

**Palmdale Logistics Center
SCH No. 2023090551**

Draft Environmental Impact Report

Prepared for
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

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Prepared by

E | P | D
SOLUTIONS, INC

949.794.1180
3333 Michelson Drive, Suite 500
Irvine, CA 92612

EPDSolutions.com



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1. Executive Summary

This Draft Environmental Impact Report (EIR) evaluates the environmental effects that may result from the construction and operation of the Palmdale Logistics Project (proposed Project). This EIR has been prepared in conformance with State and City of Palmdale environmental policy guidelines for the implementation of the California Environmental Quality Act (CEQA). The analysis for this EIR is based on information compiled from several environmental technical studies prepared for the proposed Project and included as appendices to this draft EIR.

This Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with Section 15087 and Section 15105 of the CEQA Guidelines. During the 45-day review period, the Draft EIR will be available for public review on the City of Palmdale's website: <https://www.cityofpalmdaleca.gov/277/Environmental-Documents>. Written comments related to environmental issues in the Draft EIR should be addressed to:

Brenda Magaña, Planning Manager
Department of Economic and Community Development
38250 Sierra Highway
Palmdale, CA 93550
bmagana@cityofpalmdale.org

A Notice of Availability of the Draft EIR was published concurrently with distribution of this document.

Following public review, the City of Palmdale will prepare responses to written comments concerning environmental topics and publish a Final EIR. Before taking action to approve the Project, the City of Palmdale (serving as the CEQA Lead Agency) has the obligation to: (1) ensure this EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this EIR as part of its decision-making processes; (3) make a statement that this EIR reflects the City of Palmdale's independent judgment; (4) ensure that all significant effects on the environment are avoided or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or project alternatives identified in this EIR are infeasible and citing the specific benefits of the proposed Project that outweigh its unavoidable adverse effects (CEQA Guidelines Sections 15090-15093).

1.1 PROJECT LOCATION

The Project site is located within the northern portion of the City of Palmdale. Specifically, the Project site is located within Section 32, Township 7 North, Range 11 West of the Lancaster East United States Geological Survey (USGS) 7.5-minute Quadrangle. Regional access to the Project site is provided by State Route (SR) 14 and SR 138. Local access to the site is provided from 30th Street East, a designated major arterial, and East Avenue M/Columbia Way, a designated regional arterial. The Project site is northeast of the 30th Street East and East Avenue M/Columbia Way intersection.

The Project area totals 170.28 acres which includes the 150.63-acre Project site, 17.65 acres of offsite roadway improvements, and 2.0 acres of offsite improvements for a water line extension. The 150.63-acre Project site is comprised of one parcel identified as Assessor's Parcel Number (APN) 3170-018-081.

1.2 PROJECT DESCRIPTION SUMMARY

The applicant, Transwestern Development Company, has submitted applications to the City of Palmdale for a Tentative Parcel Map (TPM), Conditional Use Permit (CUP), and Site Plan Review (SPR) for the Project referred to as the Palmdale Logistics Center to allow for development of two single-story industrial buildings. The TPM would subdivide the approximately 150.63-acre Project site into three parcels. The Project would develop two warehouses, each totaling 1,500,856 square feet (SF) on two of the parcels. The third parcel would be dedicated to the construction of a stormwater detention basin that would serve only the Project site. The CUP is required for additional building height and the SPR is required for additional screening wall height.

1.2.1 Building and Architecture

Each separate building would be 1,500,856 SF total and provide 1,480,856 SF of warehouse space, 10,000 SF of office space mezzanine, and 10,000 SF of ground floor office space.

Building 1 would total 1,500,856 SF on the 2,995,185.6 SF (68.76-acre) Parcel 1, resulting in a FAR of 0.50; and Building 2 would total 1,500,856 SF on the 3,069,673.2 SF (70.47-acre) Parcel 2, resulting in a FAR of 0.49. Each building would include 258 loading dock doors, totaling 516 doors for the Project.

1.2.2 Circulation and Street Improvements

Vehicle access to the proposed Project would be provided via eight driveways, four of which would be on 30th Street East and four on 35th Street East, as shown in Figure 3-11, *Circulation and Driveways*, in Section 3, *Project Description*. No driveways are proposed on East Avenue M/Columbia Way.

Building 1 would be accessible via five driveways: Driveways 1, 2, and 3 located on 30th Street East, along the west side of Building 1, and Driveways 5 and 6 located on 35th Street East, along the east side of Building 1. Driveway 1 would be 40 feet wide and allow for both truck and passenger vehicle access. Driveway 2 would be 26 feet wide and be limited to passenger vehicles. Driveway 3 would be a 50-foot-wide signalized driveway and would be limited to truck access. Driveway 5 would be 44 feet wide and allow access for both truck and passenger vehicles, and Driveway 6 would be 26 feet wide and be limited to passenger vehicles. Internal circulation for Building 1 would be provided via 28-foot-wide drive aisles that would also serve as fire lanes.

Building 2 would be accessible via three driveways: Driveway 4 located on 30th Street East, along the west side of Building 2, and Driveways 7 and 8 located on 35th Street East, along the east side of the Building 2. Driveway 4 would be 50 feet wide and allow for both truck and passenger vehicle access; Driveway 7 would be a 50-foot-wide signalized driveway limited to truck access; and Driveway 8 would be 50 feet wide and allow access for both truck and passenger vehicles. Internal circulation for Building 2 would be provided via 28-foot-wide drive aisles that would also serve as fire lanes.

1.2.3 Parking

The proposed Project would provide 499 trailer parking stalls for Building 1 and 491 trailer parking stalls for Building 2. Additionally, the Project would provide 753 automobile parking stalls for Building 1 and 764 automobile parking stalls for Building 2.

1.2.4 Landscaping

The proposed Project includes approximately 951,135 SF (or 21.84 acres) of ornamental landscaping that would cover approximately 15 percent of the overall site. Landscaping would be planted along the perimeter of the warehouse building and throughout the parking areas.

1.2.5 Infrastructure

The Project applicant would include construction of new onsite and offsite water lines. The proposed Project would construct new onsite 16-inch water lines along the perimeter of the Project site that would connect to a proposed 24-inch main water line along East Avenue M/Columbia Way. The proposed 24-inch water line would extend approximately 13,400 linear feet east within East Avenue M/Columbia Way and connect to an existing 30-inch water line on East Avenue M/Columbia Way.

The Project would install new onsite and offsite sewer lines. The sewer lines would connect to an existing 15-inch-diameter sewer main line along 30th Street East. The onsite main will also be connected to 35th street and stubbed for means of future development on the east side of road.

1.2.6 Drainage

The proposed Project would include construction of an onsite drainage system. The proposed detention basin would be approximately 11 acres and located at the northernmost portion of the Project site spanning the width of the site from 30th Street East to 35th Street East. The basin has a total volume of approximately 78 acre-feet, which could accommodate runoff from two successive 100-year storms.

1.3 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to develop an underutilized property with an employment-generating industrial use to help grow the economy in the City of Palmdale. The Project would achieve this goal through the following objectives:

- To make efficient use of the property in the City of Palmdale by adding to its potential for employment-generating uses.
- To attract new business and employment to the City of Palmdale and thereby promote economic growth.
- To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
- To develop an underutilized property with two industrial warehouse buildings near State Route 14 State Route 138, to help meet demand for logistics business in the City and surrounding region.
- To build an industrial warehouse project in Palmdale that are similar to and compatible with other industrial buildings that were recently built or recently approved for construction in Palmdale.

1.4 SUMMARY OF ALTERNATIVES

Section 8, *Alternatives*, of this Draft EIR analyzes a range of reasonable alternatives to the proposed Project. The alternatives that are analyzed in detail in Section 8 are summarized below.

Alternative 1: No Project/No Build Alternative. Under this alternative, the Project would not be developed, and no development would occur. The Project site would remain vacant and undeveloped. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable

property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states that, “In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

Accordingly, Alternative 1: No Project/No Build provides a comparison between the environmental impacts of the Project in contrast to the result from not approving, or denying, the Project. Thus, this alternative is intended to meet the requirements of CEQA Guidelines Section 15126.6(e) for evaluation of a no project alternative.

Alternative 2: 30 Percent Reduced Project Alternative. This 30 Percent Reduced Project Alternative consists of development of the Project site in a manner similar to the Project, but with a 30 percent reduction in square footage and operational intensity. Specifically, the Reduced Project Alternative would result in development of two warehouse buildings. Building 1 would total 1,050,599 SF on the 2,987,292 SF (68.58-acre) Parcel 1, resulting in a FAR of 0.35; Building 2 would total 1,050,599 SF on the 3,059,048-SF (70.23-acre) Parcel 2, resulting in a FAR of 0.34. The third parcel would be dedicated to the construction of a stormwater detention basin. Development under the 30 Percent Reduced Project Alternative would reduce Project square footage by approximately 30 percent, or by 900,513.6 SF on the total 150.63-acre Project site. Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, construction and implementation of stormwater facilities, and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. The buildings would operate as two speculative industrial warehouses with no cold storage, 90 percent would be used for warehouse uses and 10 percent for manufacturing uses.

Alternative 3: Manufacturing Use/50 Percent Reduced Warehouse with Storage. This alternative consists of developing the Project site in a manner that is consistent with the existing zoning designation, but with manufacturing uses and a 50 percent reduction in square footage compared to the proposed Project. The Heavy Industrial (HI) zone is intended to allow a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing distribution, and the like. This zone implements the Industrial (IND) General Plan land use designation, which permits a variety of industrial uses, including manufacturing. This alternative assumes that the 150.63-acre site would be developed with two manufacturing buildings and two storage yards; each building would be 750,000 SF and have a FAR of 0.25. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. The third parcel would be dedicated to the construction of a stormwater detention basin. Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, construction and implementation of stormwater facilities, and pavement of parking areas and driveways. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. The two buildings would operate 100 percent for manufacturing uses.

1.5 SUMMARY OF IMPACTS

Table 1-1, *Summary of Impacts*, summarizes the conclusions of the environmental analysis contained in this EIR. Section 2, *Introduction*, of this Draft EIR established that the proposed Project would not result in impacts related to certain thresholds from CEQA Appendix G including cultural resources, mineral resources, recreation, and wildfire. Thus, no further assessment of those impacts was required in this Draft EIR. Therefore, the numbering of impacts shown in Table 1-1 reflects the omission of further evaluation for certain thresholds.

Relevant standard conditions of approval are identified, and mitigation measures are provided for all potentially significant impacts. The level of significance of impacts after the proposed mitigation measures are applied are identified as either significant and unavoidable, less than significant, or no impact. Where Table 1-1 states that no mitigation measures are feasible, a further discussion of this analysis is provided in

the relevant portions of this Draft EIR. After the application of all feasible mitigation measures, the Project would result in significant and unavoidable environmental impacts related to agriculture, air quality, greenhouse gas emissions, and transportation.

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Table 1-1: Summary of Impacts

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 Aesthetics				
Impact Aesthetics-1: Would the Project have a substantial adverse effect on a scenic vista?		Less than significant	None required	Less than significant
Impact Aesthetics-3: Would the Project, in a non-urbanized area, 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), or in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality?		Less than significant	None required	Less than significant
Impact Aesthetics-4: Would the Project create a new source of substantial light or glare which would adversely affect day and nighttime views in the area?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.2 Agriculture and Forestry Resources				
Impact Agriculture-1: Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		Potentially significant	None are feasible	Significant and unavoidable

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact Agriculture-2: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?		No impact	None required	No impact
Impact Agriculture-3: Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?		No impact	None required	No impact
Impact Agriculture-4: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?		No impact	None required	No impact
Impact Agriculture-5: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?		Potentially significant	None are feasible	Significant and unavoidable
Cumulative		Potentially significant	None are feasible	Significant and unavoidable
5.3 Air Quality				
Impact Air Quality-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?		Less than significant	None required	Less than significant
Impact Air Quality-2: Would the Project result in a cumulatively	PPP AQ-1: Antelope Valley Air Quality Management District	Potentially significant	MM AQ-1: Super-Compliant Low VOC. The construction plans and specifications	Significant and unavoidable

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard?	<p>(AVAQMD) Rule 402. The following measure shall be incorporated into construction plans and specifications as implementation of AVAQMD Rule 402. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.</p> <p>PPP AQ-2: AVAQMD Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of Rule 403:</p> <p>Pre-activity:</p> <ul style="list-style-type: none"> • Pre-water the site sufficiently to limit Visible Dust Emissions (VDE) to 20 percent opacity; and, • Phase work to reduce the amount of Disturbed Surface Area at any one time. <p>During Activity:</p> <ul style="list-style-type: none"> • Apply water or chemical/organic stabilizers/suppressants sufficient to limit VDE to 20 percent opacity. • Construct and maintain wind barriers sufficient to limit VDE to 20 percent opacity. If utilizing 		<p>shall state that the Project shall utilize “Super-Compliant” low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by AVAQMD Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC.</p> <p>MM AQ-2: Idling Regulations. Prior to issuance of a certificate of occupancy, legible, durable, weather-proof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use.</p> <ol style="list-style-type: none"> 1. Instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to “neutral” or “park” and the parking brake is engaged. 2. Telephone numbers of the building facilities manager and CARB to report violations. <p>MM AQ-3: Truck Route Signs. The Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route.</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>wind barriers, control measure (a) above shall also be implemented; or,</p> <ul style="list-style-type: none"> Apply water or chemical/organic stabilizers/suppressants to unpaved haul/access roads and unpaved vehicle/equipment traffic areas sufficient to limit VDE to 20 percent opacity and meet the requirements of section (C)(9). <p>Temporary Stabilization during Periods of Inactivity:</p> <ul style="list-style-type: none"> Restrict vehicular access to the area; and, Apply water or chemical/organic stabilizers/suppressants, sufficient to limit VDE to 20 percent opacity, or to comply with the conditions of a Stabilized Surface. If an area having one-half acres or more of Disturbed Surface Area remains unused for seven or more days, the area must comply with the conditions for a Stabilized Surface area. <p>PPP AQ-3: AVAQMD Rule 1113. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 1113. The proposed Project shall only use “Low-Volatile Organic Compounds (VOC)” paints (no more than 50 gram/liter of VOC for flat coatings and 150 g/l for nonflat-high</p>		<p>(Source: State of California, Department of Justice. Rob Bonta, Attorney General. (2022). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act).</p> <p>MM AQ-4: Energy Efficient Vendor Trucks. The Project plans and specifications shall include requirements (by contract specifications) that vendor trucks for the industrial buildings include energy efficiency improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption.</p> <p>MM AQ-5: Bicycle Parking. The Project plans and specifications shall include bicycle parking facilities totaling 80 short-term and 40 long-term bicycle parking spaces for each building (for a total of 240), exceeding the state/local requirement of 75 short-term and 38 long-term per building. (Source: City of Palmdale General Plan EIR, 2022).</p> <p>MM AQ-6: Clean Air Vehicle and Carpool Parking. The Project plans and specifications shall include a minimum of five parking spaces for carpool/vanpool vehicles. Electric vehicle parking spaces shall be equivalent to the number of electric vehicle charging stations. (Source: State of California, Department of Justice. Rob Bonta, Attorney General. (2022).</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>gloss coatings) consistent with AVAQMD Rule 1113.</p> <p>PPP GHG-1: 2022 California Energy Code Section 110.10. The Project shall comply with the 2022 [or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 110.10 for Mandatory Requirements for Solar Readiness. Section 110.10 includes requirements that the roof be, at a minimum, 15 percent solar ready.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. The Project shall comply with the or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 140.10 for Nonresidential Solar PV. Section 140.10 includes requirements for solar photovoltaic systems for warehouse buildings. The size of the photovoltaic system shall be calculated based on conditioned floor area, as required by Section 140.10. For a building with 20,000 SF of air-conditioned space (office space), the solar photovoltaic system required would be approximately 62.6 Kilowatt system.</p>		<p>Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act). Source: City of Palmdale General Plan EIR, 2022).</p> <p>MM AQ-7: Electric Vehicle Charging Stations and Future Truck Charging Capability. Prior to issuance of building permits, the following features shall be demonstrated on the Project's building plans to the extent feasible over minimum California Code of Regulations Title 24 requirements. Installation shall be verified by the City prior to issuance of a certificate of occupancy.</p> <ol style="list-style-type: none"> 1. For use by employees and visitors conducting business at the building, install automobile electric vehicle (EV) charging stations at the minimum number required by the California Code of Regulations Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building. (Source: City of Palmdale General Plan EIR, 2022). 2. Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and 	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>PDF AQ-1: Construction Air Quality Best Management Practices. Prior to the issuance of grading and building permits, the City shall review the construction documents for the Project to ensure that the construction contractors are obligated to implement the following best management practices to reduce construction air pollutant emissions. These items shall also be listed in construction bid documents and construction contracts. The construction contractors shall allow City access to the construction site to inspect for adherence to these measures.</p> <ol style="list-style-type: none"> 1. Ensure that the cleanest possible construction practices and equipment are used, as economically feasible. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero emission equipment and tools. 2. It shall be the responsibility of the construction contractor to implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology, vehicles, and equipment that will be operating onsite during construction, as necessary and when economically feasible. 		<p>truck EV charging stations in the future.</p> <ol style="list-style-type: none"> 3. Install raceways for conduit to tractor trailer parking areas in logical, gated locations determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts. <p>MM AQ-8: Electric Interior Vehicles. The Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles.</p> <p>MM AQ-9: Transportation Management Association. The Project plans and specifications shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. The TMA shall advertise its services to the building occupants. The TMA shall offer transit incentives to employees and shall provide shuttle service to and from public transit, should a minimum of 5 employees request and use such service from a transit stop at the same drop-off and/or pickup time. The TMA shall distribute public transportation</p>	

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	<p>Necessary infrastructure may include the physical (e.g. needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy trucks.</p> <p>3. All off-road diesel-powered equipment used during construction shall be equipped with Tier 4 Interim or cleaner engines. If the operator lacks Tier 4 Interim or cleaner equipment, and it is not available for lease or short-term rental within 50 miles of the project site, Tier 3 or cleaner off-road construction equipment may be utilized subject to City approval.</p> <p>4. Heavy-duty trucks entering the construction site during grading and building construction phases shall comply with the California Air Resources Board (CARB) regulations including the following: all heavy-duty trucks shall be model year 2010 or later. Per the California Air Resource's Board (CARB) Heavy-Duty Omnibus Regulation, all heavy-duty trucks shall also meet CARB's lowest optional low oxides of nitrogen (NOx) standard starting in the year 2022.</p>		<p>information to its employees. The TMA shall provide electronic message board space for coordination rides.</p> <p>MM AQ-10: Water Efficient Fixtures. All water fixtures within the Project shall be water efficient (toilets/urinals (1.5 gallons per minute [gpm] or less), showerheads (2.0 gpm or less), and faucets (1.28 gpm or less)).</p> <p>MM AQ-11: City Review of Construction Documents. Prior to issuance of building permits, the following features shall be demonstrated on the Project's building and landscape plans to the extent feasible. Installation shall be verified by the City prior to issuance of a certificate of occupancy.</p> <ol style="list-style-type: none"> 1. Install Energy Star-rated heating, cooling, lighting, and appliances 2. Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment. <p>MM AQ-12: Prohibition of Cold Storage. Prior to the issuance of building permits and prior to issuance of tenant occupancy permits, the City of Palmdale shall confirm that the Project does not include cold storage equipment for warehouse operations (chilled, refrigerated, or freezer warehouse space). Cold storage was not included in the analysis for the EIR. If cold storage is proposed, additional</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>5. All construction equipment and fleets shall be in compliance with all current air quality regulations.</p>		<p>studies will be required to analyze the impacts associated with the use.</p> <p>MM AQ-13: Tenant Lease Agreement. Prior to issuance of a certificate of occupancy, the following language shall be included within tenant lease agreements in order to reduce operational air pollutant emissions to the extent feasible:</p> <ol style="list-style-type: none"> 1. Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs. 2. Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. 3. Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc. 4. Requirements to exclusively use zero-emission light and medium-duty delivery trucks and vans, when economically feasible. 5. Requirements to operate in compliance with, and to monitor compliance with, all current and applicable air quality regulations for on-road trucks 	

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			<p>including the California Air Resources Board's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.</p> <p>6. Requirements and identification of the responsible party to maintain, replace, and upgrade rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed Project would comply with existing solar requirements per the California Energy Code in effect during permitting of the Project (at the time of Construction Drawing Plan Check Submittal). In the case that the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process.</p> <p>7. Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weather-proof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations.</p> <p>8. The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model year 2010 engine emission standards shall be used for the on-road transport of materials to and from the Project site.</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			9. Requirements for the building owner to provide a Green Cleaning Products and Paint Education Program available to the building tenant, to keep at the building's office, break room, leasing space, or on an accessible website.	
Impact Air Quality-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?	PPP AQ-2: AVAQMD Rule 403 , as listed above.	Less than significant	None required	Less than significant
Impact Air Quality-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	PPP AQ-1: AVAQMD Rule 402 , as listed above.	Less than significant	None required	Less than significant
Cumulative	PPP AQ-1: AVAQMD Rule 402 , as listed above. PPP AQ-2: AVAQMD Rule 403 , as listed above. PPP AQ-3: AVAQMD Rule 1113 , as listed above.	Potentially significant	MM AQ-1 through AQ-12 , as listed above.	Significant and unavoidable
5.4 Biological Resources				
Impact Biological-1: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		Potentially significant	MM BIO-1: Pre-Construction Nesting Bird Surveys. Project plans, specifications, and construction permitting instructions shall include that in the event that grading or construction activities, including vegetation removal, occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>ground-disturbing activities. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Established buffers shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist shall have the authority to stop work if nesting pairs exhibit signs of disturbance.</p> <p>MM BIO-2: Pre-Construction Burrowing Owl Surveys. Project plans, specifications, and construction permitting instructions shall require pre-construction burrowing owl surveys be conducted no less than 14 days prior to the start of Project-related activities and within 24</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>hours prior to ground disturbance, in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (2012 or most recent version) (Staff Report). Pre-construction surveys shall be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If burrowing owl surveys are negative and burrowing owl is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If unoccupied burrows are observed onsite, construction shall be allowed to proceed.</p> <p>If the pre-construction surveys confirm occupied burrow(s), active burrows shall be avoided by the Project in accordance with CDFW's Staff Report (CDFG 2012). CDFW shall be immediately informed of any burrowing owl observations. The qualified biologist shall coordinate with CDFW to prepare and implement a Burrowing Owl Plan for avoidance, minimization, and/or mitigation measures that shall be submitted to CDFW for review and approval prior to commencing Project activities. A grading permit may be issued once the Burrowing Owl Plan is approved and, if relocations are deemed necessary, the species has been relocated. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required. Avoidance, minimization, and/or mitigation measures in the Burrowing Owl Plan may include any one of the following:</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<ul style="list-style-type: none"> • If burrowing owls are observed on-site outside the breeding season (September 1 to January 31) and they cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the CDFW. Relocation shall occur only outside of the breeding season or once the young are able to leave the nest and fly. In the event that burrowing owls are to be relocated, a Burrowing Owl Relocation Plan shall be submitted for review and approval by the CDFW. The CDFW shall be consulted prior to any relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation. <p>Passive relocation shall include the use of one-way doors to exclude owls from the burrows; doors shall be left in place for at least 48 hours. Once the burrow is determined to be unoccupied, as verified by site monitoring, the burrow shall be closed by a qualified Biologist who shall excavate the burrow using hand tools. Prior to excluding an owl from an active burrow, a receptor burrow survey shall be conducted to confirm that at least two potentially suitable unoccupied burrows are within approximately 688 feet prior to installation of the one-way door. If</p>	

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			<p>two natural receptor burrows are not located, two artificial burrows shall be created for every burrow that would be closed.</p> <ul style="list-style-type: none"> • If burrowing owls are observed on-site during the breeding season (September 1 to January 31), the burrow(s) shall be protected until nesting activity has ended (i.e., all young have fledged from the burrow). Temporary fencing, or a buffer, shall be installed at least at a 250-foot diameter buffer zone from the active burrow, (or as otherwise determined by the biologist) to prevent disturbance during grading or construction. The designated buffer will be clearly marked in the field and will be mapped as an Environmental Sensitive Area (ESA) on construction plans. Installation and removal of the buffer shall be done with a biological monitor present. 	
Impact Biological-4: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		Potentially significant	MM BIO-1: Preconstruction Nesting Bird Surveys , as listed above.	Less than significant
Cumulative		Potentially significant	MM BIO-1: Preconstruction Nesting Bird Surveys , as listed above.	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		(Nesting birds and special status species)	MM BIO-2: Pre-Construction Burrowing Owl Surveys , as listed above.	(Nesting birds and special status species)
5.5 Energy				
Impact Energy-1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<p>PPP GHG-1: 2022 California Energy Code Section 110.10. The Project shall comply with the 2022 [or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 110.10 for Mandatory Requirements for Solar Readiness. Section 110.10 includes requirements that the roof be, at a minimum, 15 percent solar ready.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. The Project shall comply with the or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 140.10 for Nonresidential Solar PV. Section 140.10 includes requirements for solar photovoltaic systems for warehouse buildings. The size of the photovoltaic system shall be calculated based on conditioned floor area, as required by Section 140.10. For a building with 20,000 SF of air-conditioned space (office space), the solar photovoltaic system required would be approximately 62.6 Kilowatt system.</p>	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact Energy-2: Would the Project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<p>PPP GHG-1: 2022 California Energy Code Section 110.10. As listed above.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. As listed above.</p>	Less than significant	None required	Less than significant
Cumulative	<p>PPP GHG-1: 2022 California Energy Code Section 110.10. As listed above.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. As listed above.</p>	Less than significant	None required	Less than significant
5.6 Geology and Soils				
Impact Paleontological-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		Potentially significant	<p>MM PAL-1: Paleontological Monitoring. Prior to the issuance of grading permits, the Project Applicant shall retain a qualified paleontologist approved by the City to create and implement a Project-specific plan for monitoring site grading/earthmoving activities (Project paleontologist). The Project paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resources Mitigation and Monitoring Plan (PRMMP). The PRMMP shall describe the monitoring levels required during excavations, and the location of areas deemed to have a high paleontological resource potential. This</p>	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>PRMMP shall be submitted to the City for approval prior to issuance of a grading permit. Requirements to be included in the PRMMP are as follows:</p> <ol style="list-style-type: none"> 1. <u>Worker's Environmental Awareness Program.</u> Prior to the start of the proposed Project activities, the PRMMP shall require that all field personnel shall receive a worker's environmental awareness training on paleontological resources. The training shall provide a description of the laws and ordinances protecting fossil resources, the types of fossil resources that may be encountered in the Project area, the role of the Project paleontologist, outline steps to follow in the event that a fossil discovery is made and provide contact information for the Project paleontologist. The training shall be developed by the Project paleontologist and can be delivered concurrent with other training including cultural, biological, safety, etc. 2. <u>Paleontological Mitigation Monitoring.</u> The PRMMP shall describe the monitoring levels required during excavations, and the location of areas deemed to have a high paleontological resource potential. Monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls. If the Project paleontologist determines 	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>full-time monitoring is no longer warranted, based on the geologic conditions at depth, he/she/they may recommend that monitoring be reduced or cease entirely.</p> <p>3. <u>Fossil Discoveries.</u> If a paleontological resource is discovered, the Project paleontologist shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Project paleontologist shall complete the following:</p> <ul style="list-style-type: none"> • <i>Salvage of Fossils.</i> If fossils are discovered, all work in the immediate vicinity shall be halted to allow the Project paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project paleontologist shall recover them following standard field procedures for collecting paleontological as outlined in the PRMMP prepared for the Project. The Project paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be 	

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			<p>removed in a safe and timely manner.</p> <ul style="list-style-type: none"> Fossil Preparation and Curation. The PRMMP shall identify the museum that has agreed to accept fossils that may be discovered during Project-related excavations. Upon completion of fieldwork, all significant fossils collected shall be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossil specimens shall be identified to the lowest taxonomic level practical prior to curation at an accredited museum. The fossil specimens shall be delivered to the accredited museum or repository no later than 90 days after all fieldwork is completed. The cost of curation shall be assessed by the repository and shall be the responsibility of the Project Applicant. <p>4. <u>Final Paleontological Mitigation Report.</u> Upon completion of ground-disturbing activities (and curation of fossils if necessary), the Project paleontologist shall prepare a final mitigation and</p>	

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			monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.	
Cumulative		Potentially significant	MM PAL-1: Paleontological Monitoring, as listed above.	Less than significant
5.7 Greenhouse Gas Emissions				
Impact Greenhouse Gas Emissions-1: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<p>PPP GHG-1: 2022 California Energy Code Section 110.10. As listed above.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. As listed above.</p>	Potentially significant	<p>MM AQ-4: Energy Efficient Vendor Trucks. As listed above.</p> <p>MM AQ-7: Electric Vehicle Charging Stations. As listed above.</p> <p>MM AQ-9: Transportation Management Association. As listed above.</p> <p>MM AQ-11: City Review of Construction Documents. As listed above.</p> <p>MM GHG-1: Recycling Bins. The Project plans and specifications shall include external recycling bins at central locations for collection truck pick-up.</p> <p>MM GHG-2: Drought Tolerant Landscaping. The Project plans and specifications shall include a requirement that all landscaping and trees throughout the Project site be drought tolerant low-</p>	Significant and unavoidable

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>water and use water with drip irrigation and weather based smart irrigation controllers.</p> <p>MM GHG-3: Exceed Energy Efficient Building Requirements. Prior to the issuance of building permits, the Project applicant or successor in interest shall provide documentation to the City of Palmdale demonstrating that the Project is designed to achieve energy efficient buildings that comply with the 2022 Title 24 standards, and go beyond those standards with the incorporation of the following design criteria:</p> <p>Building envelop insulation of conditioned space within the building shall be R15 or greater for walls and R30 or greater for attics/roofs.</p> <p>Windows shall have an insulation factor of 0.28 or less Ufactor and 0.22 or less SHGC.</p> <p>All roofing material shall be CRRC Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance.</p> <p>All heating/cooling ducting within the buildings shall be insulated with R6 or greater insulation.</p> <p>All heating and cooling equipment shall be ERR 14/78 percent AFUE, or 7.7 HSPF levels of efficiency or greater.</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>All water heaters shall be high efficiency electric water heaters with a minimum 0.72 Energy Factor or greater.</p> <p>Lighting within the building shall be high efficiency LED lighting with a minimum of 40 lumens/watt for 15 watt or less fixtures, 50 lumens/watt for 15–40-watt fixtures, 60 lumens/watt for fixtures greater than 40 watts</p>	
Impact Greenhouse Gas Emissions-2: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<p>PPP GHG-1: 2022 California Energy Code Section 110.10. As listed above.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. As listed above.</p>	Less than significant	None required	Less than significant
Cumulative	<p>PPP GHG-1: 2022 California Energy Code Section 110.10. As listed above.</p> <p>PPP GHG-2: 2022 California Energy Code Section 140.10. As listed above.</p>	Potentially significant (GHG emissions)	<p>MM AQ-4: Energy Efficient Vendor Trucks. As listed above.</p> <p>MM AQ-7: Electric Vehicle Charging Stations. As listed above.</p> <p>MM AQ-10: Transportation Management Association. As listed above.</p> <p>MM AQ-11: Energy Efficient Appliances. As listed above.</p> <p>MM GHG-1: Recycling Bins. As listed above.</p>	Significant and unavoidable (GHG emissions)

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			MM GHG-2: Drought Tolerant Landscaping. As listed above. MM GHG-3: Exceed Energy Efficient Building Requirements, as listed above	
5.8 Hazards and Hazardous Materials				
Impact Hazardous-1: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<p>PPP HAZ-1: Transportation of Hazardous Waste. Hazardous materials and hazardous wastes will be transported to and/or from the Project development as required by the County of Los Angeles Fire Department's Health Hazardous Materials Division in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (CFR) (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.</p> <p>PPP HAZ-2: Resource Conservation and Recovery Act. Hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of nonhazardous solid wastes and underground tanks storing</p>	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>petroleum and other hazardous substances. The Los Angeles County Fire Department serves as the designated Certified Unified Program Agency (CUPA) which implements state and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program (3) California Accidental Release Prevention Program (Cal-ARP), (4) Aboveground Storage Tank Program and the (5) Underground Storage Tank Program.</p> <p>PPP HAZ-3: Hazardous Materials Business Plan. Prior to issuance of operational permits, businesses that store or handle hazardous wastes shall have a Hazardous Materials Business Plan approved by the City Fire Department and/or City Building Division. Article 1 of Chapter 6.95 of the California Health and Safety Code (Sections 25500–25520) requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP shall include a minimum of three sections:</p>			

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	<p>(1) an inventory of hazardous materials, including a site map that details their location; (2) an emergency response plan; and (3) an employee-training program.</p> <p>PPP HYD -1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site</p>			
<p>Impact Hazardous-2: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p>	<p>PPP HAZ-2: Resource Conservation and Recovery Act, as listed above.</p> <p>PPP HAZ-3: Hazardous Materials Business Plan, as listed above.</p> <p>PPP HYD-1: NPDES/SWPPP, as listed above.</p> <p>PPP HYD-2: Phase II Small MS4 General Permit. Prior to issuance of</p>	<p>Less than significant</p>	<p>None required</p>	<p>Less than significant</p>

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the Drainage Management Plan (DMP) of the City of Palmdale which establishes the hydrologic and hydraulic requirements for development within the City limits in accordance with revised procedures developed by the County of Los Angeles Department of Public Works and adopted by the City of Palmdale. It is the policy of the City of Palmdale that each development consisting of five acres or greater in size shall attenuate on-site storm runoff as required by drainage law and shall prepare hydrology and hydraulic studies in accordance with the DMP. Each development is required by City Ordinance to attenuate post-developed flows to 85 percent of pre-developed flows through the installation of an onsite storm drain system to remove particulate pollutants and to reduce maximum runoff values associated with development/			
Impact Hazardous-3: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	PPP HAZ-1: Transportation of Hazardous Waste, as listed above.	No impact	None required	No impact
Impact Hazardous-4: Would the Project be located on a site which is		No impact	None required	No impact

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?				
Impact Hazardous-5: 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?		Less than significant	None required	Less than significant
Impact Hazardous-6: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		Less than significant	None required	Less than significant
Impact Hazardous-7: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?		No impact	None required	No impact
Cumulative	PPP HAZ-1: Transportation of Hazardous Waste , as listed above. PPP HAZ-2: Resource Conservation and Recovery Act , as listed above. PPP HAZ-3: Hazardous Materials Business Plan , as listed above.	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	PPP HYD-1: NPDES/SWPPP , as listed above. PPP HYD-2: Phase II Small MS4 General Permit , as listed above.			
5.9 Hydrology and Water Quality				
Impact Hydrology-1: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	PPP HYD-1: NPDES/SWPPP , as listed above. PPP HYD-2: Phase II Small MS4 General Permit , as listed above	Less than significant	None required	Less than significant
Impact Hydrology-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?		Less than significant	None required	Less than significant
Impact Hydrology-3: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in a 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	PPP HYD -1: NPDES/SWPPP , as listed above. PPP HYD -2: Phase II Small MS4 General Permit , as listed above	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?				
Impact Hydrology-4: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to Project inundation?		No Impact	None required	No impact
Impact Hydrology-5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	PPP HYD -1: NPDES/SWPPP , as listed above. PPP HYD -2: Palmdale MS4 Permit , as listed above	Less than significant	None required	Less than significant
Cumulative	PPP HYD -1: NPDES/SWPPP , as listed above. PPP HYD -2: Phase II Small MS4 General Permit , as listed above	Less than significant	None required	Less than significant
5.10 Land Use and Planning				
Impact Land Use-1: Would the Project physically divide an established community?		No Impact	None required	No impact
Impact Land Use-2: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.11 Noise				
Impact Noise-1: Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		Less than significant	None required	Less than significant
Impact Noise-2: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?		Less than significant	None required	Less than significant
Impact Noise-3: 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?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant
5.12 Population and Housing				
Impact Population-1: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Cumulative		Less than significant	None required	Less than significant
5.13 Public Services				
Impact Public Services-1: 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?	PPP PS-1: Development Impact Fees. Prior to the issuance of either a certificate of occupancy or prior to building permit final inspection, the Applicant shall provide payment of the appropriate fees set forth by in the Palmdale Municipal Code Chapter 3.42 and 3.45, as applicable, related to the funding of public safety and other public facilities.	Less than significant	None required	Less than significant
Cumulative	PPP PS-1: Development Impact Fees, as listed above.	Less than significant	None required	Less than significant
5.14 Transportation				
Impact Transportation-1: Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	PDF TR-1: Sidewalks. The Project would construct 8-foot-wide sidewalks along the Project's frontage on Avenue L-8, East Avenue M, 30th Street East and 35th Street East. PDF TR-2: Bicycle Facilities. The Project would construct a 12-foot-	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
	wide bike trail along East Avenue M/Columbia Way.			
Impact Transportation-2: Would the Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?		Potentially significant	<p>Mitigation Measure T-1: CAPCOA Measure T-7, Implement Commute Trip Reduction Marketing. The City's operational and occupancy permitting shall include that the tenant shall be required (by contract specifications) to implement a marketing strategy to promote the Project site employer's Criteria Pollutant and Toxics Emissions Reporting (CTR) program. Information sharing and marketing to promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, taking transit, walking, and biking.</p> <p>Mitigation Measure T-2: CAPCOA Measure T-8, Provide Rideshare Program. The City's operational and occupancy permitting shall include that the tenant shall implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions. As per Table T-8.1 in CAPCOA handbook, the reduction percentage for suburban areas, such as the City of Palmdale, is 4 percent.</p>	Significant and unavoidable
Impact Transportation-3: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or	PDF TR-1: Sidewalks, as listed above.	Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
dangerous intersections) or incompatible uses (e.g., farm equipment)?	PDF TR-2: Bicycle Facilities , as listed above.			
Impact Transportation-4: Would the Project result in inadequate emergency access?		Less than significant	None required	Less than significant
Cumulative	PDF TR-1: Sidewalks , as listed above. PDF TR-2: Bicycle Facilities , as listed above.	Potentially significant (VMT)	Mitigation Measure T-1: CAPCOA Measure T-7, Implement Commute Trip Reduction Marketing , as listed above. Mitigation Measure T-2: CAPCOA Measure T-8, Provide Rideshare Program , as listed above.	Significant and unavoidable (VMT)

5.15 Tribal Cultural Resources

Impact Tribal-1: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria	PPP TCR-1: Native American historical and cultural resources and sacred sites are protected under PRC Sections 5097.9 to 5097.991, which require that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods. During Project construction, these requirements will be followed. PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project would be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body (within a 100-foot buffer of the find) until the County Coroner	Potentially significant	MM TCR-1: On-Site Tribal Monitor. Prior to the issuance of grading permits, the Project Applicant shall notify the consulting tribes (Yuhaaviatam of San Manuel Nation, Fernandefio Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians) and shall enter into a Tribal Monitoring Agreement with at least one of the consulting tribes for a Tribal Monitor. In the case that more than one of the consulting tribes designates a monitor, monitors shall rotate to ensure that only one monitor is present at the site at any given time. The designated Tribal Monitor(s) shall be on-site during all initial ground-disturbing activities including, but not limited to, clearing, grubbing, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, driving posts,	Less than significant
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Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.		<p>auguring, blasting, stripping topsoil or similar activity ("Tribal Monitoring").</p> <p>Tribal Monitoring services shall continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the Project's scheduled activities require the Tribal Monitor to leave the Project for a period of time and return, confirmation shall be submitted to the Tribal Monitor by project applicant, in writing, upon completion of each set of scheduled activities and 5 days' notice (if possible) shall be submitted to the Tribal Monitor by project applicant, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards retained by the project applicant as well as the Tribal Monitor shall assess the find.</p> <p>Mitigation Measure TCR-2: Retention of Archaeologist. Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a Qualified Archaeologist who</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>meets the U.S. Secretary of the Interior Standards (SOI). The Archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The Archaeologist will conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event.</p> <p>Mitigation Measure TCR-3: Pre-Grade Meeting. The retained Qualified Archeologist and Consulting Tribal representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.</p> <p>Mitigation Measure TCR-4: A Cultural Mitigation Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared, in consultation with a single representative on behalf of the consulting tribes (Yuhaaviatam of San Manuel Nation, Fernandefio Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians), prior to the commencement of any and all ground-disturbing activities for the Project, including any archaeological testing. The CRMMP will provide details regarding the</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. The CRMMP shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.</p> <p>Mitigation Measure TCR-5: Inadvertent Discovery of Cultural Resources. The Lead Agency and/or project applicant shall, in good faith, consult with the Yuhaaviatam of San Manuel Nation (YSMN), Fernandefio Tataviam Band of Mission Indians (FTBMI), and the Morongo Band of Mission Indians (MBMI) on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.</p> <p>In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and so that the Qualified Archaeologist and Tribal Monitor can evaluate the find.</p> <p>Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the consulting tribes' (Yuhaaviatam of San Manuel Nation, Fernandefio Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians) Cultural Resources</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>Departments shall be contacted, as required by the CRMMP created per TCR-4, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist and tribal monitor make their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.</p> <p>A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and the Tribal Monitor[s] and be submitted to the Lead Agency for review and approval. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to the consulting tribes for review and comment, as detailed within TCR-4.</p> <p>Mitigation Measure TCR-6: Inadvertent Discovery of Human Remains: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. No photographs</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>are to be taken except by the coroner, with written approval by the consulting Tribe[s].</p> <p>a. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code §7050.5. and Public Resources Code (PRC) § 5097.98.</p> <p>b. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.</p> <p>c. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			<p>granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98</p> <p>The tribe that is named the Most Likely Descendant (MLD) may wish to reburial the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial shall not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations shall be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.</p> <p>Mitigation Measure TCR-7: Archaeological/Cultural Documents. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to consulting tribes (Yuhaaviatam of San Manuel Nation, Fernandeano Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians). The Lead Agency and/or applicant shall, in good faith, consult with the tribes throughout the life of the construction of the project.</p>	

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
			Mitigation Measure TCR-8: Final Report: The final report[s] created as a part of the project (AMTP, isolate records, site records, survey reports, testing reports, etc.) shall be submitted to the Lead Agency and Consulting Tribe for review and comment. After approval of all parties, the final reports are to be submitted to the Eastern Information Center, and the Consulting Tribes	
Cumulative	PPP CUL-1: Human Remains , as listed above. PPP TCR-1: As listed above.	Potentially significant	Mitigation Measure TCR-1, TCR-2, TCR-3, TCR-4, TCR-5, TCR-6, TCR-7, and TCR-8: As listed above.	Less than significant
5.16 Utilities and Service Systems				
Impact Utilities-1: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?		Less than significant	None required	Less than significant
Impact Utilities-2: Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?		Less than significant	None required	Less than significant

Impact	Applicable Standard Condition, Plan, Program, or Policy (PPP), or Project Design Feature (PDF)	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact Utilities-3: Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?		Less than significant	None required	Less than significant
Impact Utilities-4: Would the Project 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?		Less than significant	None required	Less than significant
Impact Utilities-5: Would the Project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?		Less than significant	None required	Less than significant
Cumulative		Less than significant	None required	Less than significant

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2. Introduction

This Draft Environmental Impact Report (EIR) is an informational document that evaluates the environmental effects that may result from the planning, construction, and operation of the proposed Palmdale Logistics Project (Project), which requires approval of a Development Plan Review, Tentative Parcel Map, and Conditional Use Permit. The term “Project” includes all discretionary and administrative approvals and permits required for its implementation.

