	INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Project Title:	Secure Space Self Storage
Case No.	3.4321-MAJ
Assessor's Parcel No.	669-430-016 & 669-430-019
Lead Agency Name and Address:	City of Palm Springs 3200 E. Tahquitz Canyon Way Palm Springs, California 92262
Project Location:	North side of West San Rafael Drive, east of McCarthy Road
Project Sponsor's Name and Address:	Insite Property Group 19191 S. Vermont Avenue, Suite 680 Torrance, CA 90502
General Plan Designation(s):	Mixed-use
Zoning:	M-1
Contact Person:	Alex Rubalcava, Assistant Planner
Phone Number:	760-323-8245
Date Prepared	August, 2022

Table of Contents

LIST OF EXHIBITS

LIST OF TABLES

APPENDICES

CHAPTER 1: INTRODUCTION AND PROJECT DESCRIPTION

Description of the Project

The San Rafael Self Storage Facility will be located on West San Rafael Drive, south of the Desert Highland Gateway Estates. The Project will be located on a parcel of land designated as Mixed Use by the City of Palm Springs General Plan and developed within the M-1 Service and Manufacturing Zone. The Project site is also within the boundaries of the College Park Specific Plan, and designated for industrial uses in the Plan. The Project is permitted under section 92.17.01 of the zoning ordinance as "Wholesaling and warehousing, including mini-warehouse/storage". The Project site closely neighbors the San Jacinto Mountain on its west side and is currently undeveloped desert land bounded by West Radio Road to the north, additional service and manufacturing facilities to the east, West San Rafael Drive to the south, and Medium Density Residential housing to the west.

The self-storage facility will be accessible by two primary entrances located on San Rafael Drive, and one secondary entrance located on Radio Road. This gated facility will be designed to be visually compatible with adjacent cube-shaped geometric industrial structures, including a monochrome grey exterior color scheme with blue accents.

The Project proposes to develop a vacant parcel of land with an area of 6.43 acres; improvements consisting of one 3-story self-storage building and leasing office comprising 127,200 square feet, 182 covered RV stalls, and 11 parking stalls totaling an area impervious area of 242,000 square feet are proposed. The main storage facility will be constructed on the southern half of the property, and much of the Project site will be covered by asphalt to provide RV parking on the northern portion of the property and general parking located directly in front of the main storage facility entrance, with the east and western edges being converted into desert landscaping totaling 37,092.8 square feet.

The storage facility will operate Monday through Sunday between 10 am and 6 pm and will be staffed by 2-3 employees during operating hours.

The Project proposes to include storm drainpipes, inlets, and underground infiltration basins along the eastern edge of the site perpendicular to San Rafael Drive to ensure adequate drainage in the event of a 100-year storm.

Each floor of the main self-storage facility will be 9 feet in height and contain 5'x5', 10'x10', 10'x15', and 10'x20' storage units for a total of 975 units within the building. The self-storage building will be 30 feet in height, in compliance with the 40-foot maximum height limit set by the M-1 zone.

Utilities and Service Providers:
The following agencies and companies will provide service to the Project site:

1. Sanitary Sewer: City of Palm Springs
2. Water: Desert Water Agency (DWA)
3. Electricity: Southern California Eddison (SCE)
4. Gas: Southern California Gas Company (The Gas Company)
5. Telephone: Frontier/various
6. Cable: Time Warner Cable (TWC)

Other public agencies whose approval is required.
Regional Water Quality Control Board.

Source: Google Maps, 2021

07.19.22

Exhibit

1

TERRA NOVA®
PLANNING & RESEARCH, INC.

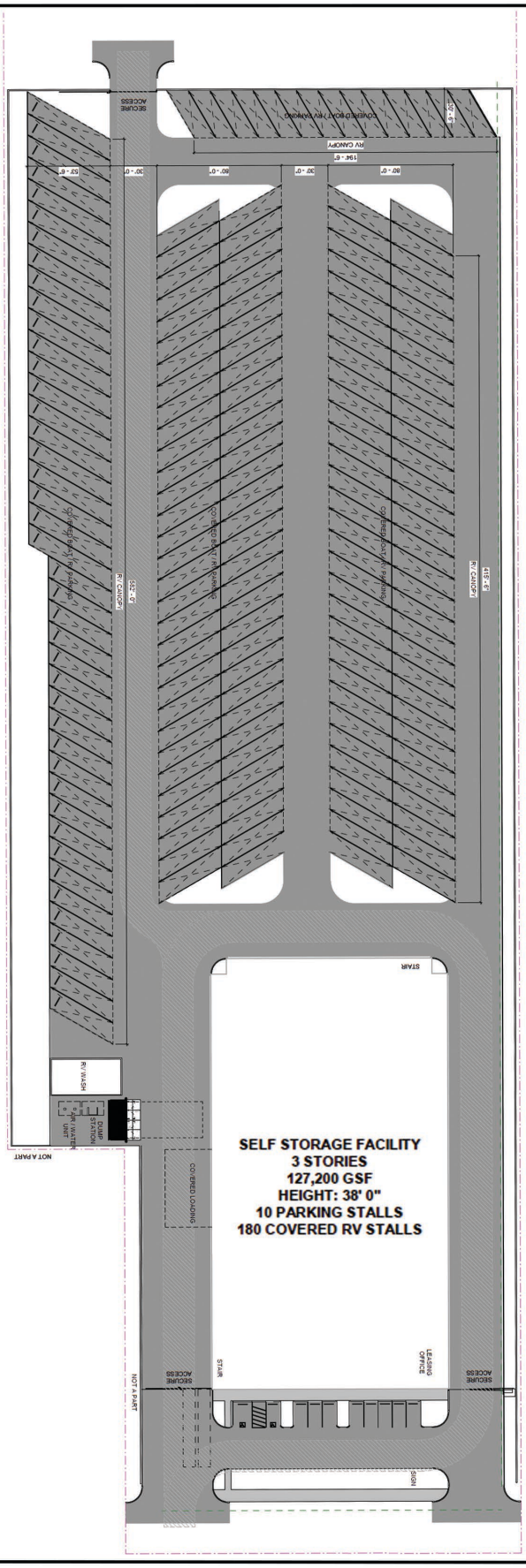
Secure Space Self Storage
Vicinity Map
Palm Springs, California

TERRA NOVA®
PLANNING & RESEARCH, INC.

Secure Space Self Storage
Project Location Map
Palm Springs, California

Exhibit
2

PROJECT INFORMATION		
PROJECT ADDRESS:		W SAN RAFAEL DR PALM SPRINGS, CA 92262
PARCEL NUMBER(S):		669430019 (5.23 ACRES)
		669430016 (1.26 ACRES)
ZONING:		M-1
TOTAL SITE AREA:		6.43 ACRES
TOTAL DISTURBED AREA:		6.43 ACRES
FAR:		.45 (.5 ALLOWED)
SITE COVERAGE:		47% (60% ALLOWED)
BUILDING INFORMATION		
CONSTRUCTION TYPE:		TYPE II-B
		FULLY SPRINKLERED PER NFPA 13
OCCUPANCY:		S-1 STORAGE INDUSTRIAL
TOTAL BUILDING AREA:		127,200 SF
SETBACKS:		
	FRONT:	25' -0"
	SIDE:	10'-0" AND 25'-0" (RESIDENTIAL ADJACENT)
	REAR:	10'-0"
PARKING REQUIRED:		6 STALLS
PARKING PROVIDED		10 STALLS
CONTACT / APPLICANT		
INSITE PROPERTY GROUP DEVELOPMENT MANAGER MIKE DIACOS MIKE@INSITEPG.COM 805.766.0292		



Source: InSite, May 2022

N

07.19.22

TERRA NOVA®
PLANNING & RESEARCH, INC.

Secure Space Self Storage
Project Site Plan
Palm Springs, California

Exhibit

3

Environmental Factors Potentially Affected:

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

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

CHAPTER 2: ENVIRONMENTAL ANALYSIS AND DETERMINATION

DETERMINATION: The City of Palm Springs Planning Department

On the basis of this initial evaluation:

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

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

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

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

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

Alex Rubalcava

Alex Rubalcava
Assistant Planner

9/14/2022

Date

PURPOSE OF THIS INITIAL STUDY

This Initial Study has been prepared consistent with CEQA Guidelines Section 15063, to determine if the Project, as proposed, may have a significant effect upon the environment. Based upon the findings contained within this report, the Initial Study will be used in support of the preparation of a Mitigated Negative Declaration.

EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:
    a) The significance criteria or threshold, if any, used to evaluate each question; and
    b) The mitigation measure identified, if any, to reduce the impacts to less than significance.

I. AESTHETICS Except as provided in Public Resources Code Section 21099, would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, 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?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Google Earth Pro Version (7.3.2.5776), accessed July 2022; "California Scenic Highway Mapping System," accessed July 2022.

Setting

The Project site is located within the City of Palm Springs. The region is bounded by the San Jacinto and Santa Rosa mountains to the west and southwest, the San Gorgonio mountains to the north, and the San Bernardino and Little San Bernardino mountains to the northeast. The Coachella Valley's mountains are formations which resulted from historic geological seismic activity of the nearby San Andreas fault, are integral features of the skyline for many residents, and have resulted in land use and zoning ordinances that preserve the views from scenic highways. Highway 111, which hugs Mount San Jacinto, is an eligible scenic highway for the City of Palm Springs.

The Project site is in the Highland – Gateway neighborhood. The proposed self-storage facility will be built less than 0.4 miles from Highway 111 and less than 1.6 miles from the San Jacinto Mountain. The proposed development will result in a gated, 30 foot high, 3-story building, accompanying RV parking and stormwater drainage structures surrounded by a wall on a 6.43-acre parcel of land. The storage facility's height is under the maximum 40-foot maximum height for the M-1 zone.

Discussion of Impacts

a) **No Impact.** Scenic resources in the Project area are the San Jacinto Mountains to the west, the Santa Rosa Mountains to the southwest, the San Gorgonio Mountains to the northwest, and Little San Bernadino Mountains to the northeast. Viewing the Project site from Radio Road, the peaks from the San Jacinto and Santa Rosa mountains are visible but the bases of both ranges are significantly obstructed by existing industrial buildings and fences on the east and west borders of the Project site. Additionally, tree canopies from neighboring projects and utility poles irregularly obstruct views of both ranges. Viewing the Project site from the south on West San Rafael Drive, the San Jacinto Mountains are visible to the west. Portions of the San Gorgonio and Little San Bernadino Mountains are visible from this viewpoint, but are significantly obstructed by existing industrial structures near the Project site. There are no public vantage points on the east or west sides of the Project site which would allow for a view of scenic resources. The existing viewsheds of scenic vistas from both the north and south sides of the Project are either partially or completely obstructed, and the addition of a 30 foot storage facility would not alter the visibility of scenic vistas from publicly accessible vantage points. Therefore, the Project would have no impact on scenic vistas.

b) **No Impact.** The Project site is not located in close proximity to a state scenic highway, historic buildings, and does not contain scenic resources such as trees or rock outcroppings. The Project site is a vacant parcel of undeveloped land devoid of scenic resources. Additionally, the Project does not violate existing height restrictions in the City. Therefore, the proposed development will have no impact on scenic resources. Due to the Project site's existing conditions as an undeveloped parcel of land consisting of minimal desert landscape, the Project has no potential to substantially damage any scenic resources.

c) **Less Than Significant Impact.** The visual character of the Project site is defined by adjacent industrial buildings. A series of automotive businesses neighbor the Project site on its eastern side and are mostly white and grey in color. A wall runs along the length of the Project site's east side and northwestern edge. Due to the height of industrial warehouse buildings on North Anza Road, McCarthy Road, and West Del Sol Road, the Project site's undeveloped landscape is not visible from most public views in the area. At the proposed height of 30 feet, the top of the storage facility may be visible from some public viewing areas other than West San Rafael and Radio Road but will be consistent in mass and scale with the existing industrial structures. The Project site does not exceed the Zoning height limit of 40 feet, and therefore does not conflict with the City's regulations for preserving public views and scenic quality. The Project site's proposed self-storage facility is consistent with the land use designation of the M-1 Service and Manufacturing zone. In addition, given the Project's monotone gray and blue color palette, it is unlikely to stand out or significantly degrade the existing visual character of its surroundings and therefore will have a less than significant impact on the visual character of the area.

d) **Less Than Significant Impact**. The adjacent industrial structures host several lamp posts and light fixtures attached to building entrances that contribute to lighting levels within the service and manufacturing zone in this part of the City. The Palm Springs General Plan Community Design Element outlines lighting policies for the City. The City strives to reduce light pollution by encouraging low illumination levels, reducing light spillover, and the conscious use of street and outdoor lighting. The proposed improvements will include a storage facility and business sign near the primary entrances to the property along West San Rafael Drive. Both the storage facility and entrance sign will remain lit after hours of operations. Both the storage facility's 14

wall-mounted light fixtures and business sign's lettering are designed to shield the light they will be emitting in order to prevent light pollution and spillover onto adjacent properties. 35 ceiling mounted light fixtures will be placed under parking shades in the RV storage area. 5 area lighting fixtures will be placed near the Project site's southern parking spaces and behind the self-storage facility. All outdoor light fixtures chosen have shaded or hooded designs in order to ensure compliance with City standards. Given the existing restrictions for light fixtures in the City's General Plan and Zoning Ordinance, this new source of ambient light will not significantly impact lighting levels in this area of the City.

