Code and the Santa Clarita Municipal Code. The proposed structures on the Project Site would be constructed pursuant to the 2022 California Building Code. Code-required fire features that would be implemented include ignition-resistant construction materials; interior fire sprinklers; fire apparatus access that would provide unobstructed travel lanes, lengths, turnouts, turnarounds, and clearances; fire staging and temporary refuge areas throughout the developed Project area and along roadways and open space; and reliable water source for operations and during emergencies requiring extended fire flow.

Although potential fires in the Project area are expected to be wind-driven and wildfire risk would remain, compliance with regulatory requirements of the applicable building and fire codes would reduce the likelihood of wildfire ignition and spread on the Project Site and in the surrounding area. Accordingly, the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors and expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Project would also not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, the Project would result in less-than-significant impacts related to wildfire risks.

**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 discussed above, areas to the northeast of the Project Site are characterized by hilly, undeveloped terrain and are located within a VHFHSZ/LRA. The Project could potentially expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. However, on-site improvements would eliminate the potential for erosion to occur in areas covered by impervious surfaces. In addition, the Project would incorporate BMPs, such as an infiltration and detention basin, multiple catch basins, covered trash storage areas, and landscape designed to minimize or eliminate runoff, to ensure that on- and off-site flooding and substantial changes to drainage patterns would not occur. Accordingly, the Project would not 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. Therefore, the Project would result in less-than-significant impacts related to wildfire.

| | Potentially Significant Impact | Less Than Significant Impact with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| **Section 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? | ☐ | ☒ | ☐ | ☐ |
| 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)? | ☐ | ☒ | ☐ | ☐ |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ |

Discussion

**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.** The Project Site is not within or adjacent to, and would not conflict with the provisions of, an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. Although vegetation located within and adjacent to the Project Site provides suitable nesting habitat for birds, the Project would be required to comply with the MBTA and CFGC to ensure that the implementation of the Project would not interfere with the nesting of any native bird species. In addition, the Project would not have substantial impacts to archaeological, paleontological, and tribal cultural resources with incorporation of **Mitigation Measures MM-CR-1** and **MM-GEO-1**.

Therefore, with the identified mitigation measures incorporated, the Project would not have the potential to 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, 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.

**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 with Mitigation Incorporated.** The Project would not cause impacts that are cumulatively considerable. The Project has the potential to result in significant impacts to air quality, cultural resources, tribal cultural resources, and paleontological resources; however, with the mitigation measures outlined in the Mitigation Monitoring Program attached to this Initial Study, these Project impacts would be mitigated to less-than-significant levels.

A significant cumulative impact may occur if the Project, in conjunction with related projects in the region, would result in impacts that are less than significant when viewed separately but would be significant when viewed together. When considering the Project in combination with other past, present, and reasonably foreseeable future projects in the vicinity of the Project Site, the Project does not have the potential to cause impacts that are cumulatively considerable. As detailed in the above discussions, the Project would not result in any significant unavoidable impacts in any environmental categories. In all cases, the impacts associated with the Project are limited to the Project Site and would not result in a significant contribution to any cumulative impacts. Therefore, based on the analysis contained in this Initial Study, the Project would not result in a Mandatory Finding of Significance due to cumulative impacts.

**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.** All potential impacts of the Project have been identified, and mitigation measures have been provided, where applicable, to reduce potential impacts to less-than-significant levels. Upon implementation of these mitigation measures, the Project would not have the potential to result in substantial adverse impacts on human beings either directly or indirectly. No additional mitigation measures would be required. Therefore, the Project would not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

**D. MITIGATION MONITORING PROGRAM**

| **I. AESTHETICS** |
|---|
| None required |
| **II. AGRICULTURE AND FORESTRY RESOURCES** |
| None required |
| **III. AIR QUALITY** |
| **Mitigation Measure MM-AQ-1:** Prior to the issuance of a grading permit, the following shall be required and incorporated into the grading plan and/or grading permit conditions:<br>• For off-road equipment with engines rated at 75 horsepower or greater, no construction equipment shall be used that is less than Tier 4 Interim. An exemption from these requirements may be granted in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. For example, if a Tier 4 Interim piece of equipment is not reasonably available at the time of construction and a lower tier equipment is used instead (e.g., Tier 3), another piece of equipment could be upgraded from a Tier 4 Interim to a higher tier (i.e., Tier 4 Final) or replaced with an alternative-fueled (not diesel-fueled) equipment to offset the emissions associated with using a piece of equipment that does not meet Tier 4 Interim standards.<br>• Before an exemption may be considered, the applicant shall be required to demonstrate that two construction fleet owners/operators in the region were contacted and that those owners/operators |

confirmed Tier 4 Interim or better equipment could not be located in the region. To ensure that Tier 4 construction equipment or better would be used during the Project's construction, the applicant will include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

**Party Responsible for Mitigation:** Project applicant

**Monitoring Action/Timing:** Prior to issuance of a grading permit; during Project construction

**Enforcing, Monitoring Agency:** City of Santa Clarita

**IV. BIOLOGICAL RESOURCES**

None required

**V. CULTURAL RESOURCES**

**Mitigation Measure MM-CR-1:** Prior to commencement of construction activities for all phases of Project implementation, the Project applicant/owner/developer shall retain a qualified archaeological principal investigator (Principal Investigator/Archaeologist) that meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, is approved by the City of Santa Clarita, and has experience and is well-acquainted with the history of the ancestral tribes geographically connected to the Project site to implement this mitigation measure. Additionally, the Fernandeño Tataviam Band of Mission Indians (FTBMI) shall be contacted and invited to be involved with the following mitigation program for the Project.