2.1 PURPOSE OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) requires that all State and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority prior to taking action on those projects. The CEQA Guidelines provide the following information regarding the purpose of an EIR:

- **Project Information and Environmental Effects.** An EIR is an informational document that will inform public agency decision makers and the public generally of the potential significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (State CEQA Guidelines Section 15121(a)).
- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to enable decision makers to make an intelligent decision that takes into account environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (State CEQA Guidelines Section 15151).

As a public disclosure document, the purpose of an EIR is not to recommend either approval or denial of a project, but to provide information regarding the physical environmental changes that would result from an action being considered by a public agency to aid in the agency’s decision-making process.

2.2 LEGAL AUTHORITY

This Draft EIR has been prepared in accordance with all criteria, standards, and procedures of CEQA (California Public Resource Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.).

Pursuant to CEQA Section 21067 and State CEQA Guidelines Article 4 and Section 15367, the City of Palmdale is the Lead Agency under whose authority this Draft EIR has been prepared. “Lead Agency” refers to the public agency that has the principal responsibility for carrying out or approving a project. Serving as the Lead Agency and before taking action on any approvals for the Project, the City of Palmdale has the obligation to: (1) ensure that this Draft EIR has been completed in accordance with CEQA; (2) review and consider the information contained in this Draft EIR as part of its decision-making process; (3) make a statement that this Draft EIR reflects the City of Palmdale’s independent judgment; (4) ensure that all significant effects on the environment are eliminated or substantially lessened where feasible; and, if necessary, (5) make written findings for each unavoidable significant environmental effect stating the reasons why mitigation measures or Project alternatives identified in this Draft EIR are infeasible and citing the

specific benefits of the proposed Project that outweigh its unavoidable adverse effects (State CEQA Guidelines Sections 15090 through 15093).

Pursuant to State CEQA Guidelines Sections 15040 through 15043, and upon completion of the CEQA review process, the City of Palmdale will have the legal authority to do any of the following:

- Approve the Project;
- Require feasible changes in any or all activities involved in the Project in order to substantially lessen or avoid significant effects on the environment;
- Disapprove the Project, if necessary, in order to avoid one or more significant effects on the environment that would occur if the Project was approved as proposed; or
- Approve the Project even though the Project would cause a significant effect on the environment if the City of Palmdale makes a fully informed and publicly disclosed decision that: (1) there is no feasible way to lessen the effect or avoid the significant effect; and (2) expected benefits from the Project will outweigh significant environmental impacts of the Project.

2.3 ENVIRONMENTAL IMPACT REPORT PROCESS

A project-level analysis has been provided pursuant to State CEQA Guidelines Section 15161. This Draft EIR meets the content requirements discussed in State CEQA Guidelines Article 9, beginning with State CEQA Guidelines Section 15120.

2.3.1 Notice of Preparation

Pursuant to the requirements of CEQA, the City of Palmdale issued a Notice of Preparation (NOP) for the Project, which was distributed on September 25, 2023, for a public review period of 30 days through October 25, 2023. The purpose of the NOP was to solicit early comments from public agencies with expertise in subjects that are discussed in this Draft EIR and to solicit comments from the public regarding potential environmental impacts from the Project. As provided in the NOP, the City of Palmdale determined through the initial review process that impacts related to the following topics are potentially significant and require a detailed level of analysis in this Draft EIR.

- | | |
|--------------------------------------|---------------------------------|
| • Aesthetics | • Hydrology and Water Quality |
| • Agriculture and Forestry Resources | • Land Use and Planning |
| • Air Quality | • Noise |
| • Biological Resources | • Population and Housing |
| • Energy | • Public Services |
| • Geology and Soils | • Transportation |
| • Greenhouse Gas Emissions | • Tribal Cultural Resources |
| • Hazards and Hazardous Materials | • Utilities and Service Systems |

The NOP requested members of the public and public agencies to provide input on the scope and content of environmental impacts that should be included in the EIR being prepared. Comments received on the NOP are included in Appendix A and are summarized below in Table 2-1, *Summary of NOP Comment Letters*, which also includes references to the Draft EIR sections in which issues raised in the comment letters are addressed.

Table 2-1: Summary of NOP Comment Letters

Comment Letter and Comment	Relevant Draft EIR Sections
State and Local Agencies	
Attorney General, State of California Department of Justice, October 13, 2023	
This letter provides details and recommendations on avoiding, analyzing, and mitigating potential environmental impacts from warehouses. The comment letter also contains an attached copy of the Attorney General Office's Bureau of Environmental Justice published document that contains best practices and mitigation measures for warehouse projects.	Air Quality, Greenhouse Gas Emissions, and Noise
Caltrans, October 20, 2023	
This comment letter states that the proposed Project would induce demand for additional vehicle trips and vehicle miles travelled (VMT). This comment letter requests that the Project include mitigation for safety and environmental impacts related to VMT. It also states that the DEIR should confirm that the project would result in a net reduction in VMT.	Transportation
CDFW, October 25, 2023	
This comment letter requests that the DEIR provides a discussion and full disclosure of potential environmental impacts to special status species with potential to occur on the Project site. The comment letter requests an adequate biological resources assessment and lists information regarding biological resources that should be included in the DEIR. The comment letter also requests focus surveys, mitigation, and permits (if applicable) for those species. This letter requests a complete analysis of direct, indirect, and cumulative impacts as it relates to wildlife movement and biological resources.	Biological Resources
Los Angeles County Sanitation Districts, October 12, 2023	
This comment states that this Project would require annexation into District 14 before sewage service can be provided because the Project site is outside the jurisdictional boundaries of the Districts.	Geology and Soils, and Utilities and Service Systems

2.3.2 Public Scoping Meeting

Pursuant to Section 15082(c)(1) of the CEQA Guidelines, the City of Palmdale hosted a public scoping meeting for members of the public and public agencies to provide input as to the scope and content of the environmental information and analysis to be included in the Draft EIR for the Project. A scoping meeting was held on October 5, 2023, at 5:00 p.m. online via Zoom. No comments were received on the Project during the public scoping meeting.

2.3.3 Draft EIR

Topics requiring a detailed level of analysis that are evaluated in this Draft EIR have been identified based upon the responses to both the NOP and a review of the Project by the City of Palmdale. Pursuant to State CEQA Guidelines Section 15125.5(a) which states, "An EIR shall identify and focus on the significant effects on the environment," the City of Palmdale determined that Project impacts on the below topics would not be

significant. Consequently, these topics are not analyzed in this Draft EIR, but are further discussed in Section 7, *Effects Found Not to be Significant*.

- Cultural Resources
- Mineral Resources
- Recreation
- Wildfire

The City of Palmdale has filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research State Clearinghouse, indicating that this Draft EIR has been completed and is available for review and comment. A Notice of Availability (NOA) of the Draft EIR was published concurrently with distribution of this document. The Draft EIR is being circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days in accordance with State CEQA Guidelines Sections 15087 and 15105. During the 45-day review period, the Draft EIR is available for public review digitally on the City of Palmdale's website at <https://www.cityofpalmdaleca.gov/277/Environmental-Documents> or physically at the following location:

City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550

Written comments related to environmental issues in the Draft EIR should be addressed to:

Brenda Magaña, Planning Manager
Department of Economic and Community Development
38250 Sierra Highway
Palmdale, CA 93550
bmagana@cityofpalmdale.org

2.3.4 Final EIR

Upon completion of the 45-day review period, written responses to all comments related to the environmental issues in the Draft EIR will be prepared and incorporated into a Final EIR. The written responses to comments will be made available at least 10 days prior to the public hearing at which the certification of the Final EIR will be considered by the Planning Commission. These comments, and their responses, will be included in the Final EIR for consideration by the City, as well as other responsible and trustee agencies in accordance with CEQA. The Final EIR may also contain corrections and additions to the Draft EIR and other information relevant to the environmental issues associated with the Project. The Final EIR will be available for public review prior to its certification by the City. Notice of the availability of the Final EIR will be sent to all who comment on the Draft EIR.

2.4 ORGANIZATION OF THIS DRAFT EIR

This Draft EIR is organized into the following sections. To help the reader locate information of interest, a brief summary of the contents of each chapter is provided.

- **Section 1, Executive Summary:** This section provides a brief summary of the Project area, the Project, and alternatives. This section also provides a summary of the potential environmental impacts and mitigation measures, applicable Project design features, applicable regulatory requirements, and the level of significance after implementation of the mitigation measure. The level of significance after implementation of the proposed mitigation measure(s) will be characterized as either *less than significant* or *significant and unavoidable*.

- **Section 2, Introduction:** This section provides an overview of the purpose and use of the EIR, the scope of this Draft EIR, a summary of the legal authority for this Draft EIR, a summary of the environmental review process, and the general format of this document.
- **Section 3, Project Description:** This section provides a detailed description of the Project, its objectives, and a list of Project-related discretionary actions.
- **Section 4, Environmental Setting:** This section provides a discussion of the existing conditions within the Project area.
- **Section 5, Environmental Impact Analysis:** This section is divided into sub-sections for each environmental impact area. Each section includes a summary of the existing statutes, ordinances, and regulations that apply to the environmental impact area being discussed; the analysis of the Project's direct and indirect environmental impacts on the environment, including potential cumulative impacts that could result from the Project; applicable Project design features, standard conditions, and plans, policies, and programs that could reduce potential impacts; and feasible mitigation measures that would reduce or eliminate the significant adverse impacts identified. Impacts that cannot be mitigated to *less than significant* are identified as *significant and unavoidable*.
- **Section 6, Other CEQA Considerations:** This section summarizes the significant and unavoidable impacts that would occur from implementation of the Project and provides a summary of the environmental effects of the implementation of the Project that were found not to be significant. Additionally, this section provides a discussion of various CEQA-mandated considerations including growth-inducing impacts and the identification of significant irreversible changes that would occur from implementation of the Project. This section also provides a discussion of impacts found not to be significant.
- **Section 7, Effects Found Not to be Significant:** This section summarizes the potential environmental effects related to the Project that were determined not to be significant during preparation of this EIR.
- **Section 8, Alternatives:** This section describes and analyzes a reasonable range of alternatives to the Project. The CEQA-mandated No Project Alternative is included along with alternatives that could reduce one or more significant effects of the proposed Project. As required by the CEQA Guidelines, the environmentally superior alternative is also identified.
- **Section 9, Report Preparation and Persons Contacted:** This section lists authors of the Draft EIR and City staff that assisted with the preparation and review of this document. This section also lists other individuals and/or organizations that were contacted for information that is included in this Draft EIR document.

2.5 INCORPORATION BY REFERENCE

State CEQA Guidelines Section 15150 allows for the incorporation “by reference all or portions of another document... most appropriate for including long, descriptive, or technical materials that provide general background but do not contribute directly to the analysis of a problem at hand.” The purpose of incorporation by reference is to assist the Lead Agency in limiting the length of this Draft EIR. Where this Draft EIR incorporates a document by reference, the document is identified in the body of the Draft EIR, citing the appropriate section(s) of the incorporated document and describing the relationship between the incorporated part of the referenced document and this Draft EIR.

The Project is within the geographical limits of the City of Palmdale and is covered by the City's General Plan. The General Plan was approved by the City on October 2022 (and amended on March 2023) and provides the fundamental basis for the City's land use and development policies. The City of Palmdale General Plan was the subject of an environmental review under CEQA, and an EIR for the General Plan was certified by the City in 2020 (State Clearinghouse Number (SCH) 2021060494). Accordingly, the EIR for the General Plan is herein incorporated by reference with State CEQA Guidelines Section 15150. The documents are available at <https://palmdale2045.org/general-plan> and the City of Palmdale Planning Department located at 38250 Sierra Hwy, Palmdale, CA 93550.

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3. Project Description

3.1 PROJECT LOCATION

The proposed Project is located within the northern portion of the City of Palmdale in Los Angeles County. Specifically, the Project site is located within Section 32, Township 7 North, Range 11 West of the Lancaster East United States Geological Survey (USGS) 7.5-minute Quadrangle. Regional access to the City of Palmdale is provided by State Route (SR) 14 and SR 138. Local access to the Project site is provided from 30th Street East, a designated major arterial, and East Avenue M/Columbia Way, a designated regional arterial. The Project site is northeast of the 30th Street East and East Avenue M/Columbia Way intersection.

The Project site is comprised of one parcel encompassing 150.63 acres. This parcel is identified as Assessor's Parcel Number (APN) 3170-018-081. The Project site and surrounding area is shown in Figure 3-1, *Regional Location*, and Figure 3-2, *Local Vicinity*.

3.2 PROJECT SITE SETTING

The Project site consists of undeveloped land that has been heavily disturbed by historic land uses associated with agricultural operations, off-road vehicular access, illegal dumping, and surrounding development. The site is relatively flat with a gentle upward slope in the northwestern direction. The Project site contains sparse vegetation consisting primarily of grasses and weeds, with a few shrubs located along the northeastern boundary of the Project site. The Project site's existing conditions are shown in Figure 3-3, *Aerial View*, and Figure 3-4, *Site Photos*. The existing land uses and conditions of the Project site are further described in Section 4, *Environmental Setting*.

3.3 EXISTING LAND USE AND ZONING DESIGNATIONS

The Project site has a General Plan land use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI). The IND land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses up to a maximum floor area ratio (FAR) of 0.5. The Heavy Industrial zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution, and allows a maximum FAR of 0.5. The Project site's existing land use designation and zoning is shown in Figure 3-5, *General Plan Land Use Designation*, and Figure 3-6, *Zoning Designation*.

3.4 SURROUNDING LAND USE AND ZONING DESIGNATIONS

The Project site is located within a predominately vacant area that primarily consists of defunct agricultural land. The site is located north of Palmdale Regional Airport and is within the Military Influence Area of Air Force Plant 42. The site is bounded to the north by an unnamed, unpaved road with undeveloped vacant land beyond; to the south by East Avenue M/Columbia Way followed by airport related facilities; to the east by an unnamed, unpaved road followed by undeveloped vacant land; and to the west by 30th Street East followed by a solar farm. The surrounding General Plan land use and zoning designations are described in Table 3-1, *Surrounding Existing Land Use, Zoning, and Specific Plan Designations*.

Table 3-1: Surrounding Existing Land Use, Zoning, and Specific Plan Designations

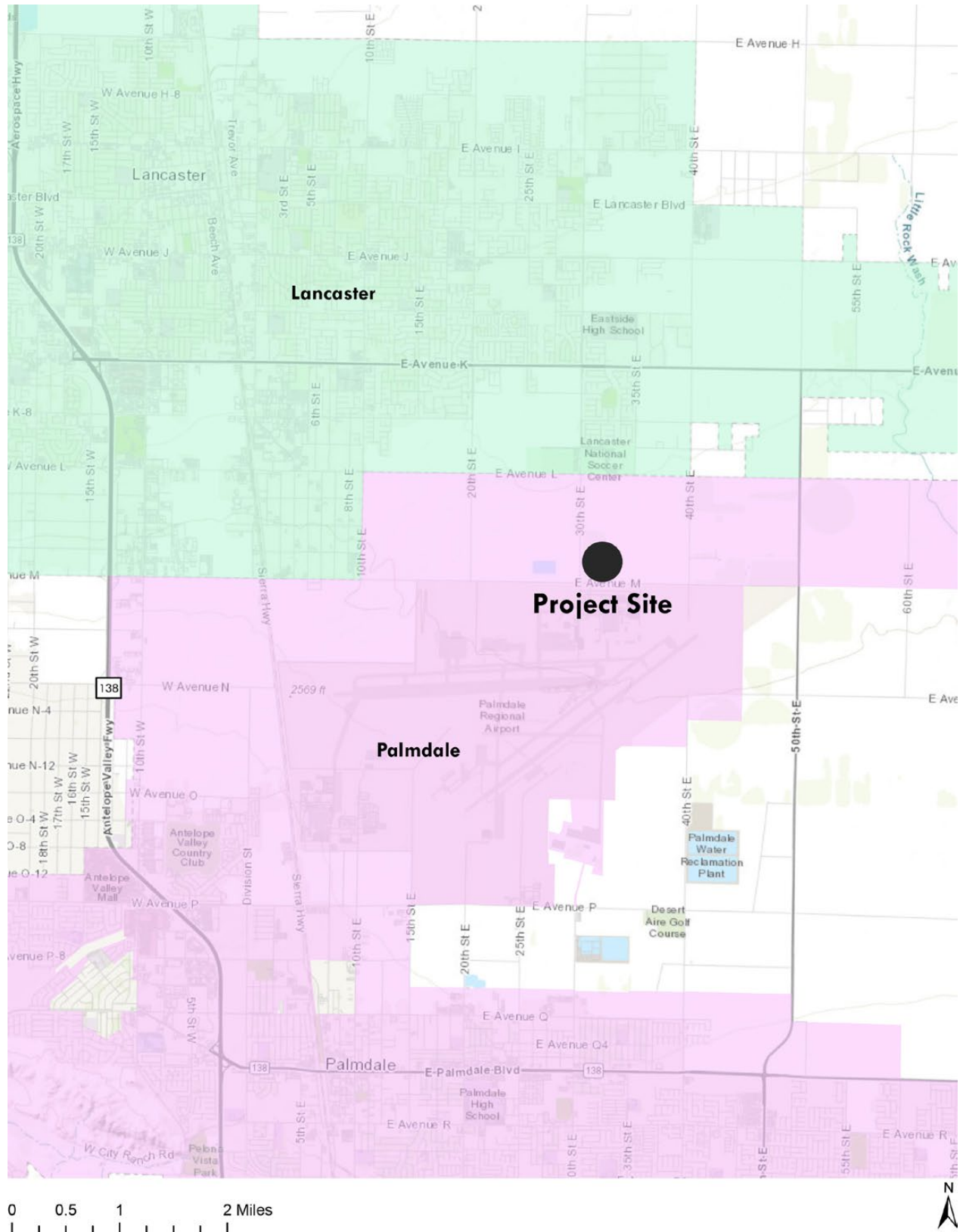
	Existing Land Use	General Plan Designation	Zoning Designation
North	Undeveloped land (Future vehicle storage facility SPR 19-012 to the northeast)	Industrial (IND)	Heavy Industrial (HI)
South	East Avenue M/Columbia Way followed by airport related facilities	Aerospace Industrial (AI)	Aerospace Industrial (AI)
East	Undeveloped land	Industrial (IND)	Heavy Industrial (HI)
West	30th Street East followed by a solar farm	Industrial (IND)	Heavy Industrial (HI)

3.5 PROJECT OBJECTIVES

The Project site plan has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to develop an underutilized property with an industrial use to provide an employment-generating use to help grow the economy in the City of Palmdale. The Project would achieve this goal through the following objectives:

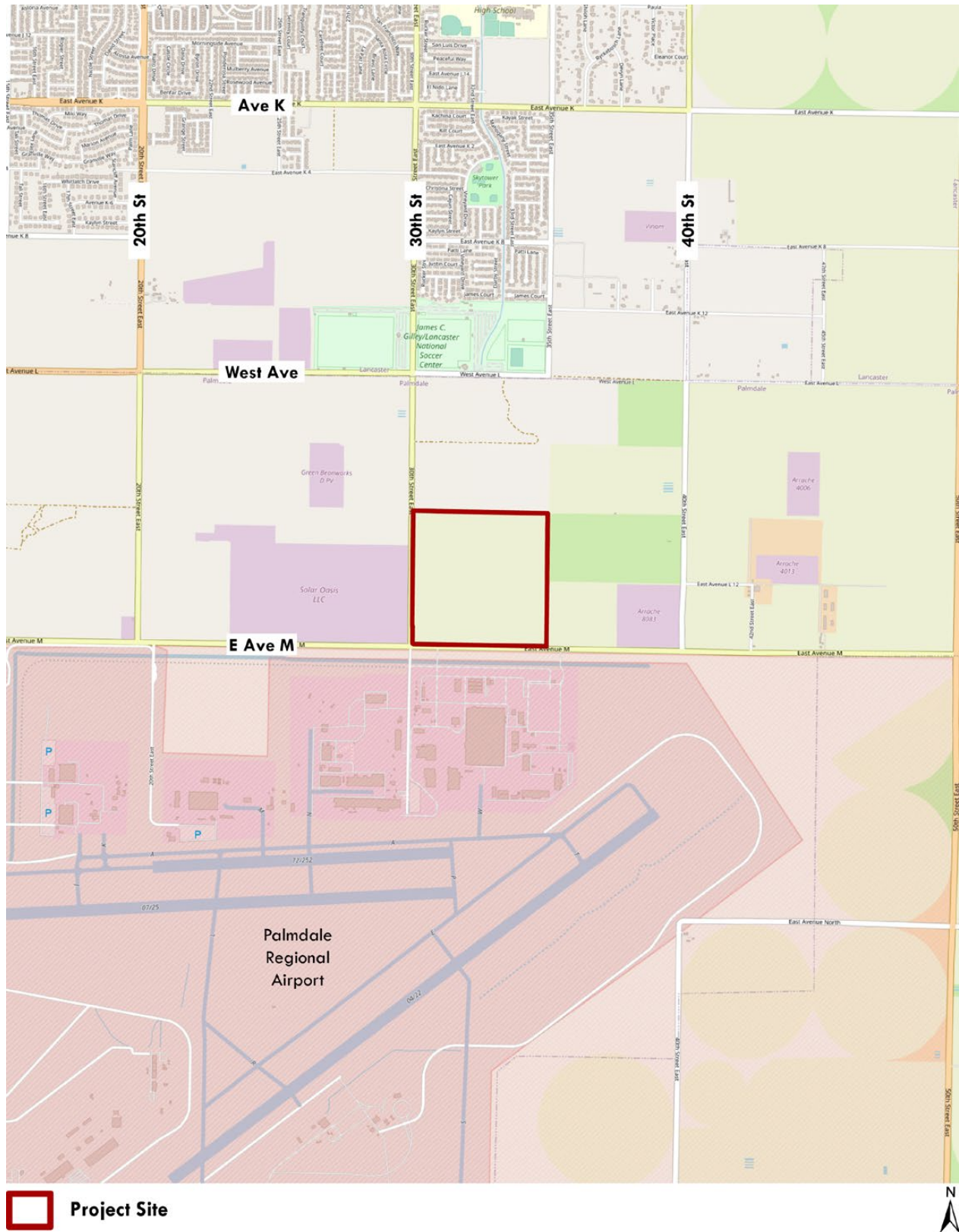
1. To make efficient use of the property in the City of Palmdale by adding to its potential for employment-generating uses.
2. To attract new business and employment to the City of Palmdale and thereby promote economic growth.
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
4. To develop an underutilized property with an industrial warehouse building near State Route 14, to help meet demand for logistics business in the City and surrounding region.
5. To build an industrial warehouse project in the City of Palmdale that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Palmdale.
6. To develop a project that does not contribute to surface and groundwater quality degradation by treating surface and stormwater flows.

Regional Location



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Local Vicinity



Palmdale Logistics Center
City of Palmdale

Figure 3-2

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Aerial View

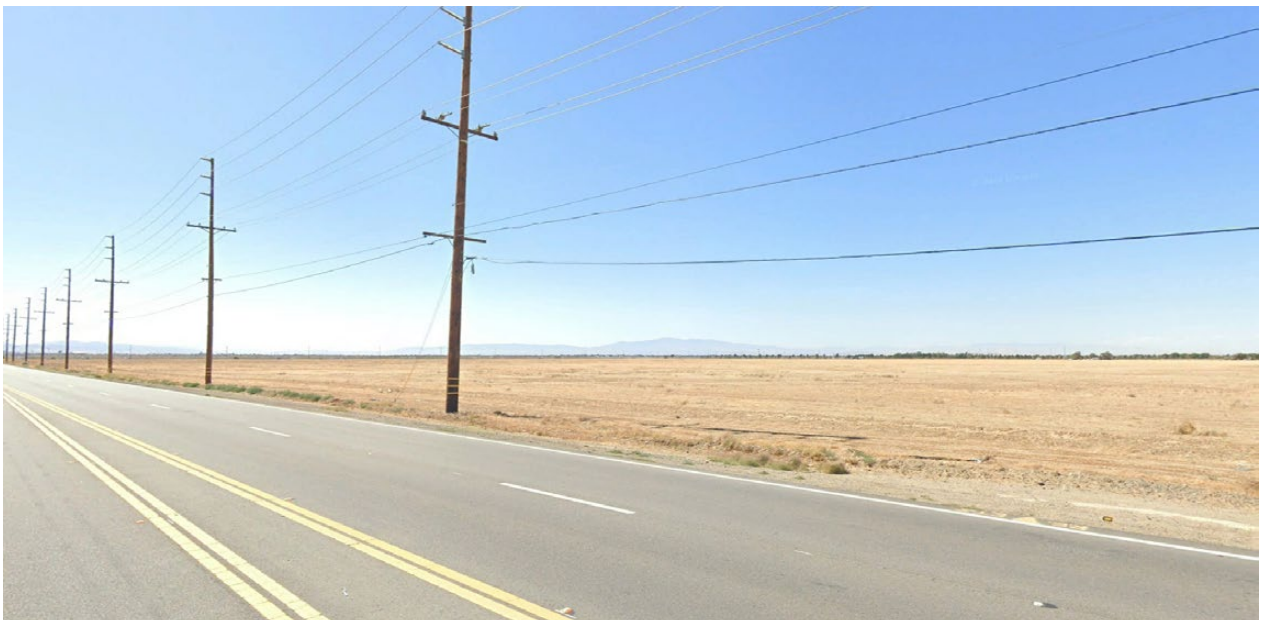


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Existing Site Photos



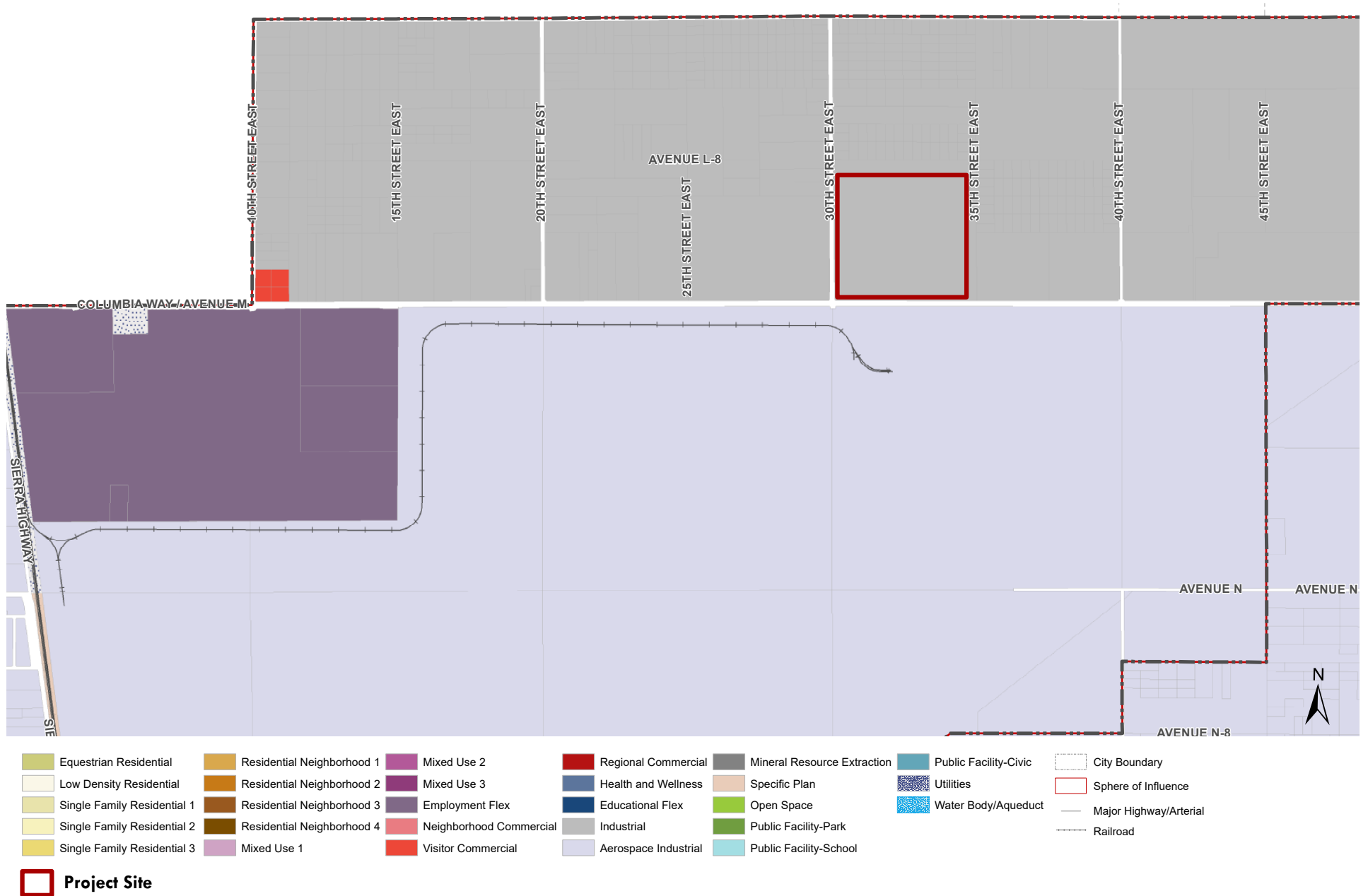
View of the southwest corner from the intersection of East Ave M and 30th St.



Looking westward along East Ave M from the southeast corner of the site.

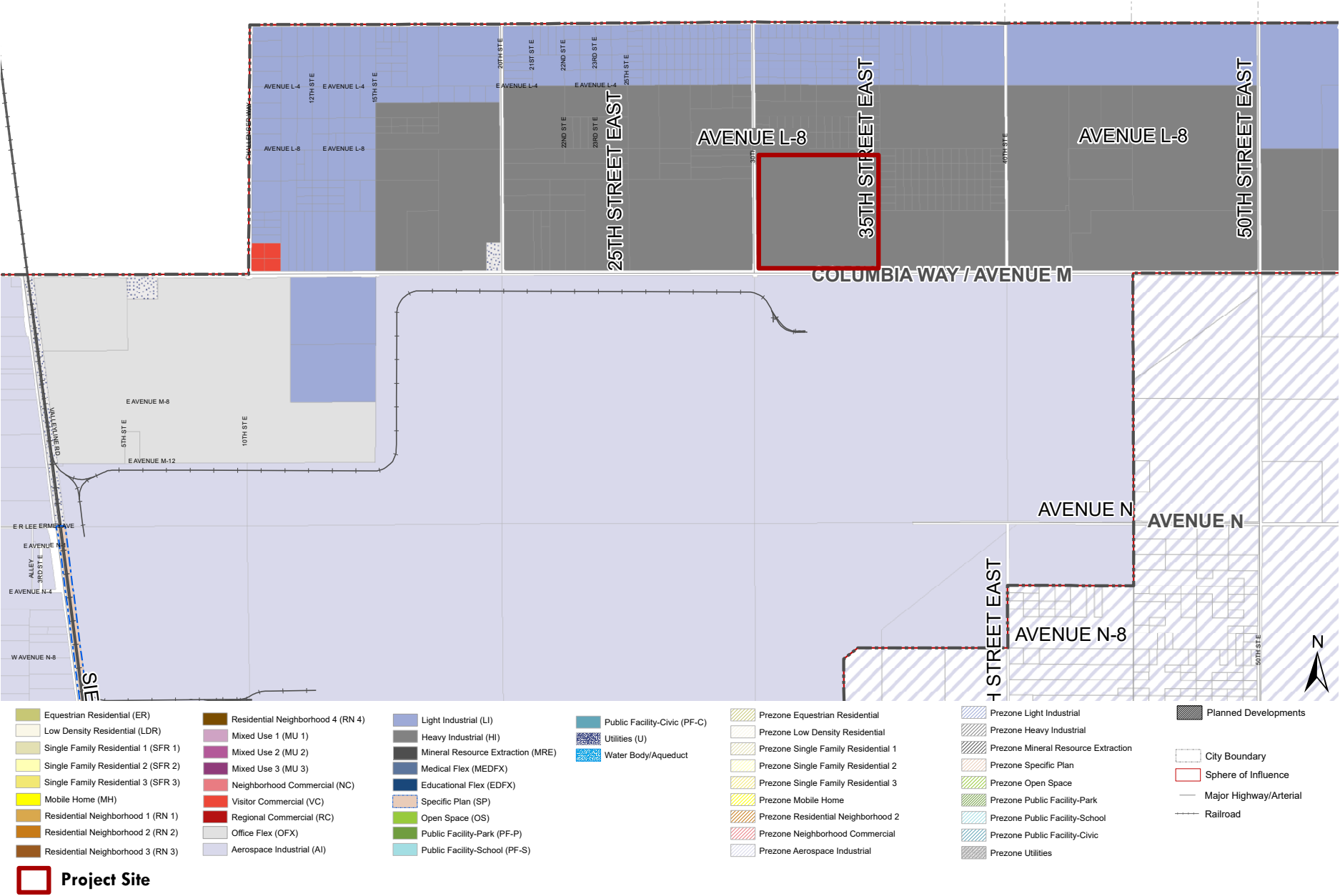
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General Plan Land Use Designation



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Zoning Designation



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3.6 PROJECT CHARACTERISTICS

“Project,” as defined by the State CEQA Guidelines, means:

the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.” (14 Cal. Code of Reg. § 15378(a).)

The Project analyzed in this Draft EIR would be developed in one phase and constructed over approximately 11 months. The Draft EIR analyzes buildout at a Project level of detail, based upon entitlement applications being considered by the City of Palmdale, compared to the existing conditions.

3.7 DESCRIPTION OF THE PROJECT

3.7.1 Project Overview

The Project applicant proposes a tentative parcel map to subdivide the approximately 150.63-acre Project site into three parcels. The Project would develop two warehouses, each totaling 1,500,856 square feet (SF) on two of the parcels. The third parcel would be dedicated to the construction of a stormwater detention basin. In addition, approximately 17.65 acres of offsite improvements would be required for necessary roadway infrastructure to support the Project (including the addition of 35th Street East and Avenue L-8), as described in Section 3.7.7, *Offsite Roadway Improvements*). Also, an additional 2.0 acres (or 17,400 linear feet) will be required for offsite utility improvements. The total area of disturbance for the Project would be 170.28 acres. Additional improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. The Project includes a Conditional Use Permit (CUP) that is required for additional building height and a Minor Site Plan review that is required for additional screening wall height. The Project also requires site annexation into the Los Angeles County Waterworks District No. 40 for water services and annexation into the Los Angeles County Sanitation Districts (LACSD) for wastewater services.

3.7.2 Tentative Parcel Map

The Project applicant proposes a parcel map to subdivide the approximately 150.63-acre Project site into three parcels, including two numbered lots and one lettered lot. Parcel 1 would be 68.76 acres, Parcel 2 would be 70.47 acres, and Lot A would be 11.39 acres. Figure 3-7, *Tentative Parcel Map*, illustrates the parcel map as proposed.

3.7.3 Building and Architecture

The two proposed industrial warehouse buildings would support warehouse, manufacturing, and office uses. Each building would be 1,500,856 SF total and provide 1,480,856 SF of warehouse space, 10,000 SF of office space mezzanine, and 10,000 SF of ground floor office space. The proposed buildings would be single-story and approximately 56 feet and 9 inches tall, each with loading docks, and associated vehicle and truck trailer parking spaces. Figure 3-8, *Conceptual Site Plan*, illustrates the proposed site plan and Figures 3-9a through 3-9c provide conceptual elevations of the proposed buildings. As shown, the proposed building architecture includes window locations, building height, and wall variations to reduce the visual size

of the building and provide visual interest. As detailed on Figure 3-9c, the Project proposes earth-toned shades of grey with blue accents and window glazing.

Building 1 would total 1,500,856 SF on the 2,995,185.6 SF (68.76-acre) Parcel 1, resulting in a FAR of 0.50. Building 2 would total 1,500,856 SF on the 3,069,673.2 SF (70.47-acre) Parcel 2, resulting in a FAR of 0.49.

Building 1 would be set back approximately 441 feet from Avenue L-8, approximately 196 feet from 35th Street East, approximately 208 feet from 30th Street East, and approximately 480 feet from Building 2. Building 2 would be set back approximately 275 feet from East Avenue M/Columbia Way, 205 feet from 35th Street East, 203 feet from 30th Street East, and approximately 480 feet from Building 1.

3.7.4 Parking and Loading Docks

The proposed Project would provide truck and automobile parking as summarized in Table 3-2 below. Truck loading docks would be located along both the north and south sides of Building 1 and Building 2. Each building would include 258 loading dock doors, totaling 516 doors for the Project. Building 1 would include 499 trailer stalls and Building 2 would include 491 trailer stalls, totaling 990 trailer stalls. The Project would also provide trailer stalls along the southern property line, adjacent to East Avenue M/Columbia Way, and in the northern portion of the site bordering the storm water detention basin.

A total of 1,517 automobile stalls would be located along the eastern and western property lines of the Project site. Building 1 would have 753 total automobile stalls consisting of 586 standard automobile stalls, 12 accessible standard automobile stalls, four accessible van parking stalls, and 151 EV capable automobile stalls. Building 2 would have 593 standard parking stalls, 12 accessible standard parking stalls, four accessible van parking stalls, and 155 EV capable parking stalls. In addition, the proposed Project would install 80 short-term and 40 long-term bicycle parking spaces for each building (for a total of 240), exceeding the requirement of 75 short-term and 38 long-term per building.

Table 3-2: Proposed Parking and Loading Docks

	Building 1	Building 2
Trailer Parking Stalls	499	491
Loading Docks	258	258
Bicycle Parking	120	120
Total Automobile Stalls	753	764
<i>Standard Automobile Parking Stalls</i>	<i>586</i>	<i>593</i>
<i>Accessible Automobile Parking Stalls</i>	<i>12</i>	<i>12</i>
<i>Accessible Van Parking Stalls</i>	<i>4</i>	<i>4</i>
<i>EV Capable Parking Stalls</i>	<i>151</i>	<i>155</i>

3.7.5 Landscaping, Fencing, and Screening Walls

The proposed Project includes approximately 951,135 SF (or 21.84 acres) of ornamental landscaping that would cover approximately 25.55 percent of the parking area and 15 percent of the overall site, as shown in Figures 3-10a and 3-10b, *Landscape Plan*. Proposed landscaping includes 36-inch and 24-inch box trees, 15-gallon trees, various shrubs, and succulents to screen the proposed buildings, infiltration/detention basin, and parking and loading areas from offsite viewpoints on 30th Street East and East Avenue M/Columbia Way. The Project includes a 35-foot landscape setback along East Avenue M/Columbia Way. A 10-foot landscape setback would also be installed along 30th Street East and 35th Street East.

A 6-foot-tall wrought iron fence is proposed around the detention basin on the northern Project site boundary, along Avenue L-8. Two 8-foot-tall wrought iron fences are proposed adjacent to the trailer stall parking areas in the center of the Project site between Building 1 and Building 2, one fence for each building. In addition, 12-foot screening walls would be installed to the east and west of the loading docks and trailer stall parking areas to screen building operations from offsite views.

3.7.6 Access and Circulation

Trucks traveling to the proposed development would travel via SR-14 to East Avenue M/Columbia Way and enter the site through the driveways located on 30th Street East or 35th Street East. As shown in Figure 3-11, *Circulation and Driveways*, site access would be provided from eight driveways (numbered Driveways 1 through 8 in the description below and in Figure 3-11), four of which would be on 30th Street East and four on 35th Street East. No driveways are proposed on East Avenue M/Columbia Way.

Building 1 would be accessible via five driveways: Driveways 1, 2, and 3 located on 30th Street East, along the west side of Building 1, and Driveways 5 and 6 located on 35th Street East, along the east side of Building 1. Driveway 1 would be 40 feet wide and allow for both truck and passenger vehicle access. Driveway 2 would be 26 feet wide and be limited to passenger vehicles. Driveway 3 would be a 50-foot-wide signalized driveway and would be limited to truck access. Driveway 5 would be 44 feet wide and allow access for both truck and passenger vehicles, and Driveway 6 would be 26 feet wide and be limited to passenger vehicles. Internal circulation for Building 1 would be provided via 28-foot-wide drive aisles that would also serve as fire lanes.

Building 2 would be accessible via three driveways: Driveway 4 located on 30th Street East, along the west side of Building 2, and Driveways 7 and 8 located on 35th Street East, along the east side of the Building 2. Driveway 4 would be 50 feet wide and allow for both truck and passenger vehicle access; Driveway 7 would be a 50-foot-wide signalized driveway limited to truck access; and Driveway 8 would be 50 feet wide and allow access for both truck and passenger vehicles. Internal circulation for Building 2 would be provided via 28-foot-wide drive aisles that would also serve as fire lanes.

Each building is designed to function independently. However, the Project includes installation of a shared 28-foot private driveway/fire lane in between the two buildings. Access to trailer stalls and loading dock areas would be controlled through the use of gates. The proposed Project would include one metal, manually operated gate at each entrance/exit of the truck loading areas, for a total of eight gates. Additionally, the proposed Project would include construction of a an 8-foot-wide sidewalk around the entire Project's property line along Avenue L-8, East Avenue M/Columbia Way, 30th Street East and 35th Street East.