Mitigation Measures: None required.

Monitoring: None required.

II. AGRICULTURAL 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:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); California Important Farmland Finder, California Department of Conservation, accessed July 2022.

Setting

The Project Site sits on a parcel of land at the northeastern edge of Palm Springs designated for Mixed Use under the Palm Springs General Plan and zoned as M-1 in the Zoning Ordinance. Farmland, forest land, and timberland designations do not exist in the Palm Springs General Plan nor does a corresponding zoning designation exist. This land is arid and not viable for agricultural production.

Discussion of Impacts

a-e) **No Impact.** The Project site is currently undeveloped desert land unsuitable for agricultural production. The Project site is within the M-1 service/manufacturing zone and designated as Mixed Use in the General Plan, and therefore will have no impact on the conversion of agriculturally-designated lands to other uses.

Prime Farmland: The California Important Farmland Finder lists the Project site under the Urban and Built-Up Land designation, described as being occupied by structures with a building density of about 6 structures per 10-acre parcel. The Project site is located in the City's urban core, and therefore will have no impact on existing zoning for agricultural use.

Williamson Act: Williamson Act was established to preserve land for agricultural use. Williamson Act Contracts occur between private landowners and local governments and designate parcels of land to be solely used for agriculture in exchange for lower property taxes for the landowners. The City of Palm Springs does not have any areas of agricultural land under a Williamson contract and therefore the Project will have no impact on an existing Williamson Act contract site.

Forest Land: The Project site exists at an elevation of approximately 623 feet above sea level on the valley floor. The desert terrain at this elevation is not supportive of forest land. Forest land and timberland designations do not exist in the Palm Springs General Plan nor does a corresponding zoning designation. The Project site sits on undeveloped desert land, and therefore development of the Project site will not have any impact on forestland.

Mitigation Measures: None required.

Monitoring: None required.

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:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); "Final 2016 Air Quality Management Plan," prepared by South Coast Air Quality Management District, March 2017; South Coast AQMD Air Quality Significance Thresholds, April 2019; "2003 Coachella Valley PM10 State Implementation Plan," August 1, 2003; "Final Localized Significance Threshold Methodology,' prepared by the South Coast Air Quality Management District, Revised, July 2008; Air Quality/ Greenhouse Gas Emissions Assessment prepared by Kimley-Horn and Associates, Inc. on CalEEMod Version 2020.4.0.(CalEEMod), July 2022.

Setting

The Palm Springs pollution profile is comprised of stationary and mobile sources of pollution. Sources of stationary pollution for the City are commercial, industrial, and residential equipment and fixtures. Examples of residential stationary sources of pollution are gas heaters, fireplaces, and landscape exhaust, though the amount of air pollution they produce comparatively is low. The Palm Springs International Airport, the I-10, City streets and the Union Pacific Railroad are all mobile sources of pollution for the City.

The South Coast Quality Air Management District (SCQAMD) is responsible for managing the Salton Sea Air Basin (SSAB), which includes the City of Palm Springs. The SSAB is characterized by hot summers, mild winters, and low annual precipitation. Frequent periods of strong winds, combined with the flat valley terrain are relevant environmental conditions which exacerbate poor air quality. Under California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS), the SSAB is designated as in a state of attainment for the following air pollutants: Carbon Monoxide, Nitrogen Dioxide, Sulfur Dioxide, and Lead.

The California Air Resources Board under the direction of the California EPA is responsible for Identifying Toxic Air Contaminants (TAC's) which are defined by the California Health and Safety Code as Hazardous air Pollutants (HAP) under subsection (b) of section 112 of federal codes (42 USC Sec. 7412[b]).

CAAQS and NAAQS designate Ozone (O3) and Suspended Inhalable particulate Matter (PM2.5 & PM10) as in a state of nonattainment. The United States Environmental Protection Agency (USEPA) is currently monitoring Ozone through the California Air Resources Board (CARB) in order to ensure compliance with the California Clean Air Act (CCAA) and federal ambient air quality standards. Baseline air quality conditions such as direct sunlight, light winds, and warm temperatures exacerbate the production of Ozone within the SSAB.

The Coachella Valley PM 10 State Implementation Plan (CVISP) was created in response to the designation of PM10 nonattainment by state and federal ambient air quality standards and built upon existing dust control programs within the Coachella Valley, requiring stricter control measures regarding transportation, mobile, construction, paved roads, unpaved roads, agriculture, windblown, and vegetable burning emissions of particulate matter.

Discussion of Impacts

a) **Less Than Significant Impact**. The Project site is located within the South Coast Air Basin (SCAB). The SCAB is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and regulated by the SCAQMD's 2016 Air Quality Management Plan (AQMP), whose emission standards and pollution control strategies are set in consultation with the Southern California Association of Governments' (SCAG) population growth projections, Regional Transportation Plan (RTP), Sustainable Community Strategies (SCS), and based on the latest and most accurate scientific data.

According to Air Quality Assessments performed by Kimley-Horn and Associates, Inc (Appendix A), the Project construction and operational emissions would not cause emission in excess of CAAQS or NAAQS. The Project site is zoned as M-1 in Palm Springs Municipal Code, and is located in PA 5 in the College Park Specific Plan. The Project site's land-use does not violate any existing land use ordinance and does not require General Plan or Zoning amendments.

The Project would not violate existing air quality standards and is consistent with current land use and growth expectation in the AQMP, therefore, the Project's conflict or obstruction of applicable air quality plans would be less than significant.

b) **Less than Significant Impact.** The Project proposes to build a self-storage and accompanying RV storage facility. Under normal operation, the storage facility will house personal belongings and large furniture items. The self-storage facility is not temperature controlled, and is not designed to host activities or house materials which would negatively impact air quality such as internal heating, onsite burning of fossil fuels, or operating machinery requiring gasoline. Under these assumptions, the Project site's land use has a low potential to generate pollutants which would negatively impact air quality during its operation.

Construction Emissions:
The approximate 14-month Project buildout beginning in April 2023 and ending in May 2024 would generate temporary criteria air pollutant emissions resulting from site grading, road paving, and motor vehicle exhaust. Assuming compliance with SCAQMD nuisance Rule 402, fugitive dust Rule 403, and architectural coatings Rule 1113, the Project's estimated construction emissions have been modeled using CalEEMod version 2020.4.0[1], as summarized in Table 1. As shown in the Table, the Project's construction will not exceed thresholds of significance established by SCAQMD, and impacts will be less than significant.

[1] Air Quality/ Greenhouse Gas Emissions Assessment prepared by Kimley-Horn and Associates, Inc. on CalEEMod Version 2020.4.0.(CalEEMod), July 2022.

Table 1 Maximum Daily Construction-Related Emissions Summary (pounds per day)						
Construction Emissions[1]	**CO**	**NO_x**	**ROG**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Daily Maximum	22.10	16.11	62.62	0.05	9.13	5.16
SCAQMD Thresholds	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds?	**No**	**No**	**No**	**No**	**No**	**No**
[1] Average of 2022 and 2023 emissions. Includes implementation of fugitive dust control measures and architectural coating standards required by SCAQMD under Rule 403 and Rule 1113, respectively. See Appendix A for modeling outputs.						

Operational Emissions:
Following completion of Project construction, mobile, energy, and area sources contribute to operational emissions for the Project. The Projects operational emissions, modeled using CalEEMod are summarized below in Table 2, and will not exceed SCAQMD thresholds.

Table 2 Maximum Daily Operational-Related Emissions Summary (pounds per day)						
Operational Emissions	**CO**	**NO_x**	**ROG**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Daily Maximum	7.39	0.87	3.63	0.02	1.90	0.52
SCAQMD Thresholds	**550.00**	**100.00**	**75.00**	**150.00**	**150.00**	**55.00**
Exceeds?	**No**	**No**	**No**	**No**	**No**	**No**
See Appendix A for modeling outputs.						

Cumulative Contribution:
The South Coast Air Basin has been designated to be in a state of non-attainment for Ozone (O3), PM10, and PM2.5 by CAAQS and O2 and PM2.5 for NAAQS. The SCAQMD has designed regional thresholds with NAAQS and CAAQS in mind and therefore if a Project does not exceed the SCAQMD's regional emissions standards, then that Project's contribution to cumulative air quality in the SCAB is less than significant. The construction and operational related emissions of the Project do not exceed SCAQMD's thresholds, and therefore their cumulative impact on air quality is less than significant.

Summary:
As summarized by Tables 1 and 2, and modeled by CalEEMod, the Project emissions for criteria pollutants are not expected to violate SCAQMD emissions standards. Therefore, the Project's impact on cumulatively considerable net increases of any criteria pollutant for which the Project region is in non-attainment under CAAQS and NAAQS is less then significant.

b) **Less than Significant Impact.** There are 4 sensitive receptors within close proximity to the Project site: Multi-family residences adjacent to the west, multi-family residences 131 feet to the southwest, single-family residences 390 feet to the north, and single-family residences 240 feet to the south. The SCAQMD has localized significance thresholds (LST) for criteria pollutants. Should emissions for the Project site's construction be lower than the LST, the SCAQMD deems that Project as not exposing sensitive receptors to significant pollutant concentrations. As modelled by CalEEMod and visualized in Table 3, the Project's emissions do not exceed the SCAQMD's LST, and therefore would have a less than significant impact on sensitive receptors in proximity to the Project.

Table 3 Localized Significance Thresholds Emissions (pounds per day)				
Construction/Operational	**CO**	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
Maximum Emissions[1]	18.24	1.22	8.93	5.10
LST Threshold	2,292	304	14	8
Exceeds Threshold?	**No**	**No**	**No**	**No**
Emission Source: CalEEMod, version 2016.3.2 LST Threshold Source: Source Receptor Area 30, LST Mass Rate Look-up Table, SCAQMD [1] Operational emissions that affect sensitive receptors are limited to on-site area emissions. Energy and mobile emissions occur off-site.				

c) **No Impact.** The Project does not fit a definition of a land use that produces odors as identified by the SCQMD CEQA Air Quality Handbook, and therefore the Project's operation would not result in the creation of odors adversely affecting a substantial number of people because a self-storage facility will not generate odors.