***Cultural Resource Inadvertent Discovery Plan.*** A cultural resource inadvertent discovery plan (Plan) shall be developed. The purpose of the Plan is to outline a program of treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing phases and to provide for the proper identification, evaluation, treatment, and protection of any cultural resources throughout the duration of the Project. This Plan shall define the process to be followed for the identification and management of cultural resources on the Project Site during construction. Existence of and importance of adherence to this Plan shall be stated on all Project plans intended for use by those conducting the ground-disturbing activities.

***Worker Environmental Awareness Program (WEAP) Training.*** All construction personnel and monitors who are not trained archaeologists shall be briefed regarding inadvertent discoveries prior to the start of construction activities. A basic presentation and handout or pamphlet shall be prepared in order to ensure proper identification and treatment of inadvertent discoveries. The purpose of the WEAP training is to provide specific details on the kinds of cultural resources that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant cultural resources. Each worker shall also learn the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of the site supervisor who shall contact the City. This requirement shall be noted on all construction plans to ensure implementation. A qualified representative of the FTBMI shall conduct the tribal cultural resources portion of the WEAP training for construction personnel regarding the aspects of tribal cultural resources and the procedures for notifying the FTBMI should tribal cultural resources be discovered by construction staff.

***Inadvertent Discovery Clause.*** In the event that potential prehistoric or historic-era archaeological resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 60 feet of the find shall immediately stop, and the Principal

Investigator/Archaeologist shall be notified immediately in order to assess the discovery and determine whether additional study is warranted. Depending on the nature of the discovery, the Principal Investigator/Archaeologist may simply record the find and allow work to continue. If the discovery proves potentially significant under CEQA, additional work, such as subsurface testing, may be warranted. If the discovery is determined significant under CEQA and avoidance is not feasible, data recovery shall be required. If archaeological resources are discovered or are suspected to be of Native American origin dating to pre-contact and/or post-contact, the FTBMI should be contacted and be provided information after the archaeologist makes their initial assessment of the nature of the find so as to provide tribal input with regards to significance and treatment. The lead agency and/or applicant shall, in good faith, consult with the FTBMI on the disposition and treatment of any tribal cultural resource encountered during all ground-disturbing activities. Should the find be deemed significant, as defined by CEQA, the Project applicant shall retain a professional Native American monitor procured by the FTBMI and, if necessary, an archaeological monitor, supervised by a Secretary of the Interior qualified archaeologist, to observe all remaining initial ground-disturbing activities, including, but not limited to, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, clearing, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. Initial excavation is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to cultural monitoring (archaeological or Native American/tribal), this definition excludes movement of sediments after they have been initially disturbed or displaced by project-related construction.

**Party Responsible for Mitigation:** Project applicant

**Monitoring Action/Timing:** Ground-disturbing construction activities

**Enforcing, Monitoring Agency:** City of Santa Clarita

**VI. ENERGY**

None Required

**VII. GEOLOGY AND SOILS**

**Mitigation Measure MM-GEO-1:** Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist per the Society of Vertebrate Paleontology (2010) guidelines. The qualified paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the Project that is consistent with the SVP (2010) guidelines and outlines requirements for preconstruction meeting attendance and worker environmental awareness training, where paleontological monitoring is required within the Project Site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring and discoveries treatment, and paleontological methods (including sediment sampling for microinvertebrate and microvertebrate fossils), reporting, and collections management. A qualified paleontological monitor shall be on-site during ground-disturbing activities, including augering, in areas underlain by Pleistocene gravel deposits and below a depth of five feet below the ground surface in areas underlain by Holocene alluvium to determine if these areas are old enough to preserve scientifically significant paleontological resources. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall allow grading to recommence in the area of the find.

**Party Responsible for Mitigation:** Project applicant

**Monitoring Action/Timing:** Ground-disturbing construction activities

**Enforcing, Monitoring Agency:** City of Santa Clarita

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|---|
| **VIII. GREENHOUSE GAS EMISSIONS** |
| None required |
| **IX. HAZARDS AND HAZARDOUS MATERIALS** |
| None required |
| **X. HYDROLOGY AND WATER QUALITY** |
| None required |
| **XI. LAND USE AND PLANNING** |
| None required |
| **XII. MINERAL AND ENERGY RESOURCES** |
| None required |
| **XIII. NOISE** |
| None required |
| **XIV. POPULATION AND HOUSING** |
| None required |
| **XV. PUBLIC SERVICES** |
| None required |
| **XVI. RECREATION** |
| None required |
| **XVII. TRANSPORTATION/TRAFFIC** |
| None required |
| **XVIII. TRIBAL CULTURAL RESOURCES** |
| Please see Mitigation Measure MM-CR-1 above. |
| **XIX. UTILITIES AND SERVICE SYSTEMS** |
| None required |
| **XX. WILDFIRE** |
| None required |

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