3.7.7 Offsite Roadway Improvements

The total area of offsite roadway improvements is 17.65 acres. The Project would construct two new roadways adjacent to the Project site: 35th Street East would run along the east side of the Project site, and Avenue L-8 would run along the north side of the Project site, along existing dirt access roads. These roadways would extend along the Project frontage limits. Additionally, the existing East Avenue M/Columbia Way would be improved with new pavement, curb and gutter, sidewalk, a 12-foot bike Class I bike path, and a k-rail barrier. The Project would also add new pavement, curb and gutter, and sidewalk to 30th Street. Proposed offsite roadway improvements are shown in Figure 3-12a, *Offsite Roadway Improvements*. Other offsite Project improvements are shown in Figure 3-12b, *Other Offsite Improvements*, and include the following:

1. Installation of a traffic signal at the Columbia Way/SR-14 southbound (SB) intersection.

2. Installation of a traffic signal and addition of a second westbound (WB) through lane at the Columbia Way/SR-14 northbound (NB) intersection.
3. Addition of a second NB left-turn lane at the Columbia Way/10th Street West intersection.
4. Addition of a second NB left-turn lane; alteration of the WB lane configuration to two left-turn lanes, one through lane, and one shared through-right lane; and installation of dotted lines as a safety measure to guide WB through-traffic at the Columbia Way/Sierra Highway intersection.
5. Modification of traffic signal phasing to implement overlap phasing for SB right-turn at the Columbia Way/30th Street East intersection.
6. Installation of a traffic signal; implementation of protected phasing for NB left-turn movement; and implementation of overlap phasing for EB right-turn movement at the Columbia Way/50th Street East intersection.

3.7.8 Energy and Communications Utilities

The Project would install underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded along East Avenue M/Columbia Way as part of the Project. The Project would connect to the existing 6-inch natural gas line in East Avenue M/Columbia Way.

3.7.9 Water and Sewer

The proposed Project would install new onsite water infrastructure that would connect to offsite 16-inch water lines that would be installed along the perimeter of the Project site that would connect to a proposed 24-inch offsite water main at East Avenue M/Columbia Way and 30th Street E. The proposed offsite 24-inch water line would extend approximately 13,400 linear feet west within the East Avenue M/Columbia Way right-of-way to 5th Street E and connect to the existing 30-inch water line in East Avenue M/Columbia Way. The proposed 24-inch watermain extension would then continue from 4th Street West to 4th Street East for an additional 4,000 linear feet. In total, the water line extension would be approximately 17,400 linear feet in length. The proposed water lines are shown in Figure 3-13a, *Utility Improvements (Water)*.

The proposed Project would include installation of new onsite and offsite sewer lines. The proposed 10-inch onsite sewer lines would be located north of Building 1 and north of Building 2 and align in an east-west direction. The onsite sewer lines would connect to an existing offsite 15-inch-diameter sewer main line along 30th Street East. The proposed onsite sewers would also be connected to 35th Street and stubbed for planned future development on the east side of road.

The Los Angeles County Water Works District (LACWD) 40 is the closest public water supplier to the Project site and the Los Angeles County Sanitation Districts (LACSD) is the closest wastewater provider. The Project includes annexation of the Project site into LACWD 40 for water services and LACSD for wastewater services, which would be completed via application to the Local Agency Formation Commission for Los Angeles County (LAFCO). The proposed water and sewer improvements are shown in Figures 3-13a and 3-13b, *Utility Improvements*.

3.7.10 Drainage

The proposed Project would include construction of an onsite drainage system. Stormwater runoff from each building would drain to the truck yard and parking lots, then drain via proposed catch basins and detention drains to a detention basin. Due to the absence of nearby storm drain improvements, the proposed basin would retain and infiltrate the entire stormwater runoff volume from the site. The proposed detention basin would be approximately 11 acres and located at the northernmost portion of the Project site spanning the

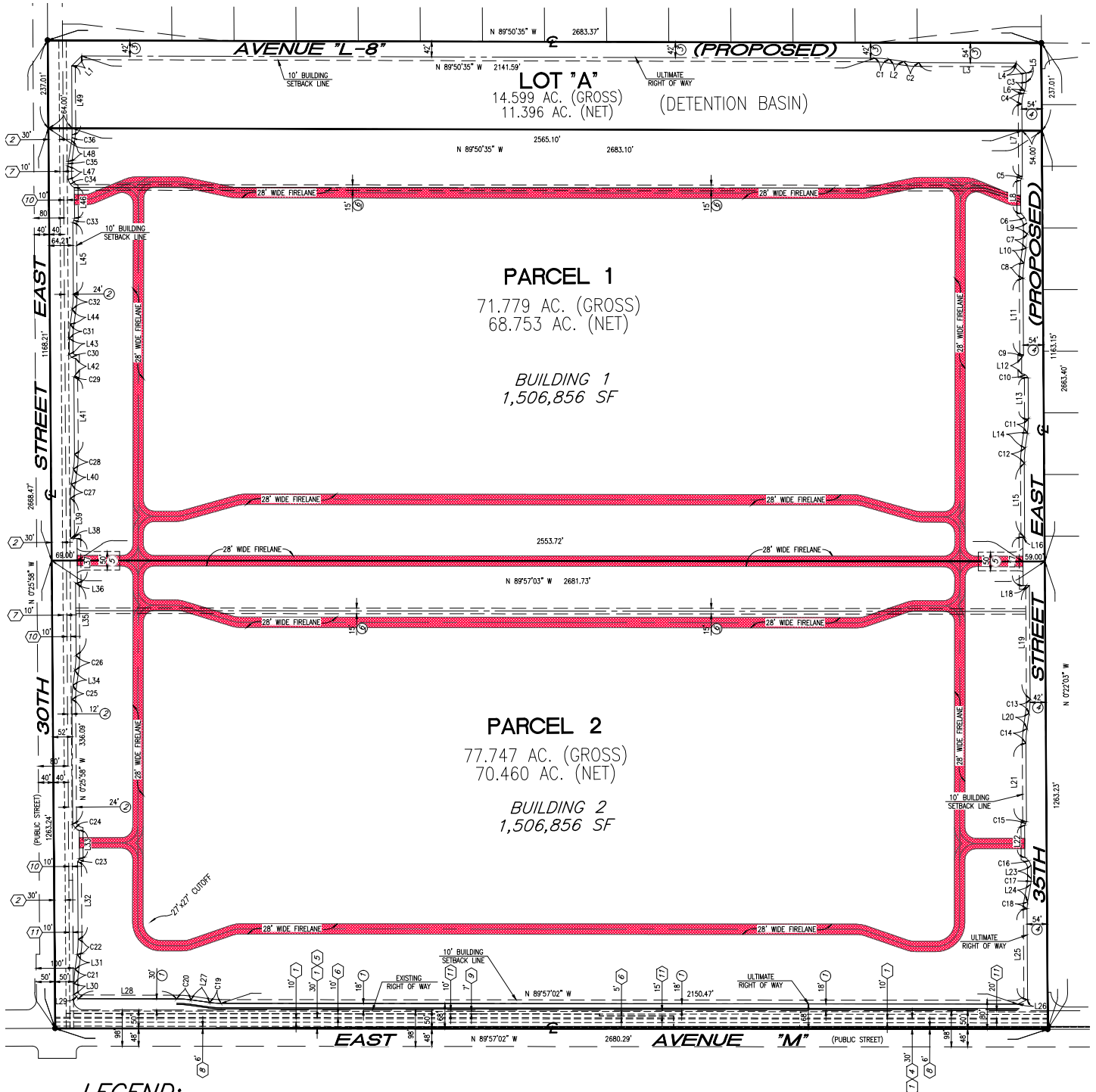
width of the site from 30th Street East to 35th Street East. The basin has a total volume of approximately 78 acre-feet, which could accommodate runoff from two successive 100-year storms.

3.7.11 Sidewalk Improvements




The proposed Project would include construction of a an 8-foot-wide sidewalk around the entire Project's property line along Avenue L-8, East Avenue M/Columbia Way, 30th Street East and 35th Street East.

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Tentative Parcel Map



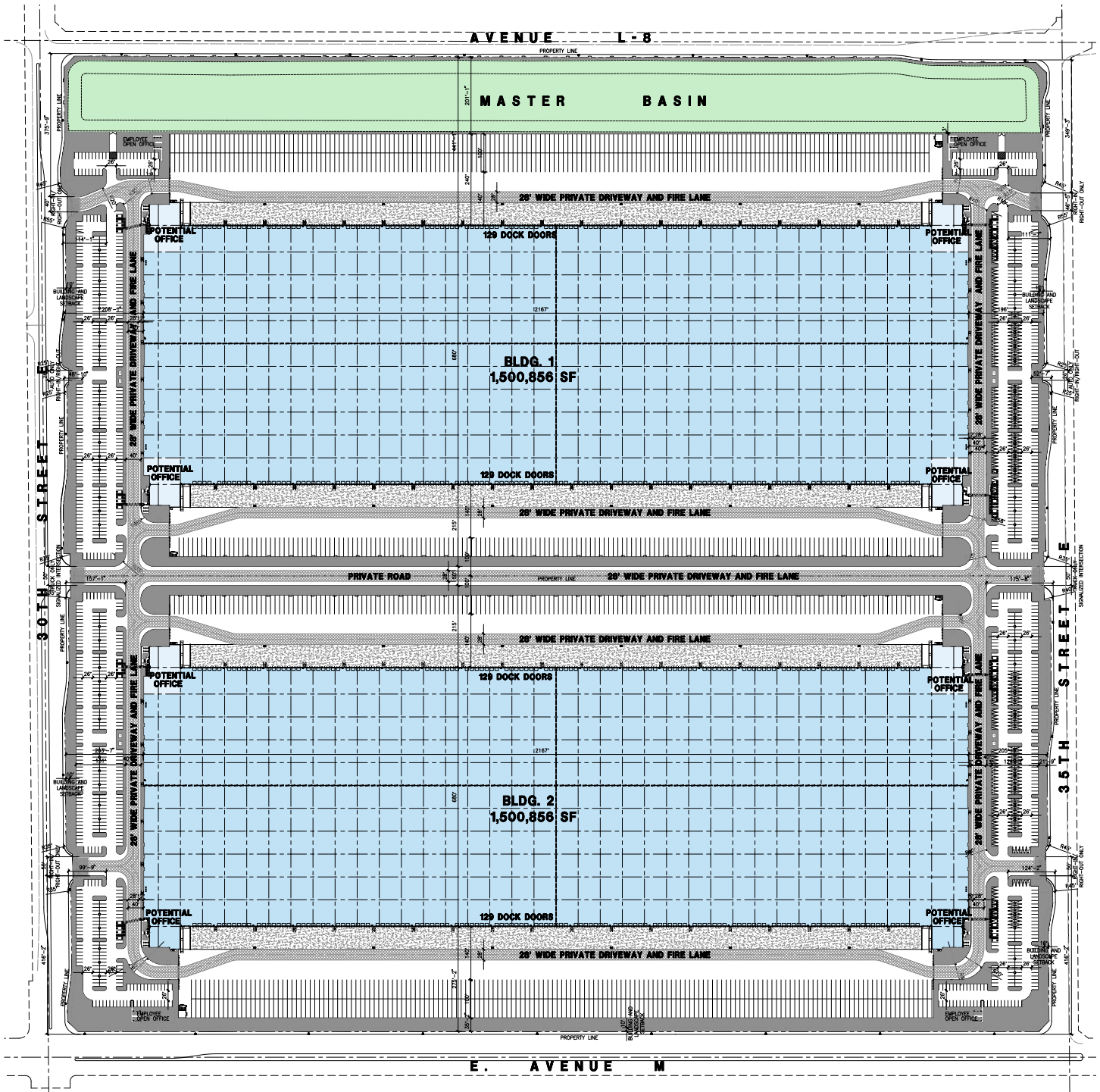
LEGEND:

CL	CENTERLINE		CONCRETE
CONC	CONCRETE		
DR	DRAIN		TREE
DRWY	DRIVEWAY		
ELEC	ELECTRIC METERS		PALM TREE
GA	GUY ANCHOR		
GM	GAS METER		
PA	PLANTER AREA		
PL	PROPERTY LINE		
PP	POWER POLE		
SDMH	STORM DRAIN MANHOLE		
SMH	SEWER MANHOLE		
STLT	STREET LIGHT		
WDF	WOOD FENCE		
WM	WATER METER		
WV	WATER VALVE		



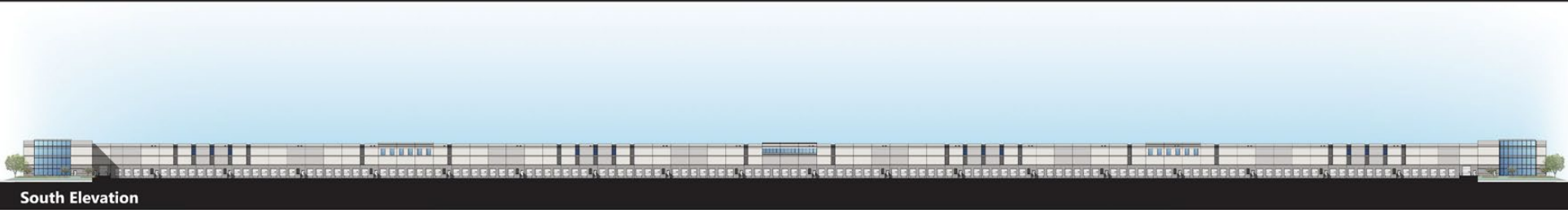
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Conceptual Site Plan (colored)



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Building 1 Elevation



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Building 2 Elevation



North Elevation



West Elevation - 30th Street E



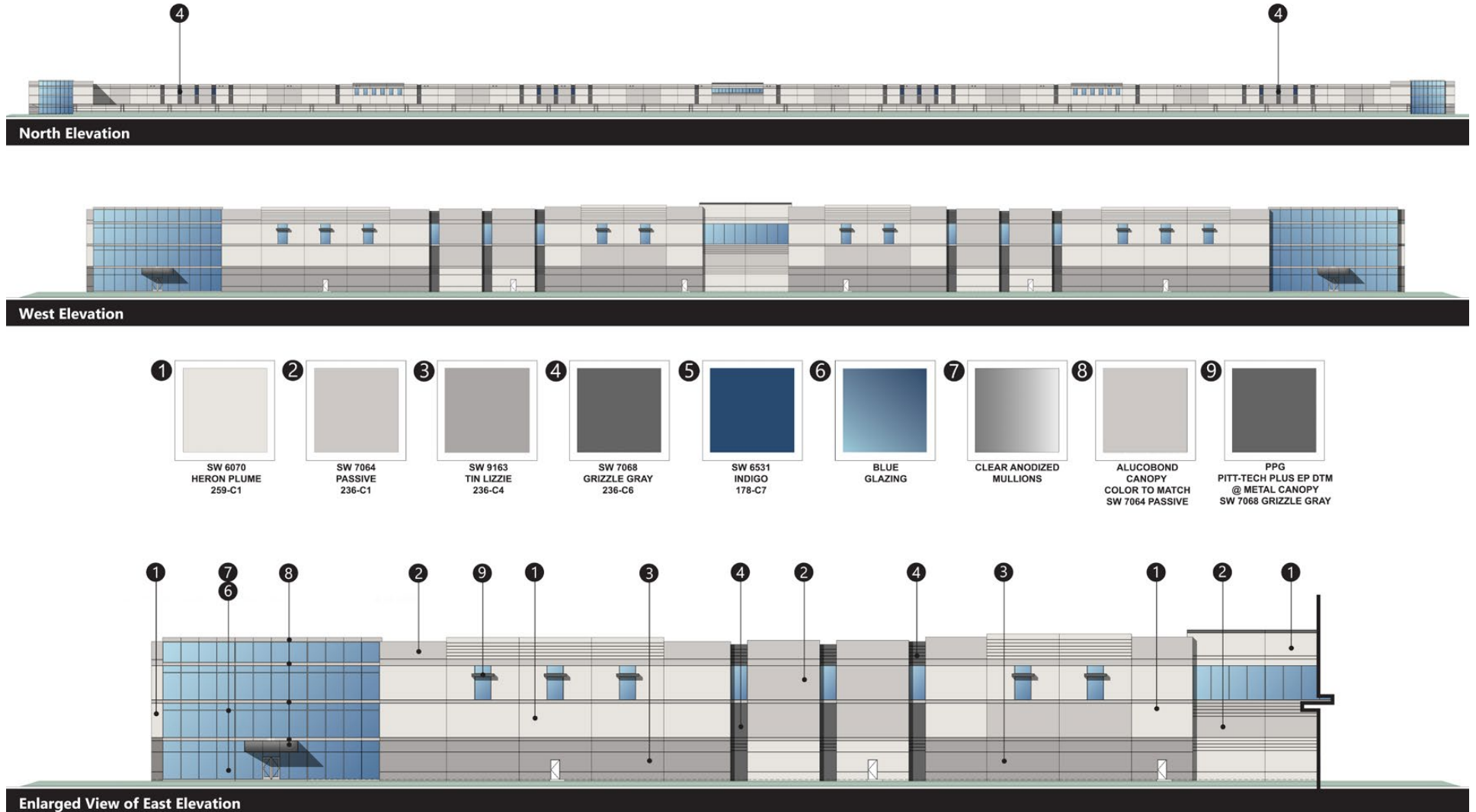
South Elevation - Avenue M



East Elevation - 35th Street E

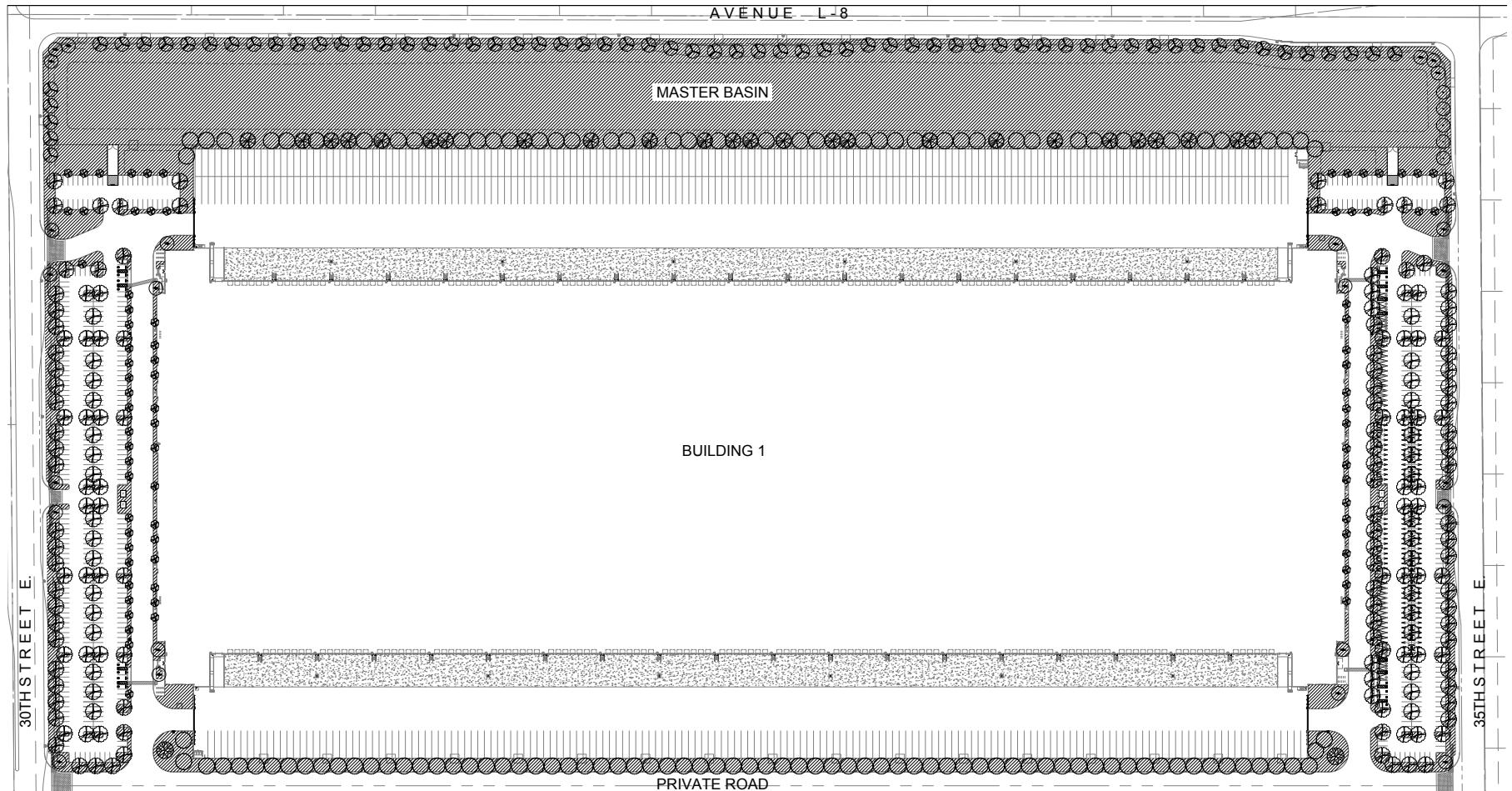
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Material Board and Color Scheme



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Building 1 Landscape Plans



PLANTING LEGEND

SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS	REMARKS
	<i>Caradellum 'Desert Museum'</i> Salt Taper Yucca	36" Box	43	L	Muti
	<i>Ficusus greggii</i> Little Leaf Ash	15 Gal	129	L	Standard
	<i>Ficusus s. 'Ravenwood'</i> Raywood Ash	24" Box	67	M	Standard
	<i>Gleditsia inornata</i> Honey Locust	24" Box	7	M	Standard
	<i>Pinus edulis</i> Alghian Pine	24" Box	230	L	Standard
	<i>Pistacia chinensis</i> Chinese Pistache	15 Gal	393	L	Standard
	<i>Prosopis juliflora</i> Chinese Mesquite	15 Gal	62	L	Muti

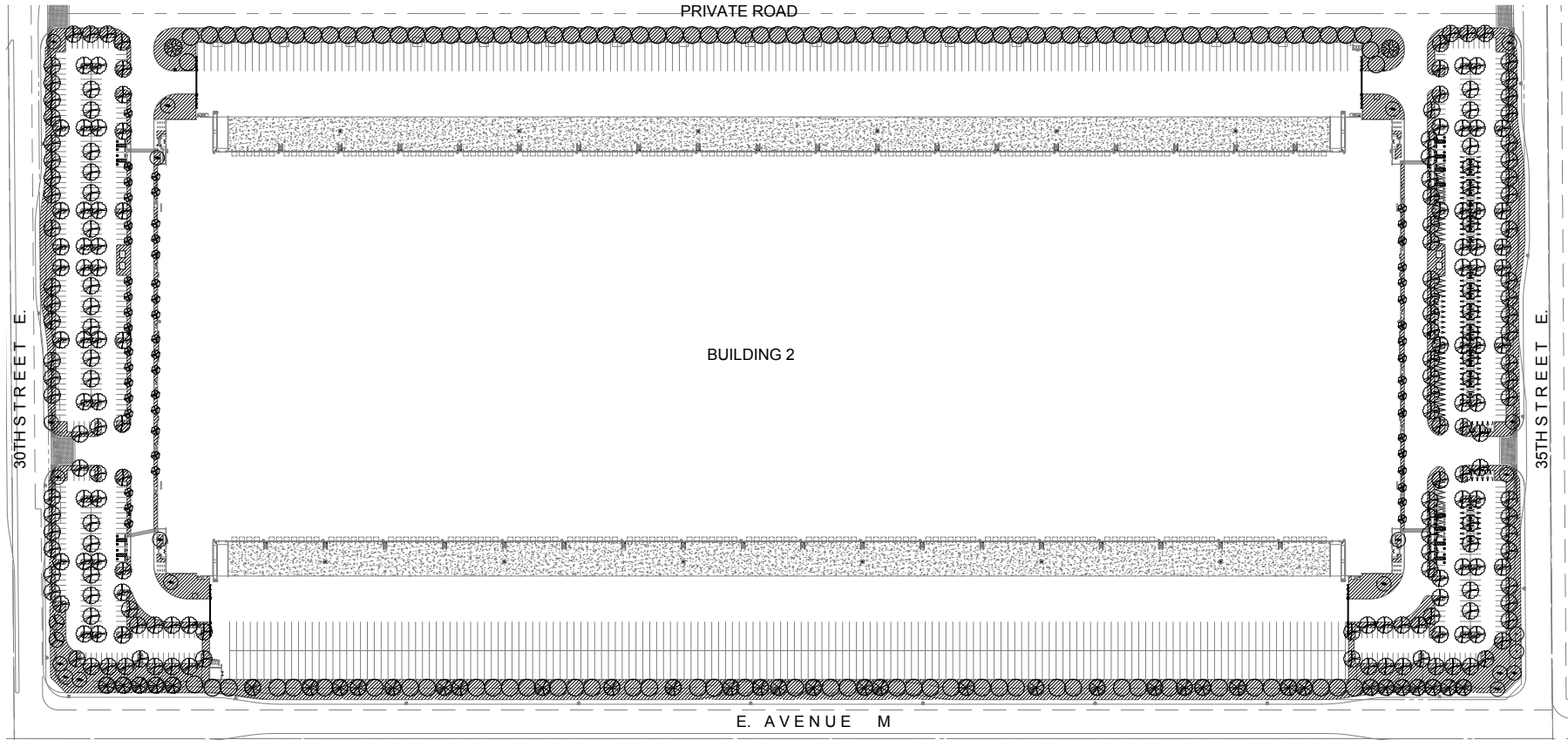
SYMBOL	BOTANICAL/COMMON NAME	SIZE	WUCOLS	REMARKS
	<i>Agave americana</i> Century Plant	5 Gal	L	
	<i>Agave Blue Glow</i> Blue Glow Agave	5 Gal	L	
	<i>Agave parviflora</i> Palm's Agave	5 Gal	L	
	<i>Dasylirion wheeleri</i> Whet Stone	5 Gal	L	
	<i>Hesperaloe parviflora</i> Red Yucca	5 Gal	L	

SYMBOL	BOTANICAL/COMMON NAME	SIZE	WUCOLS	REMARKS
	<i>Baccharis p. 'Pigeon Point'</i> Desert Coyote Bush	1 Gal	48" O.C.	L
	<i>Colobrydium 'Lowest'</i> Cholla	1 Gal	60" O.C.	M
	<i>Homocallis hybridus Yellow</i> Yellow Day Lily	1 Gal	24" O.C.	M
	<i>Lonicera j. 'Halliana'</i> Hill's Honeysuckle	1 Gal	48" O.C.	L
	<i>Stenandrium s. 'Henderson Carpet'</i> Prostrate Rosemary	1 Gal	36" O.C.	L
	<i>Trachycarpus fortunei</i> Box Palm	1 Gal	24" O.C.	M
	<i>Yucca glauca</i> Society Garlic	1 Gal	24" O.C.	M



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Building 2 Landscape Plans



PLANTING LEGEND

TREES				
SYMBOL	BOTANICAL/COMMON NAME	SIZE	QTY	WUCOLS REMARKS
	<i>Cercidium desert museum</i> Blue Palo Verde	36" Box	43	L Multi
	<i>Fraxinus greggii</i> Little Leaf Ash	15 Gal	129	L Standard
	<i>Fraxinus o. 'Raywood'</i> Raywood Ash	24" Box	67	M Standard
	<i>Gleditsia triacanthos</i> Honey Locust	24" Box	7	M Standard
	<i>Pinus edulis</i> Algham Pine	24" Box	230	L Standard
	<i>Pistacia chinensis</i> Chinese Pistache	15 Gal	393	L Standard
	<i>Prosopis juliflora</i> Chinese Mesquite	15 Gal	62	L Multi

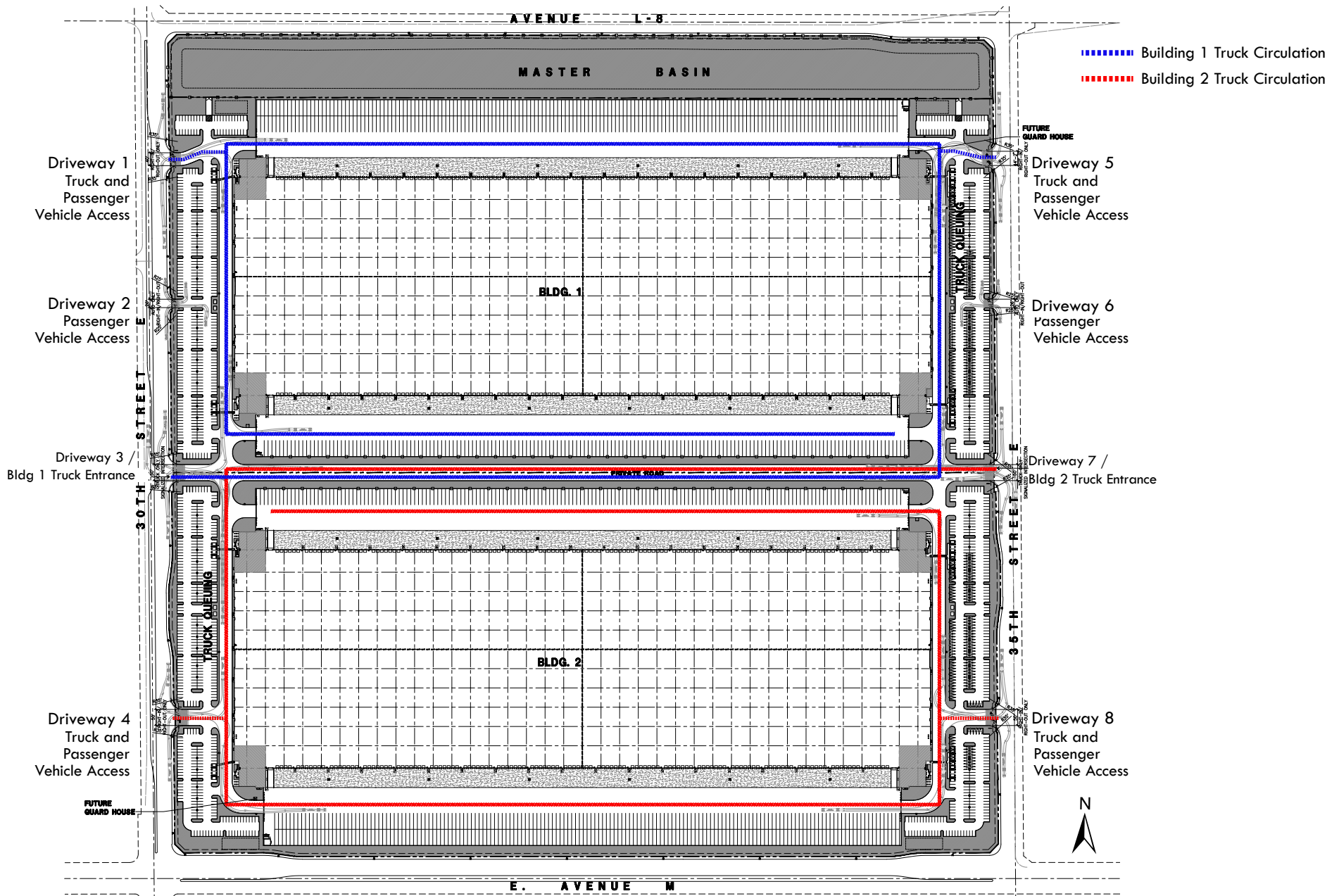
ACCENTS				
SYMBOL	BOTANICAL/COMMON NAME	SIZE	WUCOLS	REMARKS
	<i>Agave americana</i> Century Plant	5 Gal	L	
	<i>Agave 'Blue Glow'</i> Blue Glow Agave	5 Gal	L	
	<i>Agave parviflora</i> Pony's Agave	5 Gal	L	
	<i>Dasylirion wheeleri</i> Desert Spoon	5 Gal	L	
	<i>Nephrolepis parviflora</i> Red Yucca	5 Gal	L	

GROUNDCOVER				
SYMBOL	BOTANICAL/COMMON NAME	SIZE	WUCOLS	REMARKS
	<i>Baccharis p. 'Pigeon Point'</i> Dwarf Coyote Bush	1 Gal	48" O.C.	L
	<i>Cotoneaster 'Lowland'</i> Cotoneaster	1 Gal	60" O.C.	M
	<i>Hemerocallis hybridus 'Yellow'</i> Yellow Day Lily	1 Gal	24" O.C.	M
	<i>Lonicera j. 'Halliana'</i> Halls Honeysuckle	1 Gal	48" O.C.	L
	<i>Rosmarinus o. 'Huntington Carpet'</i> Prostrate Rosemary	1 Gal	36" O.C.	L
	<i>Tradescantia virginiana</i> Star Jasmine	1 Gal	24" O.C.	M
	<i>Tulbaghia violacea</i> Society Garlic	1 Gal	24" O.C.	M



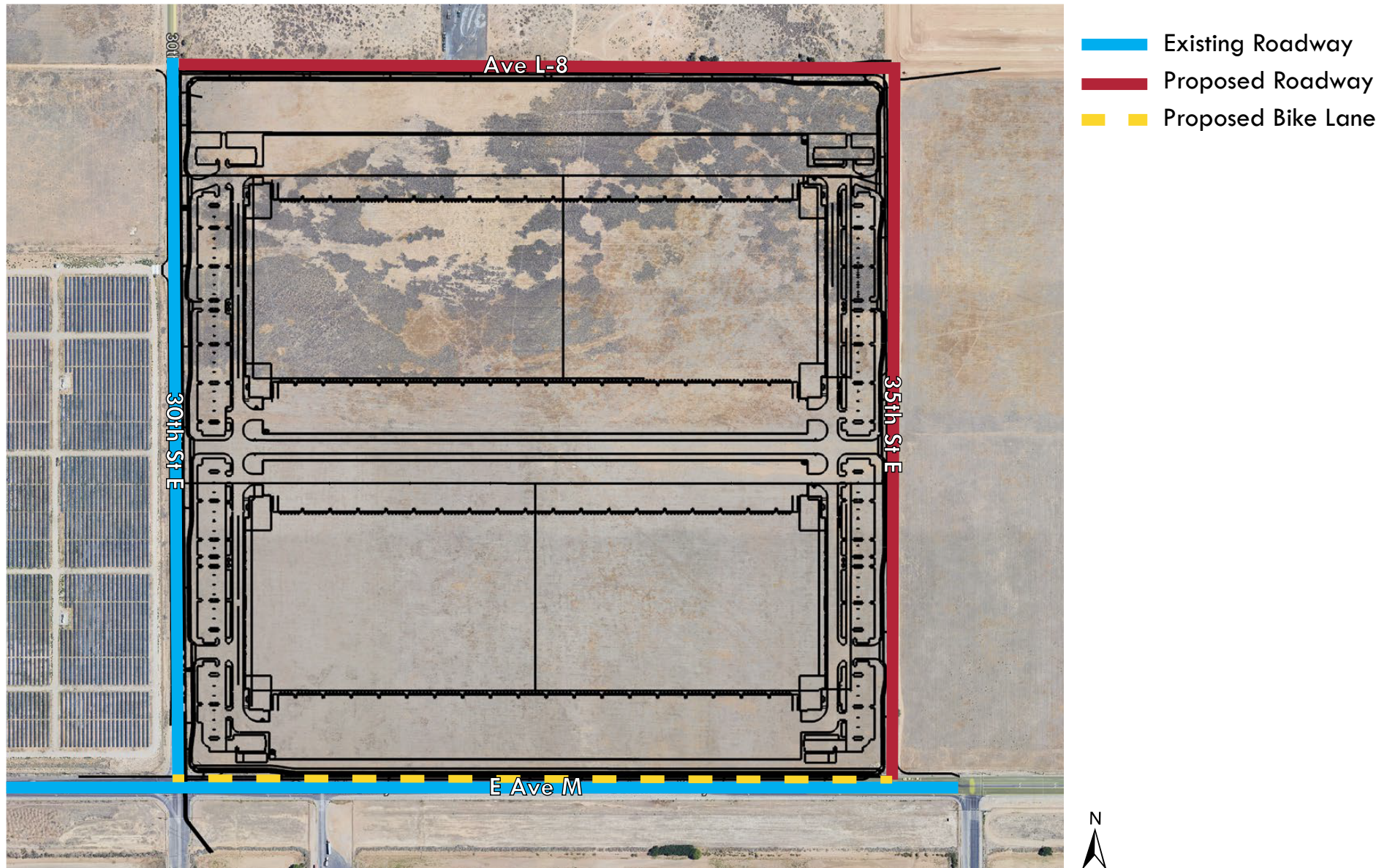
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Circulation and Driveways



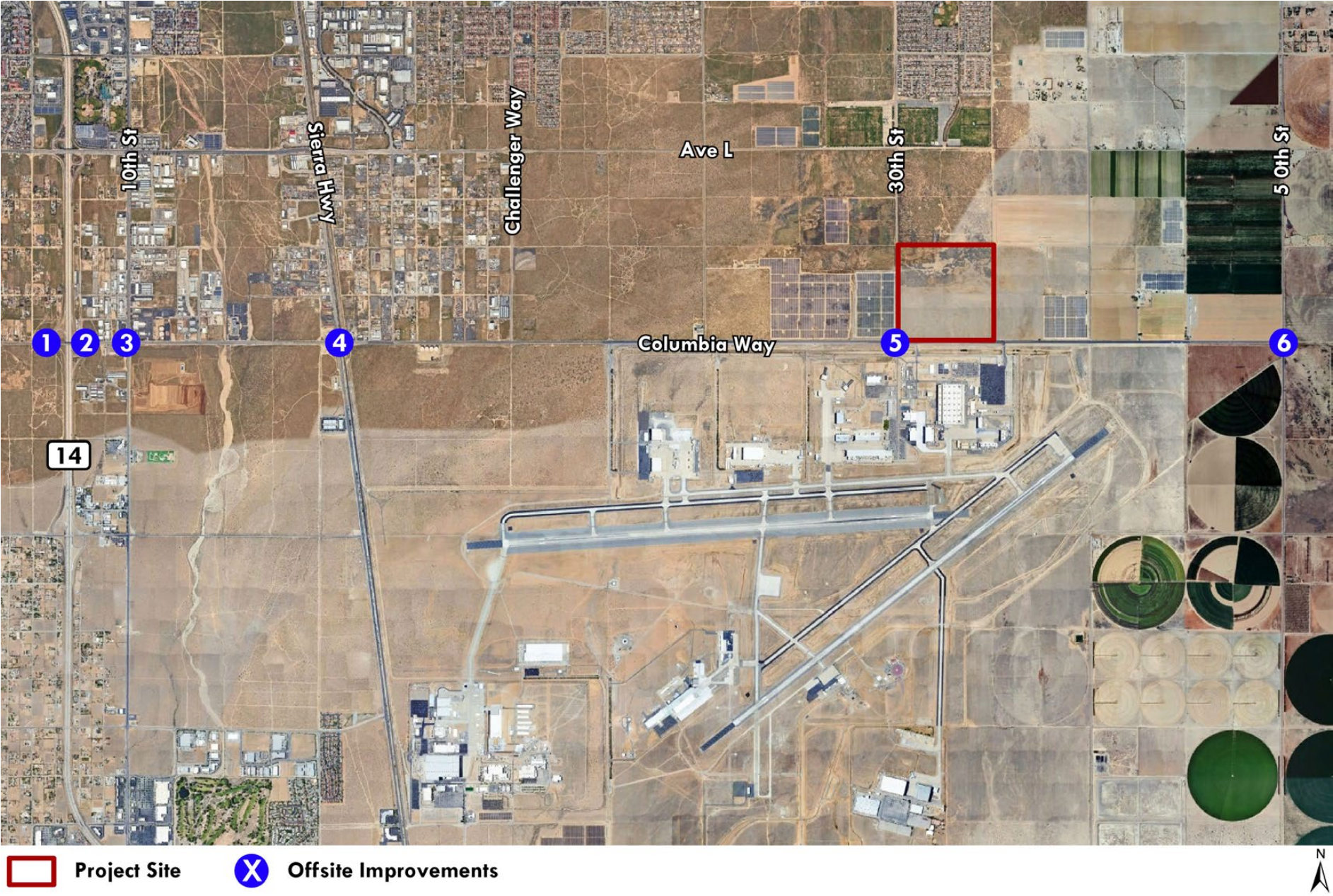
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Offsite Roadway Improvements



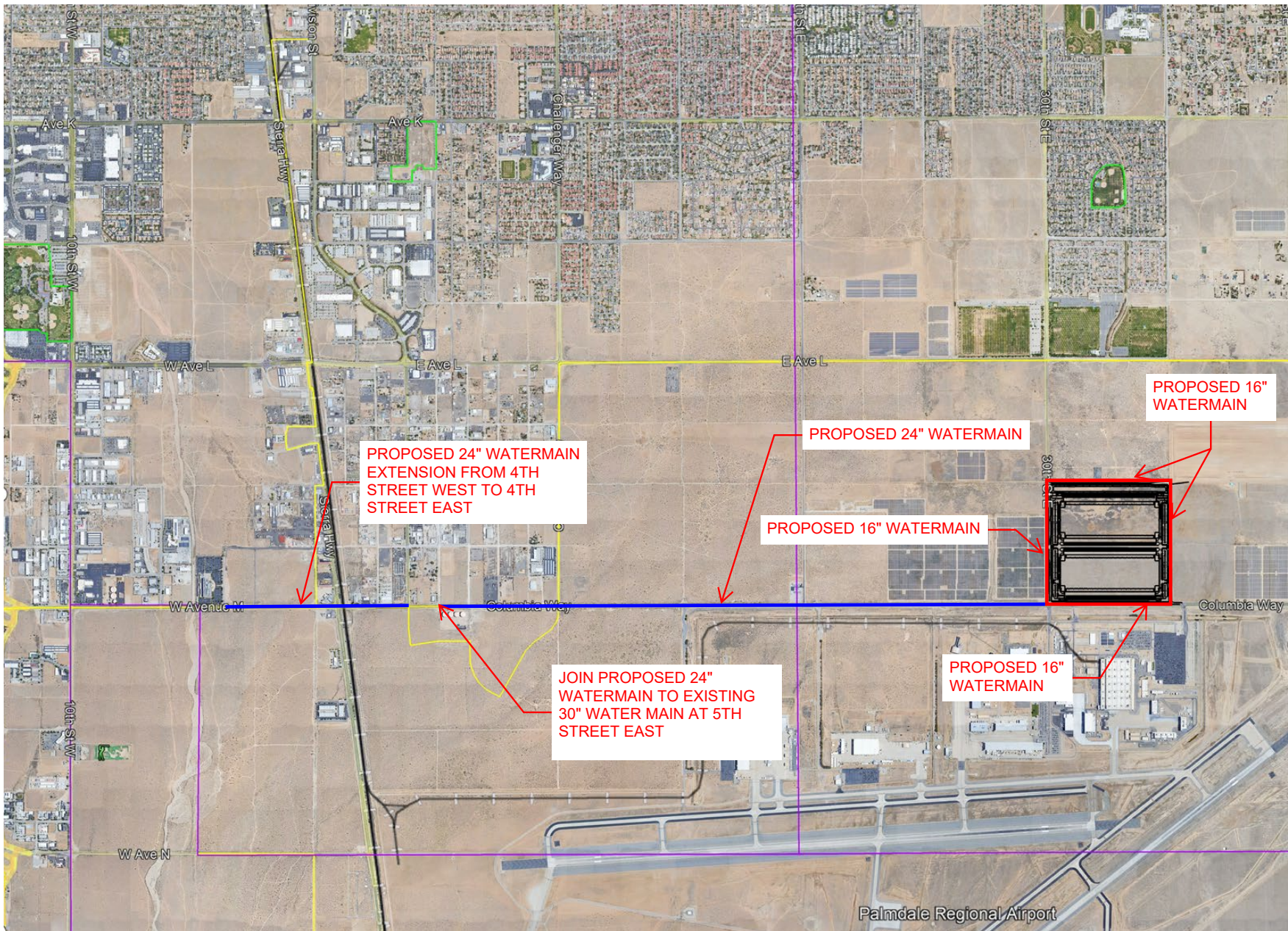
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Other Offsite Improvements



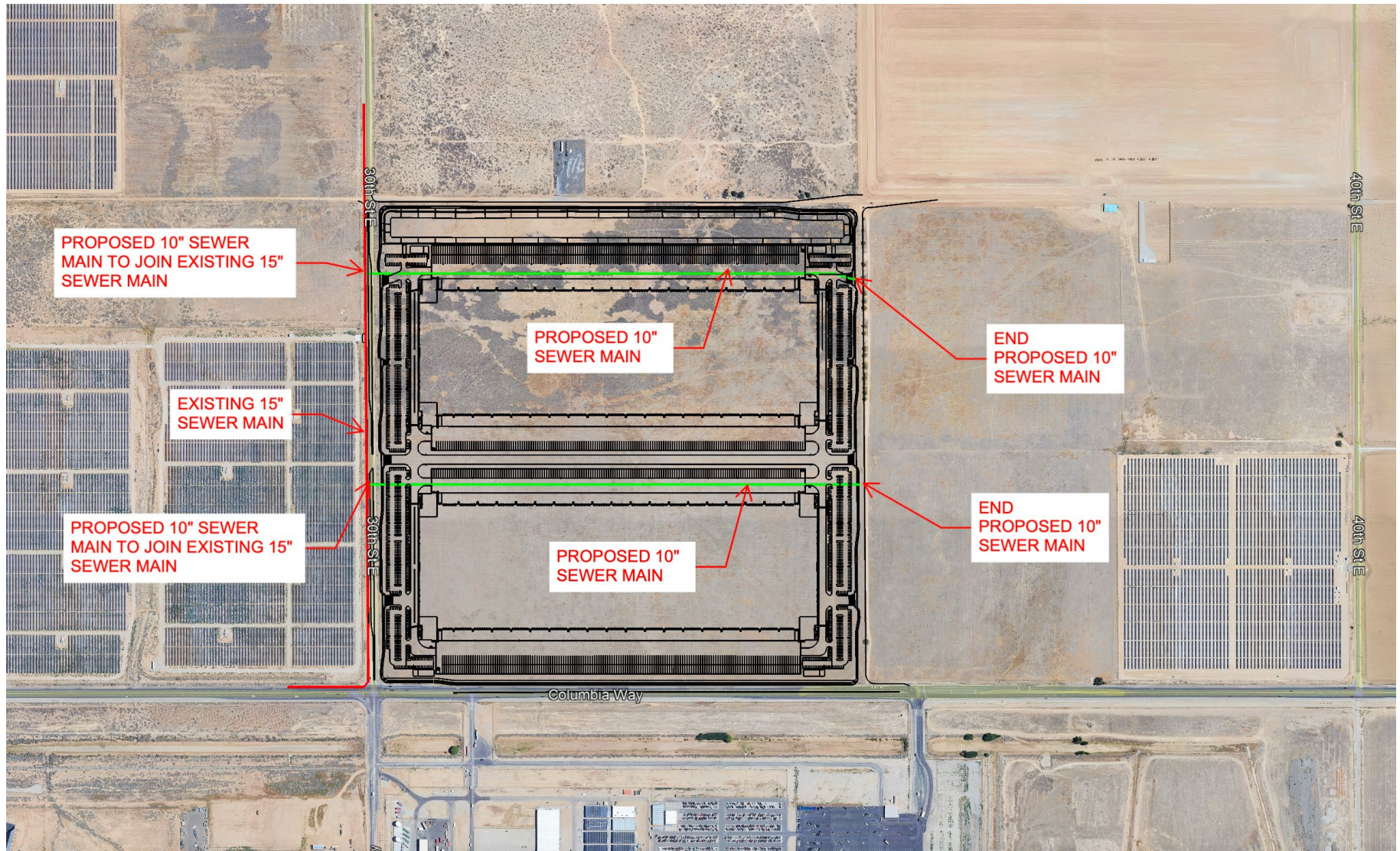
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Utility Improvements (Water)



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Utility Improvements (Sewer)



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3.7.12 Operations

The Project would operate as two speculative industrial warehouse buildings with no cold storage. The Draft EIR assumes that 90 percent would be used for warehouse uses and 10 percent for manufacturing uses. For purposes of evaluation in this Draft EIR, the proposed development is assumed to be operational 24 hours a day, 7 days a week with exterior loading and parking areas illuminated at night. Lighting would be subject to City Municipal Code Section 17.86.030, which states that outdoor lighting shall be dark-sky compliant, in accordance with the International Dark-Sky Association recommendations, and that all outdoor lighting shall be positioned so that no direct light extends to adjoining properties.