During Project build-out, construction activities and related equipment may produce some odors. However, the production of such odors would be temporary and limited to the duration of the Project's construction and would disperse quickly when they occur. Therefore, the Project would have no impact on odors adversely affecting a substantial number of people.

Mitigation Measures: None required.

Monitoring: None required.

IV. BIOLOGICAL RESOURCES Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 US 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?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); "Final Recirculated Coachella Valley Multiple Species Habitat Conservation Plan," September 2007' USFWS National Wetlands Inventory, www.fws.gov/wetlands/Data/Mapper.html, accessed July 2022.

Setting

The Coachella Valley sits on the southwestern edge of the Sonoran Desert. The desert habitat fosters dozens of federally and state recognized threatened and endangered species.

The United States Fish and Wildlife Services (FWS) is responsible for enforcing the Federal Endangered Species Act, the Migratory Bird Treaty Act, and the Clean Water Act Section 404. The California Fish and Game Code Section 1600, and California Endangered Species Act are administered by the California Department of Fish and Wildlife (CDFW.

Existing regional habitat conservation areas listed in the Palm Springs General Plan include the Coachella Valley Mountains Conservancy, the Coachella Valley Preserve system, the Whitewater Floodplain Preserve, Santa Rosa and San Jacinto Mountain National Monument, the San Bernadino National Forest, the Mount San Jacinto State Park and Wilderness, Tahquitz National Game Preserve, the James San Jacinto Mountains Reserve, Magnesia Springs Ecological Reserve, Snow Creek Conservation Area, the Highway 111/I-10 Conservation Area, and the Whitewater Floodplain Conservation Area.

There are wildlife movement corridors on the western, southeastern, northwestern territories of Palm Springs, however, this Project site is not located in close proximity to any of them. This Project site is not located on tribal conservation land and is labeled as a stabilized shielded sand field according to the Palm Springs General Plan Figure 5.4-4 and 5.4-5. The Project site is also subject to the Coachella Valley Multiple Species Habitat Conservation Plan (CVMSHCP), which has established a system of reserves for the preservation of endemic species throughout the Valley.

Discussion of Impacts

a) **Less than Significant Impact with Mitigation.** The Project site does not exist within suitable habitat for sensitive plant species according to Vegetation Communities Figure 5.4-5 of the Palm Springs General Plan. The site is vacant, highly disturbed desert land, and has a very low potential to harbor the Burrowing owl. Other native species are unlikely to occur, due to the disturbed nature of the site, and its isolation from other native habitat, since it is surrounded by development or roadways on all sides.

The Burrowing owl is federally protected by the Migratory Bird Treaty Act and a species requiring further study in the CVMSHCP, and the California Fish and Game Code prohibits take of the species. Should the species occur on the site, and be disturbed by Project construction, a significant impact would occur. In order to reduce the impact to less than significant levels, mitigation is required. Pre-construction site surveys are required to take place in order to ensure the absence of the Burrowing owl, or to protect the species if it occurs. In order to assure that impacts to burrowing owl are less than significant, Mitigation Measure BIO-1 is provided below. With implementation of BIO-1, impacts will be reduced to less than significant levels.

b,c) **No Impact.** The Project site has not been identified as an area vital to the survival of sensitive natural communities, and is not located in a Conservation Area, as defined by the CVMSHCP. The Project site is not classified as nor is it in close proximity to riparian habitat or protected wetlands and therefore will have no impact on riparian habitat, other sensitive natural communities, or federally protected wetlands.

d) **Less than Significant Impact with Mitigation.** The City of Palm Springs contains several wildlife corridors that allow wildlife to navigate east to west through the San Gorgonio pass. The closest wildlife corridor to the Project site is in northwestern Palm Springs between the San Jacinto and San Gorgonio mountains.

The Migratory Bird Treaty Act of 1918 prohibits 'take' of protected migratory bird species listed by the U.S. Fish and Wildlife Service. The Project site contains native vegetation, and is a potential nesting site for protected migratory bird species. Should ground disturbance occur during the nesting season, there could be significant impacts to nests and un-fledged young. Therefore, Mitigation Measure BIO-2 has been provided below, which requires the completion of pre-construction nest surveys by a qualified biologist, if any ground disturbing activity is to occur during the nesting season. With implementation of this mitigation measure, impacts to migratory birds will be reduced to less than significant levels.

e,f) **Less than Significant Impact.** The Project site lies within the boundaries of the Coachella Valley Multiple Species Habitat Conservation Plan, and is therefore subject to the development mitigation fee in order to offset the impact the loss of undeveloped land would have on sensitive wildlife within the City and region. The effect of the Project site's development is expected to have less than significant impact as a result of payment of the fee.

Mitigation Measures:

BIO.1 Burrowing Owl Surveys

To mitigate potential impacts to burrowing owl, two pre-construction surveys shall be conducted in accordance with CDFW protocol. The first survey shall occur between 14 and 30 days prior to ground disturbance, and the second shall occur within 24 hours of the initiation of ground disturbance activities for any phase of development on the Project site.

- If no owls are detected during those surveys, ground disturbance may proceed without further consideration of this species, assuming there is no lapse between the surveys and construction, because the protocol states "time lapses between Project activities trigger subsequent take avoidance surveys including but not limited to a final survey conducted within 24 hours prior to ground disturbance."
- If burrowing owls are detected during the surveys, avoidance and minimization measures shall be required. Avoidance and minimization measures may include establishing a buffer zone, installing a visual barrier, implementing burrow exclusion and/or closure techniques, in conformance with CDFW protocol.

BIO.2 Migratory Bird Treaty Act

If ground disturbance or tree or plant removal is proposed between February 1st and August 31st, a qualified biologist shall conduct a nesting bird survey within 7 to 10 days of initiation of grading onsite, focusing on MBTA covered species. If active nests are reported, then species-specific measures shall be prepared. At a minimum, grading in the vicinity of a nest shall be postponed until the young birds have fledged. For construction that occurs between September 1st and January 31st, no pre-removal nesting bird survey is required.

- In the event active nests are found, exclusionary fencing shall be placed around the nests until such time as nestlings have fledged. Avoidance buffers shall be 100 to 300 feet from the nests of unlisted songbirds, and 500 feet from the nests of birds-of-prey and listed species.

Monitoring:

BIO.A The Project biologist shall supply the City with reports of findings regarding burrowing owls and migratory birds. The reports will be attached to the grading permit for the Project.
Responsible Parties: Project Biologist, City Engineer, Planning Department
Timeline: prior to issuance of any permits that result in ground disturbance

V. CULTURAL RESOURCES Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 formal cemeteries?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Cultural Resources Assessment prepared by BCR Consulting LLC, July, 2022 (Appendix B).

Setting

The Coachella Valley region is known for its arid climate, with dry, hot summer and mild winters with an average annual precipitation between 2-5 inches. The Project site sits at an elevation of 620 feet above mean sea level (AMSL) just south of the Whitewater River. The City of Palm Springs has a deep pre and post historic history and is home to the Agua Caliente Band of Cahuilla Indians. When the Cahuilla first moved to the Coachella Valley thousands of years ago, Lake Cahuilla covered much of the valley floor, the historical boundary of which lies southeast of the Project site.

Their historic presence and contributions of the Cahuilla are not only recognized, but highly valued by the Coachella Valley. The University of California, Riverside has identified Andreas and Tahquitz Canyons as prehistoric archeological districts under the National Register of Historic Places. The City of Palm Springs has additional sites of historic significance that are not recognized by the National Register of Historic Places but are protected under the City of Palm Springs Municipal Code Title 8, Chapter 8.05 which created zoning for historical and cultural preservation.

The Native American Graves Protectional and Repatriation Act of 1990 created a process by which federal institutions can return Native American items of cultural significance to lineal descendants and recognized Native American Tribes. Archeological site protection efforts found on federal or Native American land are regulated by the Archeological Resources Protection Act of 1979. Under the National Historic Preservation Act of 1966 (NHPA), the Advisory Council on Historic Preservation, the State Historic Preservation Offices (SHPO), and the Tribal Historic Preservation Office (THPO) coordinate in protecting Historic and Archeological sites of national significance. The Project site is not included in the General Area of Known Historic Sites visualized in Figure 5.5-1 of the City of Palm Springs General Plan EIR.

AB 52 requires lead agencies to consult with California Native American Tribes when considering, historical, archeological, and tribal cultural resources.

Discussion of Impacts

a) **No Impact** BCR Consulting LLC conducted an archeological survey on July 27th, 2022 as part of a cultural resources study for the Project site. The cultural resources study also analyzed existing historical and archeological records for all sites within a half-mile radius of the Project site, including those from the California Resources Information System (CHRIS) at the Eastern Information Center (EIC) as well as from the Sacred Lands Files search at the State of California Native American Heritage Commission (NAHC).

Records Search
Under CEQA guidelines, in order for any object, building, structure, site, area, place, record, or manuscript to be defined as a "historical resource", it must be at least one of the following: Is listed or is eligible to be listed in the California Register of Historical Resources; listed in a local register of historical resources; identified as significant in a historical resource survey; or determined to be a historical resource by a Project's lead agency.

The records search revealed 20 cultural resource studies and 6 cultural resources identified within a half mile of the Project site according to data listed in the EIC. Four historic period locations were identified: a Historic-Period Orchard one half-mile northeast of the Project site, a Historic Period Apartment Complex 1.8 miles to the west, a Historic Period Racquet Club one half-mile to the southwest, a Historic-Period Gas Station one half-mile west-south-west, and a Historic-Period Isolated Artifact on half-mile to the south. Although the southern portion of the Project site was assessed in a previous study for cultural resources, no cultural resources have been identified within the Project site's boundaries.

Field Survey
BCR Consulting conducted a field survey on the Project site, in which the Project sites surface was systematically inspected. The field survey did not find any historical resources of significance on the Project site.

Summary of Impacts
The records search did not yield any evidence of a historical resource on the Project site nor did the field survey discover an object which meets the criteria for a historical resource. Therefore, the Project will have no impact on the significance of a historical resource pursuant to § 15064.5.

b) **Less than Significant Impact with Mitigation.** The Project site is not located in an area having a high potential for archaeological resources. However, such resources can occur below the surface, and not be discovered until Project grading and excavation uncovers older soils.

Records Search
During the initial EIC records search, one archaeological resources was identified within one half-mile of the Project site during previous cultural resource studies: a Prehistoric Isolated Artifact one half-mile to the southwest. Though two Cultural Resource Reports did include parts of the Project site, no significant historic or archeological resources were found.

Sacred Lands File Search
Palm Springs General Plan Figures 5-5 and 5-6 for Archeological and Prehistoric Cultural Resources do not indicate that the Project site likely to have or is known to have significant Prehistoric or Archeological resources. The Native American Heritage Commission (NAHC) Sacred Lands File search did not reveal any records of significant archeological resources found on the Project site.

Field Survey
The BCR Consulting field survey did not reveal any qualifying archeological resources on the surface of the Project site.

Summary of Impacts
The cultural study did not reveal any significant archeological resource on the Project site, however, the City of Palm Springs has a rich archeological background with the potential to uncover historical resources during construction related ground disturbance. In order to ensure that the Project would have a less than significant impact on a significant archeological resource in the event of discovery as a result of construction related ground disturbance, Mitigation Measure CUL-1 is provided below.

Under AB 52, local tribes must be consulted to assure they have the necessary information to identify and address potential impacts to tribal cultural resources. Further discussion of AB 52 consultation is provided in Section XVIII, Tribal Cultural Resources.