The buildings would be designed such that business operations would be conducted entirely within the buildings, with the exception of traffic movement, parking, trailer connection and disconnection, storage, and the loading and unloading of trailers. The outdoor cargo handling equipment used during loading and unloading of trailers (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) would be non-diesel powered, in accordance with contemporary industry standards.

Dock doors on the warehouse building would not be occupied by a truck at all times of the day. There are typically many more dock door positions on warehouse buildings than are needed for receiving and shipping volumes. The dock doors that are in use at any given time are usually selected based on interior building operation efficiencies (i.e., trucks dock closest to where the goods carried by the truck are stored inside the warehouse). As a result, many dock door positions are frequently inactive throughout the day. Pursuant to State law, on-road diesel-fueled trucks are required to comply with air quality and greenhouse gas emission standards, including but not limited to the type of fuel used, engine model year stipulations, aerodynamic features, and idling time restrictions.

3.7.13 Construction

Project development is estimated to take approximately 11 months. Construction activities would occur over one phase and include site preparation, grading, building construction, paving, and architectural coatings. Table 3-3 provides the anticipated construction schedule.

Table 3-3: Tentative Project Construction Schedule

Construction Activity	Working Days
Site Preparation	20
Grading	15
Building Construction	190
Paving	15
Architectural Coating	80

Grading work of soils is expected to result in approximately 412,631 cubic yards (CY) of cut and 412,631 CY of fill soils, and therefore, the site earthwork would be balanced. Construction would occur within the hours allowed by the Palmdale Municipal Code Section 8.28.030, which limits construction to between the hours of 6:30 a.m. and 8:00 p.m., Monday through Saturday, with no construction activities permitted on Sundays.

3.8 PROJECT DESIGN FEATURES AND EXISTING PLANS, PROGRAMS, OR POLICIES

Throughout the impact analysis in this Draft EIR, reference is made to existing plans, programs, or policies (PPPs) currently in place which effectively reduce environmental impacts. Where applicable, PPPs are listed to show their effect in reducing potential environmental impacts. The Project applicant has incorporated into the Project various sustainable design features, as detailed below, and are identified and discussed in the impact analysis. These sustainable design features have been included as PPPs where applicable, as they are required pursuant to California Code of Regulations Title 24, Part 11, *California Green Building Standards Code* (also referred to as CALGreen). Where the application of these measures does not reduce an impact to below a level of significance, Project-specific mitigation is introduced. The City of Palmdale would include these PPPs and mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) for the Project to ensure their implementation.

Sustainable Design Features

The Project would comply with the CALGreen policies related to sustainable design and energy conservation by incorporating the following features into Project development and/or operation:

- Installation of enhanced insulation;
- Design structure to be solar ready;
- Design electrical system to accommodate future renewable energy technologies, solar PV systems, and battery storage systems;
- Installation of energy efficient lighting, heating and ventilation systems, and appliances;
- Installation of drought-tolerant landscaping and water-efficient irrigation systems; and
- Implementation of a City construction waste diversion program.

3.9 DISCRETIONARY APPROVALS AND PERMITS

The City of Palmdale and the following responsible agencies are expected to use the information contained in this Draft EIR for consideration of approvals related to and involved in the implementation of this Project. These include, but may not be limited to, the permits and approvals described below.

As part of the proposed Project, the following discretionary actions and subsequent approvals are being requested by the Project proponent:

- Site Plan Review (SPR 23-001)
- Tentative Parcel Map (TPM 84077)
- Conditional Use Permit (CUP 23-003)
- Minor Site Plan Review
- Certification of the Environmental Impact Report
- Approvals and permits necessary to execute the proposed Project, including but not limited to grading permit, building permit, etc.

The following approvals are anticipated from responsible agencies:

- LAFCO Approval of Annexation into the Los Angeles County Water Works District Number 40 and the Los Angeles County Sanitation Districts.

4. Environmental Setting

The purpose of this section is to provide a description of the environmental setting of the Project site and surrounding area as it existed at the time of the Notice of Preparation (NOP) was published, from both a local and regional perspective. In addition to the summary below, detailed environmental setting descriptions are provided in each subsection of Section 5 of this Draft EIR.

4.1 REGIONAL SETTING

The proposed Project is located within the northern portion of the City of Palmdale in northern Los Angeles County (see Figure 3-1, *Regional Location*). The Project area is northwest of the intersection of East Avenue M/Columbia Way and 30th Street East and includes one parcel. Regional access is provided by State Route (SR) 14 (SR-14), located approximately 4.3 miles to the west and State Route 138 (SR-138) approximately 4.5 miles south of the Project site. Local access to the site is via 30th Street East, a designated crosstown street), and East Avenue M/Columbia Way, a designated regional and crosstown street. The existing site and surrounding area is shown in Figure 3-2, *Local Vicinity*.

The Project site comprises one parcel encompassing approximately 150.63 acres. This parcel is identified as Assessor's Parcel Number (APN) 3170-018-081. In addition, approximately 17.65 acres of offsite improvements would be required for necessary roadway infrastructure to support the Project. The total area of disturbance for the Project is approximately 167.83 acres. The Project site's existing conditions are shown in Figure 3-3, *Aerial View*.

4.2 EXISTING LAND USE AND ZONING

The Project site has a General Plan Land Use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI). The City of Palmdale GP states that the IND land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses. The Heavy Industrial zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution. The Project's site existing land use designation and zoning is shown in Figure 3-5, *Existing Land Use* and Figure 3-6, *Existing Zoning*.

4.3 SURROUNDING LAND USES AND DEVELOPMENT

The Project site is located within a predominately undeveloped area that primarily consists of unused agricultural land. The site is located north of Palmdale Regional Airport and is within the Military Influence Area of Air Force Plant 42, located within Palmdale Regional Airport. The Project site is surrounded by undeveloped land, a solar farm, and the Palmdale Regional Airport/Airforce Plan 42. The surrounding land uses are described in Table 4-1.

Table 4-1: Surrounding Existing Land Use, Zoning, and Specific Plan Designations

	Existing Land Use	General Plan Designation	Zoning Designation
North	Undeveloped land (Future vehicle storage facility SPR 19-012 to the northeast)	Industrial (IND)	Heavy Industrial (HI)
West	Solar farm, across 30th Street East	Industrial (IND)	Heavy Industrial (HI)
South	East Avenue M/Columbia Way followed by Airport related facilities across East Avenue M/Columbia Way	Aerospace Industrial (AI)	Aerospace Industrial (AI)
East	Undeveloped land	Industrial (IND)	Heavy Industrial (HI)

4.4 PHYSICAL ENVIRONMENTAL CONDITIONS

CEQA Guidelines Section 15125(a)(1) states that the physical environmental condition in the vicinity of the Project as it existed at the time the EIR's NOP was released for public review normally be used as the comparative baseline for the EIR. The NOP for this EIR was released for public review on September 25, 2023. The following pages include a description of the physical environmental conditions ("existing conditions") on a regional and local basis at the approximate time the NOP was released. More information regarding the Project site's environmental setting is provided in the specific subsections of Section 5 of this EIR.

4.4.1 Aesthetics

Scenic Vistas

Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting.

The City of Palmdale General Plan does not specifically identify any scenic vistas from the Project site, roadways adjacent to the Project site, or the Project site vicinity. However, Conservation Element Goal 2 identifies the following ridgelines as contributors to the aesthetic character of the Antelope Valley: Ritter Ridge, Portal Ridge, Verde Ridge, the Ana Verde Hills, the Sierra Pelona Mountains, and the lower foothills of the San Gabriel Mountains. The City's GPU EIR generally describes scenic vistas within the City as views of the desert and local mountains. Distant mountain views of the San Gabriel Mountains (located approximately 34 miles to the southeast), the Sierra Pelona Mountains (approximately 11 miles to the west), and the Tehachapi Mountains (approximately 36 miles to the northwest) are available throughout the City. Furthermore, the Leona Valley is a scenic area located approximately 4 miles to the west of the City. Because the Project vicinity is relatively flat, distant views of the surrounding desert and mountains are visible from the Project site with some obstruction due to existing structures, utility poles, trees, and other elements of the built environment.

State Scenic Highway

There are no officially designated State scenic highways adjacent to the Project site. The closest scenic highway is Route 2, which is located approximately 40 miles away.

Visual Character of Project Site and Surrounding Area

The Project site consists of one parcel located within the northern portion of the City of Palmdale in Los Angeles County. The Project site is currently zoned as Heavy Industrial (HI), which allows for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution. The Project site consists of fallow agricultural land, with airport logistic uses to the south and a solar farm to the west. The Project site is currently undeveloped.

Visual Character of Adjacent Areas

The Project site and parcels adjacent to the north and east are undeveloped; however, areas to the south, west, and the larger Project vicinity are characterized as urbanized areas. The Project site is approximately 4.4 miles east of the SR-14 corridor, which is developed with several commercial centers. The area further north of the Project site is developed with a soccer sports park (Lancaster National Soccer Center) and residential areas (single-family homes). Therefore, the existing visual character of the larger Project vicinity, and general city landscape, consists primarily of developed commercial and industrial area surrounded by undeveloped parcels and residential neighborhoods.

Light and Glare

The Project site is currently undeveloped and does not contain sources of light or glare. Nighttime lighting in the Project vicinity is currently limited because most of the surrounding area, especially to the east, is undeveloped and the solar facility to the west does not generate nighttime light or glare. However, limited nighttime lighting is generated south of the Project site, across from East Avenue M/Columbia Way, from the airport and aircraft industrial logistics uses, and lighting and glare is generated by vehicles travelling along East Avenue M/Columbia Way and 30th Street East. The light and glare receptors in the Project vicinity include motorists traveling on local streets, as well as residential uses 0.8 mile to the north.

4.4.2 Agriculture and Forestry Resources

The Project site contains approximately 1 62.5 acres of Prime Farmland, inclusive of offsite areas, as mapped by the Farmland Mapping and Monitoring Program. The entirety of the Project site, with the exception of offsite roadways, was previously utilized for farming. The Project site is relatively flat and consists of undeveloped land. The Project site does not contain any existing structures or improvement on the site but has existing irrigation infrastructure throughout the site.

The City of Palmdale does not contain any forest resources including forestland, timberland, or timberland production zones.

4.4.3 Air Quality

The Project site is located within the Mojave Desert Air Basin (Basin), which is under the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD) (LSA, 2024). The Basin is an assemblage of mountain ranges interspersed with long, broad valleys that often contain dry lakes. Many of the lower mountains that dot the vast terrain rise from 1,000 to 4,000 ft above the valley floor. Prevailing winds in the Basin are out of the west and southwest. These prevailing winds are due to the proximity of the Basin to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in Southern California by differential heating are channeled through the Basin. The Basin is separated from the Southern California coastal and central California valley regions by mountains (highest elevation is approximately 10,000 feet), whose passes form the main channels for these air masses.

Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution

control district and State air quality regulating agencies. The AVAQMD, together with the California Air Resources Board (CARB), maintains ambient air quality monitoring stations in the Basin. The air quality monitoring stations closest to the Project site are located at 43301 Division Street in Lancaster, 1630 N. Main Street, Los Angeles, and 22224 Placerita Canyon Road, Santa Clarita.

Pollutant monitoring results for years 2020 to 2022 at the Lancaster, Los Angeles, and Santa Clarita ambient air quality monitoring stations indicate that air quality in the area has generally been moderate. As indicated in the monitoring results, the federal PM₁₀ standard had one exceedance in 2020, one exceedance in 2021, and no exceedances in 2022. The State PM₁₀ standard had an unknown number of exceedances during the three-year period. The PM_{2.5} federal standard had nine exceedances in 2020, one exceedance in 2021, and an unknown number of exceedances in 2022. The 1-hour ozone State standard was exceeded four times in 2020 only. The 8-hour ozone State standard was exceeded eight times in 2020, four times in 2021, and an unknown number of times in 2022. The 8-hour ozone federal standard was eight times in 2020, three times in 2021, and 33 times in 2022. In addition, the CO, SO₂, and NO₂ standards were not exceeded in this area during the three-year period.

4.4.4 Biological Resources

The 150.63-acre Project site consists of undeveloped land that has been heavily impacted by uses associated with agriculture operations, offroad vehicular access, and illegal dumping. The site varies in vegetation densities from unvegetated to sparsely vegetated comprised of a patchy ground cover of grass, weeds, and tumbleweeds, and a row of salt cedar (*Tamarisk*) shrubs along the northeastern boundary. The site reflects arid conditions, limited rainfall, and generally poor soils of the Mojave Desert (ELMT Consulting, 2024).

Additionally, the 17.65 acres of offsite Project area include a combination of undeveloped land and existing roadway rights-of-way. The Project site is flat with elevations ranging from 2,461 to 2,475 feet above mean sea level (AMSL).

Vegetation Communities and Land Covers

No native plant communities or natural communities of special concern were observed on or adjacent to the Project site and within the offsite improvement areas. As discussed above, the Project site consists of vacant undeveloped land that has been subject to various anthropogenic disturbances, including weed abatement. These disturbances have eliminated the natural plant communities within the Project site and immediate vicinity (Appendix C). One vegetation community, classified as disturbed, was mapped within the biological study area (includes the Project site, offsite improvement areas, and a 200-foot buffer). In addition, the offsite improvement areas support developed land within the public right of way of East Avenue M/Columbia Way, which do not include native plant communities or potential habitat areas.

The disturbed area is vegetated with early successional, weedy, and non-native plant species. Common plant species observed onsite include rubber rabbitbrush (*Ericameria nauseosa*), nettle-leaved goosefoot (*Chenopodium murale*), Russian thistle (*Salsola tragus*), ripgut brome (*Bromus diandrus*), horsenettle (*Solanum carolinense*), puncturevine (*Tribulus terrestris*), Indian hedge mustard (*Sisymbrium orientale*), Gooding's willow (*Salix gooddingii*), Bermuda grass (*Cynodon dactylon*), Salt Cedar (*Tamarix* sp.), Menzies' fiddleneck (*Amsinckia menziesii*), Dutchman's pipe (*Aristolochia clematitis*), silver ragwort (*Jacobaea maritima*), rabbit tobacco (*Pseudognaphalium obtusifolium*), silver burr ragweed (*Ambrosia chamissonis*), and common dandelion (*Taraxacum officinale*).

Special-Status Plant Species

Special-status species are species that have been identified by federal, State, or local resource conservation agencies as threatened or endangered, under provisions of the federal and State Endangered Species Acts

(FESA and CESA, respectively), because they have declining or limited population sizes, usually resulting from habitat loss. The literature search conducted as part of preparation of the Biological Resources Assessment (Appendix C) identified nine special-status plant species that could have potential to occur onsite. However, no special-status plant species were observed onsite during the biological resources field investigation.

Special-Status Wildlife Species

Based on the results of the literature review and database searches, 11 special-status wildlife species were determined to have potential to occur onsite including, Cooper's hawk (*Accipiter cooperii*), northern California legless lizard (*Anniella pulchra*), burrowing owl (*Athene cunicularia*), ferruginous hawk (*Buteo regalis*), Swainson's hawk (*Buteo swainsoni*), mountain plover (*Charadrius montanus*), Soledad shoulderband (*Helminthoglypta fontiphila*), loggerhead shrike (*Lanius ludovicianus*), coast horned lizard (*Phrynosoma blainvillii*), Le Conte's thrasher (*Toxostoma lecontei*), Mohave ground squirrel (*Xerospermophilus mohavensis*). Of these species, one special-status species, the loggerhead shrike, was observed on the adjacent parcel to the Project site, outside of the Project boundaries, during the biological survey conducted for the Project. No special-status species were observed on the site.

Jurisdictional Waters and Wetlands

No State or federal wetlands or waters are present within the Project site and offsite improvement areas.

Wildlife Movement

The Project site is located in an area of Palmdale historically used for agricultural practices and is adjacent to roadways and existing development. Most of this area of Palmdale has been heavily disturbed and repurposed for industrial development and is highly fragmented from any wildlife connectivity areas. The nearest preserved habitat is located approximately 7.94 miles southeast of the Project site, in association with the Alpine Butte Wildlife Sanctuary. Additionally, Little Rock Wash, which extends from the south out of the San Gabriel Mountains north to Rosamond Dry Lake, is located approximately 3 miles east of the Project site. Little Rock Wash has the potential to support local wildlife movement opportunities out of the mountains to the valley floor. However, the Project site is separated from the Alpine Butte Wildlife Sanctuary and Little Rock Wash by industrial and agricultural development and by several heavily trafficked roadways, including 50th Street East and East Avenue M/Columbia Way.

4.4.5 Energy

Energy

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Palmdale. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal and Southern California. California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2021 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut greenhouse gas emissions 40 percent below 1990 levels by 2030 and 80 percent from the same baseline by 2050 in order to help achieve carbon neutrality by 2045. It describes that in 2021 approximately 42 percent of power that SCE delivered to customers came from carbon-free resources (SCE, 2021).

Existing electrical utilities at the Project site exist along East Avenue M/Columbia Way and along 30th Street East.

Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the Project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border. According to the CEC, total natural gas consumption in the SoCalGas service area in 2021 was 6,755 million therms (2,308 million therms for the residential sector). Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms).

Natural gas lines at the Project site exist along Columbia Way along the Project's frontage.

4.4.6 Geology and Soils

Regional Setting

The proposed Project is within the Mojave Desert Geomorphic province of California, a region consisting of desert plains and isolated mountain ranges (CGS, 2002). According to the California Geological Survey, the Mojave Desert province consists of a northwest to southeast trending fault and secondary east to west trending fault in southwestern California.

The City of Palmdale is underlain by five sedimentary rock units with high potential for paleontological resources, which include the Punchbowl, Ana Verde, Harold Formations, the Nadeau Gravels/Pleistocene Old Alluvium, and Pleistocene Lacustrine and Fluvial Sediments. The City is also underlain by five igneous and metamorphic rock units with low paleontological potential, which include the Precambrian Pelona Schist, Mesozoic metavolcanics, Mesozoic granite, quartz monzonite, and diorites (City of Palmdale, 2022).

Site Setting

The Paleontological Assessment (Appendix G) details that the geology mapped within the Project site are Holocene to late Pleistocene-aged young alluvial fan deposits (Qyf) that have a low to high palaeontologic sensitivity. The alluvial fan deposits are described as unconsolidated to slightly consolidated, silt, sand, gravel, cobble, and boulder deposits (Appendix G).

As noted in the Geotechnical Investigation, included in Appendix A, soils encountered at the Project site consisted of native alluvium to a depth of at least 30 feet below ground surface. The soils comprised of loose to very dense silty fine sands, fine to coarse sands, silty fine to coarse sands, fine sands, fine sandy silts and stiff to hard fine sandy clays and clayey silt.

Unique Geologic Feature

Unique geologic features refer to unique physical features or structures on the earth's crust. The Project site does not contain any unique geologic features. The site is an undeveloped area that has been heavily disturbed by previous agricultural operations, off-road vehicular access, illegal dumping, and surrounding development. As described previously, the site is underlain with Holocene to late Pleistocene-aged young alluvial fan deposits. The geologic processes that occurred on the Project site and in the vicinity are the same as those within the Mojave Desert Geomorphic province.

Paleontological Resources

Paleontological resources are the remains of prehistoric life that have been preserved in the geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age (SVP, 2010) but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat.

Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

According to the Paleontological Assessment, the paleontological and records search conducted for the Project site did not identify any previously recorded fossil localities on-site or adjacent to the site. The nearest fossil locality, consisting of a Pleistocene camel, was identified approximately 5 to 6 miles northwest of the Project site. Within 8.5 miles of the Project site, specimens of Pleistocene reptiles and small mammals were discovered within 3 feet below ground surface (Appendix G). As previously stated, the Project site area is classified as having Holocene to late Pleistocene aged geology. Holocene alluvial deposits are assigned a low paleontological sensitivity due to age, while Pleistocene alluvial deposits are assigned a high paleontological sensitivity due to previous yields of Ice Age terrestrial vertebrate fossils (Appendix G).

4.4.7 Greenhouse Gas Emissions

According to *California Greenhouse Gas Emissions for 2000 to 2019 Trends of Emissions and Other Indicators*, prepared by CARB, July 28, 2021, the State of California created 418.2 million metric tons of carbon dioxide equivalent (MMTCO_{2e}) in 2019. The 2019 emissions were 7.2 MMTCO_{2e} lower than 2018 levels and almost 13 MMTCO_{2e} below the State adopted year 2020 GHG limit of 431 MMTCO_{2e}. The breakdown of California GHG emissions by sector consists of 39.7 percent from transportation; 21.1 percent from industrial; 14.1 percent from electricity generation; 7.6 percent from agriculture; 10.5 percent from residential and commercial buildings; 4.9 percent from high global warming potential sources; and 2.1 percent from waste.

4.4.8 Hazards and Hazardous Materials

Environmental Site Conditions

The Project site was historically used for farming. The current condition of the site includes some vegetation on the eastern boundary, but the site has remained unimproved apart from the two inactive water wells in the southeast portion of the site and a steel pipe in the northwest corner. As such, there is a potential that agricultural chemicals such as pesticides, herbicides, and fertilizers, were used on site and exist in site soils. There are currently no structures on site. The Phase I ESA did not identify any recognized environmental conditions (RECs) associated with the Project site. There are also no offsite hazardous material sources of environmental concern surrounding the Project site.

Other Environmental Conditions

The Project site is not within an Alquist Priolo earthquake fault zone; County-identified fault zone; rockfall/debris-flow hazard area; medium or high liquefaction area (low to high and localized); nor within a high or very high fire hazard severity zone. According to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) (06037C0450F), the Project site is primarily located in "Zone X", an area of minimal flood hazard (0.2 percent annual chance of flood). In addition, Zone X flood plain areas are outside the 100-year floodplain.

Evacuation Routes

According to the Palmdale General Plan Safety Element, the City has no designated evacuation routes as there are several ways to exit the City. The City would also follow appropriate protocols listed in the City's Emergency Operations Plan (EOP) and Los Angeles County Emergency Operations Plan as needed. In case of emergency, principal responsibility would lie with the City's Emergency Services Manager (City of Palmdale, 2023).

4.4.9 Hydrology and Water Quality

Regional Hydrology

The City of Palmdale is situated within the southern region of the Antelope Valley Watershed, which is part of the Antelope Valley Groundwater Basin. The Antelope Valley Watershed spans across three counties: Los Angeles County, Kern County, and San Bernardino County, encompassing approximately 1,220 square miles in Los Angeles County, 2,006 square miles in Kern County, and 143 square miles in San Bernardino County. Numerous streams originating from the surrounding mountains and foothills flow across the valley floor, eventually converging into dry lakes (Edwards Air Force Base) adjacent to the northern county line. Unlike watersheds that drain into the Pacific Ocean, the Antelope Valley Watershed lacks defined natural and improved channels outside of the foothills, resulting in unpredictable sheet flow patterns (City of Palmdale, 2022, p. 4.10-1 and LADPW, n.d.).

Watershed

The Littlerock Dam is located just south of the City of Palmdale in the San Gabriel Mountains, and serves as the Palmdale Water District's (PWD) primary source of local surface water. The reservoir receives water from natural runoff of the San Gabriel Mountains, as well as from Littlerock and Santiago Canyons. The primary tributaries that supply water to the PWD service area are Littlerock and Big Rock Creeks, which flow north from the San Gabriel Mountains. The reservoir's watershed is 65 square miles in size and is located within the Angeles National Forest. The Littlerock Dam has a capacity of approximately 3,500 acre-feet. The PWD's surface water is stored at both Little Rock Creek Dam Reservoir and Lake Palmdale. Little Rock Dam Reservoir has a capacity of approximately 3,000 acre-feet and is filled by natural runoff from the local San Gabriel Mountains. Water from Little Rock Reservoir is transferred to Palmdale Lake through an open channel connecting the two reservoirs. This local surface water supply has historically been of very high quality.

Groundwater Basin

The U.S. Geological Survey (USGS) has identified a series of subbasins in the Antelope Valley Groundwater Basin of which encompasses 1,580 square miles of Los Angeles County, Kern County, and, less prominently, San Bernardino County, and has a storage capacity of approximately 70,000,000 acre-feet. The Antelope Valley Groundwater Basin is comprised of the upper (principal) aquifer and the lower (deep) aquifer. The Project site is located within the Lancaster groundwater subbasin. The Lancaster subbasin is in the center of the Antelope Valley Groundwater Basin with its southernmost portions lying within the PWD service area. PWD operates 10 wells in the Lancaster subbasin, with a pumping capability of approximately 12,500 gallons per minute (gpm); groundwater has accounted for 35 percent of the PWD water supply since 2016. (City of Palmdale, 2022).

Water Quality

The Project site is within the jurisdiction of the Lahontan Regional Water Quality Control Board (RWQCB), and the Water Quality Control Plan for the Lahontan Region (Basin Plan) is the governing water quality plan for the region. The Basin Plan notes that although high quality water supplies are available near streams in desert areas of the region, many desert waters have naturally poor quality (e.g., high concentrations of salts, and minerals such as arsenic and selenium). Water quality problems in the region are largely related to nonpoint sources (including erosion from construction, timber harvesting, and livestock grazing), stormwater, acid drainage from inactive mines, and individual wastewater disposal systems. There are relatively few point source discharges; these include several wastewater treatment plants, fish hatcheries operated by the California Department of Fish and Wildlife (CDFW), and some geothermal discharges.

Existing Drainage

The City of Palmdale Department of Public Works maintains the City's stormwater system and operates closed conduits, open channels, drainage basins, dry wells, and two dry creeks as natural stormwater conveyances. The site is relatively flat with a gentle slope in the northwestern direction. The Project site contains sparse vegetation consisting primarily of grasses and weeds, with a few shrubs located along the northeastern boundary of the Project site. There is no existing public storm drain infrastructure along the Project frontages or within the vicinity of the Project site.

Flood Zone

The Project site is within "Zone X" of "Other Flood Areas," as determined by the FIRM. These areas are defined as areas with a 0.2 percent annual chance of flood; areas with a 1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile; and areas protected by levees from 1 percent annual chance of flood (FEMA, 2023). Zone X is outside the Special Flood Hazard Areas (SFHAs), which are subject to inundation by the 1 percent chance flood.

4.4.10 Land Use and Planning

Existing Project Site Conditions

The 150.63-acre Project site consists of undeveloped land that has been previously disturbed by agricultural operations, off-road vehicular access, illegal dumping, and surrounding development. The site is relatively flat with a gentle slope to the northwest. The Project site is currently undeveloped and contains sparse vegetation consisting primarily of grasses and weeds, with a few shrubs located along the northeastern boundary of the Project site.

Current General Plan and Land Use Designation and Zoning Designation

The Project site has a General Plan land use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI). The IND land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses up to a maximum floor area ratio (FAR) of 0.5. The Heavy Industrial zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution, and also allows a maximum FAR of 0.5. The Project's site existing land use designation and zoning are shown in Figure 3-5, *General Plan Land Use Designation* and Figure 3-6, *Zoning Designation*, in Section 3, *Project Description*.

Airport

The Project site is located directly across East Avenue M/Columbia Way from the United States Air Force Plant 42 (AFP 42), aka Palmdale Regional Airport. AFP 42 includes approximately 5,832 acres (about 9.1 square miles) and has two long runways bordered by various airport tenants that include private aerospace contractors, the National Aeronautics and Space Administration (NASA), and small-scale commercial aviation operators.

As shown on Figure 5.8-1, *Palmdale Regional Airport/AFP 42 Noise Contours*, in Section 5.8, *Hazards and Hazardous Materials*, the Project site is located within the airport's 65 CNEL noise contour. However, the Project site is not located within an identified airport related hazard zone. The City's General Plan Figure 8.3, *Military Influence Area*, and Figure 8.4, *General Plan Land Use with Accident Potential Zone (APZ) Overlay*, detail that the Project site is not located within a military operating area, airport clear zone, APZ I, or APZ II area.

Surrounding Land Uses

Land uses surrounding the Project site include undeveloped land with some scattered solar and airport uses. Specific land uses located in the immediate vicinity of the Project site include the following:

- **North:** undeveloped land (future vehicle storage facility SPR 19-012 to the northeast).
- **East:** undeveloped land.
- **South:** East Avenue M/Columbia Way followed by airport logistics.
- **West:** 30th Street East followed by a solar farm.

4.4.11 Noise

Existing Noise Levels

To assess existing noise levels of the environment, long-term (24-hour) noise level measurements were conducted on July 25 and July 26, 2023, at two locations as shown on Figure 5.11-2, *Noise Measurement Locations*, within Section 5.11, *Noise*. The background ambient noise levels in the Project area are dominated by the transportation-related noise associated with East Avenue M/Columbia Way, 30th Street, and 40th Street, as well as faint construction noise in the vicinity of the Project site. In addition, The Project site is within the 65 dBA airport noise impact zone (Los Angeles County Airport Land Use Commission, 2004). Table 5.11-4, *Summary of 24-Hour Ambient Noise Level Measurements*, within Section 5.11 provides a summary of the measured hourly noise levels and calculated CNEL level from the long-term noise level measurements, which shows that the calculated CNEL levels range from 69.0 dBA CNEL to 74.5 dBA CNEL.

Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the Project area, other sources of groundborne vibration include heavy-duty trucks, including garbage trucks, on area roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

Existing Airport Noise

The Project site is located across East Avenue M/Columbia Way from the United States AFP 42 (also referred to as Palmdale Regional Airport). The Project site is within the 65 dBA airport noise impact zone (Los Angeles

County Airport Land Use Commission, 2004). Aircraft flyovers may be audible on the Project site due to aircraft activity in the vicinity.

Sensitive Receivers

Noise sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residences, schools, hospitals, and recreation areas.

There are no close sensitive receptors within a 1,000-foot radius of the Project site. The nearest sensitive receptors are the Lancaster National Soccer Center, located approximately 2,710 feet north of the Project boundary line, one single-family residence located approximately 3,900 feet east of the Project boundary line, and single-family residences located approximately 4,143 feet north of the Project boundary line.

4.4.12 Population and Housing

The Project site consists of undeveloped land that was previously used for agricultural uses and has no history of housing. The Project site has a General Plan land use designation of IND and a zoning HI. The IND land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses. The HI zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution. Neither the existing General Plan land use or zoning designations provide for housing or other residential uses but do provide for growth of employment within the City.

There are no residential areas located directly adjacent to the Project site. The nearest residences are located approximately 3,900 feet east of the Project site and single-family residences located approximately 4,143 feet north of the Project site.

Population

According to the Southern California Association of Governments (SCAG) 2020-2045 RTP/SCS growth forecast, the population of Palmdale is anticipated to increase from 158,600 residents to 207,000 residents (an increase of 48,400 residents) between 2016 and 2045. Comparatively, the entire population of Los Angeles County is anticipated to increase from 10,110,000 residents in 2016 to 11,674,000 residents in 2045, an increase of 1,564,000 residents. Assuming the County's population increased at a consistent rate between 2016 and 2045, the County population would grow approximately 0.5 percent annually. As shown in Table 5.12-1, *Population Trends in the City of Palmdale*, in Section 5.12, *Population and Housing*, the rate of population growth within the City is projected to be almost double the population growth rate within the County as a whole.

Housing

According to SCAG's 2020-2045 RTP/SCS forecast, the City of Palmdale is projected to add approximately 18,000 households between 2016 and 2045 (from 43,800 to 61,800). Assuming the City of Palmdale adds to the housing stock at a consistent rate between 2016 and 2045, the City would add approximately 621 dwelling units per year. Comparatively, the County as a whole is expected to add approximately 800,000 households between 2016 to 2045 (from 3,319,000 to 4,119,000). Assuming the County added to the housing stock at a consistent rate between 2016 and 2045, the County would increase dwelling units by .8 percent annually. As shown in Table 5.12-2, *Housing Trends in the City of Palmdale*, in Section 5.12, *Population and Housing*, housing growth rates within the City is projected to be 17 percent greater than the County as a whole between 2016 and 2045.

Employment

According to SCAG's 2020-2045 RTP/SCS growth forecast, the City of Palmdale anticipates an employment increase of 9,200 additional jobs (from 36,700 to 45,900), yielding a 25 percent growth rate between 2016 and 2045. Comparatively, the entire County is projected to add approximately 909,000 jobs between 2016 and 2045. Assuming the entire County added employment opportunities at a consistent rate between 2016 and 2045, the County would add approximately 31,344 jobs per year. As shown in Table 5.12-3, *Employment Trends in the City of Palmdale*, in Section 5.12, *Population and Housing*, the employment growth rate within the City is projected to be 5 percent greater than the County as a whole between 2016 and 2045.

Jobs-Housing Ratio

The jobs-housing ratio is a general measure of the total number of jobs and housing units in a defined geographic area, without regard to economic constraints or individual preferences. SCAG applies the jobs-housing ratio at the regional and subregional levels to analyze the fit between jobs, housing, and infrastructure. A major focus of SCAG's regional planning efforts has been to improve this balance. The American Planning Association recommends a target ratio of 1.5 jobs per housing unit; communities with more than 1.5 jobs per dwelling unit are considered jobs-rich; those with fewer than 1.5 are "housing rich," meaning that more housing is provided than employment opportunities in the area (Weitz, 2003). A jobs-housing imbalance can indicate potential air quality and traffic problems associated with commuting. As shown on Table 5.12-4, *Jobs – Housing Trends in the City of Palmdale*, in Section 5.12, *Population and Housing*, the projected 2045 jobs-to-housing ratio for the City of Palmdale and Los Angeles County are 0.74 and 1.31, respectively; that is, both the City of Palmdale and Los Angeles County are housing-rich. Therefore, it is possible that residents in the City of Palmdale currently commute to other incorporated cities or other counties for employment. According to the American Community Survey (ACS) 2022 survey, the mean travel time to work for Palmdale residents is 45.5 minutes, which is 1.5 times the LA-Metro area and California.

4.4.13 Public Services

Fire Services

The City of Palmdale contracts fire protection and emergency response services through the County of Los Angeles Fire Department (LACoFD) to provide fire suppression, rescue services, and emergency medical services. The Project site is within the service area of Battalion 11 (County of Los Angeles, n.d.). The nearest LACoFD stations to the Project site are both in Lancaster. Station 135, which would be the first responding station to the Project site is approximately 3.3 roadway miles away and Station 129 is approximately 4.3 roadway miles away. The nearest Palmdale station is LACoFD Station 37, located at 38318 9th Street East. Station 37 is approximately 8.3 roadway miles southwest of the Project site. The stations within the vicinity of the Project site have been determined to largely be in good condition, based on physical deterioration, age, and functionality (LACoFD, 2020).

To forecast the needs of stations, LACoFD established a tier threshold based on yearly responses to service calls. The LACoFD Master Plan describes that Battalion 11 exceeds the 6,000-response tier threshold and would require an additional firefighting and paramedic unit to relieve the current volume of calls for service (LACoFD, 2020). The LACoFD is planning to expand Station 33 that is 7.5 miles from the Project site to accommodate an additional engine company, which would be funded through development impact fees (LACoFD, 2022).

To evaluate the adequacy of service, LACoFD uses the national guidelines of a 12-minute response time for the first arriving unit for fire and EMD responses and a 20-minute response time for the advanced life support unit in rural areas (Kien Chin, personal communication, February 1, 2024).

Police Services

Police services in the City are provided by the Los Angeles County Sheriff's Department. The City is served by one station located at 750 East Avenue Q in the central portion of Palmdale, which is approximately 7.6 roadway miles southwest of the Project site. The City's sheriff's department uses the following industry standard thresholds to evaluate adequacy of response times for each priority level: 10 minutes (emergent), 20 minutes (priority), and 60 minutes (routine).

Park Services

Existing parks within the City of Palmdale include 19 parks totaling 370 acres (City of Palmdale, 2022). At the estimated population of 165,917 in 2023, there are 2.22 acres of existing parkland per 1,000 residents (DOF, 2023). City of Palmdale parks and recreation facilities closest to the Project site include Desert Sands Park at 39117 3rd Street E (approximately 7.5 roadway miles from the Project site), Melville J. Courson Park at 38226 10th St E, (approximately 9 roadway miles from the Project site), and William J. McAdam Park at 38115 30th St E (approximately 9 roadway miles from the Project site).

Existing parks within the City of Lancaster include 19 parks and recreational facilities comprising over 450 acres (City of Lancaster, n.d.). City of Lancaster parks and recreational facilities closest to the Project site are: Skytower park, located approximately 1 mile north of the Project site at 43434 Vineyard Drive; and Tierra Bonita Park, located approximately 3.5 miles north of the Project site at 44910 27th Street East.