With compliance with Archeological and Tribal Monitoring mitigation measures described in CUL-1, the Project will have a less than significant impact regarding archeological resources.

c) **No Impact** The Project site is not located in an area known to have buried human remains or an area belonging to a cemetery. The State of California Health and Safety Code Section 7050.5 regarding human remains must be followed should human remains be uncovered during Project buildout. Section 7050.5 mandates the immediate cessation of construction activities and contact of the Riverside County Coroner in order for the coroner to make a historic determination of the remains. Under Public Resources Code Section 5097.98, should the coroner make the determination that the discovered remains are prehistoric, the Native American Heritage Commission will be contacted in order to determine the Most Likely Descendant (MLD). The MLD may complete a site inspection within 48 hours of NAHC notification. Assuming compliance with the State of California Health and Safety Code Section 7050.5 protocol, the Project site will have no impact on the disturbance of human remains or those interred outside of formal cemeteries.

Mitigation Measures:

CUL-1 Archeological and Tribal Monitoring
A qualified archaeologist and ACBCI Native American monitor must be on site during all ground disturbance activities, including grading, grubbing, trenching, excavations, and earth-moving activities.

The monitors will have the authority to temporarily halt or divert construction equipment to allow the controlled archeological recovery of cultural materials. The material will be recorded and evaluated in the field to determine their resource significance. Any discovered artifacts will be analyzed, processed, and placed in a secure facility which would allow for the retrieval and subsequent study at a later date. Monitoring activities will conclude when the monitors determine that their presence is no longer necessary due to the excavation depth or stage of development.

Monitoring:

CUL-A. The applicant must provide fully executed monitoring agreements to the City of Palm Springs before any ground disturbance occurs on the site.
Responsible parties: Project applicant, Planning Division, City Engineer.

CUL-B. The Project archeologist and Tribal monitor shall prepare a detailed report summarizing the results of the Archeological and Tribal Monitoring program and file the finalized report with the City within 30 days of the conclusion of ground-disturbance activities on the Project site.

Responsible Parties: Planning Division, applicant, and Project archeologist.

VI. ENERGY Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Air Quality/ Greenhouse Gas Emissions/ Hydrology Assessment prepared by Kimley-Horn and Associates, Inc. on CalEEMod Version 2020.4.0.(CalEEMod), July 2022; City of Palm Springs Sustainability Plan

Setting

Electricity
The Project site is in northern Palm Springs. Southern California Edison is the electricity provider for the entire City of Palm Springs.

Natural Gas
The Southern California Gas Company provides natural gas services to Palm Springs under the regulation of the Public Utilities Commission.

Renewable Energy and Energy Efficiency
The City of Palm Springs is an active member of Desert Community Energy (DCE), an alternative local energy provider within the Coachella Valley. The Desert Community Energy program allows individual energy consumers to opt into the renewable energy program.

The City of Palm Springs incorporated energy efficiency measures contained in the Green Building Code into their building code which require developers to meet minimum energy efficiency standards. Title 24, Part 6 of the California Code of Regulations sets energy efficiency standards for all new developments and was last updated in 2019.

Discussion of Impacts

a,b) Less than Significant Impact. The proposed improvements include a self-storage facility, RV parking, and leasing office, consistent with land use regulations within the Palm Springs General Plan and zoning ordinance. According to the Kimley Horn Air Quality report, the building operational energy demand is 295,104 Kilowatt-hour (kWh) per year and the operational energy demand for the parking lot is projected to be 68,587.8 kWh per year for a combined operational electricity demand of 363,691.8 kWh per year. The estimated Natural Gas demand would be 2,557.33 therms per year.

The Project would not obstruct state or local plans for renewable energy or energy efficiency. The Project would abide by the City of Palm Springs' Sustainability Plan and the Palm Springs Climate Action Plan guidelines. In addition, the Project proposes rooftop compatibility for solar

panel instillation, giving the Project a potential renewable energy source in the future. The use, a self-storage facility, will have a relatively low energy demand, since units will not be climate controlled, and the primary energy use will be related to lighting in and around the site, as well as operation of the Project's rental office.

During buildout, the temporary construction period is expected to increase the number of daily trips as a result of the transport of materials to and from the Project site as well as worker commutes, which is further detailed in the Transportation section below. The annual VMT is projected to be 894,035. The Project's trip generation during construction and during operation does not constitute an unnecessary consumption of energy resources that would significantly impact the environment. Following the existing guidelines for energy and use and having the potential for renewable energy make the energy impact of the Project less than significant.

Mitigation Measures: None required.

Monitoring: None required.

VII. GEOLOGY AND SOILS Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); United States Geological Survey

Setting

The City of Palm Springs is geographically located within the Colorado River Province, a low-lying 130-mile-long basin extending from the San Gorgonio Pass to the Mexican border, and known as the Salton Trough. The Whitewater River is the most prominent hydrologic feature, and travels through the

north central portion of the City from between the San Jacinto and San Gorgonio Mountains. These mountains are the result of historic tectonic movement. Portions of the City occur directly on several areas designated as having active seismic activity by the State of California Alquist-Priolo Earthquake Fault Zoning Act of 1971. The San Andreas fault is the largest and most notable fault line which carves into the northeastern part of the Coachella Valley. The San Andreas fault is a strike-slip fault known as a right-lateral fault and results from the northwest movement of the Pacific Plate's collision with the North American Plate's southwestern movement. The Project site is near the local South Pass Fault, the Garnet Hill Fault, and the Palm Canyon Fault, but is not in an Alquist-Priolo zone.

The Palm Springs General Plan EIR lists the Project site as having a modest susceptibility for seismic settlement, a low susceptibility to liquefaction, and high rate of erosion. The U.S Geologic Survey and the Coachella Valley Water District both monitor Palm Springs ground subsidence caused by seismic activity. Ground subsidence has generally occurred southeast of the City, in the central and southern portions of the Valley.

The soil profile of Palm Springs is primarily made up of windblown sand, alluvial sand and gravel that had historically been deposited by flowing water. The Project site does not contain Holocene surficial sediments according to the Palm Springs General Plan's geologic map Figure 5.6-1 and is covered by Artificial Fill deposits.

The steep mountains funnel in high winds through the Coachella Valley and are also responsible for many geologic features of Palm Springs. On the northeastern corner of the city is a thick accumulation of wind-blown sand which towers up to 200 feet above the valley floor known as the Palm Springs Sand Ridge. In addition, these high winds along with geologic uplift contribute to high erosion levels within the City.

Discussion of Impacts

a)

i) **No Impact.** The closest local faults to the Project site are the South Pass Fault, the Garnet Hill Fault, and the Palm Canyon Fault. The Project site is located 4.5 miles from the San Andreas fault. The Project site is not located on a State of California Alquist-Priolo Earthquake Fault Zone. Therefore, the rupturing of a known earthquake fault delineated by Alquist Priolo Earthquake Fault Zoning Map will have no impact on the Project.

ii) **Less Than Significant Impact**. As previously mentioned, the Coachella Valley is a geographic region defined by fault zones and mountain formations. The San Andreas fault being the largest and most notable in the region and affecting the City of Palm Springs. The Project Site is located near several active fault zones, the closest being the South Pass, Garnet Hill, and Palm Canyon faults. These conditions give the Project stie the potential to experience seismic ground shaking with potentially substantial adverse effects. According to the United States Geologic Survey, the Inland Empire has a 75% chance of being struck by one or more 7.0 magnitude earthquakes before the year 2044.

The proposed self-storage facility's land use is not intended to be residential and will not contain dwelling units. The self-storage facility is intended for individuals to occasionally visit to store and retrieve personal items. Under regular use, the storage facility will temporarily host visitors, and may remain devoid of human activity for a significant amount of time during operating hours. Therefore, because the site will seldom host visitors, the chances of injury resulting from seismic activity on site are negligible. In addition, the California Building Code (CBC) identifies areas of susceptibility for ground shaking, and zones them according to the

frequency and degree of impact that a large earthquake would have. The City of Palm Springs is highly susceptible to seismically induced changes in velocity, speed, and acceleration associated with earthquakes, and is categorized under Zone 4. Compliance with the existing state and federal earthquake safety development regulations contained in the Building Code and Municipal Code will ensure that any seismic activity experienced onsite will have the lowest potential to result in adverse effects. Substantial adverse effects involving seismic activity will have less than significant impacts on the Project.

iii) No Impact. The phenomenon by which certain porous sediments behave as a fluid mass when exposed to ground shaking by earthquakes is called liquefaction. For liquefaction to occur on the Project site, the Project site would have to be comprised of soils with poor drainage, have groundwater at a depth of less than 50 feet, and experience serious stress from an earthquake. Northern Palm Springs has been identified as having a low probability of liquefaction given that groundwater depth is greater than 50 feet. The Project site does not meet all three conditions for liquefaction, and therefore will not directly or indirectly experience adverse effects as the result of liquefaction.

iv) No Impact. The Project site is located in an area with a slope of less than 10 degrees according to the Palm Springs General Plan Slope Distribution map Figure 5.6-2. This is because the Project site is located on the valley floor, a region characterized by its flat terrain and low elevation. The Project site is located more than a mile from the base of Mount San Jacinto, and therefore will not directly or indirectly experience potential substantial adverse risks, injuries, or deaths resulting from a landslide.

b) Less Than Significant Impact. According to Figure 5.6-3 n the Palm Springs General Plan EIR, the Project site rests in an area highly susceptible to erosion. The construction of the storage facility and associated structures will result in the disturbance of topsoil by heavy machinery. During construction, the Project will be required to implement a dust management plan, consistent with SCAQMD Rule 403.1. This requirement is specifically designed to mitigate impacts of ground disturbance by wind.

The Project site will be developed to include impermeable surfaces covering 86.8% off the site However, robust measures exist to divert stormwater runoff onsite (See Section X, Hydrology), which will offset any negative impacts that development on the Project site would have on soil erosion. Additionally, the on-site pavement, storage facility, and landscaping will provide adequate ground structure to resist long-term wind erosion. The Project's impact on soil erosion and loss of topsoil will be less than significant.

c) Less Than Significant Impact. As discussed above (a.iv), the Project site is not at risk of landslides and therefore would not exhibit lateral spread. Additionally, the Project site lacks the conditions necessary to be subject to liquefaction (a.iii). The Coachella Valley experiences subsidence as the result of groundwater usage. This subsidence is gradual and is monitored by local water agencies. According to the 2018 Coachella Valley Integrated Regional Water Management & Stormwater Resource Plan Update, the Project site does not occur within an area that experiences groundwater subsidence. The Project site is unlikely to negatively contribute to subsidence because of its limited use of water, and is unlikely to cause ground collapse as the result of development. The Project will have less than significant impact on soils.

d) **No Impact.** According to the Palm Springs General Plan, soils in the Whitewater floodplain may have expansive properties. Under the Palm Springs General Plan, if expansive soils were to be found on the Project site, appropriate remediation measures would be required in order to eliminate the risk of direct or indirect risk to life or property. This analysis will be conducted as part of the building permit process when a site- and Project-specific soils analysis is required. Should expansive soils be identified, remediation, including over-excavation and soil compaction, would be implemented to protect Project foundations. Given these existing protocols, the Project would have no impact on creating substantial direct or indirect risks to life or property due to expansive soils.

e) **No Impact**. The Project site improvements do not include septic tank use. The Project's sanitary sewer demands will be serviced by the City. Sewers are available for the disposal of wastewater in San Rafael Drive. Please also see Hydrology Section X. The Project will have no impact on the use of septic tanks or alternative wastewater disposal systems.

f) **No Impact.** The Riverside County General Plan Figure 4.7.2 lists all of Palm Springs, including the Project site, as having a low paleontological sensitivity. The Project site is currently undeveloped land devoid of unique geological features, and is covered by artificial fill deposits, which are of recent age, and not sufficiently old to contain paleontological resources. The Project will have no direct or indirect impact on paleontological resources or geological features.

Mitigation Measures: None required.

Monitoring: None required.

VIII. GREENHOUSE GAS EMISSIONS Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate 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?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Air Quality/ Greenhouse Gas Emissions Assessment prepared by Kimley-Horn and Associates, Inc. on CalEEMod Version 2020.4.0.(CalEEMod), July 2022.

Setting

Greenhouse gasses are gas molecules whose chemical composition make them more efficient at absorbing solar radiation and reemitting energy back towards the earth's surface. Thermal energy that would be escaping the earth's atmosphere is now bouncing back onto the earth's surface as heat, which causes surface temperatures to rise. This interaction between these gasses, the earth's atmosphere, and the earth's surface is known as the 'greenhouse effect' and is responsible for the rapidly increasing average global temperatures and frequency of extreme weather events over the past century following the Industrial Revolution. Carbon dioxide (CO2), Methane (CH4), and Nitrous Oxide (N2O) are three major GHG's resulting from anthropologic activity.

The California Global Warming Solutions Act of 2006 (AB 32) required California to adopt regulations in order to reduce their GHG emissions to 1990 levels by 2020. The California Global Warming Solutions Act of 2016: emissions limit (SB 32) further required California to adopt regulations to reduce GHG emissions to 40% of 1990 levels by 2030. In 2016, the City of Palm Springs amended their previous 2013 Climate Action Plan goals of reducing their GHG emission to 1990 levels by 2020, to reducing their GHG emissions to 40% of 1990 levels by 2030 in exact accordance with AB 32 and SB 32.

The South Coast Air Quality Management District adopted a greenhouse gas significance threshold for stationary industrial sources based on an October 2008 staff report which recommended using a tired approach to greenhouse gas significance. Under this tiered approach, SCAQMD would consider a Project's impact significant if it cannot comply with at least one of the following "tier" tests:

- Tier 1: Is there an applicable exemption?
- Tier 2: Is the Project compliant with a greenhouse gas reduction plan that is, at a minimum, consistent with the goals of AB 32?
- Tier 3: Is the Project below an absolute threshold (10,000 $MTCO_2e$/year for industrial Projects; 3,000 $MTCO_2e$/year for residential and commercial Projects)?
- Tier 4: Is the Project below a (yet to be set) performance threshold?
- Tier 5: Would the Project achieve a screening level with off-site mitigation?

The analysis provided below is based on the Greenhouse Gas Emissions Assessment prepared by Kimley Horn, and included in Appendix C of this document.

Discussion of Impacts

a, b) Less Than Significant Impact. The Project proposes to build a self-storage facility, accompanying leasing office, and RV parking spaces on a 6.43 acre parcel of currently undeveloped desert land. The Project proposes minor electricity usage, low natural gas demand, and will generate a low amount of traffic. Due to the nature of a self-storage facility not requiring emission intensive activities such as internal heating, onsite burning of fossil fuels, or operating machinery requiring gasoline, the Project will not generate substantial GHG emissions.

The Project will have Greenhouse Gas (GHG) emissions resulting from both construction and operation. As detailed in Section III, Air Quality, the California Emissions Estimator Model (CalEEMod) Version 2020.4.0 was used to calculate the projected emissions resulting from Construction and Operation of the Project. The CalEEMod modeling assumed best management practices (BPMs), adherence to California Building Code, and compliance with SCAQMD nuisance Rule 402, fugitive dust Rule 403, and architectural coatings Rule 1113. Projected GHG emissions for construction and operation are summarized in Table 4. Based on the tiered evaluation system described above, the Project qualifies for Tier 3, as it is a quasi-industrial use in an industrial area.

Construction

The transport of materials, commute to and from the Project site from construction workers, and the use of construction equipment are all activities that would result in GHG emissions. Beginning in April of 2023 and ending in May of 2024, the 14-month construction period would result in a total of 637.88 $MTCO_2e$ or a 30-year amortized construction emissions rate of 21.26 CO_2e (MT/YR) as summarized in Table 4. Construction-related emissions would end following Project completion.

Operation

GHG emissions from site operation result from direct and indirect sources. Direct emission sources include mobile and area sources. Indirect emissions sources include off-site electricity generation, wastewater transportation energy demands, solid waste emissions, and fugitive refrigerants from air conditioning. Operational emissions for the Project are estimated to be 538.27 $MTCO_2e$ annually as summarized in Table 4.

Total Emissions

The breakdown of Project related emissions is summarized in Table 4, which lists operational and 30 year amortized construction emissions of the Project in CO_2e (MT/YR). Neither the 14-month construction related emissions nor the operational emissions exceed the SCAQMD threshold for industrial GHG emissions.

Project related GHG emissions during the construction and operational phases do not exceed the SCAQMD Industrial (Tier 3) thresholds, and therefore the Project's impact would be less than significant.

Table 4
Projected GHG Emissions Summary (Metric Tons)

Phase	CO_2e (MT/YR)
Construction	318.94
Operational + 30 year amortized construction [1]	559.53
SCAQMD Threshold (Industrial)	**10,000.00**

1. Buildout construction GHG emissions were amortized over 30-years then added to buildout operational GHG emissions. 637.88/30 =21.26

Mitigation Measures: None required.

Monitoring: None required.

IX. HAZARDS AND HAZARDOUS MATERIALS Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Fire and Resources Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection. https://www.envirostor.dtsc.ca.gov accessed in July 2022.

Setting

The Project site is subject to several local, state, and federal laws whose agencies oversee the transportation, emissions, and disposal of hazardous waste. The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), also known as the 'Superfund Act', protects natural resources on sites on the National Priority List from the disposal of hazardous waste. The Emergency Planning and Community Right-to-know Act (EPCRA) requires businesses to report to

communities of the production of hazardous waste onsite. The Resource and Conservation Recovery Act (RCRA) regulates the management and transportation of waste material.
There are no Superfund Sites nor are there any Toxic Release Inventory (TRI) sites in the City of Palm Springs. State Highway 111 is the only route for the transport of hazardous waste recognized by the EPA in the City of Palm Springs and is less than half a mile from the Project site.

The California Accident Release Prevention Program (CalARP) designates the City of Palm Springs Department of Environment Health, Hazardous Materials Division (DEH-HMMD) a Certified Unified Program Agency (CUPA) responsible for the implementation of hazardous material disclosure programs. The Hazardous Materials Business Plan requires that all business submit a notice to the DEH-HMMD if they generate any amount of hazardous waste above federal and state guidelines.

Data obtained from the California State Water Resource Control Board's GeoTracker system indicated that there are no active Leaking Underground Storage Tank (LUST) sites within a 1-mile radius of the Project site.

The Project site is in an area with no fuel for wildfires and no recent historical wildland fires according to the California Department of Forestry and Fire Protection (CDF).

The Project site is in within Zone E of the Palm Springs International Airport Compatibility Plan, designated as an "Extended Approach/Departure Zone" within the Riverside County Airport Land Use Compatibility Plan.

Discussion of Impacts

a,b) **Less Than Significant Impact.** Under the Palm Springs General Plan, it is generally understood that development would result in increased frequency in transportation of hazardous materials to and from new projects, and that this transportation has the possibility to cause a spill, accident, or release of hazardous waste. Under current regulations, the transportation of hazardous material is limited to Highway 111, Interstate 10, and the Union Pacific Railroad. In addition, transportation of hazardous waste within the city is planned to avoid as many residential streets as possible, in order to avoid the possibility of civilian impact from hazardous waste accidents.

The Project site proposes to develop a self-storage facility and covered RV stalls. Under normal operation, the storage facility will house personal belongings and large furniture items. The RVs are likely to contain some fuel, but not in quantities that would pose a high risk to neighboring residents The self-storage facility is not temperature controlled, and is not designed to house hazardous materials, the storage of which is highly regulated. Therefore, it is unlikely that the storage facility will accumulate a significant amount of hazardous materials on site.

Given existing site conditions, protocols regarding the transportation, storage and use of hazardous materials by the California Occupational Health and Safety Administration (CalOSHA), the development on the Project site is not expected to result in a significant hazard to the public or the environment as a result of the routine transport, use, disposal, or accident involving hazardous materials and therefore its impacts would be less than significant.

c) **No Impact.** No school is located within a quarter mile of the Project Site. 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.

d) **No Impact**. The Project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Project would have no impact on creating a significant hazard to the public or the environment.

e) **No Impact.** The Project Site is located 4.8 miles from the Palm Springs international airport and is located within Airport Compatibility Zone E of the Palm Springs International Airport Influence Area (AIA). The Airport Land Use Commission found the Project consistent with the 2005 Palm Springs International Airport Land Use Compatibility Plan, provided that its conditions of approval were implemented. The conditions include: using downward facing, hooded light fixtures, restrictions regarding the use of reflective materials, prohibiting the use of steady or flashing light that could be mistaken for FAA-approved navigational signal light, any land use activity that would obstruct safe air navigation such the generation of smoke, activates that would cause electrical interference with operational aviation instrumentation, and the buildup of tall objects or other physical hazards that would interfere with aircraft safety. In addition, the Project site is required to comply with height limit maximums of 38 feet during and after construction of the Project, including appropriate notification to the Federal Aviation Administration once construction has reached its maximum height. The Project has complied with appropriate noticing requirements, does not plan to build a structure that would exceed the Commission's restrictions, nor does it propose any land use that would violate the conditions laid out within the ALUC approval letter. Therefore, the Project will have no impact on any airport land use plan.

f) **Less Than Significant Impact.** The Project does not propose to psychically obstruct or impair the implementation of an adopted emergency response plan, nor does the Project include improvements that would physically alter the existing roads or circulation of traffic on San Rafael Drive or Radio Road which would physically obstruct or impair the implementation of an adopted emergency response plan.

Once construction has been completed, the self-storage facility will be accessible by two primary entrances located on West San Rafael Drive, and one secondary entrance located on Radio Road, both of which will be reviewed by the City's fire and police departments in order to ensure adequate emergency access. The Project is expected to have a less than significant impact on emergency response plans.

g) **No Impact**. The Project site is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) according to CalFire's Fire Hazard Severity Zone map and will have no impact on people's or structures' exposure to significant risk, injury, or death resulting from wildland fires.

Mitigation Measures: None required.

Monitoring: None required.

X. HYDROLOGY AND WATER QUALITY Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Preliminary Hydrology and Hydraulics Report prepared by Kimley-Horn and Associates, Inc., July 2022.

Setting

Domestic Water:

The Coachella Valley subbasin is further categorized into several smaller subbasins, 3 of which provide water to the City of Palm Springs: the Whitewater River, Mission Creek, and Indio subbasins. The Whitewater River Subbasin is the largest groundwater subbasin of the three. The 28 million acre-feet

subbasin is recharged via recharge basins in the San Gorgonio Pass, creeks, and seasonal rainfall. In recent years, the demand for groundwater has supplanted the Whitewater River Basin's recharge rate, leading to overdraft of available groundwater. In response the Coachella Valley water agencies have exchanged their water allotment from the State Water Project for a similar entitlement from the Colorado River for use in recharging the basin.

The Palm Springs area is within the jurisdiction of 3 water service providers, the Coachella Vallely Water District, the Desert Water Agency, and the Mission Springs Water District. The Project site is within the Desert Water Agency's (DWA) jurisdiction. The DWA's water supply is made up of internal and external sources. According to the Desert Water Agency's 2015 Urban Management Plan, external sources include: surface water from Snow Creek, Falls Creek, Chino Creek, and the Whitewater River, natural groundwater recharge and storage from the Whitewater River Basin, and imported water from the Colorado River. Internal Sources include non-consumptive return to the aquifer and recycled water from the DWA's Recycled Water Treatment Facility.

Conservation:
Under the California Water Code, every water agency has adopted a Water Shortage Contingency Plan to secure water availability in the event of natural disaster or similar catastrophe. The Desert Water Agency also operates a wastewater treatment facility which lowers the amount of potable water used for irrigation by servicing the Tahquitz Creek Golf Course, DeMuth Park, and Mesquite Golf Course.

Surface Water Quality:
The California Regional Water Quality Control Board enforces state and federal water quality laws. The Board has determined that the city's water meets or exceed federal and state standards for quality.