Los Angeles County Department of Parks and Recreation operates over 181 parks throughout the county (LA County Parks and Recreation, n.d.). County parks and recreation facilities closest to the Project site include: Jackie Robinson Park, located approximately 7.5 miles southeast of the Project site at 8773 East Avenue R; Big Rock Wash, located approximately 9 miles southeast of the Project site at 11550 East Avenue O; and Alpine Butte Wildlife Sanctuary, located approximately 10 miles southeast of the Project site at Palmdale, CA 93591.

School Services

The Project site is within the Eastside Union School District for the elementary and middle school district, and the Antelope Valley Union School District for the high school district. The Eastside Union School District currently operates four schools, including three elementary schools and one middle school (CDE, n.d.). The Antelope Valley Union High School District currently operates eight high schools (Antelope Valley Union High School District, n.d.).

The nearest elementary school to the Project site is Enterprise Elementary School, located at 3730 E Avenue J-4, Lancaster, CA 93535, approximately 4.3 roadway miles north of the site. The nearest middle school is Gifford C. Cole Middle School, located at 3126 E Avenue I, Lancaster, CA 93535, approximately 5.0 roadway miles north of the site. Finally, the nearest high school is Eastside High School, located at 3200 E Avenue J-8, Lancaster, CA 93535, approximately 3.1 roadway miles north of the site.

Other Public Facilities

Other governmental services include a variety of public and quasi-public services including libraries, medical facilities, social service centers, senior centers, and other facilities. The library closest to the Project site and

surrounding area is the Palmdale City Library, located at 700 E Palmdale Boulevard, approximately 8.2 miles southwest of the Project site.

Additionally, the nearest medical facilities to the Project site are the South Valley Health Center, located approximately 7.9 miles southeast and the Wesley Health Centers located approximately 9.6 miles southwest.

4.4.14 Transportation

Existing Roadway Network

State Route 14 (SR-14) is a north–south State highway in the State of California that connects Los Angeles to the northern Mojave Desert.

Sierra Highway is a north–south road which connects Los Angeles to the Mojave Desert. The roadway is a designated truck route.

East Avenue M/ Columbia Way is an east-west regional roadway between 30th Street West and 50th Street East. The posted speed limit is 55 mph. There are no existing bike facilities along the roadway. The roadway is a designated truck route.

10th Street West is a north-south regional roadway. The posted speed limit is 50 mph. There are no existing bike facilities along the roadway. The roadway is a designated truck route.

50th Street East is a north-south regional roadway. The posted speed limit is 55 mph. There are no existing bike facilities along the roadway. The roadway is a designated truck route.

Existing Truck Routes

Figure 5.14-1, *Truck Routes*, shows that East Avenue M/Columbia Way to the south, Avenue P to the south, 50th Street East to the east, Sierra Highway to the west, and SR-14 to the west are the General Plan Circulation Element truck routes in the vicinity of the Project site.

Other truck routes in the city include Avenue P, Highway 138, and Avenue T to the south and 90th Street East to the east.

Existing Site Access

Regional access to the Project site is provided by SR-14 and SR-138. Local access to the site is provided from 30th Street East, a designated major arterial, and East Avenue M/Columbia Way, a designated regional arterial. The Project site is northeast of the 30th Street East and East Avenue M/Columbia Way intersection.

Existing Transit Service

Public transportation services within the City are provided by Metrolink and the Antelope Valley Transit Authority (AVTA). The Palmdale Metrolink Station is located approximately 4.5 miles southwest of the Project site at 39000 Clock Tower Plaza Drive East. AVTA provides bus transit services within the City. AVTA also offers on-request ride service that connects passengers to and from rural communities within the rest of AVTA's local transit system. The nearest AVTA bus stop to the Project site is located near the Avenue J and 20th Street East intersection, approximately 2.7 miles to the northeast of the Project site. There are no bus stops within one mile of the Project site.

Existing Bicycle and Pedestrian Facilities

The City's General Plan Circulation and Mobility Element identifies 30th Street East west of the Project site as a proposed bikeway. The nearest existing bikeway is located on Sierra Highway, approximately 2.96 miles east of the Project site. There are no existing sidewalks or bicycle facilities adjacent to the Project site.

Existing Vehicle Miles Traveled

The Project site is currently undeveloped. The Project site does not generate regular vehicle trips that would result in VMT from the site. The Traffic Analysis Zone (TAZ) in which the Project is located, "Zone" (TAZ 20325000), has a current VMT per employee of 18.2.

4.4.15 Tribal Cultural Resources

Native American Tribes

The Project is within an area considered the Traditional Tribal Land of the Kitanemuk people. As part of the Cultural Resources Assessment (Appendix D) for the Project site, research was conducted using several resources to identify potential tribal cultural resources within the Project area. The assessments included a records search at the South Central Coastal Information Center (SCCIC), background and literature research, a search of the Sacred Lands File (SLF) by the Native American Heritage Commission, outreach efforts with Native American tribal representatives, an examination of geological maps, and an intensive pedestrian survey of the Project site. No tribal cultural resources were identified as part of the records search and site survey of the Project site.

Site Conditions

As discussed in Section 3, *Project Description*, the Project site is undeveloped. The Cultural Resources Assessment (Appendix D) identified the Project site elevations as ranging from 2,452 to 2,465 feet above mean sea level (AMSL). The site is not listed in the Native American Heritage Commission SLF.

The Antelope Valley area has supported a long prehistoric Native American population. Evidence of villages, camps, burials, quarries, rock features, and bedrock mortars has been documented at archaeological sites across the desert.

4.4.16 Utilities and Service Systems

The Project site is located outside of the water service area of the Los Angeles County Waterworks District No. 40 Antelope Valley (LACWD40). LACWD40 encompasses approximately 232 square miles providing water service to the cities of Lancaster and Palmdale in Los Angeles County, as well as unincorporated communities of Pearblossom, Littlerock, Sun Village, Rock Creek, Northeast Los Angeles County, and Lake Los Angeles.

The LACWD No.40 2020 Urban Water Management Plan (UWMP) provides a summary of anticipated water supplies and demands for the next 20 years. LACWD40 operates a network of approximately 1,057 miles of water (potable and recycled) lines and 71 potable water tank reservoirs to deliver water to its customers.

There are no existing water lines on or adjacent to the Project site. The past water source for the Project site was from existing onsite wells that are no longer in use. The closest water line is the 30-inch water main that is located approximately 13,400 linear feet west of the Project site within the East Avenue M/Columbia Way right-of-way at 5th Street E.

Water Supply and Demand

LACWD40 has three sources of water supply: purchased water from Antelope Valley-East Kern Water Agency (AVEK), groundwater from the Antelope Valley Groundwater Basin, and recycled water purchased from the City of Lancaster and Palmdale Recycled Water Authority. Table 5.16-1, *LACWD40 Water Supply 2020*, in Section 5.16, *Utilities and Service Systems*, summarizes LACWD40's current retail water supplies. As shown on Table 5.16-1, in 2020 the LACWD40 obtained the majority of its water supply from AVEK.

Table 5.16-2, *LACWD40 Projected Water Supply (AF)*, in Section 5.16, *Utilities and Service Systems*, summarizes LACWD40's projected overall water supplies. As shown in Table 5.16-2, the 2020 UWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of purchased or imported water, groundwater, and recycled water. Projected demands for LACWD40 water supplies in the UWMP were based on SCAG projections. As shown in Table 5.16-4, *LACWD40 Projected Water Demand and Supply in Normal Years (AF)*, in Section 5.16, *Utilities and Service Systems*, LACWD40 would meet the projected water needs and have between 27,922 AF and 11,422 AF additional supply annually through 2045. The LACWD40 UWMP describes that there are planned water projects that will increase supplies and that it can purchase additional imported water from AVEK, banking it in the local groundwater water basin to prepare for multiple dry years to ensure supply.

Groundwater: LACWD40 extracts groundwater from the Antelope Valley Groundwater Basin. The Antelope Valley Groundwater Basin covers approximately 1,580 square miles and has an estimated capacity of nearly 68 million acre-feet (MAF). The Antelope Valley Groundwater Basin is divided into 12 sub-basins and is composed of two primary aquifers: the upper (principal) aquifer and the lower (deep) aquifer.

Purchased or Imported Water: LACWD40 purchases imported water from AVEK for potable uses. AVEK is a wholesale water supplier that sources water from both the State Water Project (SWP) and the Antelope Valley Groundwater Basin to then allocate to municipalities, ranchers, and other agricultural users. Approximately 70 percent of the water provided by AVEK goes to LACWD. The 2020 AVEK UWMP details that the wholesale supply would exceed demands through 2045 by a minimum of 46,640 AF.

In addition, the AVEK 2020 UWMP details that it could meet water supply demand through five years of consecutive dry year conditions. AVEK has developed several groundwater banks and is planning for future banks including the Westside Water Bank, Antelope Valley Water Bank (AVWB), and the Water Supply Stabilization Project 2 to maximize its supplies. LACWD40 has also purchased excess imported water from AVEK, banking it in the local groundwater water basin to prepare for scenarios during dry years.

Additional water supplies can also be accessed via the MOU agreement that LACWD40 has executed with AVEK. As detailed in the AVEK 2020 UWMP, when LACWD is required to acquire new supplemental water supplies for new growth, the MOU agreement requires AVEK to acquire the supplies on behalf of LACWD, and AVEK will deliver the water to LACWD along with AVEK's existing supplies.

Wastewater

Los Angeles County Sanitation Districts (LACSD) provides wastewater treatment, and recycled water services within LACSD's service area. LACSD is a public agency consisting of 24 independent special districts serving approximately 5.5 million people in Los Angeles County. The service area covers approximately 850 square miles which encompasses 78 cities and unincorporated areas throughout the County treating about 400 million gallons per day. LACSD has a wastewater system that consists of 11 wastewater treatment facilities, 49 pump stations, over 1,400 miles of sewer and 2 composting facilities.

The Project site is adjacent to the Antelope Valley Service Area of the Los Angeles County Sanitation District No. 14 (LACSD14), which services the Cities of Palmdale and Lancaster as well as surrounding unincorporated

areas and operates the Lancaster Water Reclamation Plant (LWRP). The closest sewer main to the Project site operated by LACSD14 is located within 30th Street. The LWRP serves approximately 160,000 people providing primary, secondary, and tertiary treatment with a design capacity of 18 million gallons of wastewater per day (MGD). The recycled water is then used for landscape irrigation and other municipal and industrial purposes in the City of Lancaster and surrounding areas.

In 2020, the LWRP collected and treated approximately 16,416 AFY of wastewater from the City of Lancaster, City of Palmdale, and Los Angeles County Public Works (UWMP 2020). Thus, on average, LWRP treats approximately 14,656,775 million gallons per day or 44.98 AF per day while having a capacity to treat 18 million gallons per day.

Site Drainage

Topographically, the Project site is relatively flat with an elevation of 2,452 feet above mean sea-level to 2,465 above mean sea-level. The existing site is undeveloped and currently a vacant lot with some vegetation. There are currently no nearby storm drain improvements. As described in the Preliminary Hydrology Report prepared for the Project site (Appendix I), a majority of the Project site is part of the Anaverde Watershed and adjacent to two unconstructed master plan storm drains, one of which is near the center of the Project site area, and the other one in 30th Street East along the Project frontage. Both unconstructed master plan lines would drain northerly to an existing drainage channel north of Avenue L and east of 30th Street East, in the City of Lancaster.

Solid Waste

Solid waste generated by the Project would be disposed of at either the Antelope Valley Public Landfill or the Lancaster Landfill and Recycling Center. However, the Lancaster Landfill and Recycling Center is the closest landfill, located approximately 9.9 roadway miles from the site in Lancaster. The Lancaster Landfill and Recycling Center has a current remaining capacity of 14,514,648 tons. The Lancaster Landfill and Recycling Center is permitted to accept 5,100 tons per day of solid waste and is permitted to operate through April 2044. In 2022, the average tonnage received was 405 tons per day (CalRecycle, 2022).

Electrical, Natural Gas, and Telecommunications Facilities

Electricity: Electricity is provided to the Project area by SCE. SCE provides electric power to more than 15 million persons within its 50,000 square mile service area. According to SCE's 2021 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE also purchases power from independent power producers and utilities, which includes out-of-state providers (California Energy Commission, 2023). SCE maintains power poles along 30th Street East and East Avenue M/Columbia Way, both of which are adjacent to the Project site.

Natural Gas: Natural gas is provided to the Project area by the Southern California Gas Company (SoCal Gas). The closest gas line is located in East Avenue M/Columbia Way, adjacent to the Project site.

Telecommunications: Telecommunications in the City of Palmdale and surrounding area are offered by a variety of companies. Further, the City of Palmdale has formed an agreement with WiFi Networks, a fiberoptic cable internet provider, to install an underground fiberoptic network within public and private streets of Palmdale. The applicant reached out to both Frontier Communications and AT&T. In response, Frontier Communications provided a will-serve letter confirming they have facilities to service the Project. Frontier Communications maintains aerial lines on East Avenue M/Columbia Way.

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5. Environmental Impact Analysis

This chapter examines the environmental setting of the Project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter is divided into subsections for each environmental issue area that was determined to need further study in the Draft EIR through the Notice of Preparation (NOP) review and comment process (see Appendix A). Environmental topic areas discussed in this Draft EIR include the following:

- | | |
|--|------------------------------------|
| 5.1 Aesthetics | 5.9 Hydrology and Water Quality |
| 5.2 Agriculture and Forestry Resources | 5.10 Land Use and Planning |
| 5.3 Air Quality | 5.11 Noise |
| 5.4 Biological Resources | 5.12 Population and Housing |
| 5.5 Energy | 5.13 Public Services |
| 5.6 Geology and Soils | 5.14 Transportation |
| 5.7 Greenhouse Gas Emissions | 5.15 Tribal Cultural Resources |
| 5.8 Hazards and Hazardous Materials | 5.16 Utilities and Service Systems |

This Draft EIR evaluates the direct and indirect impacts resulting from the planning, construction, and operations of the Project. Under CEQA, EIRs are intended to focus their discussion on significant impacts and may limit discussion of other impacts to a brief explanation of why the impacts are not significant.

FORMAT OF ENVIRONMENTAL TOPIC SECTIONS

Each environmental topic section generally includes the following main subsections:

- **Introduction.** This subsection describes the purpose of analysis for the environmental topic and referenced documents used to complete the analysis. This subsection may define terms used.
- **Regulatory Setting.** This subsection describes applicable federal, State, and local plans, policies, and regulations that the Project must address and may affect its implementation.
- **Environmental Setting.** This subsection describes the existing physical environmental conditions (environmental baseline) related to the environmental topic being analyzed.
- **Thresholds of Significance.** This subsection sets forth the thresholds of significance (significance criteria) used to determine whether impacts are “significant.” The thresholds of significance used to assess the significance of impacts are based on those provided in Appendix G of the CEQA Guidelines.
- **Methodology.** This subsection provides a description of the methods used to analyze the impact and determine whether it would be significant or less than significant.
- **Environmental Impacts.** This subsection provides an analysis of the impact statements for each identified significance threshold. The analysis of each impact statement is organized as follows:
 - A statement of the CEQA threshold being analyzed,
 - The Draft EIR’s conclusion as to the significance of the impact.
 - An impact assessment that evaluates the changes to the physical environment that would result from the Project.
 - An identification of significance comparing identified impacts of the Project to the significance threshold with implementation of existing regulations, prior to implementation of any required mitigation.
- **Cumulative Impacts.** This subsection describes the potential cumulative impacts that would occur from the Project’s environmental effects in combination with other cumulative projects (See Table 5-1).

- **Existing Regulations and Plans, Programs, or Policies.** A list of applicable laws and regulations that would reduce potentially significant impacts.
- **Level of Significance Before Mitigation.** A determination of the significance of the impacts after the application of applicable existing regulations and regulatory requirements.
- **Mitigation Measures.** For each impact determined to be potentially significant after the application of applicable laws and regulations, feasible mitigation measure(s) to be implemented are provided. Mitigation measures include enforceable actions to:
 - avoid a significant impact;
 - minimize the severity of a significant impact;
 - rectify an impact by repairing, rehabilitating, or restoring the effected physical environment;
 - reduce or eliminate the impact over time through preservation and/or maintenance operations during the life of the Project; and/or
 - compensating for the impact by replacing or providing substitute resources or environmental conditions.
- **Level of Significance After Mitigation.** This subsection provides the determination of the impact's level of significance after the application of regulations, regulatory requirements, and mitigation measures.
- **References.** This subsection lists the sources and references used to support the information included.

CUMULATIVE IMPACTS

Cumulative impacts refer to the combined effect of the proposed Project's impacts with the impacts of other past, present, and reasonably foreseeable probable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines Section 15130(b), "the discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone." The CEQA Guidelines direct that the discussion should be guided by practicality and reasonableness and focus on the cumulative impacts that would result from the combination of the proposed project and other projects, rather than the attributes of other projects which do not contribute to cumulative impacts.

Section 15355 of the CEQA Guidelines provides as follows:

"Cumulative impacts" refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- a) The individual effects may be changes resulting from a single project or a number of separate projects.
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Therefore, the cumulative discussion in this Draft EIR focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of impacts caused by other past, present, and reasonably foreseeable future projects. Additionally, pursuant to the CEQA Guidelines Section 15130(a)(1), an EIR should not discuss cumulative impacts that do not result at least in part from the project being evaluated in the EIR. Thus, cumulative impact analysis is not provided for any environmental issue where the proposed Project would have no environmental impact. Analysis of cumulative impacts is, however, provided for all Project impacts that are evaluated within this Draft EIR.

CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of the following, or a reasonable combination of the two:

- A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency; or
- A summary of projections contained in an adopted local, regional, or statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.

The cumulative analysis for air quality, greenhouse gas emissions, and transportation relies on projections contained in adopted local, regional, or statewide plans or related planning documents, such as the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), SCAG growth projections, and the Riverside County Transportation Model (RIVCOM). The cumulative analyses for other environmental issues use the list of projects approach.

Different types of cumulative impacts occur over different geographic areas. For example, the geographic scope of the cumulative air quality analysis, where cumulative impacts occur over a large area, is different from the geographic scope considered for cumulative analysis of aesthetic resources, for which cumulative impacts are limited to project area viewsheds. Thus, in assessing aesthetic resources impacts, only development within and immediately adjacent to the Project area would contribute to a cumulative visual effect is analyzed, whereas cumulative transportation impacts are based upon annual growth projections and the other proposed and/or foreseeable development within the traffic study area of roadways and intersections. Because the geographic scope and other parameters of each cumulative analysis discussion can vary, the cumulative geographic scope, and the cumulative projects included in the geographic scope (when the list of projects approach is used), are described for each environmental topic. Table 5-1, *Cumulative Projects List*, provides a list of projects considered in this cumulative environmental analysis, which was compiled per information provided by Lead Agency, and Figure 5-1, *Cumulative Projects*, shows the locations.

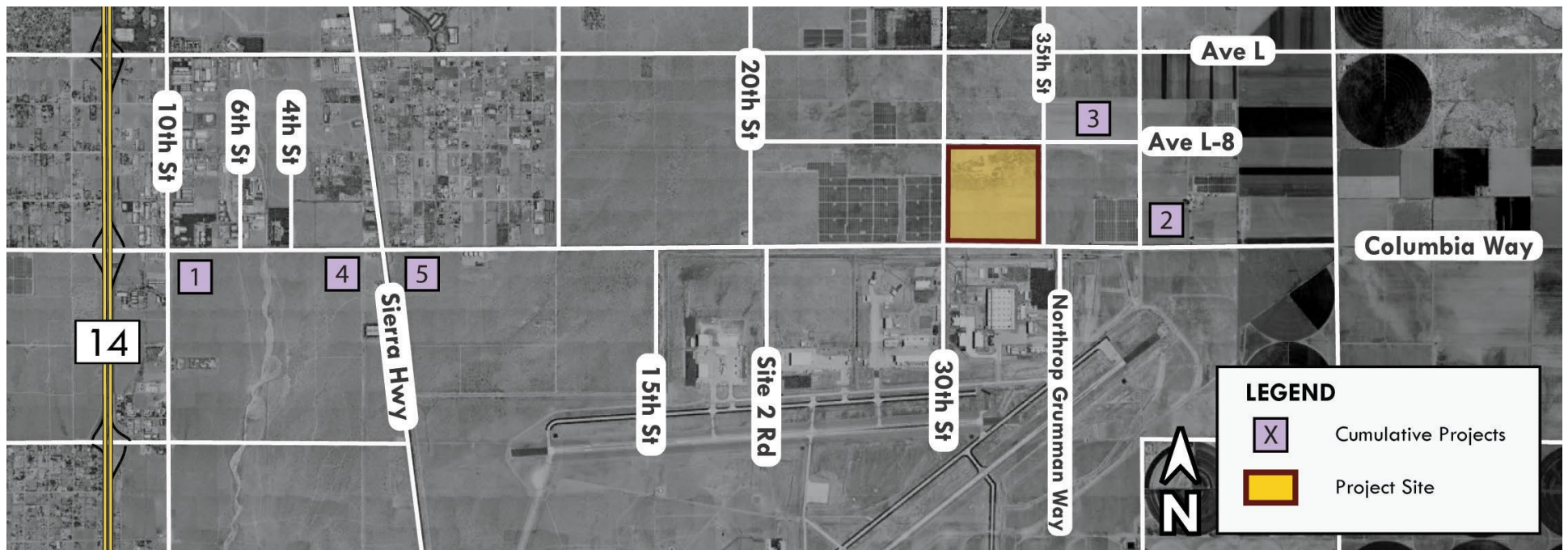
Table 5-1: Cumulative Projects List

No.	Project	Land Use	Size
1	SPR 21-005 / MM 22-057: Construction of three industrial buildings on approximately 110 acres located at the southeast corner of East Avenue M/ Columbia Way and 10 th Street West	Industrial	1,046,064 SF
2	TPM 84099 / SPR 22-018: Subdivision of 39-acre parcel into two parcels for the construction of one warehouse building and one equipment repair building located at the northwest corner of 40 th Street East and East Avenue M/Columbia Way	Industrial/Warehouse	39,400 SF
3	SPR 19-012: Vehicle storage facility located on an 81-acre parcel west of 40th Street East between Avenue L-4 and Avenue L-8	Vehicle-Storage	2,550 SF office with 61-acre storage yard
4	TPM 83915 / SPR 22-013: A request to subdivide 78 acres into two parcels for the purpose of constructing two industrial buildings located at the southwest corner of East Avenue M/Columbia Way and Division Street	Industrial	1,429,070 SF
5	TPM 83738 / SP 22-001 / GPA 22-001 / ZC 22-001 / SPR 22-008: General Plan Amendment and Zone Change located at the southeast corner of East Avenue M/Columbia Way and Sierra Highway	Industrial/Commercial-flex	8,263,332 SF of industrial building space and 61,855 SF of commercial-flex building space.

Note: SF = square feet

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Cumulative Projects



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IMPACT SIGNIFICANCE CLASSIFICATIONS

The below classifications are used throughout the impact analysis in this Draft EIR to describe the level of significance of environmental impacts. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines.

- **No Impact.** The Project would not change the environment.
- **Less Than Significant.** The Project would not cause any substantial, adverse change in the environment.
- **Less Than Significant with Mitigation Incorporated.** The Draft EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and Unavoidable.** The Project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less-than-significant level.

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5.1 Aesthetics

5.1.1 INTRODUCTION

This section describes the existing visual setting and aesthetic character of the Project site and vicinity and evaluates the potential for the Project to impact scenic vistas, visual character and quality, and light and glare. This analysis focuses on changes that would be seen from public viewpoints and provides an assessment of whether aesthetic changes from implementation of the Project would result in substantially degraded aesthetic conditions. Descriptions of existing aesthetic and visual conditions are based, in part, on site visits by the consulting team, analysis of aerial photography, and the Project application materials submitted to the City of Palmdale described in Section 3, *Project Description*, of this Draft EIR. This section is also based, in part, on the following documents and resources:

- California Department of Transportation (Caltrans) Scenic Highway Mapping System, 2018
- City of Palmdale General Plan, *Land Use and Community Design Element*, 2023
- City of Palmdale General Plan, *Conservation Element*, 2023
- City of Palmdale 2045 General Plan Update Final Environmental Impact Report, August 2022
- City of Palmdale Municipal Code

Aesthetics Terminology

Aesthetic Resources include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, which provide an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area, but also communicate the value placed upon a landscape or scene by its observers.

Scenic Resources are visually significant hillsides, ridges, water bodies, and buildings that are critical in shaping the visual character and scenic identity of the area and surrounding region.

Scenic Vistas are defined as panoramic views of important visual features, as seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting.

Visual Character broadly describes the unique combination of aesthetic elements and scenic resources that characterize a particular area. The quality of an area's visual character can be qualitatively assessed considering the overall visual impression or attractiveness created by the particular landscape characteristics. In urban settings, these characteristics largely include land use type and density, urban landscaping and design, architecture, topography, and background setting.

5.1.2 REGULATORY SETTING

5.1.2.1 Federal Regulations

There are no federal regulations concerning aesthetic impacts that are applicable to the Project.

5.1.2.2 State Regulations

State Scenic Highways

The California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality. Suitability for designation as a State scenic highway is based on vividness, intactness, and unity, as described in the Caltrans Scenic Highway Guidelines (Caltrans, n.d.):

- Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- Intactness is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- Unity is the extent to which development is sensitive to and visually harmonious with the natural landscape.

Urbanized Area

For an incorporated city, Public Resources Code Section 21071(a) defines an “urbanized area” as being an incorporated city that meets one of the following criteria:

- (1) Has a population of at least 100,000 persons.
- (2) Has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

The Project site is located within the City of Palmdale, an incorporated city in Los Angeles County. According to the United States Census Bureau, the City of Palmdale was estimated to have a population of 169,450 in 2020 (Census Bureau, 2022). Therefore, based on these criteria, the Project is located within an urbanized area for purposes of determining if the Project would conflict with applicable zoning.

5.1.2.3 Local Regulations

City of Palmdale Municipal Code

Palmdale Municipal Code (PMC) Title 17, *Zoning*, includes the City’s zoning regulations and standards. The purpose of Title 17 is to designate, regulate, and control the location, use, height, and alteration of buildings, structures, and land for residence, commerce, trade and industry, or other purposes. PMC Section 17.86.030 includes lighting standards for protecting the aesthetic character of the City. Examples of these standards include requiring lighting fixtures within residential zones not to exceed 15 feet in height to avoid glare and light spread. The City is divided into various zones, with standards for each zone regulating these qualities. Such regulations provide for the most appropriate use of land and preserve the aesthetic qualities of the City. Examples include requiring development to provide adequate open spaces for light and air, limiting the density of development, and implementing landscaping standards.

City of Palmdale General Plan

The City of Palmdale General Plan contains the following goals and policies related to aesthetics that are applicable to the Project:

- Goal LUD-4** **High-quality architecture and site design in the renovation and construction of all buildings.**
- Policy LUD-4.1** **Quality Construction.** Use simple, urban building forms made with permanent materials with high quality detailing that stands the test of time.
- Policy LUD-4.3** **Long-Lasting Building Materials.** Convey façade articulation through the strength, depth, and permanence of building materials. Thinner cladding materials, such as stucco, masonry veneers, and wood or simulated wood, may be used when finished to appear as durable and authentic as the materials they simulate.
- Policy LUD-4.6** **Urban Design in the Core.** Require four-sided architecture – all facades of a building are designed with quality, care, and visual interest - in the urban core (primarily RN3, RN4 and MU3). Encourage four-sided architecture in other areas.
- Policy LUD-4.8** **Environmental Design.** Design sites and buildings adjacent to natural areas with transparent design elements. Employ bird-safe design near habitat areas or migratory routes.
- Policy LUD-4.9** **Public Streetscapes.** Create pedestrian oriented streetscapes by establishing unified street tree planting, sidewalk dimensions and maintenance, pedestrian amenities, and high-quality building frontages in all new development.
- Goal CON-2** **Preserve designated natural hillsides and ridgelines in the Planning Area, to maintain the aesthetic character of the Antelope Valley.**
- Policy CON-2.4** **Development in Suitable Locations.** Facilitate development in more suitable locations while retaining significant natural slopes and areas of environmental sensitivity as natural open space.

5.1.3 ENVIRONMENTAL SETTING

Aesthetic resources include a combination of numerous elements, such as landforms, vegetation, water features, urban design, and/or architecture, that impart an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area, but also communicate value placed upon a landscape or scene by its observers.

The Project is located within the northeastern portion of the City of Palmdale within Los Angeles County. The Project site is located northeast of the intersection of East Avenue M/Columbia Way and 30th Street East. Existing public views of the Project site are available from East Avenue M/Columbia Way and from 30th Street East. The Project site consists of disturbed undeveloped land that is generally flat and featureless with a patchy ground cover of grass, weeds, and tumbleweeds.

The site is bounded by dirt roads followed by undeveloped vacant land to the north and east, by East Avenue M/Columbia Way followed by airport related industrial uses to the south, and by 30th Street followed by an industrial solar energy facility with north-south rows of adjustable solar panels to the west. In addition, a vehicle storage facility and associated office is located to the northeast (SPR 19-012). Therefore, the character of the site is disturbed, undeveloped, vacant land that is surrounded by either similar disturbed, undeveloped, vacant land or industrial type uses.

Scenic resources provide a visual relief from the man-made structures in the City and connect its residents to the natural environment. The City of Palmdale's General Plan does not identify scenic resources; however,

Conservation Element Goal 2 identifies the following ridgelines as contributors to the aesthetic character of the Antelope Valley: Ritter Ridge, Portal Ridge, Verde Ridge, the Ana Verde Hills, the Sierra Pelona Mountains, and the lower foothills of the San Gabriel Mountains. Furthermore, the GPU EIR states that scenic views of the desert and local mountains are predominant scenic vistas in the City. Distant views of the San Gabriel Mountains, Sierra Pelona Mountains, and Tehachapi Mountains are available across the City, with the best views being from large areas of unobstructed open space. In some areas of the City, the views of the mountains are fully to partially obstructed by existing trees and buildings.

Views from the Project site include airport/airport logistics facilities, solar farms, agricultural land, and possibly long-range views of a soccer sports park located approximately 0.5 miles north of the site. The surrounding landscape contains non-native vegetation as well as native vegetation typical of the high desert region, with Joshua trees, scrub oaks, chaparral, and grasses. Distant background views of the San Gabriel Mountains are located west, southwest, and southeast from roadway corridors surrounding the site. Distant views of the Mojave Desert are not available from the Project site due to the flat topography and existing adjacent uses. There are no officially designated State scenic highways adjacent to the Project site. The closest scenic highway is Route 2, which is located approximately 40 miles away.

5.1.3.1 Scenic Vistas

Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting.

The City of Palmdale General Plan does not specifically identify any scenic vistas from the Project site, roadways adjacent to the Project site, or the Project site vicinity. However, as described above, Conservation Element Goal 2 identifies the following ridgelines as contributors to the aesthetic character of the Antelope Valley: Ritter Ridge, Portal Ridge, Verde Ridge, the Ana Verde Hills, the Sierra Pelona Mountains, and the lower foothills of the San Gabriel Mountains. The City's GPU EIR generally describes scenic vistas within the City as views of the desert and local mountains. Distant mountain views of the San Gabriel Mountains (located approximately 34 miles to the southeast of the Project site), the Sierra Pelona Mountains (approximately 11 miles to the west of the Project site), and the Tehachapi Mountains (approximately 36 miles to the northwest of the Project site) are available throughout the City. Because the Project vicinity is relatively flat, distant views of the surrounding desert and mountains are visible from roadway corridors surrounding the Project site with some obstruction due to existing structures, such as, utility poles, trees, and other elements of the built environment.

5.1.3.2 Visual Character and Quality

The Project site consists of one parcel located at the northeast corner of the East Avenue M/Columbia Way and 30th Street East. The parcel is currently zoned Heavy Industrial (HI), which allows for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution. The Project site is undeveloped and is comprised of sparse vegetation characterized as ruderal grassland, dominated by non-native species, with a row of salt cedar (*Tamarisk*) shrubs along the northeastern boundary of the site, as shown in Figure 3-3, *Aerial View*, in Section 3, *Project Description*. As described above, the Project site is surrounded by vacant land to the north and east, by a solar power generating facility to the west, and by airport industrial/logistics uses to the south. The site is flat and visible from surrounding roadways and adjacent parcels.

The Project site and parcels adjacent to the north and east are undeveloped. However, a vehicle storage facility is located to the northeast. Furthermore, areas to the south, west, and the larger Project vicinity is

characterized as urbanized area. The Project site is approximately 4.4 miles east of the SR-14 corridor, which is developed with several commercial centers. The area further north of the Project site is developed with a soccer sports park (Lancaster National Soccer Center) and residential areas (single-family homes). Therefore, the existing visual character of the larger Project vicinity, and general city landscape, consists primarily of developed commercial and industrial area surrounded by undeveloped parcels and residential neighborhoods.

5.1.3.3 Light and Glare

Contributors to nighttime ambient light levels within the City include both stationary and mobile sources. Stationary sources of nighttime light within the City include exterior structure illumination, light spillover from interior lighting, lighting for outdoor uses such as sports fields and courts, parking lot lighting, streetlights, and illuminated signage such as billboards. The main source of mobile nighttime light is from vehicle headlights.

The Project site is currently undeveloped and does not contain sources of light or glare. Nighttime lighting in the Project vicinity is currently limited because most of the surrounding area, especially to the east, is undeveloped and the solar facility to the west does not generate nighttime light or glare. However, limited nighttime lighting is generated south of the Project site, across from East Avenue M/Columbia Way, from the airport and aircraft industrial logistics uses, and lighting and glare is generated by vehicles travelling along East Avenue M/Columbia Way and 30th Street East. The light and glare receptors in the Project vicinity include motorists traveling on local streets, as well as residential uses 0.8 mile to the north.

5.1.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates a project could have a significant effect if it were to:

- | | |
|--------------|---|
| Aesthetics-1 | Have a substantial adverse effect on a scenic vista. |
| Aesthetics-2 | Substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. |
| Aesthetics-3 | 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); or, if the project is in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality. |
| Aesthetics-4 | Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. |

The Initial Study (see Appendix A) established that the proposed Project would not result in impacts related to Threshold Aesthetics-2; therefore, no further assessment of this impact is required in this Draft EIR.

5.1.5 METHODOLOGY

Aesthetic resources were assessed based on the visual quality of the Project site and surrounding area and the changes that would occur from implementation of the proposed Project. The significance determination for scenic vistas is based on consideration of whether the vista can be viewed from public areas within or near the Project site and the potential for the Project to either hinder views of the scenic vista or result in its visual degradation. As the Project site is located within an “urbanized area,” as defined by Public Resources Code Section 21071 the analysis of visual character or quality of public views of the site focuses on the

Project's consistency with applicable zoning and other regulations governing scenic quality, such as, density, height, bulk, setbacks, landscaping, signage, etc.

The analysis of light and glare identifies light-sensitive land uses and describes the Project's light and glare sources, and the extent to which Project lighting could spill off the Project site onto adjacent existing and future light-sensitive areas. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

5.1.6 ENVIRONMENTAL IMPACTS

IMPACT AESTHETICS-1: THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA.

Less than Significant Impact.

A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista, or by blocking the view corridors or "vista" of the scenic resource at public locations. As mentioned in Section 5.1.3, *Environmental Setting*, the City considers scenic vistas within the city as views of the desert and local mountains. Distant mountain views of the San Gabriel Mountains (located approximately 34 miles to the southeast), the Sierra Pelona Mountains (approximately 11 miles to the west), and the Tehachapi Mountains (approximately 36 miles to the northwest) are available from roadway corridors surrounding the Project site. Furthermore, Goal 2 of the Conservation Element identifies the following ridgelines as contributors to the aesthetic character of the Antelope Valley: Ritter Ridge, Portal Ridge, Verde Ridge, the Ana Verde Hills, the Sierra Pelona Mountains, and the lower foothills of the San Gabriel Mountains.

The Project site is not within or adjacent to a scenic vista. The Project site consists of vacant, undeveloped land that is generally flat and featureless with a patchy ground cover of grass, weeds, and tumbleweeds, and a row of salt cedar (*Tamarisk*) shrubs along the northeastern boundary. The site varies in vegetation densities from unvegetated to sparsely vegetated. The site is visible from surrounding roadways and adjacent parcels.

The Project vicinity is relatively flat, allowing for distant views of the surrounding desert and mountains, with some obstruction due to existing structures, such as utility poles, trees, and other elements of the built environment, such as the solar panel arrays to the west of the site and the airport industrial logistics uses that are across East Avenue M/Columbia Way to the south of the site. Long distance background views of the San Gabriel Mountains are provided from roadway corridors to the west, southwest, and southeast of the Project site. Undeveloped areas of the Mojave Desert are located to the north (past the residential areas); however, due to the flat topography and existing residential areas, views of the desert from the Project site are obstructed. Views near the Project site include undeveloped parcels, airport and airport logistics facilities, solar energy generating facilities, agricultural land, and a soccer sports park located approximately 0.5 miles north of the site. The surrounding landscape on undeveloped parcels contains non-native vegetation as well as native vegetation typical of the high desert region, with Joshua trees, scrub oaks, chaparral, and grasses.

The proposed Project would develop two industrial warehouse buildings that would be set back from the adjacent streets and would not encroach into the existing scenic long-distance background views of the mountains in the public roadway corridor. Building 1 would be set back approximately 441 feet from Avenue L-8, 196 feet from 35th Street East, and 208 feet from 30th Street East. Building 2 would be set back 275 feet from East Avenue M/Columbia Way, 205 feet from 35th Street East, and 203 feet from 30th Street East. All setbacks would exceed the requirements of the Palmdale Municipal Code. Further, the proposed

Project would include appropriate landscaping to provide a visual buffer of the Project as recommended in the Land Use and Community Design Element of the City’s General Plan. Landscaping would be consistent with the City landscaping standards per the City of Palmdale Municipal Code Section 17.86.010, *Landscaping Requirements* and City of Palmdale Engineering Standards.

While proposed building heights of 56 feet and 9 inches would be higher than the maximum height of 50 feet allowed by the zoning and land use designation, the additional building height would not encroach into a scenic vista. The Project applicant would obtain a Conditional Use Permit (CUP) for the difference in height. The City Council would review the CUP as part of Project approval. Overall, long range views of the San Gabriel Mountains, Sierra Pelona Mountains, and Tehachapi Mountains would continue to be available from public vantage points on East Avenue M/Columbia Way and 30th Street East. Therefore, the Project would not result in a substantial adverse effect on a scenic vista, and impacts would be less than significant.

IMPACT AESTHETICS-3: THE PROJECT IS IN AN URBANIZED AREA, AND WOULD NOT CONFLICT WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING SCENIC QUALITY.

Less Than Significant Impact.

As described previously, the Project site is located within an “urbanized area,” as defined by Public Resources Code Section 21071; therefore, this analysis focuses on the Project’s consistency with applicable zoning and other regulations governing scenic quality.

The City’s zoning regulations are included in PMC Title 17. The purpose of Title 17 is to designate, regulate, and control the location, use, height, and alteration of buildings, structures, and land for residence, commerce, trade and industry, or other purposes. As described in Section 3, *Project Description*, the Project site has a zoning designation of Heavy Industrial (HI), and a General Plan designation of Industrial (IND). The Heavy Industrial zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution, and implements the Industrial General Plan land use designation (City of Palmdale, 2023).

The Land Use and Community Design Element of the City’s General Plan includes a description and intended physical character of the Industrial land use designation (City of Palmdale, 2023), summarized below in Table 5.1-1. The Project would be consistent with the descriptions listed in Table 5.1-1, except for building height, which would be allowable with a CUP. As shown in Table 5.1-1, the allowed building height for the Project site is 50 feet. As described in Section 3, *Project Description*, the building height of the proposed Project is 56 feet 9 inches, which is permitted with a CUP. Furthermore, as shown in Table 5.1-2, the proposed Project would be consistent with General Plan goals and policies related to scenic quality. Thus, the Project would not conflict with an applicable regulation and would have a less-than-significant impact on scenic quality.

Table 5.1-1: Consistency with General Plan Industrial Land Use Designation

	General Plan Key Features	Project	Consistency
Primary Land Uses	<ul style="list-style-type: none"> • Medium and heavy industrial activities (as allowed per Zoning) • Light industrial • Production, distribution, and repair uses • Film production/sound stage studio 	Industrial with 90 percent warehouse uses and 10 percent manufacturing uses (production).	Yes

	General Plan Key Features	Project	Consistency
Secondary Land Uses	<ul style="list-style-type: none"> • Research and development • Ancillary commercial • Auto service • Flex/makerspace Self-storage (all types) 	n/a	Yes
Allowed Height	<ul style="list-style-type: none"> • 50 feet 	56 feet 9 inches	Yes, allowed with approval of the CUP pursuant to PMC Chapter 17.22 (Conditional Use Permit)
Allowed Density and Intensity	<ul style="list-style-type: none"> • FAR: up to 0.5 	FAR: maximum of 0.50	Yes
Appropriate Building Types	<ul style="list-style-type: none"> • Standalone commercial/industrial • Low-rise industrial/flex • Block form warehouse/studio buildings 	Block form warehouse	Yes

Source: City of Palmdale General Plan

Table 5.1-2: Consistency with General Plan Goals and Policies Related to Scenic Quality

General Plan Policy	Project Consistency with Policy
Land Use Element	
LUD-4.1 Quality Construction. Use simple, urban building forms made with permanent materials with high quality detailing that stands the test of time.	Consistent. As described in Section 3, <i>Project Description</i> , the proposed Project would consist of simple, urban building forms with high quality and consistent material uses and a color scheme of blues and grays. Trees, shrubs, and groundcovers would be incorporated within the perimeter landscaping to screen buildings, and loading docks would be screened by 12-foot-high screening walls. The use of landscaping, building layout, screening walls, finish materials, and architectural accenting on the Project site would be consistent with this policy.
LUD-4.3 Long-Lasting Building Materials. Convey façade articulation through the strength, depth, and permanence of building materials. Thinner cladding materials, such as stucco, masonry veneers, and wood or simulated wood, may be used when finished to appear as durable and authentic as the materials they simulate.	Consistent. As shown in Figure 3-9c, <i>Elevations and Material Board</i> , in Section 3, <i>Project Description</i> , the proposed buildings would consist of a variety of durable materials consisting of stucco and masonry veneers. Building materials would include blue reflective glazing, earth toned gray paints at canopy, and pure whites and grays. The materials and color schemes would be reviewed and approved by the City during the site plan review and permitting process.
LUD-4.6 Urban Design in the Core. Require four-sided architecture – all facades of a building are designed with quality, care, and visual interest - in the urban core (primarily RN3, RN4 and MU3). Encourage four-sided architecture in other areas.	Consistent. As shown in in Figures 3-9a, <i>Building 1 Elevations</i> , and 3-9b, <i>Building 2 Elevations</i> , in Section 3, <i>Project Description</i> , the proposed buildings would include four-sided architecture. The building design, colors, and materials would be consistent throughout all sides of the buildings. In addition, landscaping and trees would be located around the perimeter of the buildings to enhance views of the site.
LUD-4.8 Environmental Design. Design sites and buildings adjacent to natural areas with transparent	Not Applicable. The Project site is not near a natural area. The undeveloped vacant parcels near the site have been previously used for agriculture or other uses.

General Plan Policy	Project Consistency with Policy
design elements. Employ bird-safe design near habitat areas or migratory routes.	However, surrounding sites are now vacant and not used for agricultural uses. The nearest preserved habitat is located approximately 7.94 miles southeast of the Project site, in association with the Alpine Butte Wildlife Sanctuary. The Project site is separated from this open space by industrial and agricultural development, as well as several heavily trafficked roadways including 70th Street East and Columbia Way. However, the Project includes landscaping, including trees that would surround the Project site that would provide safe roosting or nesting during migration.
LUD-4.9 Public Streetscapes. Create pedestrian oriented streetscapes by establishing unified street tree planting, sidewalk dimensions and maintenance, pedestrian amenities, and high-quality building frontages in all new development.	Consistent. The proposed Project would include a landscaped setback with unified street trees and an 8-foot-wide sidewalk around the entire Project site. As described previously, the buildings would consist of high-quality architectural frontages.
LUD-14.2 Adjacent Use Compatibility. Continue to buffer this area (Plant 42) from adjacent, non-compatible residential and commercial uses.	Consistent. The Project site has a General Plan land use designation of Industrial (IND), and zoning designation of Heavy Industrial (HI), and is located north of the Palmdale Regional Airport (Plant 42). As such, the Project is consistent with the intended uses and would be consistent with buffering Plant 42 from non-compatible residential and commercial uses.
Conservation Element	
Policy CON-2.4 Development in Suitable Locations. Facilitate development in more suitable locations while retaining significant natural slopes and areas of environmental sensitivity as natural open space.	Consistent. As stated above, the proposed Project would be located just north of Palmdale Regional Airport (Plant 42), an area that is considered non-compatible for residential and commercial uses per the City's General Plan. Furthermore, the Project site is disturbed and does not contain significant natural slopes or areas of environmental sensitivity as natural open space. As such, the Project site is a suitable location for development.

Source: City of Palmdale General Plan

The Project site is located in the Heavy Industrial Zone. Table 5.1 -3 lists the Palmdale Municipal Code Section 17.66.010 development standards that are applicable to the Project site, which are intended to minimize adverse aesthetic impacts associated with new development projects. As detailed, with approval of the proposed CUP, the Project would be consistent with all of the applicable zoning standards.

Table 5.1-3: Heavy Industrial Zone Development Standards

Heavy Industrial Zone Development Standards		Project
Parking *As contained in Section 17.87.060 of the City Municipal Code	Warehouse @ 0.5 spaces per 1,000 SF Office @ 1 space per 250 SF (743 for each building)	Building 1: 753 spaces Building 2: 764 spaces
Minimum Lot Size & Dimensions	20,000 SF (width 100 ft, depth 100 ft)	6,541,840.8 SF (150.63 acres)
FAR	0.5	Building 1: 0.5 Building 2: 0.49
Maximum Structure Height	50 ft/4 stories (without CUP)	56 ft 9 in (with CUP)

Heavy Industrial Zone Development Standards		Project
Front Setback	10 ft	Building 1: Minimum of 196 ft Building 2: Minimum of 196 ft
Street Side Setback	10 ft	Building 1: 196 ft / 208 ft Building 2: 205 ft / 203 ft
Rear Setback	10 ft	Building 1: 441 ft Building 2: n/a
Landscaping	10% overall; 15% at parking areas	15%

Source: City of Palmdale Municipal Code Title 17

The proposed Project would subdivide the 150.63-acre vacant parcel into three parcels through approval of TPM 84077. Building 1 would total 1,500,856 SF on the 2,995,185.6 -SF (68.76-acre) Parcel 1, resulting in a FAR of 0.50. Building 2 would total 1,500,856 SF on the 3,069,673.2-SF (70.47-acre) Parcel 2, resulting in a FAR of 0.49, consistent with the Palmdale Municipal Code requirements. Further, the Project would include various architectural elements such as stamped concrete, stacked stone with textured or sandblasted finishes, glass and curtainwall glazing systems, natural and/or manufactured stone and limited metal panel systems including light and warm-toned exterior building colors. Additionally, the Project's landscape would incorporate drought-tolerant plant species that can maintain vibrancy during drought conditions. Approval of the proposed Project would include a CUP and a Site Plan Review by the City which would ensure consistency with design standards and other regulations governing scenic quality. Therefore, as demonstrated in Tables 5.1-1, 5.1-2, and 5.1-3, the proposed Project would not conflict with zoning and other regulations governing scenic quality. Impacts would be less than significant.

IMPACT AESTHETICS-4: THE PROJECT WOULD NOT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE THAT WOULD ADVERSELY AFFECT DAY AND NIGHTTIME VIEWS IN THE AREA.

Less Than Significant Impact.

Construction

Limited nighttime lighting would be needed for Project construction. The City's Noise Ordinance does not allow construction between the hours of 8:00 p.m. and 6:30 a.m. Thus, most construction activity would occur during daytime hours during the week, and construction-related illumination would be used for limited safety and security purposes and would be required to be directed downward. In addition, construction of the Project would not include any materials that would generate offsite glare that could direct light to sensitive receptors. Therefore, impacts related to lighting and glare during construction would be less than significant.

Operation

Lighting

The Project would introduce new lighting sources to the area with limited nighttime lighting. The Project site is currently undeveloped and does not contain sources of light or glare. Nighttime lighting sources include vehicles from East Avenue M/Columbia Way and the Palmdale Airport related uses across East Avenue M/Columbia Way. New sources of nighttime lighting resulting from the implementation of the Project would include parking lot and loading area lighting, as well as building mounted security lights.

The Project would be subject to Section 17.86.030 of the City's Municipal Code which states that the light level at property lines shall not exceed one-quarter foot candles and requires the usage of dark-sky

compliant lighting. While nighttime lighting would increase with Project development, the additional lighting would be limited to safety, security, and signage purposes. Furthermore, nighttime lighting from the Project site would be shielded to avoid spilling onto adjacent properties as required by the provisions of the PMC, which would be verified through the City's development review and permitting process. Therefore, operation of the proposed Project would not result in substantial light that would adversely affect views of the area, and impacts related to lighting would be less than significant.

Glare

Glare can emanate from many different sources, some of which include direct sunlight, sunlight reflecting from cars or buildings, and bright outdoor or indoor lighting. Glare from reflective surfaces occurs as a result of the addition of large expanses of glass, metal, and other reflective surfaces for building façades with new construction.

The Project would develop a new building that would generally be constructed of concrete with blue glass windows, painted concrete, and painted metal doors. The glass windows would not dominate building elevations and are intended to bring daylight into the building as well as provide design treatments to the exterior building walls. The windows would be individually framed openings, extended or recessed to create more depth and shadow, and would be separated by areas of stucco; therefore, the Project windows would not generate a substantial source of glare.

Overall, the proposed Project would create limited new sources of light or glare from security and site lighting but would not adversely affect day or nighttime views in the area. Thus, impacts would be less than significant.

5.1.7 CUMULATIVE IMPACTS

The cumulative aesthetics study area for the Project is the viewshed from public areas that can view the Project site and locations that can be viewed from the Project site. As described above, the proposed Project would not impact scenic vistas and therefore, would not have impacts that could have the potential to cumulatively combine to impact scenic vistas. Development of the Project site with industrial warehousing uses would contribute to a change in visual characteristics of the Project site and Project vicinity. However, the Project would be compliant with the City's development standards governing scenic quality as listed in the General Plan and PMC.

The cumulative change in visual condition that would result from Project development and operation, in combination with future nearby projects would not be considered adverse, because the Project would implement the General Plan land use and zoning requirements related to architecture, landscaping, signs, lighting, and other related items intended to protect visual quality. Therefore, Project development and operation would result in a less-than-significant cumulatively considerable impact related to degradation of the existing visual character or quality of the Project site and its surroundings.

The cumulative study area for light and glare includes areas immediately adjacent to the Project site that could receive light or glare from the Project or generate daytime glare or nighttime lighting that would be visible within the Project site and could combine with lighting from the Project. Project lighting would comply with existing municipal code requirements to focus lighting on the Project site and shield lighting from spillage onto adjacent land uses. This would minimize nighttime light pollution and reduce the potential for glare onto adjacent roadways and land uses that could cumulatively combine with light from other projects. Other projects located throughout the vicinity would similarly be required to comply with these regulations as well. Cumulative projects would result in more intense development than currently exists within the area. However, through implementation of existing standards and applicable lighting measures, that would be verified by the City through the development review and permitting process, the Project, in combination with past,

present, and reasonably foreseeable future projects would result in less-than-significant cumulative nighttime lighting and daytime glare impacts.

5.1.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- City of Palmdale Municipal Code Section 8.28 – *Building Construction Hours of Operation and Noise Control*
- City of Palmdale Municipal Code Title 15 – *Buildings and Construction*
- City of Palmdale Chapter 17.22 – *Conditional Use Permit*
- City of Palmdale Municipal Code Section 17.86.030 – *Outdoor Lighting*

5.1.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, without mitigation, Impacts Aesthetics-1, Aesthetics-3, and Aesthetics-4 would be less than significant.

5.1.10 MITIGATION MEASURES

None required.

5.1.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation is required, as impacts would be less than significant.

5.1.12 REFERENCES

- California Department of Transportation (Caltrans). (2018). Scenic Highway Mapping System.
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5.2 Agriculture and Forest Resources

5.2.1 INTRODUCTION

This section describes the agricultural and forest resource conditions in the Project region and potential impacts on agricultural and forestry resources from Project implementation. The analysis in this section is based, in part, on the following documents and resources:

- California Department of Conservation Farmland Mapping and Monitoring Program
- *City of Palmdale General Plan*, October 2022
- *City of Palmdale 2045 General Plan Update Draft Environmental Impact Report*, July 2022
- City of Palmdale Code of Ordinances
- Land Evaluation and Site Assessment Model for Palmdale Logistics Center (LESA Model), EPD Solutions, February 29, 2023 (Appendix E)

5.2.2 REGULATORY SETTING

5.2.2.1 Federal Regulations

Forest and Timberland

The U.S. Department of Agriculture (USDA) defines a forested area as "forest land" if it is at least one acre in size and at least 10 percent occupied by forest trees of any size or formerly having had such tree cover and not currently developed for non-forest use. Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land includes transition zones which are those "areas located between heavily forested and non-forested lands that are at least 10 percent stocked with forest trees, and forest areas adjacent to urban and built-up lands" (U.S. Department of Agriculture, 2012)." The majority of federal forest land is managed as the National Forest System, which includes timberland.

"Timberland" is land owned by the federal government and designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Sections 51112 or 51113 (h) of the California Public Resources Code defines "Timberland Production Zone" (TPZ) is land used for growing and harvesting timber and compatible uses.

5.2.2.2 State Regulations

Farmland Mapping and Monitoring Program

The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP) was established in 1982 to track changes in agricultural land use and to help preserve areas of important farmland. It divides the State's farmland into different categories based on soil quality and existing agriculture, which are used to identify productive farmland and to analyze impacts on farmland. The various types of farmland identified by the FMMP include Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and grazing land. The highest rated farmland is Prime Farmland.

Land Evaluation and Site Assessment (LESA) Model

The California Agricultural LESA Model was developed to provide lead agencies with an optional methodology to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code Section 21095), including in the CEQA environmental process. The California Agricultural LESA Model evaluates measures of soil resource quality, a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The Project score becomes the basis for making a determination of a project's potential significance on loss of farmland.

Timberland

Section 12220(g) of the California Public Resources Code defines forest land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

5.2.2.3 Local Regulations

Palmdale General Plan

The City of Palmdale General Plan does not contain policies related to agriculture and forestry resources that are applicable to the Project.

Palmdale Municipal Code

Palmdale Municipal Code Chapter 17 establishes several residential and industrial zones that allow for different types of agricultural uses. Specifically, Zone ER (Equestrian Residential) allows for limited agricultural uses including crop production, horticultural production, kennels with a minor use permit (MUP); and stable/equestrian facilities with a conditional use permit (CUP). Zone LDR (Low Density Residential) allows for kennels with a minor use permit (MUP) and stable/equestrian facilities with a CUP. Additionally, Zones LI (Light Industrial) and HI (Heavy Industrial) allow for limited agricultural uses including agricultural support, sales, service, and storage; aquaculture with a CUP; and horticultural production with an MUP. However, neither of the zones allow for crop production or any other agricultural uses. Typical uses for the LI zone include warehousing and distribution, sound stage/film production, storage, research and development, and the like. Typical uses for the HI zone include manufacturing, assembly, warehousing, distribution, and the like.

5.2.3 ENVIRONMENTAL SETTING

5.2.3.1 Agricultural Resources

The City of Palmdale contains approximately 4,898 acres of agricultural land, which includes some areas outside of City limits. According to the City's General Plan EIR and the FMMP Map, a majority of the agricultural land is designated as Prime Farmland except for a few parcels which are designated as Farmland of Statewide Importance and Unique Farmland. Additionally, as shown on Figure 4.2-1 of the General Plan EIR, most of the designated farmland is located in the vicinity of the Palmdale Regional Airport and Plant 43, which consists of industrial land use designations. The Palmdale General Plan EIR also describes that none of the designated farmland is under the Williamson Act Contract.

5.2.3.2 Forest Resources

The City of Palmdale does not contain any forest resources including forestland, timberland, or timberland production zones (City of Palmdale, Rincon Consultants, 2022).

5.2.3.3 Project Site

The Project site and areas to the northwest and northeast of the Project site are designated as Prime Farmland, as described in the LESA Model (Appendix E). The Project site has a General Plan land use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI). As shown in Figure 5.2-1, *Farmland Designations*, approximately 162.5 acres of the Project site, inclusive of offsite roadway improvements, are designated as Prime Farmland by the FMMP. The Project site is relatively flat and consists of vacant and undeveloped land which has been historically used as farmland. The Project site does not contain any existing structures or improvement on the site but has existing irrigation infrastructure throughout the site.

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Farmland Designations



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5.2.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- Agriculture-1 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;
- Agriculture-2 Conflict with existing zoning for agricultural use, or a Williamson Act contract;
- Agriculture-3 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));
- Agriculture-4 Result in the loss of forest land or conversion of forest land to non-forest use; or
- Agriculture-5 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.

The Initial Study (Appendix A) established that the proposed Project would not result in impacts related to Agriculture-2, Agriculture-3, and Agriculture-4; therefore, no further assessment of these thresholds is required in this Draft EIR.

5.2.5 METHODOLOGY

Agricultural resources were assessed based on the California Department of Conservation's FMMP, which is a biennial report and mapping resource on the conversion of farmland and grazing land, and the California Agricultural LESA Model, included as Appendix E. Using these sources, the proposed Project was analyzed for potential conversion of important farmland, conflicts with zoning designations, conversion of Williamson Act contract lands, and other changes resulting from the removal of existing farmland.

Forest resources were assessed based on the City of Palmdale General Plan and evaluation of the existing conditions of the Project site. Using this source, the proposed Project was analyzed for the potential conversion of forest land to non-forest uses, conflicts with zoning designations, and other changes resulting from the proposed Project that would remove existing forest land.

5.2.6 ENVIRONMENTAL IMPACTS

IMPACT AGRICULTURE-1: THE PROPOSED PROJECT WOULD 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.

Significant and Unavoidable Impact. The Project site contains approximately 162.5 acres of Prime Farmland, inclusive of offsite roadway improvements. The entirety of the Project site, with the exception of offsite roadways, was previously utilized for farming and consists of Prime Farmland as designated by the FMMP. Project implementation would convert the 162.5 acres of designated Prime Farmland to light industrial warehouse uses with roadway improvements and result in reduction of the overall acreage of Prime

Farmland within the City. In order to assess potential impacts from implementation of the Project and conversion of agricultural land to non-agricultural uses, an agricultural resource evaluation was prepared to determine the value of the land for agricultural production. The evaluation was prepared pursuant to the California Agricultural LESA Model and considers six factors. Two land evaluation factors measure the quality of the soil on the agricultural land and four site assessment factors measure the site's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. As discussed in Appendix E onsite soils consist of 26.9 acres of Cajon loamy sand (0 to 2 percent slopes) (CaA); 17.5 acres of Hesperia fine sandy loam (0 to 2 percent slopes) (HkA); 46.2 acres of Rosamond loamy fine sand (Rm); and 71.9 acres of Rosamond fine sandy loam (Ro). A majority of the onsite soils (135.6 acres) are considered good-quality soils for agriculture. Furthermore, water was previously sourced from onsite wells which are no longer in use; however, the closest water line is approximately 13,400 linear feet west of the Project site at the intersection of East Avenue M/Columbia Way and 5th Street East (EPD Solutions Inc., 2024). As such, there are physical and economical barriers to water onsite. In addition, approximately 159.4 acres within the Project site's vicinity are designated as Prime Farmland. Consequently, the mapped area received a LESA score of 68.96 (Land Evaluation Score of 44.21 and a Site Assessment Score of 24.75) out of a 100-point scale. According to the LESA Model Significance thresholds, sites receiving a score of between 60 and 79 points are considered significant unless either the Land Evaluation weighted factor sub score or the Site Assessment weighted factor sub score is less than 20 points. Both the Land Evaluation and Site Assessment sub scores exceed 20 points. Therefore, pursuant to the LESA thresholds, the Project's conversion of Prime Farmland to nonagricultural uses is considered significant.

As the site would be developed for light industrial warehousing uses that do not involve agricultural production or farmland, there are no feasible mitigation measures to reduce impacts associated with the Project's conversion to nonagricultural uses. Retention of onsite agricultural uses would be infeasible as it would prevent the development of the proposed onsite buildings and parking areas, which would inhibit implementation of the Project as a whole. Replacement of agricultural resources offsite would be infeasible as creation of new farmland-status properties within the City is outside of the City's and Applicant's control. Also, offsite mitigation would be infeasible as it would require the Applicant to purchase replacement acreage for farmland currently not in use elsewhere in California and restore it as viable farmland; however, distant mitigation would not reduce impacts as these parcels have no relationship to the loss of agricultural lands within the City or County. Overall, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the loss of Prime Farmland and conversion of Prime Farmland to nonagricultural use. Therefore, impacts would be significant and unavoidable.

IMPACT AGRICULTURE-5: THE PROPOSED PROJECT WOULD NOT 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.

Significant and Unavoidable Impact. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural use. As described previously, the Project site was historically used as farmland and consists of Prime Farmland. Also, in the Project's vicinity, approximately 159.4 acres of land are being used for agricultural production, all of which are classified as Prime Farmland. While these lands have been previously or are currently utilized for agricultural production, they are designated for future urban development by the City of Palmdale General Plan with land use designations of Industrial, inclusive of both Light Industrial (LI) and Heavy Industrial (HI) zones. Both the LI and HI zones allow for limited agriculture uses including agricultural support, sales, service, and storage, aquaculture with a CUP, and horticultural production with an MUP; neither of the zones allow for crop production or any other agricultural uses. As such, development of the site could result in an increased development pressure on the surrounding

agricultural sites. Thus, the proposed Project would convert previously used farmland to non-agricultural use and would have the potential to influence the conversion of surrounding farmland to nonagricultural use. Therefore, the Project would involve changes in the environment that would convert farmland to nonagricultural use, and impacts would be significant. As discussed under Impact Agriculture-1, no feasible mitigation measures exist which would substantially lessen the Project's significant impacts related to the loss of farmland and conversion of farmland to nonagricultural use. Therefore, impacts to farmland would be significant and unavoidable.

Further, the City of Palmdale does not contain any forest resources including forestland, timberland, or timberland production zones. Therefore, development of the proposed Project would not cause loss of forest land on or offsite or convert forest land to non-forest use. No impacts would occur to forest land or timberlands.

5.2.7 CUMULATIVE IMPACTS

Agricultural Resources

The cumulative study area for agricultural resources for the proposed Project is the County of Los Angeles as these resources are regularly assessed on the countywide level as part of the State's FMMP. Throughout the County, numerous related projects exist that would result in the additional conversion of agricultural land, including Prime Farmland and Important Farmland, to nonagricultural uses. Agricultural use in the County has declined over the last several decades as the result of urban expansion and economic conditions. Consequently, the County and incorporated cities within the County have set forth goals and policies to protect agriculture within their individual General Plans. Notwithstanding, the County and incorporated cities within the County continue to plan for growth, including in the vicinity of the City of Palmdale. Continued conversion of agricultural lands to urban uses would substantially reduce overall agricultural productivity in the City and the region. According to the City of Palmdale General Plan EIR, buildout of the general plan would not involve land use designation changes of agricultural lands and as such would not conflict with or impact existing farmland, including approximately 4,898 acres, located primarily within the vicinity of Palmdale Regional Airport/Plant 42. However, although the proposed Project would remain consistent with the Project site's General Plan land use designation, implementation of the Project would contribute to the conversion of Prime Farmland to non-agricultural uses and an overall loss of farmland within the region, and thus would cumulatively contribute to the loss of agricultural resources. As such, the Project would result in cumulatively considerable impacts to agricultural resources. As explained above, there are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland to non-agricultural uses and the overall loss of farmland within the City and County, therefore, impacts would be cumulatively significant and unavoidable.

Forest Resources

The cumulative study area for forestry resources is the City of Palmdale. There are no forest resources or woodland vegetation within the immediate vicinity of the Project site or in the City. As explained above under Impact Agriculture-5, no impacts to forestland would occur. As such, Project implementation would not impact forest land, timberland, or timberland zoned Timberland Production, and impacts that could become cumulatively considerable would not occur. Therefore, the Project would not cumulatively contribute to forest resource impacts.

5.2.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

None.

Plans, Programs, or Policies (PPPs)

None.

5.2.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

- Impact Agriculture-1: Implementation of the Project would convert Farmland to nonagricultural uses.
- Impact Agriculture-5: Implementation of the Project would involve other changes in the environment that could result in the conversion of Farmland to nonagricultural uses.
- Cumulative Impacts: Implementation of the Project would result in impacts related to the conversion of Prime Farmland to non-agricultural uses and the overall loss of farmland within the City and County would be cumulatively significant and unavoidable.

5.2.10 MITIGATION MEASURES

There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland to non-agricultural uses and the overall loss of farmland.

5.2.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland and loss of farmland. The following impacts would be **significant and unavoidable**:

- Impact Agriculture-1: Implementation of the Project would convert Farmland to nonagricultural uses.
- Impact Agriculture-5: Implementation of the Project would involve other changes in the environment that could result in the conversion of Farmland to nonagricultural uses.
- Cumulative Impacts: Implementation of the Project would result in impacts related to the conversion of Prime Farmland to non-agricultural uses and the overall loss of farmland within the City and County would be cumulatively significant and unavoidable.

5.2.12 REFERENCES

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5.3 Air Quality

5.3.1 INTRODUCTION

This section provides an overview of the existing air quality at the Project site and in the surrounding region, a summary of applicable regulations, and analyses of potential short-term and long-term air quality impacts from implementation of the proposed Project as well as mitigation measures if necessary to reduce significant air quality impacts. This analysis is based on the following document(s):

Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report, included as Appendix B.

5.3.2 REGULATORY SETTING

5.3.2.1 Federal Regulation

Federal Clean Air Act

The 1970 federal Clean Air Act (CAA) authorized the establishment of health-based national health-based air quality standards and also set deadlines for their attainment. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans (SIP) to demonstrate how they will achieve the national standards by specified dates. The federal CAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required of areas of the nation that exceed the standards. The CAA Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is modified periodically to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins, as reported by their jurisdictional agencies.

United States Environmental Protection Agency

Criteria Air Pollutants

At the federal level, the United States Environmental Protection Agency (USEPA) has been charged with implementing national air quality programs. The USEPA's air quality mandates are drawn primarily from the federal CAA, which requires the USEPA to establish National Ambient Air Quality Standards (NAAQS). The USEPA has established primary and secondary NAAQS for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter (PM₁₀ and PM_{2.5}), and lead. Table 5.3-1, *Ambient Air Quality Standards for Criteria Pollutants*, lists the NAAQS for these pollutants, as well as their California State standards which are discussed in Section 5.3.2.2, *State Regulations*. The USEPA is responsible for reviewing all SIPs to determine whether they conform to the mandates of the CAA and its amendments, and to determine whether implementing the SIPs will achieve air quality goals. If the USEPA determines an SIP to be inadequate, a federal implementation plan that imposes additional control measures may be prepared for the nonattainment area.

The USEPA also has regulatory and enforcement jurisdiction over emission sources beyond State waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The USEPA's primary role at the state level is to oversee State air quality programs. The USEPA sets federal vehicle and stationary source emissions standards and provides research and guidance in air pollution programs.

Hazardous Air Pollutants

The USEPA has programs for identifying and regulating hazardous air pollutants (HAPs). Title III of the CAA Amendments directed the USEPA to promulgate national emissions standards for HAPs (NESHAP). The NESHAP may differ for major sources than for area sources of HAPs. Major sources are defined as stationary sources with potential to emit more than 10 tons per year (tpy) of any HAP or more than 25 tpy of any combination of HAPs; all other sources are considered area sources. The emissions standards are to be promulgated in two phases. In the first phase (1992–2000), the USEPA developed technology-based emissions standards designed to produce the maximum emissions reduction achievable. These standards are generally referred to as requiring maximum achievable control technology (MACT). For area sources, the standards may be different, based on generally available control technology. In the second phase (2001–2008), the USEPA promulgated health-risk-based emissions standards that were deemed necessary to address risks remaining after implementation of the technology-based NESHAP.

Table 5.3-1: Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O₃)	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when ROG and NO _x react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial/industrial mobile equipment.
	8 hours	0.07 ppm	0.075 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO₂)	1 hour	0.18 ppm	0.100 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Arithmetic Mean	0.030 ppm	0.053 ppm		
Sulfur Dioxide (SO₂)	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.50 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Arithmetic Mean	---	0.03 ppm		
Respirable Particulate Matter (PM₁₀)	24 hours	50 µg/m ³	150 µg/m ³	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	---		

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Fine Particulate Matter (PM_{2.5})	24 hours	---	35 µg/m ³	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NO _x , sulfur oxides, and organics.
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³		
Lead (Pb)	30 Day Average	1.5 µg/m ³	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction (in severe cases).	<i>Present source:</i> lead smelters, battery manufacturing and recycling facilities. <i>Past source:</i> combustion of leaded gasoline.
	Calendar Quarter	---	1.5 µg/m ³		
	Rolling 3-Month Average	---	0.15 µg/m ³		
Hydrogen Sulfide (H₂S)	1 hour	0.03 ppm	...	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal power plants, petroleum production and refining
Sulfates (SO₄)	24 hour	25 µg/m ³	...	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	...	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See PM _{2.5} .

ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter

Source: Appendix B

The CAA Amendments also required the USEPA to promulgate vehicle or fuel standards containing reasonable requirements that control toxic emissions of, at a minimum, benzene and formaldehyde. Performance criteria were established to limit mobile-source emissions of toxics, including benzene, formaldehyde, and 1,3-butadiene. In addition, Section 219 required the use of reformulated gasoline in selected areas with the most severe ozone nonattainment conditions to further reduce mobile-source emissions.

5.3.2.2 State Regulations

California Clean Air Act

In 1988, the California Clean Air Act (CCAA) required that all air districts in the State endeavor to achieve and maintain set standards for CO, O₃, SO₂, and NO₂ by the earliest practical date. The CCAA provides districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources. Each nonattainment

district is required to adopt a Clean Air Plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan shows how a district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards, as shown in Table 5.3-1, above.

California Air Resources Board

Criteria Pollutants

The California Air Resources Board (CARB), a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of State and local air pollution control programs in California and for implementation of the CCAA. The CCAA requires CARB to establish the California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants (CO, O₃, SO₂, and NO₂). Applicable CAAQS are shown in Table 5.3-1, *Ambient Air Quality Standards for Criteria Pollutants*, above.

The CCAA requires all local air districts in the state to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts shall focus particular attention on reducing the emissions from transportation and area-wide emission sources and provides districts with the authority to regulate indirect sources.

Among CARB's other responsibilities are overseeing compliance by local air districts with California and federal laws, approving local air quality plans, submitting SIPs to the USEPA, monitoring air quality, determining and updating area designations and maps, and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

Diesel Regulations

CARB and the Ports of Los Angeles and Long Beach have adopted several iterations of regulations for diesel trucks that are aimed at reducing diesel particulate matter (DPM). More specifically, the CARB Drayage Truck Regulation, the CARB statewide On-road Truck and Bus Regulation, and the Ports of Los Angeles and Long Beach Clean Truck Program (CTP) require accelerated implementation of "clean trucks" into the statewide truck fleet. In other words, older, more polluting trucks will be replaced with newer, cleaner trucks as a function of these regulatory requirements.

Moreover, the average statewide DPM emissions for heavy duty trucks (HDT), in terms of grams of DPM generated per mile traveled, will dramatically be reduced due to these regulatory requirements. Diesel emissions identified in this analysis therefore overstate future DPM emissions because not all of these regulatory requirements are reflected in the modeling for the sake of providing a conservative analysis.

Toxic Air Contaminants

Air quality regulations also focus on toxic air contaminants (TACs). In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no safe level of exposure. This contrasts with the criteria air pollutants, for which acceptable levels of exposure can be determined and for which the ambient standards have been established. Instead, the USEPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the MACT or best available control technology (BACT) for toxics and to limit emissions. These statutes and regulations, in conjunction with additional rules set forth by the districts, establish the regulatory framework for TACs.

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill (AB) 1807 [Chapter 1047, Statutes of 1983]) (Health and Safety Code Section 39650 *et seq.*) and the Air Toxics Hot Spots Information and Assessment Act (Hot Spots Act) (AB 2588) [Chapter 1252, Statutes of 1987]) (Health and Safety Code Section 44300 *et seq.*). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted the USEPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure (ATCM) for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate BACT to minimize emissions.

The Air Toxics Hot Spots Information and Assessment Act requires existing facilities emitting toxic substances above a specified level to prepare a toxic-emission inventory, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB published the *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook), which provides guidance concerning land use compatibility with TAC sources. Although it is not a law or adopted policy, the Handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help keep children and other sensitive populations out of harm's way. Based on CARB's Community Health Air Pollution Information System (CHAPIS), no major TAC sources are located in proximity to the Project area. In addition, CARB has promulgated the following specific rules to limit TAC emissions:

- **CARB Rule 2485** (13 CCR, Chapter 10 Section 2485), Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- **CARB Rule 2480** (13 CCR Chapter 10 Section 2480), Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- **CARB Rule 2477** (13 CCR Section 2477 and Article 8), Airborne Toxic Control Measure for In-Use Diesel Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted AB 1493 requiring the adoption of regulations to develop fuel economy standards for the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce fuel use and emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy standards for model 2017-2025 vehicles, which are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes. The idling limit does not apply to:

- idling when queuing,
- idling to verify that the vehicle is in safe operating condition,
- idling for testing, servicing, repairing or diagnostic purposes,
- idling necessary to accomplish work for which the vehicle was designed (such as operating a crane),
- idling required to bring the machine system to operating temperature, and

- idling necessary to ensure safe operation of the vehicle.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code (CALGreen) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CALGreen is updated on a regular basis.

The 2022 CALGreen standards that reduce air quality emissions and are applicable to the proposed Project include, but are not limited to, the following:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
- Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine

flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).

- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute at 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

Senate Bill 1000 Environmental Justice in Local Land Use Planning

In an effort to address the inequitable distribution of pollution and associated health effects in low-income communities and communities of color, the Legislature passed and Governor Brown signed Senate Bill (SB) 1000 in 2016, requiring local governments to identify environmental justice communities (called "disadvantaged communities") in their jurisdictions and address environmental justice in their general plans. This new law has several purposes, including to facilitate transparency and public engagement in local governments' planning and decision-making processes, reduce harmful pollutants and the associated health risks in environmental justice communities, and promote equitable access to health-inducing benefits, such as healthy food options, housing, public facilities, and recreation. SB 1000 requires environmental justice elements to identify objectives and policies to reduce unique or compounded health risks in disadvantaged communities. Generally, environmental justice elements will include policies to reduce the community's exposure to pollution through air quality improvement. SB 1000 affirms the need to integrate environmental justice principles into the planning process to prioritize improvements and programs that address the needs of disadvantaged communities.

5.3.2.3 Local and Regional Regulations

Antelope Valley Air Quality Management District

The Antelope Valley Air Quality Management District (AVAQMD, or District) is the regional agency responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the northern desert portion of the Los Angeles County. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The AVAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The most recent air quality plans are the *PM₁₀ Attainment Demonstration and Attainment Plan* and the *O₃ Attainment Plan*.^{1, 2}

In addition, emissions that would result from mobile, area, and stationary sources during construction and operation of the Project are subject to the rules and regulations of the AVAQMD. The AVAQMD rules applicable to the Project may include, but are not limited to, the following:

- **Rule 401 – Visible Emissions:** This rule establishes the limit for visible emissions from stationary sources.
- **Rule 402 – Nuisance:** This rule prohibits the discharge of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.
- **Rule 403 – Fugitive Dust:** This rule ensures that the NAAQS for PM₁₀ will not be exceeded due to anthropogenic sources of fugitive dust within the Antelope Valley Planning Area by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.
- **Rule 1113 – Architectural Coatings:** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Southern California Association of Governments

Southern California Association of Governments (SCAG) is a council of governments for Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura Counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With regard to air quality planning, SCAG prepares the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP), which address regional development and growth forecasts and form the basis for the land use and transportation control portions of the Air Quality Management Plan (AQMP) and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP, RTIP, and AQMP are based on projections originating within local jurisdictions.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the AVAQMD. The RCP is a framework for decision-making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards, while maintaining consistency with regional goals regarding growth and changes. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAG adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), titled "Connect SoCal," on September 3, 2020. Connect SoCal is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. Connect SoCal is an important planning document for the region, allowing project sponsors to qualify for federal funding and

¹ AVAQMD. (2020). *70 ppb Ozone Standard Implementation Evaluation*. Retrieved July 2023 from <https://avaqmd.ca.gov/files/722da0773/2020+AV+70+ppb+Ozone+Standard+Evaluation+May+2020.pdf>

² AVAQMD. (2023). *Federal 70 ppb Ozone Attainment Plan*. Retrieved July 2023 from <https://avaqmd.ca.gov/files/020b4aec1/70+ppb+Ozone+Plan+Final+Draft+AV+01.04.2023.pdf>

takes into account operations and maintenance costs, to ensure reliability, longevity, and cost effectiveness. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in Connect SoCal, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels).

City of Palmdale General Plan

The City of Palmdale addresses air quality in the Air Quality Element of the City's General Plan. The Air Quality Element contains goals and policies that work to improve air quality. The following policies are applicable to the proposed Project:

- Policy AQ 1-1 Reduce Work Related Trips.** Reduce the number and length of work-related trips through such means as providing a balance of jobs and housing in the community, promoting alternate work schedules, telecommuting, teleconferencing, company-sponsored ride-share and alternative fuel vehicle programs, use of commuter trains and other alternative modes of transportation to the workplace, creation of additional park and ride facilities, and improving the fiber optic network and connectivity.
- Policy AQ 1-8 Environmentally Review New Development.** Use the environmental review process for new development applications to assess and, as necessary, mitigate the impacts of new development related to increased vehicle miles traveled.
- Policy AQ 2-2 Construction Site Requirements.** Require measures at construction sites to prevent deposition of soil onto public right-of-way.
- Policy AQ 2-4 Erosion and Dust Control Measures.** Require erosion and dust control measures for new construction, including covering soil with straw mats or use of chemical soil and dust binders during site grading, followed by hydroseeding and watering disturbed construction areas as soon as possible after grading to prevent fugitive dust.
- Policy AQ 3-2 Eliminate Emissions.** Promote the AVAQMD's efforts to eliminate emissions from such sources as excessive car dealership cold starts, excessive curb idling, emissions from advertising vehicles, and emissions from leaf blowers, among others, through assisting with implementation and enforcement of AVAQMD programs and rules.
- Policy AQ 3-4 Reduce Reactive Organic Gas.** Reduce reactive organic gas (ROG) and particulate emissions from building materials and construction methods, by promoting the use of nonsolvent-based, high-solid, or water-based coatings, and requiring compliance with all pertinent AVAQMD rules.
- Policy AQ 3-5 Minimize Emissions.** Minimize emissions of toxic air contaminants that contribute to climate change and ozone depletion, and that create potential health risks for residents, workers, and visitors.
- Policy AQ 3-7 Environmentally Review New Development Applications.** Through the environmental review process for new development applications, ensure that emissions of toxic air contaminants are minimized and that any significant health effects associated with such contaminants are appropriately mitigated.
- Policy AQ 4-2 Energy Conservation.** Encourage energy conservation from all sectors of the community by promoting and/or requiring the use of energy efficient appliances, processes, and equipment, and promoting energy audits and retrofits of existing structures.

5.3.3 ENVIRONMENTAL SETTING

5.3.3.1 Climate and Meteorology

The Project area is located within the jurisdiction of the AVAQMD. The AVAQMD lies within the northern portion of Los Angeles County, within the Mojave Desert Air Basin (MDAB, or Basin). An air basin is a geographical region to describe an area with a commonly shared air mass, since air pollution does not follow county, city, or political boundaries. The Basin is an assemblage of mountain ranges interspersed with long, broad valleys that often contain dry lakes. Many of the lower mountains that dot the vast terrain rise from 1,000 to 4,000 feet above the valley floor. Prevailing winds in the Basin are out of the west and southwest. These prevailing winds are due to the proximity of the Basin to coastal and central regions and the blocking nature of the Sierra Nevada Mountains to the north; air masses pushed onshore in Southern California by differential heating are channeled through the Basin. The Basin is separated from the Southern California coastal and central California valley regions by mountains (of which the highest elevation is approximately 10,000 ft), whose passes form the main channels for these air masses. The Mojave Desert is bordered on the southwest by the San Bernardino Mountains, separated from the San Gabriel Mountains by the Cajon Pass (4,200 ft). A lesser pass lies between the San Bernardino Mountains and the Little San Bernardino Mountains in the Morongo Valley. The Palo Verde Valley portion of the Mojave Desert lies in the low desert, at the eastern end of a series of valleys (notably the Coachella Valley), whose primary channel is the San Geronimo Pass (2,300 ft) between the San Bernardino and San Jacinto Mountains (Appendix B).

The ambient concentrations of air pollutants are determined by the amount of emissions released by sources and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

During the summer, the Basin is generally influenced by a Pacific subtropical high cell that sits off the coast, inhibiting cloud formation and encouraging daytime solar heating. The Basin is rarely influenced by cold air masses moving south from Canada and Alaska, as these frontal systems are weak and diffuse by the time they reach the desert. Most desert moisture arrives from infrequent warm, moist, and unstable air masses from the south. The Basin averages between 3 and 7 inches of precipitation per year (from 16 to 30 days with at least 0.01 inch of precipitation). The Basin is classified as a dry-hot desert climate (BWh), with portions classified as dry-very hot desert climate (BW_hh), to indicate that at least 3 months have maximum average temperatures over 100.4 degrees Fahrenheit (Appendix B).

Snow is common above 5,000 ft in elevation, resulting in moderate snowpack and limited spring runoff. Below 5,000 ft, any precipitation normally occurs as rainfall. Pacific storm fronts normally move into the area from the west, driven by prevailing winds from the west and southwest. During late summer, moist high-pressure systems from the Pacific Ocean collide with rising heated air from desert areas, resulting in brief, high-intensity thunderstorms that can cause high winds and localized flash flooding. During the fall and winter months, strong, dry Santa Ana winds from the northeast can cause rapid temperature variations of significant magnitude.

5.3.3.2 Criteria Air Pollutants

CARB and the USEPA currently focus on the following air pollutants as indicators of ambient air quality: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀), fine particulate matter with an aerodynamic diameter of 2.5 micrometers or less (PM_{2.5}), and lead. These pollutants are referred to as "criteria air pollutants" because they are the most prevalent air pollutants known to be injurious to human health. Extensive

criteria documents regarding the effects of these pollutants on human health and welfare have been prepared over the years. Standards have been established for each criteria pollutant to meet specific public health and welfare criteria set forth in the federal CAA. California has generally adopted more stringent ambient air quality standards for the criteria air pollutants (CAAQS) and has adopted air quality standards for some pollutants for which there is no corresponding national standard, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Ozone

Ozone (O_3), the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include reactive organic gases (ROGs) or volatile organic compounds (VOCs), and oxides of nitrogen (NO_x). While both ROGs and VOCs refer to compounds of carbon, ROG is a term used by CARB and is based on a list of exempted carbon compounds determined by CARB. VOC is a term used by the USEPA and is based on its own exempt list. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing regional pollution problems. Ozone concentrations are the cumulative result of regional development patterns rather than the result of a few significant emission sources.

Once ozone is formed, it remains in the atmosphere for one or two days. Ozone is then eliminated through reaction with chemicals on the leaves of plants, attachment to water droplets as they fall to earth ("rainout"), or absorption by water molecules in clouds that later fall to earth with rain ("washout").

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. In addition to causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide

CO is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Nitrogen Dioxide

NO_2 is a reddish-brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO_2 . Combustion devices emit primarily nitric oxide (NO), which reacts through oxidation in the atmosphere to form NO_2 . The combined emissions of NO and NO_2 are referred to as NO_x , which are reported as equivalent NO_2 . Aside from its contribution to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels.

Sulfur Dioxide

SO_2 is a colorless, extremely irritating gas or liquid that enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries. When SO_2 oxidizes in the atmosphere, it forms sulfur trioxide (SO_3). Collectively, these pollutants are referred to as sulfur oxides (SO_x).

Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of SO₂ aggravate lung diseases, especially bronchitis. This compound also constricts the breathing passages, especially in people with asthma and people involved in moderate to heavy exercise. SO₂ potentially causes wheezing, shortness of breath, and coughing. Long-term SO₂ exposure has been associated with increased risk of mortality from respiratory or cardiovascular disease.