The primary threat to the city's water quality is stormwater runoff. Stormwater runoff carries undesired chemicals and metals and deposits it in areas which may harm plants and wildlife and pollute water sources. The Board has established standards and requirements which protect local and regional water from pollution.

Flood Management
The relatively flat geography of the Coachella Valley makes desert cities susceptible to flooding. The City of Palm Springs' Master Drainage Plan is responsible for determining the city's stormwater drainage boundaries. The Palm Springs Master Drainage Plan was first developed in 1982 and investigates the city's existing stormwater drainage structures in order to suggest economic and engineering alternatives. Beginning on the west side where the cliffside meets the city, the drainage area gently slopes eastward over 26.5 square miles. According to the Palm Springs General Plan, the Project site sits outside of the 500-year flood plain.

Discussion of Impacts

a,b,e) Less Than Significant Impact. The Regional Water Quality Control Board (RWQCB) requires all projects that have the potential to impact water reaching the Whitewater River to have a Water Quality Management Plan (WQMP). A Project-specific WQMP was prepared by Kimley-Horn and Associates and details the steps that will be taken to address potential water quality standards, wastewater discharge requirements, deterioration of surface and groundwater quality, decreasing groundwater supplies, interference with groundwater recharge, and alteration to existing drainage patterns.

The Project site will connect to the existing City sewer system via an existing 12 inch line in San Rafael Drive. The City's wastewater treatment facilities operate in compliance with all waste discharge requirements, and the Project's limited sanitary sewer flows from office bathroom facilities are not expected to impact the plant's operations.

Under the National Pollutant Discharge Elimination System (NPDES), all facilities with the potential to pollute surface or flood downstream properties due to onsite runoff must submit a Discharge Monitoring Report. By extension of this principle, the hydrology study and the water quality management plan prepared for this site aim to exceed local, state, and federal standards for water quality, waste discharge, the degradation of surface water, and the degradation of groundwater.

The hydrology and hydraulic analysis was created in compliance with the Riverside County Hydrology Manual. Following the analysis methods outline within the manual, peak discharges for proposed Project conditions were calculated in order to meet the most conservative storm event peak flow. Currently, the Project site is an undeveloped parcel of desert land which is completely pervious and consists of one drainage area which flows onto West Radio Road from the southeast. The Project's 100-year storm, 24-hour flow is 24.12 cubic feet per second (cfs). The Project proposes to build a 3-story self-storage facility, covered RV parking spaces, uncovered office parking spaces, desert and hard landscape areas, southern entrance driveway, northern entrance driveways, and two underground infiltration basins across 5 separate drainage areas. Under the proposed conditions, the Project site will be 13.83% pervious per the Kimley-Horn report, and under the most conservative estimates for the 100-year storm event, the Project's 24-hour flow will be 28.51 cubic feet per second. The Project's drainage system has been designed to contain the 100-year storm on-site, and implement best management practices (BMPs) to assure that storm flows are not polluted by on-site sources, such as dust and sand, chemicals or fuels. These standards assure that impacts associated with storm flow discharge remain less than significant.

The Desert Water Agency will provide domestic water service to the Project site. The Project site will require limited water, primarily for landscaping, which has been designed to use drought tolerant landscaping, and from office bathroom use. The Project's water demand is expected to be equal to or less than water use from a comparably sized industrial project on the site. The Desert Water Agency's 2015 Urban Management Plan details its sources and allotment from groundwater basins and its practices which ensure DWA water usage does not result in groundwater overdraft or improper use. Assuming the implementation of best management practices (BMP's) in accordance with the DWA's 2015 Urban Water Management Plan, the Project site is not expected to violate water quality standards and will have a less than significant impact on decreasing groundwater supplies that would interfere with groundwater recharge and the obstruction of any water quality control plan.

c)

i. **Less than significant impact** The Project proposes to substantially alter the site's current underdeveloped conditions. The Project site is currently desert land and 100% pervious, and consists of one drainage area, where runoff flows northwesterly off the Project site and onto West Radio Road. The Project proposes to build a self-storage facility and RV parking lot, which will result in 86.17% site imperviousness. The site buildout will alter the existing drainage pattern of the site, creating 5 drainage areas that will redirect stormwater runoff to 2 onsite infiltration

basins. However, because the Project site will be mostly comprised of impervious material such as asphalt and concrete that protect against long-term wind and water erosion, and long term BMPs will be required by the City, the Project's drainage alterations will not have a significant impact on erosion.

ii. **Less Than Significant Impact.** The Project drainage plan proposes that there will be 5 drainage areas which will divert stormwater to storm drain inlets and pipes to 2 underground infiltration basins on the eastern edge of the Project site. The required combined volume for the underground infiltration basins is 6,420 cubic feet (cf). The combined volume of the underground infiltration basins is 33,001 cf, exceeding the required volume of detention for the Project site. Because the Project's drainage plan will contain the drainage flows onsite, impacts associated with increasing offsite drainage flows will be less than significant.

iii. **Less Than Significant Impact** The Project site's hydrology and hydraulic analyses indicate that the proposed conditions are designed to mitigate the effects of a 100-year, 6-hour storm event in compliance with City standards for peak flow mitigation. Because the on-site drainage plans ensure that stormwater runoff will be substantially mitigated even in the most conservative and extreme scenarios, and contain stormwater within infiltration basins to protect against onsite flooding, the Project's addition of impervious surfaces will have a less than significant impact on the rate of surface runoff which would result in flooding on or offsite.

iv. **Less Than Significant Impact** The Project proposes to alter the on-site drainage flows from existing conditions. The proposed stormwater infrastructure which would retain the 100-year storm scenario via 2 underground infiltration basins, will control storm flows, and not alter flood flows negatively. Rather, storm flows that currently occur through the site in the form of sheet flows will be controlled, and on-site storm water retained. Therefore, the Project site's addition of impervious surfaces will have a less than significant impact on impeding or redirecting flood flows.

d) **No Impact.** The Project site is located in Zone X, according to the FEMA flood zone maps, which indicates that the Project is in an area with reduced flood risk due to levee. The Project site is not located near a body of water and is therefore not as risk of releases of pollutants from inundation due to tsunami, or seiche. The Project will have no impact.

Mitigation Measures: None required.

Monitoring: None required.

XI. LAND USE AND PLANNING Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007)

Setting

The City of Palm Springs is located on the western end of the Coachella Valley and shares its eastern border with Cathedral City, its northern border with Desert Hot Springs and its southern border with Palm Desert. The rest of the city is bounded by County lands, making the City's total land area 95 square miles. The Agua Caliente Band of Cahuilla Indians' Tribal Council and allottees have development rights over Indian land, which is partitioned in a grid pattern throughout the City. The Project site does is fee land.

The Project site is within the Mixed-Use designation boundaries set by the Palm Springs General Plan and is zoned as M-1 under the Zoning Map for service and manufacturing uses. The Project site is in the Highland – Gateway Neighborhood.

Discussion of Impacts

a) **No Impact**. The Project site proposes to develop a vacant parcel of land within the M-1 service and manufacturing zone and is consistent with land use restrictions for the area under the Palm Springs Zoning Ordinance because it falls under the permitted land use of "Wholesaling and warehousing, including mini-warehouse/storage". Adjacent to the Project are several light industrial facilities as well as medium density residential housing on its western side. The Project would therefore have no impact on the division of an established community.

b) **No Impact**. The proposed development is within the M-1 service and manufacturing zone as well as designated Mixed-Use under the Palm Springs General Plan. This storage facility would not violate existing land use restrictions and would be compliant with all relevant City policies because it falls under the permitted land use of "Wholesaling and warehousing, including mini-warehouse/storage" within the Palm Springs Zoning Ordinance and therefore, no environmental impacts will occur due to conflict with existing land use policies.

Mitigation Measures: None required.

Monitoring: None required.

XII. MINERAL RESOURCES Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007)

Setting

Mineral deposits of high concentration are a vital part of economic development due to being a finite, non-renewable resource with many industrial, and construction uses. The California Geological Survey Mineral Resources Project identifies and reports on non-fuel mineral resources in the state of California. Examples of non-fuel mineral resources include iron, copper, clay, limestone, sand, and gravel.

The Lower San Gorgonio River Sector and the Whitewater River Sector, are notable sources of mineral resources for the City of Palm Springs. Sand and gravel used for asphalt, concrete, and other construction purposes, known as aggregate, is the top mineral resource for the City of Palm Springs. Much of this aggregate is collected from the northern Palm Springs MRZ-2 zone, north of the Project site. The Project site is located within Mineral Resource Zone 2 (MRZ-2) which indicates either a likelihood that mineral resources are present, and development should be controlled, or that sufficient scientific information exists indicating significant mineral deposits exist in that area.

Discussion of Impacts

a, b) **No Impact** The Project site is located within Mineral Resource Zone 2 (MRZ-2). According to the Zoning Ordinance, mining of aggregate is not permitted if the Project site is located less than a mile from a residential community. Furthermore, the site is located in the City's urban core, and is designated for urban development, as are all surrounding lands. Although sand resources are likely available from the Project site, its location in the City and the availability of sand and gravel resources elsewhere in the City and County result in no impacts associated with mineral resources from the loss of these lands to development.

Mitigation Measures: None required.

Monitoring: None required.

XIII. NOISE Would the Project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of 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?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?	☐	☐	☒	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007)

Setting

Sound is usually measured in decibels (dB), a logarithmic scale which describes loudness. In order to measure the impact that sounds have on a community, the Community Noise Level Equivalent (CNEL) and the A-weighted decibel (dBA) are used. On the A-weighted decibel scale, 3 dBA is on the lowest end for the quietest sounds, while a 100dBA would be considered very loud.

The City of Palm Springs has 4 sources of significant noise generation: the Palm Springs International Airport, the Union Pacific Railroad, the Interstate-10, and Highway 111. There are 7 noise monitoring sites were temporarily set up throughout the city to collect data for the Palm Springs General Plan EIR. Noise monitoring station #1 on Palm Canyon Drive south of Cabrillo Road was the closest noise monitoring station to the Project site.

The City has established land use noise standards and restrictions on private activities through its Noise Ordinance (Municipal Code Chapter 11.74). Interstate-10 and Highway 111 are under the purview of the Federal Highway Administration (FHWA). FHWA has developed noise standards that are typically applied to federally funded roadway projects that require either federal or Caltrans review.

The Project site is located on the 60 dBA Noise Contour for traffic noise levels according to the Palm Springs General Plan. The traffic noise levels for San Rafael Drive and Indian Canyon Drive are 67.2 dBA CNEL. The traffic noise levels for San Rafael Drive and Sunrise Way are 68 dBA CNEL.

The Project site is located 2.2 miles northwest of the Palm Springs International Airport, and is within zone E as defined by its land use plan.

Discussion of Impacts

a) **Less Than Significant Impact.** According to table 5.11-5 of the Palm Springs General Plan, acceptable exterior noise levels for office buildings, commercial and professional land uses are under 70 dBA. The Project is located within the M-1 Service and Manufacturing Zone and adjacent to several industrial buildings with similar land use. The Project includes a self-storage facility, RV parking, and a small office and is not expected to generate high noise levels during operation. As a commercial use, and not a residential use, the Project will not contain sensitive receptors. The Project will generate noise during construction, and also during operation. Each of these is discussed individually below.

Construction Noise

The Project site will require construction and the use of heavy machinery. According to the City of Palm Springs Municipal Code, Section 8.04.220, construction is restricted to weekdays between 7am and 7pm. Residents located to the west and southwest may experience somewhat elevated noise levels from construction activity. Construction can result in noise levels in excess of 90 dBA, however, such noise levels, generated by heavy equipment, will move across the site as grading occurs, and will not result in sustained noise. Further, noise will occur during the less sensitive daytime hours, as required by the Municipal Code.

Operational Noise

The proposed Project will consist of personal storage units within an enclosed building, and RV parking and storage spaces in covered but open parking bays. As currently configured, the building in which the storage spaces will occur will be located at the south end of the site, closest to residential uses to the west and southwest. RV parking spaces will be located in the northerly two-thirds of the site. Noise from the storage unit building is expected to be low, particularly since all the units will occur within an enclosed building, and activity at storage facilities is limited. Noise from RVs being started and traveling through the site will be somewhat greater, but is also expected to be highly intermittent, given the nature of the facility as a storage area. Impacts are expected to be less than significant.

Noise from surrounding land uses and streets on users of the site is not expected to be significant, because of the low traffic volumes on San Rafael Drive, and the perimeter walls surrounding the Project. Further, no sensitive receptors will occur on the site, and visitors and tenants will not be exposed to excessive noise levels while on the property for short periods of time. Sustained noise levels on the site will not exceed the City's 70 dBA CNEL noise standards. Therefore, noise generated off-site is expected to have a less than significant impact on the Project.

b) **Less Than Significant Impact.** The storage of household goods and recreational vehicles will not result in groundborne vibration. Should any groundborne vibration be produced, it would occur during the initial construction period. Short term vibration could result from heavy equipment during the grading of the site. These activities, however, will be short-lived, and will occur during the daytime hours. Further, the closest residential units to the Project are at least 170 feet from the west boundary of the Project, and groundborne vibration will dissipate rapidly with distance. Given the temporary nature of construction that would take place on site, and the existing regulations for the days and times that construction activity is permitted within the City, the Project will have a less than significant impact on the generation of groundborne vibration and noise levels.

c) **No Impact.** The Project site is located 2.2 miles from the Palm Springs Airport. The Project site is within Airport Compatibility zone E. According to the City of Palm Springs General Plan's Noise Exposure Map, the Project site does not occur within the CNEL Noise Contour boundaries for the Palm Springs International Airport. Therefore, noise levels associated with the airport will have no impact on the Project.

Mitigation Measures: None required.

Monitoring: None required.

XIV. POPULATION AND HOUSING Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007). United States Census Bureau, Quick Facts: https://www.census.gov/quickfacts/palmspringscitycalifornia accessed July 2022.

Setting

The City of Palm Springs has a population of 44,397 residents and accounts for approximately 3 percent of the County of Riverside's total population. Palm Springs is a resort community with a large seasonal population. The city is approximately 62 percent White and 26 percent Latino, with the remaining 12 percent being comprised of other racial and ethnic groups. The City of Palm Springs has a median age of 47, and a total of 35,502 Housing Units with 1.8 persons per household. The Project site is in the Highland – Gateway Neighborhood.

Discussion of Impacts

a,b) **No Impact**. The Project site will allow RVs to be parked onsite but will prohibit persons from living inside the RVs. The storage facility is not expected to produce an increase in foot or vehicle traffic, (see Section XVII). Instead, the Project will supply a service to existing and future residential development in the City. The storage facility's office will be staffed by at most 3 employees, and this employment is not expected to induce significant population growth.

The Project site is currently vacant and disturbed desert. The development of the Project site will not displace any persons and will not necessitate the construction of replacement housing elsewhere. The Project will have no impact on population or housing.

Mitigation Measures: None required.

Monitoring: None required.

XV. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007).

Setting

Fire Protection:
The Palm Springs Fire Department (PSFD) has 5 fire stations that provide service to the City. 1 County of Riverside fire station also services Palm Springs. The closest fire station to the Project site is located on 590 E. Racquet Club.

Police Protection:
The Palm Springs Police Department (PSPD) is located on 200 S. Civic Drive, approximately 4.8 miles from the Project site. PSPD's Operation and Service divisions' responsibilities include but are not limited to: patrol, airport law enforcement operations, crime suppression, traffic enforcement, investigation, jail operations, and animal control.

Schools:
Both the Palm Springs Unified School District (PSUSD) and the Banning Unified School District (BUSD) service the City of Palm Springs, though only the northernmost part of the city belongs within the jurisdiction of BUSD. The Palm Springs Unified School District has 29 K-12 schools located in Cathedral City, Desert Hot Springs, Palm Desert, Rancho Mirage, and Thousand Palms.

The closest school to the Project site is Vista Del Monte Elementary located 0.9 miles away on E Francis Drive.

Parks and their public facilities:
The Project Site is located 4.2 miles from the Palm Springs Public Library and 4.8 miles from Palm Springs City Hall. The Project site is located 0.3 miles south of the James O Jesse Community Center and park, and 1.2 miles from Victoria Park, which lies to the southeast of the Project stie. Additionally, the Project site is located 2.5 miles northwest of Ruth Hardy Park.

Discussion of Impacts

a) i) Less Than Significant Impact. The Project Site will be serviced by the PSFD and will marginally increase demand for fire protection services. The self-storage facility will be accessible by two primary entrances located on West San Rafael Drive, and one secondary entrance located on Radio Road in accordance with local standards for emergency access. The storage facility will have a fully automated sprinkler and fire alarm systems. New developments must also abide by existing policies to develop using fire resistant materials, and provide the City with a fire protection plan. Compliance with existing local codes and fire safety guidelines will ensure the storage facility's impact to fire protection services provided by the Palm Springs Fire Department will be less than significant.

ii) Less Than Significant Impact. The Project Site will be served by the Palm Springs Police Department located 4.8 miles away on 200 S. Civic Drive. Under normal use, storage facilities will house personal belongings and furniture items which have the potential to be of significant monetary value. Because of this, access to the self-storage facility will be via a secured entry point along San Rafael Drive, with keypad entry gates and accompanying video surveillance monitoring for the entire site. Therefore, the storage facility will increase the demand for local police services; however, existing measures limit the impact the storage facility would have on policing services. The Project site will not increase the City's population and allows for the City to maintain a ratio of one sworn officer per 1,000 residents under Policy 8.7 of the General Plan. Therefore, the Project will have a less than significant impact on the performance, response times, or objectives of police services provided by the Palm Springs Police Department.

iii) No Impact. The Project will not increase residential housing and will prohibit habitation on the premises, so it is not projected to increase population, and therefore will have no impact on the number of students served by the Palm Springs Unified School District. However, the Project will be required to pay the State's mandated school fees, which are designed to offset the impact of all new development on school facilities. The Project is expected to have no impact on public school services.

iv, v) No Impact. The Project will not increase the City's population, and will not generate a need for parks or other municipal services. The storage facility will generate little activity, and will provide a service to existing and future residents. No impact to parks or other services will occur.

Mitigation Measures: None required.

Monitoring: None required.

XVI. RECREATION	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007).

Setting

The Palm Springs Department of Parks and Recreation has a total of 10 specialty, local, neighborhood, and community parks spanning a combined 156 acres. In addition, the City of Palm Springs is home to 6 public golf courses totaling 160 acres. The City of Palm Springs has a trail network totaling 80 miles, including equestrian, bicycle, and off-road trails. The storage facility will be built 0.3 miles from Desert Highland Park and the James O Jesse Community Center.

Discussion of Impacts

a), b) No Impact. The Project site is not expected to increase population. There are only an estimated 3 employees which would be onsite at one time. Project staff are not anticipated to create a new demand for recreational facilities nor is the addition of limited employment onsite expected to cause significant population growth that would indirectly increase demand for these services. The Project will have no impact on the physical deterioration of neighborhood or regional parks. The Project does not include any recreational facilities.

Mitigation Measures: None required.

Monitoring: None required.

XVII. TRANSPORTATION Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) 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?	☐	☐	☐	☒

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007). Transportation Scoping Memorandum for the Secure Space Self-Storage Project prepared by Kimley-Horn and Associates, inc. May 24, 2022.

Setting

The City of Palm Springs' existing roadway network is built on a series of limited access freeways and arterial roadways. The interstate 10 freeway and Highway 111 provide primary access to the City. Arterial roads for the City of Palm Springs include Expressways, Major Thoroughfares, Secondary Thoroughfares, Collectors, local streets, and private streets. The Project site is located 0.4 mile from Highway 111 and 3.4 Miles from the I-10. San Rafael Drive is classified as a secondar thoroughfare by the City of Palm Springs General Plan.

The Sunline Transit Agency, operated in partnership with 8 Coachella Valley cities and Riverside County, provide local public transportation services to the City of Palm Springs. Regional bus services are offered by Greyhound. Sunline Route 4 provides service on San Rafael Drive.

The City hosts a vast network of bikeways, including the Las Palmas, Downtown, Citywide, Tahquitz Creek, Deepwell, and the Canyon Country Club loops as well as the Coachella Valley Bikeway. Bikeways are categorized into 3 classes according to the Palm Springs General Plan. Class 1 bike lanes are protected from traffic by a physical barrier. Class 2 bike lanes are unprotected from traffic and occupy a separate 6-foot-wide one-way lane marked by a stripe on the road. Class 3 bikeways share the road with traffic in absence of any road markings or physical protection barriers. The bikeway on San Rafael Drive is a class 2 bikeway under the Palm Springs General Plan.

There are 7 truck routes within the City of Palm Springs, Sunrise Way, Sunrise Parkway, Indian Canyon Drive, Gene Autry Trail, Vista Chino, Palm Canyon Drive, and Ramon Road. W. San Rafael Drive intersects with Indian Canyon Drive .3 miles east of the Project Site.

Existing traffic conditions for arterial roads are measured by the volume/capacity ratio. The V/C ratio is calculated by taking the average daily volume of traffic for a road (ADT) and dividing it by the

theoretical road capacity. This V/C ratio is then graded A-F to determine the Level of Service (LOS). Although LOS is no longer the metric for analyzing traffic impacts under CEQA, the City's General Plan does consider LOS. The City has determined that an LOS D or better is considered acceptable. West San Rafael Drive is a 2 lane undivided road with an average daily volume of 5,000 and a capacity of 13,000. The V/C ratio for West San Rafael Drive where the Project will be developed is 0.38 and graded A on the LOS scale. An A grade on the LOS scale indicates that traffic is free flowing, and no lanes reach full capacity during peak traffic hours.

Discussion of Impacts

a) Less Than Significant Impact.

Existing Traffic Conditions The Project site is currently undeveloped desert and does not contribute to the generation of traffic. San Rafael Drive operates at LOS A under current conditions.

Project Trip Generation
The Project site's expected trip generation was modeled using vehicle trip rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual 11th edition (2021). The Project's forecasted trip generation was prepared using the ITE Land Use Code 151 for Mini-Warehouses. Assuming normal costumer use of the self-storage facility, the Project is forecasted to produce 208 daily trips, 14 AM peak-hour trips, and 20 PM peak-hour trips as summarized in Table 5.

Table 5
Project Trip Generation

Land Use	ITE LU Code	Quantity	Daily Rate	Daily Trips	AM Peak Hour		PM Peak Hour	
					Rate	Trips	Rate	Trips
Mini-Warehouse	151	6.43 acres	17.96	**208**	1.21	**14**	1.68	**20**

The Project proposes to develop a self-storage facility on west San Rafael drive. The General Plan EIR calculated the impact that General Plan buildout would have on traffic conditions for the City, including the impact on the level of service within the Industrial Manufacturing Zone. According to the General Plan EIR's buildout forecast, Table 5.15-7, West San Rafael Drive would maintain an LOS A. Trip generation for the Project site is projected to be lower than adjacent industrial land uses such as automotive repair shops, which is consistent with normal use for a self-storage facility. Because the most conservative estimates for General Plan Buildout maintains a LOS A for West San Rafael Drive and the self-storage facility is estimated to contribute far less to traffic demand than adjacent industrial land uses, the Project will have a less than significant impact on General Plan policies relating to traffic and circulation.

b) Less than Significant Impact. SB 743 amended CEQA Guidelines Section 15064.3 and required vehicle miles traveled (VMT) be adopted in favor of level of service (LOS) for evaluating Project traffic impacts. The City updated its Traffic Impact Analysis requirements in accordance with SB 743. The City Traffic Impact Analysis Guidelines exempts local-serving retail from VMT analysis due to its land use function generally reducing VMT and having a less than significant transportation impact. Because the proposed Project will provide local services, it screens out of VMT analysis, and is presumed to have a less than significant impact on traffic.

c), d) **No Impact.** The Project does not propose any alteration of existing roads or public right of ways that would substantially increase hazards due to geometric design features or incompatible uses. The self-storage facility will be accessible by two primary entrances located on West San Rafael Drive, and one secondary entrance located on Radio Road, both of which will be reviewed by the local fire and police departments in order to ensure adequate emergency access. The Project is expected to have no impact on hazards due to geometric design features or inadequate emergency access.