Particulate Matter

PM₁₀ and PM_{2.5} consist of particulate matter that is 10 microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter). PM₁₀ and PM_{2.5} represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Acute and chronic health effects associated with high particulate levels include the aggravation of chronic respiratory diseases, heart and lung disease, and coughing, bronchitis and respiratory illnesses in children. Particulate matter can also damage materials and reduce visibility. One common source of PM_{2.5} is diesel exhaust emissions.

PM₁₀ consists of particulate matter emitted directly into the air (e.g., fugitive dust, soot, and smoke from mobile and stationary sources, construction operations, fires, and natural windblown dust) and particulate matter formed in the atmosphere by condensation and/or transformation of SO₂ and ROG. Traffic generates particulate matter emissions through entrainment of dust and dirt particles that settle onto roadways and parking lots. PM₁₀ and PM_{2.5} are also emitted by burning wood in residential wood stoves and fireplaces and open agricultural burning. PM_{2.5} can also be formed through secondary processes such as airborne reactions with certain pollutant precursors, including ROGs, ammonia (NH₃), NO_x, and SO_x.

Lead

Lead is a metal found naturally in the environment and present in some manufactured products. There are a variety of activities that can contribute to lead emissions, which are grouped into two general categories, stationary and mobile sources. On-road mobile sources include light-duty automobiles; light-, medium-, and heavy-duty trucks; and motorcycles.

Emissions of lead have dropped substantially over the past 40 years. The reduction before 1990 is largely due to the phase-out of lead as an anti-knock agent in gasoline for on-road automobiles. Substantial emission reductions have also been achieved due to enhanced controls in the metals processing industry. In the Basin, atmospheric lead is generated almost entirely by the combustion of leaded gasoline and contributes less than one percent of the material collected as total suspended particulates.

Toxic Air Contaminants

Concentrations of TACs – or in federal parlance, HAPs – are also used as indicators of ambient air quality conditions. A TAC is defined as an air pollutant that may cause or contribute to an increase in mortality or in serious illness, or that may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air; however, their high toxicity or health risk may pose a threat to public health even at low concentrations.

According to the *California Almanac of Emissions and Air Quality*, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important being particulate matter from DPM. DPM differs from other TACs in that it is not a single substance, but rather a complex mixture of hundreds of substances. Although DPM is emitted by diesel-fueled internal combustion engines, the composition of the emissions varies depending on engine type, operating conditions, fuel composition, lubricating oil, and whether an emission control system is present.

Unlike the other TACs, no ambient monitoring data are available for DPM because no routine measurement method currently exists. However, CARB has made preliminary concentration estimates based on a particulate matter exposure method. This method uses the CARB emissions inventory's PM₁₀ database, ambient PM₁₀ monitoring data, and the results from several studies in the basin to estimate concentrations of diesel PM. In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para- dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

CO Hotspots

An adverse CO concentration, known as a “hot spot” is an exceedance of the State one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated at attainment, and CO concentrations in the Project vicinity have steadily declined.

Odorous Emissions

Odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). Offensive odors are unpleasant and can lead to public distress generating citizen complaints to local governments. Although unpleasant, offensive odors rarely cause physical harm. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source, wind speed, direction, and the sensitivity of receptors.

5.3.3.3 Existing Conditions

The AVAQMD, together with the CARB, maintains ambient air quality monitoring stations in the Basin. The air quality monitoring stations closest to the Project site are located at 43301 Division Street in Lancaster, 1630 N. Main Street in Los Angeles, and 22224 Placerita Canyon Road in Santa Clarita.

Pollutant monitoring results for years 2020 to 2022 at the Lancaster, Los Angeles, and Santa Clarita ambient air quality monitoring stations, shown in Table 5.3-2, indicate that air quality in the area has generally been moderate. As indicated in the monitoring results, the federal PM₁₀ standard had one exceedance in 2020, one exceedance in 2021, and no exceedances in 2022. The State PM₁₀ standard had an unknown number of exceedances during the three-year period.³ The PM_{2.5} federal standard had nine exceedances in 2020, one exceedance in 2021, and an unknown number of exceedances in 2022. The State 1-hour ozone standard was exceeded four times in 2020 only. The State 8-hour ozone standard was exceeded eight times in 2020, four times in 2021, and an unknown number of times in 2022. The federal 8-hour ozone standard was exceeded eight times in 2020, three times in 2021, and 33 times in 2022. The CO, SO₂, and NO₂ standards were not exceeded in this area during the three-year period.

³ For unknown number of exceedances, there is insufficient (or no) data available to determine the value.

Table 5.3-2: Ambient Air Quality at the Nearest Monitoring Stations

Pollutant	Standard	2020	2021	2022 ²
Carbon Monoxide (CO)^{1, 2}				
Maximum 1-hour concentration (ppm)		1.6	1.4	1.5
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.1	1.1	0.6
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O₃)¹				
Maximum 1-hour concentration (ppm)		0.099	0.086	0.098
Number of days exceeded:	State: > 0.09 ppm	4	0	0
Maximum 8-hour concentration (ppm)		0.083	0.079	0.082
Number of days exceeded:	State: > 0.07 ppm	8	4	ND
	Federal: > 0.07 ppm	8	3	33
Coarse Particulates (PM₁₀)¹				
Maximum 24-hour concentration (µg/m ³)		192.3	411.2	76.0
Number of days exceeded:	State: > 50 µg/m ³	ND	ND	ND
	Federal: > 150 µg/m ³	1	1	0
Annual arithmetic average concentration (µg/m ³)		30.6	29.6	ND
Exceeded for the year:	State: > 20 µg/m ³	Yes	Yes	ND
	Federal: > 50 µg/m ³	No	No	ND
Fine Particulates (PM_{2.5})¹				
Maximum 24-hour concentration (µg/m ³)		74.1	35.7	15.1
Number of days exceeded:	Federal: > 35 µg/m ³	9	1	ND
Annual arithmetic average concentration (µg/m ³)		9.2	8.1	7.5
Exceeded for the year:	State: > 12 µg/m ³	No	No	No
	Federal: > 15 µg/m ³	No	No	No
Nitrogen Dioxide (NO₂)¹				
Maximum 1-hour concentration (ppm)		0.051	0.046	0.044
Number of days exceeded:	State: > 0.250 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.008	0.008	0.008
Exceeded for the year:	Federal: > 0.053 ppm	No	No	No
Sulfur Dioxide (SO₂)³				
Maximum 1-hour concentration (ppm)		0.0038	0.0022	0.0065
Number of days exceeded:	State: > 0.25 ppm	0	0	0
Maximum 24-hour concentration (ppm)		0.0009	0.0012	0.0012
Number of days exceeded:	State: > 0.04 ppm	0	0	0
	Federal: > 0.14 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.00023	0.00039	0.00026
Exceeded for the year:	Federal: > 0.030 ppm	No	No	No

Pollutant	Standard	2020	2021	2022 ²
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1. Data taken from 43301 Division Street, Lancaster Monitoring Station.

2. CO 2022 data taken from 22224 Placerita Canyon Road, Santa Clarita

3. Data taken from 1630 N. Main Street, Los Angeles Monitoring Station

µg/m³ = micrograms per cubic meter; CARB = California Air Resources Board; ND = No data, there were insufficient (or no) data to determine the value; ppm = parts per million; USEPA = United States Environmental Protection Agency

Source: Appendix B

Table 5.3-3: Attainment Status of Criteria Pollutants in the Mojave Desert Air Basin

Pollutant	State	Federal
O ₃ 1 hour	Nonattainment: Moderate	Revoked June 2005 ¹
O ₃ 8 hour	Nonattainment	Nonattainment: Moderate
PM ₁₀	Nonattainment	Nonattainment: Moderate
PM _{2.5}	Nonattainment	Unclassified/attainment
CO	Attainment	Attainment
NO ₂	Attainment/unclassified	Attainment/unclassified
SO ₂	Attainment/unclassified	Attainment/Unclassified
Lead	Attainment	Attainment ¹
O ₃ 1 hour	Nonattainment: Moderate	Revoked June 2005

CO = carbon monoxide

N/A = not applicable

NO₂ = nitrogen dioxide

O₃ = ozone

Source: Appendix B

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

SO₂ = sulfur dioxide

¹ On June 15, 2005, the 1-Hour Ozone NAAQS was revoked for all areas except the 8-Hour Ozone

5.3.3.4 Sensitive Land Uses

Land uses such as schools, children's daycare centers, hospitals, and convalescent homes are considered to be more sensitive to poor air quality than the general public because the population groups associated with these uses have increased susceptibility to respiratory distress. In addition, residential uses are considered more sensitive to air quality conditions than commercial and industrial uses, because people generally spend longer periods of time at their residences, resulting in greater exposure to ambient air quality conditions.

Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation.

There are no nearby sensitive receptors within a 1000-foot radius from the Project site. The closest sensitive receptors are single-family homes located approximately 4,143 feet north of the Project site, and the Lancaster National Soccer Center that is located approximately 2,734 feet north of the Project site.

5.3.4 THRESHOLDS OF SIGNIFICANCE

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. Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- Air Quality-1 Conflict with or obstruct implementation of the applicable air quality plan.
- Air Quality-2 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.
- Air Quality-3 Expose sensitive receptors to substantial pollutant concentrations.
- Air Quality-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Some air districts have created guidelines and requirements to conduct air quality analysis. The AVAQMD's current guidelines from its *CEQA Air Quality Handbook*, with associated updates, were followed in this assessment of air quality impacts for the proposed Project.

5.3.4.1 Regional Thresholds

The AVAQMD has established daily emissions thresholds for construction and operation of a proposed project in the MDAB. Specific criteria for determining whether the potential air quality impacts of a project are significant are set forth in the AVAQMD's *CEQA and Federal Conformity Guidelines*. The criteria include emissions thresholds, compliance with State and national air quality standards, and consistency with the current air quality plans. The emissions thresholds were established based on the attainment status of the Basin with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

Table 5.3-4 lists the AVAQMD's CEQA significance thresholds for construction and operational emissions. Projects with construction- or operation-related emissions that exceed any of their respective emission thresholds would result in potentially significant impacts that would require mitigation. These thresholds apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have both a project-specific and cumulative impact.

Table 5.3-4: AVAQMD Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold					
	VOCs	NO _x	CO	PM ₁₀	PM _{2.5}	SO _x
Tons Per Year						
Construction	25	25	100	15	12	15
Operations	25	25	100	15	12	25
Pounds Per Year						
Construction	137	137	548	82	65	137
Operations	137	137	548	82	65	137

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

SO_x = sulfur oxides

Source: Appendix B

PM₁₀ = particulate matter less than 10 microns in size

PM_{2.5} = particulate matter less than 2.5 microns in size

VOCs = volatile organic compounds

5.3.4.2 Health Risk Thresholds

The AVAQMD *CEQA and Federal Conformity Guidelines* states that emissions of TACs are considered significant if a project exposes sensitive receptors to substantial pollutant concentrations, including those

resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.0.

The following limits for maximum individual cancer risk (MICR) and noncancer acute and chronic Hazard Index (HI) from project emissions of TACs are considered appropriate, per AQMD Rule 1401, for use in determining the health risk for projects in the MDAB:

- **MICR:** MICR is the estimated probability of a maximally exposed individual (MEI) contracting cancer as a result of exposure to TACs over a period of 30 years for adults and 9 years for children in residential locations and over a period of 25 years for workers. The MICR calculations include multipathway consideration, when applicable.

The cumulative increase in MICR that is the sum of the calculated MICR values for all TACs would be considered significant if it would result in an increased MICR greater than 10 in 1 million (1×10^{-5}) at any receptor location.

- **Chronic HI:** Chronic HI is the ratio of the estimated long-term level of exposure to a TAC for a potential MEI to its chronic reference exposure level. The chronic HI calculations include multipathway consideration, when applicable.

A project would be considered significant if the cumulative increase in total chronic HI for any target organ system would exceed 1.0 at any receptor location.

- **Acute HI:** Acute HI is the ratio of the estimated maximum 1-hour concentration of a TAC for a potential MEI to its acute reference exposure level.

A project would be considered significant if the cumulative increase in total acute HI for any target organ system would exceed 1.0 at any receptor location.

5.3.4.3 Localized Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the project are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the Basin a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 parts per million (ppm)
- California State 8-hour CO standard of 9 ppm

5.3.5 METHODOLOGY

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the proposed Project, based on the maximum development assumptions that are outlined in Section 3, *Project Description*.

Air pollutant emissions associated with the proposed Project would result from construction equipment usage and from construction-related traffic. Additionally, emissions would be generated from operations of the proposed warehouse/distribution uses and from traffic volumes generated by these new uses. Through this analysis, the net increase in emissions generated by these activities and other secondary sources have been quantitatively estimated and compared to the applicable thresholds of significance recommended by AVAQMD.

5.3.5.1 AQMP Consistency

The AVAQMD's CEQA Guidelines provides the following criteria to determine whether a Project would be consistent or in conflict with any applicable maintenance plans or growth forecasts:

A Project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A Project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. An example of a non-conforming Project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan) (Antelope Valley Air Quality Management District, 2016).

The AVAQMD has adopted two attainment plans, the *Federal Particulate Matter Attainment Plan* and the *Ozone Attainment Plan*, to move the MDAB from federal and State nonattainment status for PM₁₀ and Ozone to federal and State attainment status. These plans incorporate the future growth assumptions from existing general plan land use plans (GPLUs), provided by local governments.

Additionally, the Project site is within the Southern California Association of Governments (SCAG) area. The SCAG 2045 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) analyzes the impacts of the assumed buildout of the SCAG region, using the GPLU information provided by the multiple jurisdictions within the SCAG region. Therefore, if the proposed Project is consistent with the existing GPLU, the proposed Project would be consistent with SCAG's RTP/SCS growth assumptions.

5.3.5.2 Construction

Construction activities can generate a substantial amount of air pollution. Construction activities are considered temporary; however, short-term impacts can contribute to exceedances of air quality standards. Construction activities include demolition, site preparation, earthmoving, and general construction. The emissions generated from these common construction activities include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel and gasoline powered equipment, portable auxiliary equipment, and worker commute trips.

The California Emissions Estimator Model version 2022.1.1.12 (CalEEMod) computer program was used to calculate emissions from onsite construction equipment and emissions from worker and vehicle trips to the site. In addition, this analysis assumes the use of Tier 4 construction equipment. This analysis also assumes that the proposed Project would comply with AVAQMD Rule 403 measures as required by existing regulations. The maximum day estimated emissions are compared to AVAQMD thresholds to determine if a potential exceedance would occur and if mitigation is required.

5.3.5.3 Operations

The air quality analysis includes estimating emissions associated with long-term operation of the proposed Project. Consistent with the AVAQMD guidance for estimating emissions associated with land use development projects, the CalEEMod computer program was used to calculate the long-term operational emissions associated with the Project that are compared to AVAQMD thresholds to determine if a potential exceedance would occur and if mitigation is required.

5.3.6 ENVIRONMENTAL IMPACTS

IMPACT AIR QUALITY-1: THE PROJECT WOULD CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE APPLICABLE AIR QUALITY PLAN.

Less than Significant Impact. As discussed above, areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The most recent air quality plans for the Project area are the 2020 70 parts per billion (ppb) Ozone Evaluation and the Federal 70 ppb Ozone Attainment Plan. The attainment plans are based on regional growth projections developed by SCAG.

With respect to determining the proposed Project's consistency with the air quality plan growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's RTP/SCS regarding population, housing, and growth trends. According to SCAG's 2020–2045 RTP/SCS, the City's population, households, and employment are forecast to increase by approximately 48,400 residents, 18,000 households, and 9,200 jobs, respectively, between 2016 and 2045, as detailed in Section 5.12, *Population and Housing*.

The proposed Project would construct two warehouse buildings with a combined total building square footage of 3,001,712 SF. As discussed in Section 5.12, *Population and Housing*, SCAG estimates that the average number of employees generated by industrial uses is one per 1,518 SF. Therefore, the proposed Project would accommodate approximately 1,977 employees. The additional 1,977 employees would be 21.5 percent of the 9,200 projected jobs projected for the City. Therefore, the Project's labor demand would not substantially increase unplanned population, households, or employment growth in the City that could conflict with an air quality plan because the growth falls within the projected growth figures contemplated by each plan.

Additionally, the proposed Project would be consistent with the City's General Plan land use and zoning designations and would therefore, be consistent with the City's General Plan and Zoning Ordinance which is consistent with the SCAG Regional Comprehensive Plan Guidelines and the 2022 AQMP. Therefore, the Project would not result in conflict with the AQMP. As such, the proposed Project would be consistent with the regional air quality plans. Therefore, the proposed Project would not affect the regional emissions inventory or conflict with strategies in the applicable air quality plans.

IMPACT AIR QUALITY-2: THE PROJECT WOULD 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.

Significant and Unavoidable Impact.

The Basin is designated as nonattainment for O₃ and PM_{2.5} for federal standards and nonattainment for O₃, PM₁₀, and PM_{2.5} for State standards. The AVAQMD's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the AVAQMD considered the emission levels for which a project's individual emissions would be considered cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be considered cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Construction

Construction activities associated with the proposed Project would result in emissions of CO, VOCs, NO_x, PM₁₀, and PM_{2.5} and TACs such as diesel and exhaust particulate matter. Project construction activities would include site preparation, grading, building construction, paving, and architectural coating activities. Construction-related effects on air quality from the proposed Project would be greatest during the site preparation phase due to the disturbance of soils. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants.

Construction emissions are short-term and temporary. The maximum daily construction emissions for the proposed Project were estimated using CalEEMod version 2022.1.1.12. Table 5.3-5, *Project Construction Emissions Without Mitigation*, provides the estimated maximum daily emissions of criteria air pollutants from construction of the Project. As shown in Table 5.3-5, construction emissions associated with the Project would not exceed the AVAQMD thresholds for NO_x, CO, SO_x, PM_{2.5}, or PM₁₀ emissions; however, the maximum daily emissions for VOC would exceed the significance criteria. The VOC emissions associated with the proposed Project are primarily a result of architectural coating emissions during construction. Therefore, Mitigation Measure AQ-1 has been included to require use of super-compliant low VOC paints to reduce VOC emissions. With implementation of Mitigation Measure AQ-1, VOC emissions associated with the Project would be below the AVAQMD significance thresholds, as shown in Table 5.3-6.

Furthermore, the proposed Project would also incorporate construction air quality best management practices, as a project design future (PDF), listed as PDF AQ-1 below. Implementation of PDF AQ-1 would be verified by the City during the permitting process and prior to issuance of grading and building permits.

As stated in Section 5.3.4.1, per the AVAQMD's *CEQA and Federal Conformity Guidelines*, AVAQMD CEQA significance thresholds apply as both project and cumulative thresholds. Therefore, with implementation of Mitigation Measure AQ-1 construction of the proposed Project would not result in emissions that would result in a cumulatively considerable net increase of any criteria pollutant for which the Project is in nonattainment under an applicable federal or State ambient air quality standard. Therefore, construction impacts would be less than significant with implementation of Mitigation Measure AQ-1.

Table 5.3-5: Project Construction Emissions Without Mitigation

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Pounds Per Day						
Maximum (lbs/day)	184.2	27.9	171.2	0.1	24.3	6.1
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Exceeds Threshold?	Yes	No	No	No	No	No
Tons Per Year						
Maximum (tons/year)	7.4	1.4	6.4	<0.1	1.1	0.3
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	120
Exceeds Threshold?	No	No	No	No	No	No

Note: Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.

AVAQMD = Antelope Valley Air Quality Management District

CO = carbon monoxide

PM_{2.5} = particulate matter less than 2.5 microns in size

lbs/day = pounds per day

PM₁₀ = particulate matter less than 10 microns in size

NO_x = nitrogen oxides

SO_x = sulfur oxides

Source: Appendix B

VOCs = volatile organic compounds

Table 5.3-6: Project Construction Emissions With Mitigation

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Maximum Pounds Per Day						
Maximum (lbs/day)	44.4	27.9	171.2	0.1	24.3	6.1
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Exceeds Threshold?	No	No	No	No	No	No
Tons Per Year						
Maximum (tons/year)	1.8	1.4	6.4	<0.1	1.1	0.3
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	120
Exceeds Threshold?	No	No	No	No	No	No

Note: Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.

AVAQMD = Antelope Valley Air Quality Management District

CO = carbon monoxide

PM_{2.5} = particulate matter less than 2.5 microns in size

lbs/day = pounds per day

PM₁₀ = particulate matter less than 10 microns in size

NO_x = nitrogen oxides

SO_x = sulfur oxides

Source: Appendix B

VOCs = volatile organic compounds

Operation

Operational emissions are typically associated with mobile sources (e.g., vehicle and truck trips), energy sources (e.g., natural gas), area sources (e.g., architectural coatings and the use of landscape maintenance equipment), and stationary sources (e.g., emergency diesel generator) related to the proposed Project.

Implementation of the proposed Project would result in long-term emissions of criteria air pollutants from area sources generated by the proposed warehouse and manufacturing building and related vehicular emissions, landscaping, and use of consumer products. Long-term operation emissions associated with the proposed Project were calculated using CalEEMod version 2022.1.1.12. Model results are shown below in Table 5.3-7, *Project Operational Emissions Without Mitigation*. The Project would not exceed the significance criteria for VOCs, SO_x, or PM_{2.5} emissions; however, the daily emissions of CO, NO_x, and PM₁₀ and annual emissions of NO_x and PM₁₀ would exceed the significance criteria and mitigation would be required. NO_x is a byproduct of combustion processes such as automobiles and industrial operations. CO emissions are formed by the incomplete combustion of fossil fuels, almost entirely from automobiles. PM₁₀ emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways. Thus, the significant operational air quality impacts are related mainly to vehicular and truck trips.

Mitigation Measures AQ-2 through AQ-13 have been included to reduce emissions. These mitigation measures were compiled in part from the State of California Department of Justice Warehouse *Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (DOJ, 2022) and the City of Palmdale General Plan EIR (City of Palmdale, Rincon Consultants, 2022). Mitigation Measure AQ-2 would be implemented to install signs at loading dock facilities that restrict idling to no more than 5 minutes. Mitigation Measure AQ-3 requires installation of truck route signs that provide directional information to the truck route. Mitigation Measure AQ-4 would incorporate energy efficient vendor trucks by contract specification. Mitigation Measure AQ-5 requires implementation of bicycle parking facilities that are beyond State/local requirements. Mitigation Measure AQ-6 requires implementation of clean air vehicle and carpool parking. Mitigation Measure AQ-7 requires the Project to provide electric vehicle charging stations and future truck charging capability. Mitigation Measure AQ-8 requires all buildings to be designed to provide

infrastructure to support use of electric-powered forklifts and/or other interior vehicles. . Mitigation Measure AQ-9 requires that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. Mitigation Measure AQ-10 requires the use of water efficient fixtures. Mitigation Measure AQ-11 requires incorporation of energy star-rated appliances and of outdoor electrical outlets so that outdoor landscape equipment may be electrically powered. Mitigation Measure A Q-12 states that cold storage was not included in the analysis for this EIR, as such, if cold storage proposed in the future, then additional studies would be required. Mitigation Measure AQ-13 includes information to be included in the tenant lease agreement in order to reduce air pollutant emissions.

Furthermore, consistent with PPP GHG-1 and PPP GHG-2, the Project would be designed in accordance with 2022 California Energy Code Section 110.10 that requires that the roof be, at a minimum, 15 percent solar-ready; and Section 140.10 that require installation of solar photovoltaic systems for warehouses based on square footage of air-conditioned space. Consistency with CALGreen requirements would be verified by the City during the permitting process.

While many of the mitigation measures listed above are not quantifiable, implementation of Mitigation Measures AQ-2 through AQ-13 would be required to reduce criteria pollutant emissions from the proposed Project to the extent feasible. Mitigated long-term operation emissions associated with the proposed Project were calculated using CalEEMod version 2022.1.1.12. Model results with quantifiable mitigation measures are shown below in Table 5.3-8, *Project Operational Emissions With Mitigation*. However, with compliance with existing rules, and implementation of the mitigation measures, daily emissions of CO, NO_x, and PM₁₀ and annual emissions of NO_x and PM₁₀ would continue to exceed regional thresholds of significance established by the AVAQMD, as shown in Table 5.3-8.

It is important to note that a majority of the Project's emissions are derived from vehicle and truck trips. The Project would implement Mitigation Measures AQ-2 through AQ-13 to reduce the operational emissions; however, these measures would not be sufficient enough to reduce the emissions to below the thresholds. Neither the Project applicant nor the City have regulatory authority to control tailpipe emissions. Thus, no feasible mitigation measures exist that would reduce these emissions to levels that are less than significant. Therefore, operation of the Project would result in air quality emissions that would be significant and unavoidable.

Table 5.3-7: Project Operational Emissions Without Mitigation

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Pounds Per Day						
Mobile Sources – Vehicles and Light Duty Trucks	26.4	49.3	442.0	1.0	82.7	21.5
Mobile Sources – Heavy Duty Trucks	1.4	78.6	15.8	0.7	22.9	7.0
Area Sources	90.5	1.1	130.5	<0.1	0.2	0.2
Energy Sources	1.0	17.4	14.6	0.1	1.3	1.3
Stationary Sources	0.6	2.8	1.6	<0.1	0.1	0.1
Total Project Emissions	119.9	149.2	604.5	1.8	107.2	30.0
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Significant?	No	Yes	Yes	No	Yes	No
Tons Per Year						

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile Sources – Vehicles and Light Duty Trucks	4.6	9.2	65.2	0.2	15.0	3.9
Mobile Sources – Heavy Duty Trucks	0.2	14.4	2.8	0.1	4.2	1.3
Area Sources	14.5	0.1	11.7	<0.1	<0.1	<0.1
Energy Sources	0.2	3.2	2.7	<0.1	0.2	0.2
Stationary Sources	0.1	0.5	0.3	<0.1	<0.1	<0.1
Total trip Project Emissions	19.5	27.4	82.7	0.3	19.4	5.4
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	12.0
Significant?	No	Yes	No	No	Yes	No

Note = Some values may not appear to add correctly due to rounding.

CO = carbon monoxide

Lbs/day = pounds per day

NO_x = nitrogen oxides

Source: Appendix B

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

SO_x = sulfur oxides

VOCs = volatile organic compounds

Table 5.3-8: Project Operational Emissions with Mitigation

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Pounds Per Day						
Mobile Sources – Vehicles and Light Duty Trucks	26.4	49.3	442.0	1.0	82.7	21.5
Mobile Sources – Heavy Duty Trucks	1.4	78.6	15.8	0.7	22.9	7.0
Area Sources	87.2	1.1	130.5	<0.1	0.2	0.2
Energy Sources	1.0	17.4	14.6	0.1	1.3	1.3
Stationary Sources	0.6	2.8	1.6	<0.1	0.1	0.1
Total Project Emissions	116.6	149.2	604.5	1.8	107.2	30.1
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Significant?	No	Yes	Yes	No	Yes	No
Tons Per Year						
Mobile Sources – Vehicles and Light Duty Trucks	4.6	9.2	65.2	0.2	15.0	3.9
Mobile Sources – Heavy Duty Trucks	0.2	14.4	2.8	0.1	4.2	1.3
Area Sources	13.9	0.1	11.7	<0.1	<0.1	<0.1
Energy Sources	0.2	3.2	2.7	<0.1	0.2	0.2
Stationary Sources	0.1	0.5	0.3	<0.1	<0.1	<0.1
Total trip Project Emissions	19.0	27.4	82.7	0.3	19.4	5.4
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	12.0
Significant?	No	Yes	No	No	Yes	No

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<p>Note = Some values may not appear to add correctly due to rounding.</p> <p>CO = carbon monoxide</p> <p>Lbs/day = pounds per day</p> <p>NO_x = nitrogen oxides</p> <p>Source: Appendix B</p> <p>PM_{2.5} = particulate matter less than 2.5 microns in size</p> <p>PM₁₀ = particulate matter less than 10 microns in size</p> <p>SO_x = sulfur oxides</p> <p>VOCs = volatile organic compounds</p>						

Health Impacts of Exceeded Criteria Pollutant Emissions.

The significant and unavoidable impact with respect to CO emissions is due largely to vehicle trips. CO is a “criteria” pollutant, a pollutant that is regulated by the USEPA pursuant to the federal Clean Air Act. The potential health impacts of criteria pollutants are analyzed on a regional level, not on a facility/project level. The SCAQMD and the San Joaquin Valley Unified Air Pollution Control District (SJVAPD), experts in the area of air quality, both recognize that a meaningful, accurate analysis of potential health impacts resulting from criteria pollutants is not currently possible and not likely to yield substantive information that promotes informed decision making. The SJVAPD, in its amicus curiae brief for the recent California Supreme Court decision in *Sierra Club v. County of Fresno* (2018)6 Cal.5th 502, explained that “it is not feasible to conduct a [health impact analysis] for criteria air pollutants because currently available computer modeling tools are not equipped for this task.” The SJVAPD described a project-specific health impact analysis as “not practicable and not likely to yield valid information” because “currently available modeling tools are not well suited for this task.”

The SJVAPD further noted that “...the CEQA air quality analysis for criteria pollutants is not really a localized, project-level impact analysis but one of regional” cumulative impacts. It should also be noted that CO, NO_x, and VOCs are “precursor” pollutants, which makes analysis of potential health impacts even more difficult. CO, NO_x, and VOCs are precursors to ozone, which is formed in the atmosphere from the chemical reaction of CO, NO_x, and VOCs in the presence of sunlight. As explained by the SCAQMD in its amicus curiae brief for *Sierra Club v. County of Fresno*, it takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources.” Given this, “...it takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels over an entire region.” Therefore, SCAQMD opined that while it “may be feasible” for large, regional projects with very high emissions of CO, NO_x, and VOCs to conduct an accurate health impact analysis, SCAQMD staff does not currently know of a way to accurately quantify ozone-related health impacts caused by CO, NO_x, or VOC emissions from relatively small projects.

Thus, the difficulties with preparing potential health impact analysis related to the Project’s CO, NO_x, and VOC emissions are twofold. First, current modeling is not capable of correlating emissions of criteria pollutants to concentrations that can be reasonably linked to specific health impacts. Second, CO, NO_x, and VOCs are precursor emissions and concentrations of CO, NO_x, and VOC are impacted by regional atmospheric conditions. CO, NO_x, and VOCs emitted by the Project may, depending upon interactions with the sun and other emissions, convert to ozone by complex chemical processes. Thus, there is a significant level of unpredictability associated with such conversion to ozone, as noted by the SCAQMD and the SJVAPD. It should also be noted that this Draft EIR does identify health concerns related to CO and NO_x emissions. Table 5.3-1 includes a list of criteria pollutants and summarizes common sources and effects. Thus, this Draft EIR’s analysis is reasonable and intended to foster informed decision making.

IMPACT AIR QUALITY-3: THE PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS.**Less than Significant Impact.****CO Hot Spots**

An adverse CO concentration, known as a “hot spot,” would occur if an exceedance of the State’s one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of a proposed Project. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project’s effect on local CO levels. As discussed in the *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* (Appendix B), existing air quality is evaluated is measured at the established AVAQMD air quality monitoring stations. CO concentrations in the immediate Project vicinity are not available. The closest stations to the Project site are the Lancaster and Santa Clarita Stations, located 3.3 miles northwest and 31.4 miles southwest, respectively. Ambient CO levels monitored at the Lancaster and Santa Clarita stations showed a highest recorded 1-hour concentration of 1.6 ppm (the State standard is 20 ppm) and a highest 8-hour concentration of 1.1 ppm (the State standard is 9 ppm) during the past 3 years.

The 2003 AQMP estimated traffic volumes that could generate CO concentrations to result in a “hot spot.”⁴ Per the 2003 AQMP, the busiest intersection had a daily traffic volume of approximately 100,000 vehicles per day, and the 1-hour CO concentration was 4.6 ppm. This indicates that, even with a traffic volume of 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not exceed the most stringent 1-hour CO standard (20.0 ppm).

The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis. The proposed Project is expected to generate approximately 420 AM peak hour trips and 494 PM peak-hour trips. These trips distributed throughout the vicinity of the Project would not result in daily traffic volumes of 100,000 vehicles per day or more. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP; and are not high enough to generate a CO “hot spot.” Given the existing extremely low level of CO concentrations in the Project area discussed above, and lack of traffic impacts at any intersections, as discussed in the Traffic Impact Analysis (TIA), Project-related vehicles are not expected to contribute significantly to result in the CO concentrations exceeding the State or federal CO standards. Therefore, the Project would have less-than-significant impact on CO Hot Spots exposure to sensitive receptors.

Friant Ranch Case

In December 2018, in the case of *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, California Supreme Court held that an EIR’s air quality analysis must meaningfully connect the identified air quality impacts to the human health consequences of those impacts, or meaningfully explain why that analysis cannot be provided. As noted in the *Brief of Amicus Curiae* by the SCAQMD in the *Friant Ranch* case (April 6, 2015, Appendix 10.1), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.

⁴ SCAQMP. (August 2003). 2003 Air Quality Management Plan. <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan/2003-aqmp>

The SCAQMD discusses that it may be infeasible to quantify health risks caused by projects similar to the proposed Project, due to many factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The *Brief* states that it may not be feasible to perform a health risk assessment for airborne toxics that will be emitted by a generic industrial building that was built on “speculation” (i.e., without knowing the future tenant(s)). Even where a health risk assessment can be prepared, however, the resulting maximum health risk value is only a calculation of risk - it does not necessarily mean anyone will contract cancer as a result of the Project. The *Brief* also cites the author of the CARB methodology, which reported that a PM_{2.5} methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify O₃-related health impacts caused by NO_x or VOC emissions from relatively small projects, due to photochemistry and regional model limitations. The *Brief* concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

On the other hand, the SCAQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs/day of NO_x and 89,180 lbs/day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O₃. The proposed Project does not generate anywhere near 6,620 lbs/day of NO_x or 89,190 lbs/day of VOC emissions. As shown previously on Table 5.3-7, prior to mitigation, the peak operational emissions of the proposed Project would generate up to 131.8 lbs/day of NO_x (2% of 6,620 lbs/day). The VOC emissions would be a maximum of 184 lbs/day during construction and 118.9 lbs/day of during operations (0.2% and 0.01% of 89,190 lbs/day, respectively). Therefore, the emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level. In addition, a Construction and Operational Health Risk Assessment (Appendix B) was prepared, which determined that the Project would not exceed applicable AVAQMD significance thresholds, as detailed below.

Health Risk on Nearby Sensitive Receptors

As described previously, the closest sensitive receptors to the Project site are single-family residences located approximately 4,143 feet north of the Project site boundary and the Lancaster National Soccer Center, located approximately 2,734 feet north of the Project site boundary.

A Health Risk Assessment (HRA) which evaluates construction and operational health risk to offsite receptors was prepared for the proposed Project. The receptor MEI included in the analysis are the Lancaster National Soccer Center and the single-family homes located north of the Project site; the worker receptor MEI includes office uses located south of the Project site. The following section describes the potential impacts on sensitive receptors from construction and operation of the proposed Project.

Construction Health Risk Assessment

The construction HRA identifies, as shown in Table 5.3-9, *Health Risks from Project Construction to Offsite Receptors*, that the maximum cancer risk for the sensitive receptor MEI would be approximately 0.21 in one million, which would not exceed the AVAQMD cancer risk threshold of 10 in one million. The worker receptor risk would be lower at approximately 0.12 in one million, which would also not exceed the AVAQMD cancer risk thresholds. The total chronic hazard index would be less than 0.001 for the sensitive and worker receptor MEI, which are below the threshold of 1.0. In addition, the total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0. Therefore, construction of the proposed Project would not exceed AVAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. Impacts related to Project construction emissions would be less than significant.

Table 5.3-9: Health Risks from Project Construction to Offsite Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Sensitive Receptor Risk	0.21	<0.001	0.000
Worker Receptor Risk	0.12	<0.001	0.000
AVAQMD Significance Threshold	10.0 in one million	1.0	1.0
Significant?	No	No	No

Source: Appendix B

Operational Health Risk Assessment

The operational HRA analyzed the potential health risk associated with the exhaust of diesel-powered trucks and equipment to people living and working near the Project site. As shown in Table 5.3-10, *Health Risks from Project Operation to Offsite Receptors*, the maximum cancer risk for the sensitive receptor MEI would be approximately 5.66 in one million, which is less than the threshold of 10 in one million. The worker receptor risk would be approximately 2.56 in one million, which is also less than the threshold of 10 in one million. The total chronic hazard index would be 0.002 for the sensitive receptor MEI and 0.008 for the worker receptor MEI, which is below the threshold of 1.0. In addition, the total acute hazard index would be less than 0.001 for the sensitive receptor MEI and 0.003 for the worker receptor MEI, which would also not exceed the threshold of 1.0. As these results show, all health risk levels to nearby residents from operation-related emissions would be well below the AVAQMD's HRA thresholds. Therefore, Project operation emissions would result in less-than-significant impacts related to sensitive receptors and substantial pollutant concentrations.

Table 5.3-10: Health Risks from Project Operation to Offsite Receptors

Location	Carcinogenic Inhalation Health Risk in One Million	Chronic Inhalation Hazard Index	Acute Inhalation Hazard Index
Sensitive Receptor Risk	5.66	0.002	<0.001
Worker Receptor Risk	2.56	0.008	0.003
AVAQMD Significance Threshold	10.0 in one million	1.0	1.0
Significant?	No	No	No

Source: Appendix B

Offsite Improvements Health Risk Assessment

The proposed Project includes a detention basin of approximately 11 acres for stormwater collection. The detention basin would be located in the northern portion of the Project site. The proposed Project would also include offsite improvement areas along Avenue L-8 (located north of the property line) and 35th Street East (located east of the property line). Construction of the offsite improvements may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). However, construction contractors would be required to implement measures to reduce or eliminate emissions by following the AVAQMD Rule 403 dust control measures. In addition, construction emissions associated with the offsite improvements would not exceed AVAQMD Significance Threshold of 10.0 in one million, as described in Appendix B. Once the proposed detention basin and offsite improvements are constructed, these facilities would not be a significant source of long-term operational emissions based on their uses. Therefore, sensitive receptors would not be exposed

to substantial pollutant concentrations associated with implementation of the proposed basin and offsite improvements. As such, impacts would be less than significant.

IMPACT AIR QUALITY-4: THE PROJECT WOULD NOT RESULT IN OTHER EMISSIONS (SUCH AS THOSE LEADING TO ODORS) ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE.

Less than Significant Impact. The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by AVAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The proposed Project would implement industrial development within the Project area. These land uses do not involve the types of uses that would emit objectionable odors affecting a substantial number of people. Odors generated by industrial land uses are generated from uses such as manufacturing facilities, paint/coating operations, refineries, chemical manufacturing, and food manufacturing facilities. At the current time, the specific tenants and uses of the proposed industrial buildings are unknown. However, the future tenant would be subject to comply with AVAQMD Rule 402 *Nuisance*, including odor regulations, as stated above.

During construction, emissions from construction equipment, architectural coatings, diesel exhaust, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. The noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials.

In addition, all Project-generated solid waste would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations and would not generate objectionable odors. Therefore, impacts associated with other operation- and construction-generated emissions, such as odors, would be less than significant.

5.3.7 CUMULATIVE IMPACTS

The geographic area for analysis of cumulative air quality impacts is the AVAQMD. The AVAQMD's boundaries start on the south just outside of Acton, north to the Kern County line, east to the San Bernardino County line, and west to the Quail Lake area. As described previously, per AVAQMD's methodology, if an individual project would result in air emissions of criteria pollutants that exceeds the AVAQMD's thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants.

As described in Impact AQ-2 above, with implementation of Mitigation Measure AQ-1 construction of the proposed Project would not result in emissions that would result in a cumulatively considerable net increase of any criteria pollutant for which the Project is in nonattainment under an applicable federal or State ambient air quality standard. However, emissions from operation of the proposed Project would still exceed

AVAQMD's threshold for CO and PM₁₀ after implementation of mitigation measures. A majority of operational-source CO and PM₁₀ emissions would be generated by Project vehicles that neither the Project applicant nor the County have the ability to reduce emissions of. Therefore, operational-source CO and PM₁₀ emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

5.3.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES.

Plans, Programs, or Policies

The following plans, programs, and policies (PPP) related to air quality are incorporated into the proposed Project and would reduce impacts related to air quality. These actions will be included in the proposed Project's mitigation monitoring and reporting program (MMRP):

PPP AQ-1: AVAQMD Rule 402. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 402. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

PPP AQ-2: AVAQMD Rule 403. The following measures shall be incorporated into construction plans and specifications as implementation of Rule 403:

Pre-activity:

- Pre-water the site sufficiently to limit Visible Dust Emissions (VDE) to 20 percent opacity; and,
- Phase work to reduce the amount of Disturbed Surface Area at any one time.

During Activity:

- Apply water or chemical/organic stabilizers/suppressants sufficient to limit VDE to 20 percent opacity.
- Construct and maintain wind barriers sufficient to limit VDE to 20 percent opacity. If utilizing wind barriers, control measure (a) above shall also be implemented; or,
- Apply water or chemical/organic stabilizers/suppressants to unpaved haul/access roads and unpaved vehicle/equipment traffic areas sufficient to limit VDE to 20 percent opacity and meet the requirements of section (C)(9).

Temporary Stabilization during Periods of Inactivity:

- Restrict vehicular access to the area; and,
- Apply water or chemical/organic stabilizers/suppressants, sufficient to limit VDE to 20 percent opacity, or to comply with the conditions of a Stabilized Surface. If an area having one-half acres or more of Disturbed Surface Area remains unused for seven or more days, the area must comply with the conditions for a Stabilized Surface area.

PPP AQ-3: AVAQMD Rule 1113. The following measure shall be incorporated into construction plans and specifications as implementation of Rule 1113. The proposed Project shall only use "Low-Volatile Organic Compounds (VOC)" paints (no more than 50 gram/liter of VOC for flat coatings and 150 g/l for nonflat-high gloss coatings) consistent with AVAQMD Rule 1113.

PPP GHG-1: 2022 California Energy Code Section 110.10. The Project shall comply with the 2022 [or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)]

California Energy Code Section 110.10 for Mandatory Requirements for Solar Readiness. Section 110.10 includes requirements that the roof be, at a minimum, 15 percent solar ready.

PPP GHG-2: 2022 California Energy Code Section 140.10. The Project shall comply with the or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 140.10 for Nonresidential Solar PV. Section 140.10 includes requirements for solar photovoltaic systems for warehouse buildings. The size of the photovoltaic system shall be calculated based on conditioned floor area, as required by Section 140.10. For a building with 20,000 SF of air-conditioned space (office space), the solar photovoltaic system required would be approximately 62.6 Kilowatt system.