Mitigation Measures: None required.

Monitoring: None required.

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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007); Cultural Resources Assessment prepared by BCR Consulting LLC, July, 2022 (Appendix B).

Setting

California Public Resources Code section 21074 defines "Tribal cultural resources" as sites, features, places, cultural landscapes, sacred places, and object with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources.

When the Cahuilla first moved to the Coachella Valley thousands of years ago, Lake Cahuilla covered much of the valley floor. Since then, the Cahuilla have left a remarkable impression on the valley through what are now state and federally recognized historic sites. The University of California, Riverside has identified Andreas and Tahquitz Canyons as prehistoric archeological districts under the National Register of Historic Places.

Anthropologists have recognized 3 geographically distinct groups of Cahuilla, which together encompass 9 federally recognized tribes. The Agua Caliente Band of Cahuilla are a part of the Pass Cahuilla group and have historic roots in what is now the City of Palm Springs. Today, the Agua Caliente Band of Cahuilla Indians' Tribal Council and Allottees have development rights over Indian Land, which is partitioned in a grid pattern throughout the city.

Discussion of Impacts

i, ii) **Less than Significant with Mitigation.** As described in Section V, CEQA requires the implementation of Assembly Bill 52 (AB 52) by having lead agencies consult local Native American tribes prior to approving development projects which may involve the discovery or disturbance of Tribal cultural resources in order to inform and address their concerns. The lead agency is required to present local Tribes with a written notice about the proposed Project.

The City of Palm Springs has begun the consultation process by sending a written notice to the Agua Caliente Band of Cahuilla Indians, the Soboba Band of Luiseno Indians, and the Morongo Band of Mission Indians, consistent with the noticing requirements in AB 52. When the City completes consultation with these tribes, additional mitigation measures, if any, will be added to this Initial Study or to conditions of approval for the Project.

As described in Section V., Mitigation Measure CUL-1, archeological and tribal monitoring will occur during Project site grading activities. Implementation of CUL-1 as described in Section V. will ensure that the Project's impact on Tribal cultural resources, as defined in Public Resources Code section 21074, is less than significant.

Mitigation Measures: See Section V. CUL-1.

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

Source: City of Palm Springs General Plan EIR (2007); City of Palm Springs General Plan (2007). Air Quality Emissions prepared by Kimley-Horn and Associates, Inc. on CalEEMod Version 2020.4.0.(CalEEMod), July 2022. 2020 Coachella Valley Regional Urban Water Management Plan.

Setting

Domestic Water

The Coachella Valley Water District (CVWD), the Desert Water Agency (DWA), and the Mission Springs Water District (MSWD) all provide domestic water services to the City of Palm Springs and are responsible for implementing Urban Water Management Plans (UWMP) and updating them every 5-years. The City of Palm Springs' water supply is sourced from the Whitewater River, Mission Creek, and Indio Subbasins. The Project site is located within Desert Water Agency's authority.

Wastewater Treatment
In partnership with Veolia Water North America, the City of Palm Springs' water treatment program operates a wastewater treatment facility with a capacity for treating 10.9 million gallons per day (mgd). This wastewater treatment system includes 225 miles of sewer collection pipelines and six percolation ponds. The treatment plan also accommodates approximately 6.5 mgd of sewage flow as a part of its biosolids disposal program and lowers potable water usage by using treated water to irrigate Tahquitz Creek Golf Course, DeMuth Park, and the Mesquite Golf Course.

Flood Management
The relatively flat geography of the Coachella Valley makes desert cities susceptible to flooding. The City's Master Drainage Plan guides the City's stormwater management. The Palm Springs Master Drainage Plan was first developed in 1982 and is still being implemented today. Beginning in the west side where the cliffside meets the City, the drainage area gently slopes eastward over 26.5 square miles. Regional flood control is managed by the Riverside County Flood Control District.

Solid Waste
The City is estimated to produce a total of 95,160 tons of solid waste per year. Solid waste is transported from Palm Springs to the Edom Hill Transfer Station on 70100 Edom Hill Rd, Cathedral City. The Edom Hill facility can receive up to 2,600 tons of solid waste per day. The Edom Hill Transfer Station trucks solid waste to the Lamb Canyon Sanitary Landfill in Beaumont. The Lamb Canyon Sanitary Landfill has the capacity to receive 3,000 tons of solid waste per day. The Project site is within the service area of Palm Springs Disposal Services. Alternatively, Palm Springs Disposal Services uses Badlands Landfill in Moreno Valley. The Badlands Landfill has the capacity to receive 4,000 tons of waste per day and has been approved by the Riverside County Department of Waste Resources for expansion that would extend the operation of the facility by 40 years.

Electricity
The City of Palm Springs' electricity needs are serviced by Southern California Edison. SCE provides sufficient service to meet the energy demands of the city.

Natural Gas
The Southern California Gas Company provides natural gas services to Palm Springs under the regulation of the Public Utilities Commission and other federal agencies.

Telecommunications
Frontier Communications is the main telephone service provider for the City. Television Service is provided by Time Warner Cable. Internet, wired, and wireless data transmission services are provided by other carriers.

Discussion of Impacts

a-c) Less Than Significant Impact. Due to the land use associated with the Project, the Project is not expected to produce a substantial amount of wastewater or have a water demand that would exceed the capacity of current the City and Desert Water Agency infrastructure.

Water
The Desert Water Agency's 2015 Urban Water Management Plan outlined the agency's water allotments from groundwater basins and implemented water conservation procedures, withdrawal rates, in accordance with historical data for dry and multiple dry years. Additionally, the 2020 Coachella Valley Urban Water Management Plan (UWMP) indicates

that the DWA's current and Projected future water supply is sufficient to support additional developments within its jurisdiction, based in part on the land uses identified in the City General Plan.

Water service will be provided by the Desert Water Agency. Water lines are currently located adjacent to the Project in City right-of-way. The Project proposes to include 2 restrooms on the self-storage's northeastern corner of the second floor above the leasing office. The Project site water demand is expected to be 0.09 AFY. In contrast, the Desert Water Agency supplied 32,504 AFY to 23,550 municipal connections in 2020. According to the 2020 Coachella Valley Regional Urban Water Management Plan, the Project will not significantly increase the regional demand for water nor require significant water infrastructure to be built by the Desert Water Agency in order to meet the demands of the Project.

Wastewater Treatment

The Project is not expected to produce a significant amount of wastewater, nor will the Project produce a significant demand for treated wastewater. Sanitary sewer is available in adjacent right-of-way, and the project will produce limited waste stream, generated from on-site restrooms. No additional infrastructure will be required to serve the self-storage facility, nor will the wastewater generated by the Project require expansion of the treatment plant.

Stormwater Drainage

As discussed in section X, Hydrology and Water Quality, the Project drainage plans meet the City's requirements for limiting stormwater runoff including 2 underground infiltration basins which will control the 100-year storm onsite. Therefore, because the Project will not discharge Project storm flows off-site, the development of the Project will have less than significant impacts on stormwater infrastructure.

Electricity, Natural Gas & Telecommunications

According to the CalEEMod estimates produced by Kimley-Horn, the operational energy demand is 363,691.8 kWh per year, and the estimated natural gas demand would be 2,557.33 therms per year. This will not significantly increase the regional demand for energy and will not require significant energy infrastructure to be built in order to meet the demands of the Project.

d), e) Less Than Significant Impact. The Project is consistent with CAlGreen code standards for recycling and waste management. The Project will generate solid waste, but not in quantities that would exceed landfill capacity. Therefore, the Project will have a less than significant impact on the attainment of solid waste reduction goals.

Mitigation Measures: None required.

Monitoring: None required.

XX. WILDFIRE **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:**	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Source: Fire and Resources Assessment Program (FRAP) maps, California Department of Forestry and Fire Protection.

Setting

The State of California has endured an unprecedented number of wildfires in the past decade. Not only are these wildfires becoming more frequent due to rising global average temperatures, they are burning hotter and spreading much further than any on the historical record. The 100 year policy of fire suppression has left dense areas of dry fuel across the state which exacerbate California's already vulnerable environmental conditions.

The California Department of Forestry and Fire Protection (CalFIRE) has a number of programs designed to assess and manage vulnerabilities to wildfires throughout the state and serves a lead role in responding to state emergencies. CalFIRE has analyzed environmental conditions and graded areas throughout the state based on the fire risk visualized by the Fire and Resource Assessment Program's (FRAP) Fire Hazard Severity Zone (FHSZ) Maps. The FHSZ map for the City of Palm Springs indicates that most of the western Palm Springs, including much of the hills extending into the city's SOI, is categorized as a Very High Fire Hazard Severity Zone (VHFHSZ).

Discussion of Impacts

a-d) **No Impact**. The Project site is not categorized as a VHFHSZ by Calfire's FRAP, and therefore has no impact on existing wildfire emergency plans, regulations, and risk factors. The Project site is located on land with a slope of less than 10 degrees in the City's core, is not subject to factors exacerbating wildfire risk and does not require the construction, installation, or maintenance of existing powerlines, roads, emergency water sources, or utilities. Therefore, the Project will have no impact on emergency response plans, emergency evacuation plans, fire risk, exposing Project occupants to pollutant concentrations, uncontrolled spread of wildfire, and the installation or maintenance of infrastructure that would exacerbate fire risk.

Mitigation Measures: None required.

Monitoring: None required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

a) Less than Significant with Mitigation. The Project proposes to build a 3-story self storage facility, RV parking lot, and leasing office on a 6.43 acre parcel of undeveloped land on San Rafael Drive in northern Palm Springs.

Biological Resources

The Project is located on a parcel of land not suitable for the majority of federally endangered or special status species, including those protected by the CVMSHCP. However, the Project site is potential habitat for the burrowing owl, and could harbor bird nests of species protected by the MBTA. With the implementation of the mitigation measures contained in this Initial Study, however, impacts to biological resources from implementation of the Project would be less than significant.

Cultural Resources

The Project site is not identified as an area of high sensitivity for historic or archaeological resources, nor were such resources identified during the field survey conducted for the Project. The potential for buried resources does occur, however, which would represent a significant

impact without mitigation. The monitoring required by Mitigation Measure CUL-1 will assure that impacts associated with cultural resources will be less than significant.

b) **Less than Significant Impact**. The Project does not have impacts that are individually significant, and due to the low intensity of the proposed use, will not have cumulatively considerable impacts. The Project is consistent with the land use plan in the General Plan, and as analyzed in the General Plan EIR, and will likely reduce water, utility and traffic, given its lack of intensity, when compared to that considered in the General Plan EIR. Cumulative impacts are expected to be less than significant.

c) **Less than Significant Impact.** The Project does not have exceed air quality or noise thresholds, and will not impact human beings in surrounding residential projects. The Project occurs in an industrial area of the City, and will be a low-impact land use. Impacts to human beings are expected to be less than significant.

Appendix A

Air Quality Assessment

(Available for review at City Hall)

Appendix B

Cultural Resources Assessment

(available for review at City Hall)

Appendix C

Greenhouse Gas Emissions Assessment

(available for review at City Hall)

Appendix D

Traffic Memo

(Available for review at City Hall