5.3.9 PROJECT DESIGN FEATURES

PDF AQ-1: Construction Air Quality Best Management Practices. Prior to the issuance of grading and building permits, the City shall review the construction documents for the Project to ensure that the construction contractors are obligated to implement the following best management practices to reduce construction air pollutant emissions. These items shall also be listed in construction bid documents and construction contracts. The construction contractors shall allow City access to the construction site to inspect for adherence to these measures.

1. Ensure that the cleanest possible construction practices and equipment are used, as economically feasible. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero emission equipment and tools.
2. It shall be the responsibility of the construction contractor to implement, and plan accordingly for, the necessary infrastructure to support the zero and near-zero emission technology, vehicles, and equipment that will be operating onsite during construction, as necessary and when economically feasible. Necessary infrastructure may include the physical (e.g., needed footprint), energy, and fueling infrastructure for construction equipment, onsite vehicles and equipment, and medium-heavy and heavy-heavy duty trucks.
3. All off-road diesel-powered equipment used during construction shall be equipped with Tier 4 Interim or cleaner engines. If the operator lacks Tier 4 Interim or cleaner equipment, and it is not available for lease or short-term rental within 50 miles of the project site, Tier 3 or cleaner off-road construction equipment may be utilized subject to City approval.
4. Heavy-duty trucks entering the construction site during grading and building construction phases shall comply with the California Air Resources Board (CARB) regulations including the following: all heavy-duty trucks shall be model year 2010 or later. Per the California Air Resource's Board (CARB) Heavy-Duty Omnibus Regulation, all heavy-duty trucks shall also meet CARB's lowest optional low oxides of nitrogen (NOx) standard starting in the year 2022.

All construction equipment and fleets shall be in compliance with all current air quality regulations.

5.3.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts Air Quality-1, Air Quality-3, and Air Quality-4 would be less than significant.

Prior to mitigation, the following impacts would be **potentially significant**:

Impact Air Quality-2: Construction and operational associated with the proposed Project would generate a substantial increase of criteria air pollutant emissions that exceed the threshold criteria and would cumulatively contribute to the nonattainment designations of the basin.

Cumulative Impacts: Construction VOC emissions and operational-source CO and PM10 emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

5.3.11 MITIGATION MEASURES

- MM AQ-1: Super-Compliant Low VOC.** The construction plans and specifications shall state that the Project shall utilize “Super-Compliant” low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD’s Rule 1113. Super-Compliant low VOC paints shall be no more than 10g/L of VOC.
- MM AQ-2: Idling Regulations.** Prior to issuance of a certificate of occupancy, legible, durable, weather-proof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use.
1. Instructions for drivers of diesel trucks to restrict idling to no more than five minutes once the vehicle is stopped, the transmission is set to “neutral” or “park” and the parking brake is engaged.
 2. Telephone numbers of the building facilities manager and CARB to report violations.
- MM AQ-3: Truck Route Signs.** The Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route. (Source: *State of California, Department of Justice. Rob Bonta, Attorney General. (2022). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*).
- MM AQ-4: Energy Efficient Vendor Trucks.** The Project plans and specifications shall include requirements (by contract specifications) that vendor trucks for the industrial buildings include energy efficiency improvement features through the Carl Moyer Program—including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires—to reduce fuel consumption.
- MM AQ-5: Bicycle Parking.** The Project plans and specifications shall include bicycle parking facilities totaling 80 short-term and 40 long-term bicycle parking spaces for each building (for a total of 240), exceeding the state/local requirement of 75 short-term and 38 long-term per building. (Source: *City of Palmdale General Plan EIR, 2022*).
- MM AQ-6: Clean Air Vehicle and Carpool Parking.** The Project plans and specifications shall include a minimum of five parking spaces for carpool/vanpool vehicles. Electric vehicle parking spaces shall be equivalent to the number of electric vehicle charging stations. (Source: *State of California, Department of Justice. Rob Bonta, Attorney General. (2022). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*). Source: *City of Palmdale General Plan EIR, 2022*).
- MM AQ-7: Electric Vehicle Charging and Future Truck Charging Capability.** Prior to issuance of building permits, the following features shall be demonstrated on the Project’s building plans to the extent feasible over minimum California Code of Regulations Title 24 requirements. Installation shall be verified by the City prior to issuance of a certificate of occupancy.

1. For use by employees and visitors conducting business at the building, install automobile electric vehicle (EV) charging stations at the minimum number required by the California Code of Regulations Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building. (Source: *City of Palmdale General Plan EIR, 2022*).
2. Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations in the future.
3. Install raceways for conduit to tractor trailer parking areas in logical, gated locations determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts.

MM AQ-8: Electric Interior Vehicles. The Project plans and specifications for all of the industrial buildings shall include infrastructure to support use of electric-powered forklifts and/or other interior vehicles.

MM AQ-9: Transportation Management Association. The Project plans and specifications shall require that a Transportation Management Association (TMA) or similar mechanism shall be established by the Project to encourage and coordinate carpooling. The TMA shall advertise its services to the building occupants. The TMA shall offer transit incentives to employees and shall provide shuttle service to and from public transit, should a minimum of 5 employees request and use such service from a transit stop at the same drop-off and/or pickup time. The TMA shall distribute public transportation information to its employees. The TMA shall provide electronic message board space for coordination rides. (Source: *City of Palmdale General Plan EIR, 2022*).

MM AQ-10: Water Efficient Fixtures. All water fixtures within the Project shall be water efficient (toilets/urinals (1.5 gallons per minute [gpm] or less), showerheads (2.0 gpm or less), and faucets (1.28 gpm or less)).

MM AQ-11: City Review of Construction Documents. Prior to issuance of building permits, the following features shall be demonstrated on the Project's building and landscape plans to the extent feasible. Installation shall be verified by the City prior to issuance of a certificate of occupancy.

1. Install Energy Star-rated heating, cooling, lighting, and appliances
2. Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment (Source: *City of Palmdale General Plan EIR, 2022*).

MM AQ-12: Prohibition of Cold Storage. Prior to the issuance of building permits and prior to issuance of tenant occupancy permits, the City of Palmdale shall confirm that the Project does not include cold storage equipment for warehouse operations (chilled, refrigerated, or freezer warehouse space). Cold storage was not included in the analysis for this EIR. If cold storage is proposed, additional studies will be required to analyze the impacts associated with the use.

MM AQ-13: Tenant Lease Agreement. Prior to issuance of a certificate of occupancy, the following language shall be included within tenant lease agreements in order to reduce operational air pollutant emissions to the extent feasible:

1. Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs.
2. Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.
3. Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.
4. Requirements to exclusively use zero-emission light and medium-duty delivery trucks and vans, when economically feasible.
5. Requirements to operate in compliance with, and to monitor compliance with, all current and applicable air quality regulations for on-road trucks including the California Air Resources Board's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation.
6. Requirements and identification of the responsible party to maintain, replace, and upgrade rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed Project would comply with existing solar requirements per the California Energy Code in effect during permitting of the Project (at the time of Construction Drawing Plan Check Submittal). In the case that the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process.

described previously, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project

7. Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weather-proof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations.
8. The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model year 2010 engine emission standards shall be used for the on-road transport of materials to and from the Project site.
9. Requirements for the building owner to provide a Green Cleaning Products and Paint Education Program available to the building tenant, to keep at the building's office, break room, leasing space, or on an accessible website.

5.3.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact Air Quality-2: With implementation of Mitigation Measure AQ-1, VOC emissions associated with the project would be below the AVAQM significance thresholds. Therefore, the construction-related VOC

emissions from implementation of the proposed Project would be less than significant with mitigation and would not be cumulatively considerable.

Emissions from operation of the proposed Project would continue to exceed AVAQMD's thresholds for NO_x, CO, and PM₁₀ after implementation of existing regulations and Mitigation Measures AQ-2 through AQ-12. Because a majority of operational-source emissions would be generated by emissions from Project vehicles and truck trips, neither the Project applicant nor the City have the ability to reduce emissions. Therefore, operational-source NO_x, CO, and PM₁₀ emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

Cumulative Impacts: With implementation of Mitigation Measures AQ-1 through AQ-13, operational-source CO and PM₁₀ emissions from implementation of the proposed Project would be cumulatively considerable, and cumulative air quality impacts would be significant and unavoidable.

5.3.13 REFERENCES

City of Palmdale. (October 22, 2022). *Envision Palmdale 2045 City of Palmdale General Plan*. Retrieved November 20, 2023, from <https://palmdale2045gp.org/>

City of Palmdale, Rincon Consultants. (2022, August). *City of Palmdale 2045 General Plan Update Final Environmental Impact Report* (SCH# 2021060494). Retrieved November 20, 2023. https://static1.squarespace.com/static/5c7dc93065a707492aca3e47/t/631fa8d1f119fa360cd7f0ee/1663019242025/Palmdale+2045+GPU+FEIR_reduce.pdf

LSA (2024). Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report. Palmdale Logistics Industrial Warehouse Project City of Palmdale, California. **(Appendix B)**

State of California, Department of Justice (DOJ). Rob Bonta, Attorney General. (2022). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf> (accessed November 2023).

5.4 Biological Resources

5.4.1 INTRODUCTION

This section addresses potential environmental effects of the Project related to biological resources. This assessment is based on information compiled through field reconnaissance and database searches, and the following document:

Biological Resources Assessment, prepared by ELMT Consulting for the Project, included as Appendix C.

5.4.2 REGULATORY SETTING

5.4.2.1 Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973 defines an endangered species as “any species which is in danger of extinction throughout all or a significant portion of its range.” A threatened species is defined as “any species which is likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range.” Under provisions of Section 9(a)(1)(B) of the FESA, unless properly permitted, it is unlawful to “take” any endangered or threatened listed species. “Take” is defined in Section 3(18) of FESA as: “harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.” Further, the United States Fish and Wildlife Service (USFWS), through regulation, has interpreted the terms “harm” and “harass” to include certain types of habitat modification as forms of “take.” These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a federal agency for an action that could affect a federally-listed plant or animal species, the property owner and agency are required to consult with USFWS pursuant to Section 7 of the FESA if there is a federal nexus, or consult with USFWS and potentially obtain a permit pursuant to Section 10 of the FESA in the absence of a federal nexus. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants. Within this EIR, the following acronyms are used to identify federal status species:

- FE: Federally-listed as Endangered
- FT: Federally-listed as Threatened
- FPE: Federally proposed for listing as Endangered
- FPT: Federally proposed for listing as Threatened
- FPD: Federally proposed for delisting
- FC: Federal candidate species (former C1 species)

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) protects individuals as well as any part, nest, or eggs of any bird listed as migratory. In practice, federal permits issued for activities that potentially impact migratory birds typically have conditions that require pre-disturbance surveys for nesting birds. In the event nesting is observed, a buffer area with a specified radius must be established, within which no disturbance or intrusion is allowed until the young have fledged and left the nest, or it has been determined that the nest has failed. If not otherwise specified in the permit, the size of the buffer area varies with species and local circumstances (e.g., presence of busy roads, intervening topography, etc.), and is based on the professional judgment of a monitoring biologist. A list of migratory bird species protected under the MBTA is published by USFWS.

5.4.2.2 State Regulations

California Endangered Species Act

Under the California Endangered Species Act (CESA), California Species of Special Concern are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. Informally listed species are not protected per se but warrant consideration in the preparation of biological resource assessments. For some species, the California Natural Diversity Database (CNDDDB), which the State uses to inventory the status of plants and animals, is only concerned with specific portions of life history, such as roosts, rookeries, or nest areas. Within this EIR, the following acronyms are used to identify State designated special-status species:

- SE: State-listed as Endangered
- ST: State-listed as Threatened
- SR: State-listed as Rare
- SCE: State candidate for listing as Endangered
- SCT: State candidate for listing as Threatened
- SFP: State Fully Protected
- SSC: California Species of Special Concern

State of California Fish and Game Code, Sections 3503.5, 3511, 3515

Section 3503.5 of the California Fish and Game Code states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Activities that result in the abandonment of an active bird of prey nest may also be considered in violation of this code. In addition, California Fish and Game Code, Section 3511 prohibits the taking of any bird listed as fully protected, and California Fish and Game Code, Section 3515 states that it is unlawful to take any non-game migratory bird protected under the MBTA.

5.4.2.3 Local and Regional Regulations

West Mohave Coordinated Management Plan

The West Mojave Coordinated Management Plan (Conservation Plan) is a habitat conservation plan that acts as a comprehensive strategy to conserve the desert tortoise, Mohave ground squirrel, and over 100 sensitive plants, animals, and natural communities. The plan provides for a streamlined program for complying with the requirements of the CESA and FESA. It encompasses a 9,357,929-acre (14,621 square miles) planning area located to the north of the Los Angeles metropolitan area and applies to public and private land (U.S. Department of the Interior, 2004). The Project site is located within the Conservation Plan area.

City of Palmdale Municipal Code Section 8.44.020

The Palmdale Municipal Code Section 8.44.020 addresses tree preservation within the City, including the maintenance of tree cover on private property and ensuring that new development projects include tree planting in their landscape plans.

5.4.3 ENVIRONMENTAL SETTING

The 150.63-acre Project site consists of vacant undeveloped land that has been heavily impacted by uses associated with agriculture operations, offroad vehicular access, and illegal dumping. The site varies in vegetation densities from unvegetated to sparsely vegetated comprised of a patchy ground cover of grass, weeds, and tumbleweeds, and a row of salt cedar (*Tamarisk*) shrubs along the northeastern boundary. The site reflects arid conditions, limited rainfall, and generally poor soils of the Mojave Desert. Additionally, the 17.65-acre area for offsite Project improvements includes a combination of vacant, undeveloped land and existing roadway rights-of-way. The Project site is flat with elevations ranging from 2,461 to 2,475 feet above mean sea level (AMSL).

Vegetation Communities

No native plant communities or natural communities of special concern were observed on or adjacent to the Project site and within the offsite improvement areas. As discussed above, the Project site consists of vacant undeveloped land that has been subject to various anthropogenic disturbances, including weed abatement. These disturbances have eliminated the natural plant communities within the Project site and immediate vicinity (Appendix C). One land cover, classified as disturbed, was mapped within the biological study area (includes the Project site, offsite improvement areas, and a 200-foot buffer). In addition, the offsite improvement areas support developed land within the public right of way of East Avenue M/Columbia Way, which do not include native plant communities or potential habitat areas.

The disturbed area is vegetated with early successional, weedy, and non-native plant species. Common plant species observed onsite include rubber rabbitbrush (*Ericameria nauseosa*), nettle-leaved goosefoot (*Chenopodium murale*), Russian thistle (*Salsola tragus*), ripgut brome (*Bromus diandrus*), horsenettle (*Solanum carolinense*), puncturevine (*Tribulus terrestris*), Indian hedge mustard (*Sisymbrium orientale*), Gooding's willow (*Salix gooddingii*), Bermuda grass (*Cynodon dactylon*), Salt Cedar (*Tamarix* sp.), Menzies' fiddleneck (*Amsinckia menziesii*), Dutchman's pipe (*Aristolochia clematitis*), silver ragwort (*Jacobaea maritima*), rabbit tobacco (*Pseudognaphalium obtusifolium*), silver burr ragweed (*Ambrosia chamissonis*), and common dandelion (*Taraxacum officinale*).

Special-Status Plant Species

Special-status species are species that have been identified by federal, State, or local resource conservation agencies as threatened or endangered, under provisions of the federal and State Endangered Species Acts (FESA and CESA, respectively), because they have declining or limited population sizes, usually resulting from habitat loss.

The literature search conducted as part of preparation of the Biological Resources Assessment (Appendix C) identified nine special-status plant species that could have potential to occur onsite. However, no special-status plant species were observed onsite during the biological resources field investigation.

Special-Status Wildlife Species

Based on the results of the literature review and database searches, 11 special-status wildlife species were determined to have potential to occur onsite including, Cooper's hawk (*Accipiter cooperii*), northern California legless lizard (*Anniella pulchra*), burrowing owl (*Athene cunicularia*), ferruginous hawk (*Buteo regalis*), Swainson's hawk (*Buteo swainsoni*), mountain plover (*Charadrius montanus*), Soledad shoulderband (*Helminthoglypta fontiphila*), loggerhead shrike (*Lanius ludovicianus*), coast horned lizard (*Phrynosoma blainvillii*), Le Conte's thrasher (*Toxostoma lecontei*), Mohave ground squirrel (*Xerospermophilus mohavensis*). Of these species, one special-status species, the loggerhead shrike, was observed adjacent to the Project

site during the biological survey conducted for the Project. No special-status species were observed on the Project site.

Jurisdictional Waters

No State or federal wetlands or waters are present within the Project site and offsite improvement areas.

Wildlife Movement

The Project site is located in an area of Palmdale historically used for agricultural practices and is adjacent to roadways and existing development. Most of this area of Palmdale has been heavily disturbed and repurposed for industrial development and is highly fragmented from any wildlife connectivity areas. The nearest preserved habitat is located approximately 7.94 miles southeast of the Project site, in association with the Alpine Butte Wildlife Sanctuary. Additionally, Little Rock Wash, which extends from the south out of the San Gabriel Mountains north to Rosamond Dry Lake, is located approximately 3 miles east of the Project site. Little Rock Wash has the potential to support local wildlife movement opportunities out of the mountains to the valley floor. However, the Project site is separated from the Alpine Butte Wildlife Sanctuary and Little Rock Wash by industrial and agricultural development and by several heavily trafficked roadways.

The Alpine Butte Wildlife Sanctuary is an ecologically rich area consisting of small sand dunes, large rock formations, creosote bush scrub and Joshua tree woodlands. The sanctuary is located at the northern terminus of Big Rock Wash that extends out of the mountains to the south through the flat land to the north. Big Rock Wash provides live in habitat for wildlife species potentially migrating between the mountains and the valley floor in search of food and shelter. Similar to Big Rock Wash, Little Rock Wash extends out of the mountains to the south through the flat land to the north and provides live in habitat for wildlife species potentially migrating between the mountains and the valley floor in search of food and shelter.

5.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- Biological-1 Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
- Biological-2 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 Wildlife or U.S. Fish and Wildlife Service.
- Biological-3 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.
- Biological-4 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.
- Biological-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Biological-6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

The Initial Study, included in Appendix A, determined that the Project would not result in impacts related to Thresholds Biological-2, Biological-3, Biological-5, and Biological-6. No further assessment of these impacts is required in this Draft EIR.

5.4.5 METHODOLOGY

The analysis within this EIR section and the biological reports prepared for the Project is based on information compiled through a literature review and two field surveys.

A review of literature, and of aerial photographs and topographic maps of the Project site and surrounding areas was conducted as part of the Biological Resources Assessment for this Project. The Project site is located within Section 32, Township 7 North, Range 11 West of the Lancaster East United States Geological Survey (USGS) 7.5-minute Quadrangle. The Lancaster East USGS 7.5-minute topographic quadrangle was used to identify sensitive species in the CNDDDB. Only one quadrangle was queried due to the proximity of the site to quadrangle boundaries, regional topography, and conditions in the vicinity of the site. In addition, the USFWS endangered species lists and the California Native Plant Society's rare plants lists were reviewed. Two general biological surveys were conducted for the Project site on November 15, 2022, and on January 16, 2024.

A 200-foot buffer surrounding the Project site was also surveyed to document existing habitat, obtain plant and animal species information, view surrounding uses, assess potential for State and federal waters, assess potential for wildlife movement corridors and, if critical habitat is present, assess for presence of constituent elements. The appendices to the Biological Resource Assessment (Appendix C of this Draft EIR) contain a comprehensive list of all plant and wildlife species detected during the field survey.

5.4.6 ENVIRONMENTAL IMPACTS

IMPACT BIOLOGICAL-1: THE PROJECT WOULD NOT HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATIONS, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS, OR BY THE CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE OR U.S. FISH AND WILDLIFE SERVICE.

Less than Significant with Mitigation Incorporated.

The proposed Project would include development of two single-story, industrial buildings on the 150.63-acre site, which is currently vacant and undeveloped. Additionally, approximately 17.65 acres of offsite improvements are included as part of the Project to implement roadway and utility infrastructure improvements to support the Project.

Special Status Plant Species

As described previously, nine special-status plant species have been recorded in the Lancaster East quadrangle. However, no special-status plant species were observed onsite during the two field surveys. The Biological Resources Assessment prepared for the Project site determined that the site and offsite areas have been subjected to a variety of anthropogenic disturbances that have eliminated the natural plant communities, which has removed the potential for the areas to provide suitable habitat for special-status plant species known to historically occur in the area. Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, the Biological Resources Assessment determined that the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and all are presumed to be absent. As such, the proposed Project

would have no direct or indirect impact on any plant species identified as a candidate, sensitive, or special status species.

Special Status Wildlife Species

One listed special-status wildlife species, the loggerhead shrike, was observed during the biological field investigation adjacent to the Project site. The previous anthropogenic disturbances on the Project site and offsite construction areas have eliminated the natural plant communities, which has reduced potential foraging and nesting/denning opportunities for wildlife species (Appendix C). Based on habitat requirements for specific species and the availability and quality of onsite habitats, the Biological Resources Assessment determined that the proposed Project site does not have the potential to provide suitable habitat for any of the other special-status wildlife species known to occur in the area. However, due to regional significance and mobility of these species to provide the potential for occurrence of other special status wildlife species including the loggerhead shrike, northern California legless lizard, coast horned lizard, burrowing owl, mountain plover, and Mohave ground squirrel, they are also discussed below.

Loggerhead Shrike

The loggerhead shrike is a bird designated as a California Species of Special Concern. It is a year-round resident of southern California. This species is typically found in open country with short vegetation, including pastures, old orchards, cemeteries, golf courses, agricultural fields, riparian areas, and open woodlands. It utilizes somewhat prominent perching positions for hunting and eating. This species primarily nests in thorny shrubs and trees but will nest in brush piles or other debris if no shrubs or trees are present.

As described above, the loggerhead shrike was observed during the field investigation on an adjacent parcel outside of the Project site and not within the proposed Project's offsite improvement areas. The Project site provides suitable foraging habitat with minimal nesting habitat. To avoid potential impacts to nesting loggerhead shrike, construction activities, including grading and vegetation removal, would be conducted outside the general bird nesting season (February 1 to August 31). If construction activities cannot occur outside the bird nesting season, a pre-construction nesting bird survey by a qualified biologist is required prior to construction. This requirement is included as Mitigation Measure BIO-1. With implementation of Mitigation Measure BIO-1, potential impacts to loggerhead shrike would be less than significant.

Northern California Legless Lizard

The northern California legless lizard occurs primarily in areas with sandy or loose loamy soils under sparse vegetation of beaches, chaparral, or pine-oak woodland; or near sycamores, oaks, or cottonwoods that grow on stream terraces. Often found under or in the close vicinity of logs, rocks, old boards, and the compacted debris of woodrat nests. This species was not observed onsite during field investigations. Furthermore, there is no suitable habitat present within or adjacent to the Project site. Therefore, the Project site was determined to have no potential to support northern California legless lizard.

Coast Horned Lizard

The coast horned lizard occurs in a wide variety of vegetation types including coastal sage scrub, annual grassland, chaparral, oak woodland, riparian woodland and coniferous forest. In inland areas, this species is restricted to areas with pockets of open microhabitat, created by disturbance such as, fire, floods, roads, and grazing. The key elements of such habitats are loose, fine soils with a high sand fraction; an abundance of native ants or other insects; and open areas with limited overstory for basking and low, but relatively dense shrubs for refuge. This species was not observed onsite during field investigations. Furthermore, there is no suitable habitat present within or adjacent to the Project site. Therefore, the Project site was determined to have no potential to support coast horned lizard.

Burrowing Owl

The burrowing owl is listed as a California Species of Special Concern. It is a grassland species distributed throughout western North America where it occupies open areas with short vegetation and bare ground within shrub, desert, and grassland environments. Burrowing owls are dependent upon the presence of burrowing mammals, such as ground squirrels, whose burrows are used for roosting and nesting. The presence or absence of mammal burrows is often a major factor that limits the presence or absence of burrowing owls. Where mammal burrows are scarce, burrowing owls have been found occupying man-made cavities, such as buried and non-functioning drainpipes, stand-pipes, and dry culverts. Burrowing mammals may burrow beneath rocks and debris or large, heavy objects such as abandoned cars, concrete blocks, or concrete pads. They also require open vegetation allowing line-of-sight observation of the surrounding habitat to forage as well as watch for predators.

No burrowing owls or recent signs (i.e., pellets, feathers, castings, or whitewash) were observed during the field investigations. A majority of the Project site is vegetated with a variety of low-growing plant species that allow for line-of-sight observation favored by burrowing owls. However, no suitable burrows (>4 inches in diameter) for roosting and nesting were observed within site boundaries. Additionally, the site is surrounded by electrical poles, tall buildings, and streetlights that provide perching opportunities for large raptors (i.e., red-tailed hawk) that prey on burrowing owls, which may reduce the likelihood that burrowing owl would establish onsite. Therefore, the Project site was determined to have low potential to support burrowing owl.

Despite the Project's site low potential to support burrowing owl, Mitigation Measure BIO-2 has been included to require pre-construction burrowing owl surveys no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance. Pre-construction burrowing owl surveys would be performed by a qualified biologist following the recommendations and guidelines provided in the CDFW Staff Report on Burrowing Owl Mitigation. If the pre-construction surveys confirm occupied burrowing owl habitat, Project activities would be immediately halted until CDFW grants approval of a Burrowing Owl Relocation Plan. Overall, the proposed Project would have less than significant impact on burrowing owl with implementation of Mitigation Measure BIO-2.

Mountain Plover

The mountain plover is currently listed as a California Species of Special Concern. It prefers dry habitats with short grass, usually due to grazing, and bare ground throughout North America and are not found near bodies of water or on wet soil. They are typically found in grassland and prairie habitats, plains, plateaus, foothills, and other relatively flat or gently rolling landscapes. Their breeding range spans from southeastern Alberta and southwestern Saskatchewan to northern New Mexico and the Texas panhandle. In winter, many are found in the San Joaquin and Imperial Valleys in California and along the U.S.-Mexican border. During winter, mountain plovers may move to different habitats, including agricultural fields, fallow land, or coastal areas. They can be found at lower elevations during these times but still prefer open habitats with suitable foraging opportunities.

Mountain plover generally only occur in this region during the winter months, and do not typically nest in this region. The second survey, conducted on January 16, 2024, was conducted during the timeframe when mountain plover are known to occur in the region of the Project site, and no mountain plovers were observed. The majority of the Project site provides minimal foraging opportunities for the mountain plover. As such, mountain plover are not expected to nest onsite. Therefore, the Project site was determined to have no potential to support mountain plover.

Mohave Ground Squirrel

The Mohave ground squirrel is endemic to the western Mojave Desert in California. It occupies portions of Inyo, Kern, Los Angeles, and San Bernardino Counties in the western Mojave Desert. This species was listed as threatened under the California Endangered Species Act in 1985. The Mohave ground squirrel occupies all major desert scrub habitats in the western Mojave Desert and has been observed in the following habitats:

- Mojave creosote scrub, dominated by creosote bush and burrobush;
- Desert saltbush scrub, dominated by various species of saltbush;
- Desert sink scrub, which is similar in composition to saltbush scrub, but is sparser and grows on poorly drained soils with high alkalinity;
- Desert greasewood scrub, with very sparse vegetation generally located on valley bottoms and dry lake beds;
- Shadscale scrub; and
- Joshua tree woodland, which includes Joshua trees widely scattered over a variety of shrub species.

Mohave ground squirrel was not observed during the field surveys. Although the Project site is located within the historic range for Mohave ground squirrel, the site is near the southwestern boundary of the range. The site is not located within any core areas, nor is it located within or immediately adjacent to any corridors or other known populations. The closest CNDDDB documented Mohave ground squirrel was captured approximately 1.6 miles southeast of the Project site west of Little Rock Wash in 1973, and 2 miles northwest of the Project site in 1984. Based on data provided in *Current Status of the Mohave Ground Squirrel: an update covering the period 2013-2020*, the closest reported Mohave ground squirrel observation during the 2013-2020 time period was located south of Edwards Airforce Base, approximately 10 miles north of the Project site.

In addition to lack of local observation of the species, there is no native habitat with a relatively diverse shrub component on the Project site. Hoary saltbush, spiny hopsage, and winterfat, which are species that are important forage for Mohave ground squirrel, were not observed during the investigation. Further, no wildlife corridors exist between the closest core Mohave ground squirrel population and the Project site. Therefore, the lack of native habitat on the site, disturbances associated with urban development and related activities, and location from core populations limits the potential for Mohave ground squirrel to occupy the Project site.

Based on habitat requirements for Mohave ground squirrel, known distributions, site conditions, and regional trapping studies, the Biological Resources Assessment (Appendix C) determined that the species is absent from the Project site and impacts would not occur.

Thus, based on the information above, with implementation of Mitigation Measures BIO-1 and BIO-2, potential impacts to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, would be less than significant.

IMPACT BIOLOGICAL-4: THE PROJECT WOULD NOT INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES, OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES.

Less than Significant Impact with Mitigation Incorporated. Wildlife movement corridors link together areas of suitable habitat that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. The Project site is not within or adjacent to a wildlife movement corridor. The site is adjacent to roadways and existing development. The site is adjacent to 30th Street to the west, followed by a fenced

solar energy generating facility. The site is adjacent to East Avenue M/Columbia Way to the south that is followed by airport related industrial uses. The eastern boundary of the site is adjacent to an unpaved roadway, an undeveloped parcel that is followed by a solar energy generating facility, and/or 40th Street E. Although the parcels to the north and northeast of the site are undeveloped, those parcels are bounded by roadways, agricultural uses, and a soccer sports park. Overall, due to surrounding land uses and lack of habitat, the Project site does not function as a local or regional wildlife movement corridor.

The nearest preserved habitat is located approximately 7.94 miles southeast of the Project site, in association with the Alpine Butte Wildlife Sanctuary. Additionally, Little Rock Wash, which extends from the south out of the San Gabriel Mountains north to Rosamond Dry Lake, is located approximately 3 miles east of the Project site. The Project site is separated from Alpine Butte Wildlife Sanctuary and Little Rock Wash by industrial and agricultural development, as well as several heavily trafficked roadways including East Avenue M/Columbia Way and 50th Street East. Thus, there is no wildlife corridor connection between the Project site to the preserved habitat areas. Therefore, impacts related to wildlife corridors would not occur from implementation of the proposed Project.

However, the Project site contains shrubs that can support nesting birds or raptors that are protected under the Federal MBTA and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code during the nesting season. Therefore, grading activities or vegetation removal between the February 1 and August 31 general bird nesting season might result in potential impacts to nesting birds. However, compliance with the MBTA and Mitigation Measure BIO-1, which includes preconstruction nesting bird surveys during the nesting bird season, would ensure that potential impacts to nesting birds would be less than significant.

5.4.7 CUMULATIVE IMPACTS

The cumulative study area for purposes of biological resources would be the City of Palmdale. This cumulative impact analysis for biological resources considers development of the proposed Project in conjunction with other development projects as well as the projects identified in Table 5-1, *Cumulative Projects List*, in Section 5.0, *Environmental Impact Analysis*. Projects identified in Table 5-1 are proposed near the Project site and within the greater Palmdale area.

Special-Status Species

The Project could result in potentially significant impacts to loggerhead shrike. However, implementation of Mitigation Measure BIO-1 would reduce potential construction impacts to loggerhead shrike to a less-than-significant level. Burrowing owls are not anticipated to be located within the onsite or offsite Project affected areas. However, Mitigation Measure BIO-2 would be implemented to ensure that potential impacts to burrowing owls would be less than significant.

The less-than-significant impacts from the Project are not anticipated to combine with other development projects to result in a potentially significant impact. Therefore, cumulative impacts related to special status species would be less than cumulatively significant.

Sensitive Habitat

CDFW is concerned about the cumulative loss of desert habitats that support sensitive avian and herpetofauna species, and rare plants, as well as the general biodiversity of plant and wildlife species occurring in these local habitats. As described previously, no native plant communities or natural communities of special concern exist on or adjacent to the Project site and within the offsite improvement areas. The Project site and offsite areas have been subject to various anthropogenic disturbances, including weed abatement that have eliminated natural plant communities and the related habitat for special status species. Therefore, the Project site does not contain sensitive habitat that could be impacted and have the potential

to combine. As a result, cumulative impacts related to sensitive habitat, including sensitive desert habitats that support a biodiversity of avian and herpetofauna species, and rare plants, would not occur from the proposed Project. In addition, the Project site does not contain any riparian habitat, jurisdictional waters, or other sensitive habitats. Therefore, cumulative impacts related to riparian habitat and jurisdictional waters would not occur.

Nesting and Migratory Birds

Mitigation is included to avoid impacts to nesting bird species through compliance with the MBTA. As described above, the Project site contains shrubs that can support nesting birds or raptors protected under the MBTA and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code. The less-than-significant impacts with Mitigation Measure BIO-1 from the Project are not anticipated to combine with other development projects to substantially affect these species to result in a potentially significant impact to nesting and migratory birds. Therefore, cumulative impacts related to nesting and migratory birds would be less than cumulatively significant.

Ordinances/Adopted Conservation Plans

The Project site lies within the Western Mojave Habitat Conservation Plan. However, the Project site is not within a Conservation Area identified in the Western Mojave Habitat Conservation Plan. Furthermore, the Project site is not within a County of Los Angeles Significant Ecological Areas. The Project would have no impacts on adopted ordinances or adopted conservation plans. Therefore, cumulative impacts related to adopted ordinances or adopted conservation plans would not occur from implementation of the proposed Project.

5.4.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Federal

- Federal Endangered Species Act
- Migratory Bird Treaty Act

State

- California's Endangered Species Act
- California Fish and Game Code

Local

- Palmdale Municipal Code Section 8.44.020

5.4.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impacts Biological-1 and Biological-4 would be potentially significant without mitigation.

5.4.10 MITIGATION MEASURES

MM BIO-1: Pre-Construction Nesting Bird Surveys. Project activities (i.e., grading, vegetation removal) shall be conducted outside the general bird nesting season (February 1 to August 31). If Project activities cannot occur outside the bird nesting season, project plans, specifications, and

construction permitting instructions shall include a pre-construction clearance survey for nesting birds and raptors. A pre-construction clearance survey shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities. Preconstruction surveys shall focus on suitable habitat throughout the entire project site, including nest locations and nesting behavior. If Project activities are delayed or suspended for more than 7 days during the nesting season, the pre-construction clearance survey shall be repeated. The qualified avian biologist shall make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. A buffer shall not be decreased unless CDFW provides concurrence. If special-status birds or raptors (i.e., loggerhead shrike) are observed nesting on site, the qualified biologist shall halt Project activities and coordinate with CDFW on appropriate measures. Personnel working on the Project, including all contractors working on site, shall be instructed on the presence of nesting birds, restricted areas, and adherence to no disturbance buffers. Established buffers shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist shall have the authority to stop work if nesting birds exhibit signs of disturbance.

MM BIO-2: Pre-Construction Burrowing Owl Surveys. Project plans, specifications, and construction permitting instructions shall require pre-construction burrowing owl surveys be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the CDFW Staff Report on Burrowing Owl Mitigation (2012 or most recent version) (Staff Report). Pre-construction surveys shall be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If burrowing owl surveys are negative and burrowing owl is confirmed absent, then ground-disturbing activities shall be allowed to commence, and no further mitigation would be required. If unoccupied burrows are observed onsite, construction shall be allowed to proceed.

If the pre-construction surveys confirm occupied burrow(s), such active burrows shall be avoided by the Project in accordance with CDFW's Staff Report (CDFG 2012). CDFW shall be immediately informed of any burrowing owl observations. The qualified biologist shall coordinate with CDFW to prepare and implement a Burrowing Owl Plan for avoidance, minimization, and/or mitigation measures that shall be submitted to CDFW for review and approval prior to commencing Project activities. A grading permit may be issued once the Burrowing Owl Plan is approved and, if relocations are deemed necessary, the species has been relocated. If the grading permit is not obtained within 30 days of the survey, a new survey shall be required. Avoidance, minimization, and/or mitigation measures in the Burrowing Owl Plan may include any one of the following:

- **If burrowing owls are observed on-site outside the breeding season** (September 1 to January 31) and they cannot be avoided, active or passive relocation shall be used to exclude owls from their burrows, as agreed to by the CDFW. Relocation shall occur only outside of the breeding season or once the young are able to leave the nest and fly. In the event that burrowing owls are to be relocated, a Burrowing Owl Relocation Plan shall

be submitted for review and approval by the CDFW. The CDFW shall be consulted prior to any relocation to determine acceptable receiving sites available where this species has a greater chance of successful long-term relocation.

Passive relocation shall include the use of one-way doors to exclude owls from the burrows; doors shall be left in place for at least 48 hours. Once the burrow is determined to be unoccupied, as verified by site monitoring, the burrow shall be closed by a qualified Biologist who shall excavate the burrow using hand tools. Prior to excluding an owl from an active burrow, a receptor burrow survey shall be conducted to confirm that at least two potentially suitable unoccupied burrows are within approximately 688 feet prior to installation of the one-way door. If two natural receptor burrows are not located, two artificial burrows shall be created for every burrow that would be closed.

- **If burrowing owls are observed on-site during the breeding season** (September 1 to January 31), the burrow(s) shall be protected until nesting activity has ended (i.e., all young have fledged from the burrow). Temporary fencing, or a buffer, shall be installed at least at a 250-foot diameter buffer zone from the active burrow, (or as otherwise determined by the biologist) to prevent disturbance during grading or construction. The designated buffer will be clearly marked in the field and will be mapped as an Environmental Sensitive Area (ESA) on construction plans. Installation and removal of the buffer shall be done with a biological monitor present.

5.4.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The mitigation measures listed above, and existing regulations would reduce potential impacts associated with biological resources for Impacts Biological-1 and Biological-4 to a level that is less than significant. Therefore, no significant unavoidable adverse impacts related to biological resources would occur.

5.4.12 REFERENCES

City of Palmdale. (2022, October 22). *Envision Palmdale 2045 City of Palmdale General Plan*. Retrieved November 20, 2023, from <https://palmdale2045gp.org/>

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U.S. Department of Interior. (2004, December). *West Mojave Plan*. Retrieved March 1, 2024. https://eplanning.blm.gov/public_projects/lup/72544/97517/117675/wemo_plan_vol-1_2004.pdf

5.5 Energy

5.5.1 INTRODUCTION

This section of the Draft EIR assesses the significance of the use of energy, including electricity, natural gas, gasoline, and diesel fuels, that would result from implementation of the proposed Project. It discusses existing energy use patterns and examines whether the proposed Project (including development and operation) would result in the consumption of large amounts of fuel or energy or use such resources in a wasteful manner.

Refer to Section 5.7, *Greenhouse Gas Emissions*, for a discussion of the relationship between energy consumption and greenhouse gas (GHG) emissions, and Section 5.16, *Utilities and Service Systems*, for a discussion of water consumption. This analysis is based on the *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* for the Project, included as Appendix B.

5.5.2 REGULATORY SETTING

5.5.2.1 Federal Regulations

Energy Independence and Security Act, Corporate Average Fuel Efficiency Standards

On December 19, 2007, the Energy Independence and Security Act of 2007 was signed into law, requiring an increased Corporate Average Fuel Economy (CAFE) standard of 35 miles per gallon (mpg) for the combined fleet of cars and light trucks by the 2020 model year.

In addition to setting increased CAFE standards for motor vehicles, the Energy Independence and Security Act includes the following additional provisions:

- Renewable Fuel Standard (RFS) (Section 202)
- Appliance and Lighting Efficiency Standards (Sections 301–325)
- Building Energy Efficiency (Sections 411–441)

Additional provisions of the Act address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy Standards

On March 31, 2022, the National Highway Traffic Safety Administration (NHTSA) finalized the Corporate Average Fuel Economy (CAFE) standards for model years 2024–2026 of passenger cars and light trucks. The amended CAFE standards would require an industry wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026, by increasing fuel efficiency by 8 percent annually for

model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save about 234 billion gallons of gas between model years 2030 to 2050.

5.5.2.2 State Regulations

California Code of Regulations (CCR) Title 13, Motor Vehicles, Section 2449(d)(3)

No vehicle or engines subject to this regulation may idle for more than 5 consecutive minutes. The idling limit does not apply to:

- Idling when queuing;
- Idling to verify that the vehicle is in safe operating condition;
- Idling for testing, servicing, repairing, or diagnostic purposes;
- Idling necessary to accomplish work for which the vehicle was designed (such as operating a crane);
- Idling required to bring the machine system to operating temperature; and
- Idling necessary to ensure safe operation of the vehicle.

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6, the California Energy Code (CALGreen), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CALGreen is updated on a regular basis.

The 2022 Energy Code encourages efficient electric heat pumps, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The California Energy Commission anticipates that the 2022 Energy Code will reduce GHG emissions by 10 million metric tons.

The 2022 CALGreen standards that reduce GHG emissions and are applicable to the proposed Project include, but are not limited to, the following:

- **Short-term bicycle parking.** If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- **Long-term bicycle parking.** For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- **Designated parking for clean air vehicles.** In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- **EV charging stations.** New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- **Outdoor light pollution reduction.** Outdoor lighting systems shall be designed to meet the backlight, uplight and glare ratings per Table 5.106.8 (5.106.8).
- **Construction waste management.** Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1. 5.405.1.2, or

5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).

- **Excavated soil and land clearing debris.** 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- **Water conserving plumbing fixtures and fittings.** Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:
 - **Water Closets.** The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
 - **Urinals.** The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
 - **Showerheads.** Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
 - **Faucets and fountains.** Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- **Outdoor potable water uses in landscaped areas.** Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent (5.304.1).
- **Water meters.** Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- **Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF.** Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- **Commissioning.** For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

The 2022 CALGreen Building Standards Code has been adopted by the City of Palmdale as Municipal Code Chapter 8.04.

5.5.2.3 Local and Regional Regulations

City of Palmdale Energy Action Plan

Palmdale adopted its Energy Action Plan (EAP) in August 2011. The EAP includes a GHG emissions inventory for the baseline year 2005 and a GHG emissions forecast to the horizon year of 2035. The EAP establishes

reduction goals, measures, and an implementation program to reduce energy demand, water consumption, and transportation trips, and to promote the use of renewable energy. The EAP contains municipal and community-wide goals, each of which are supported by several measures. Goals and applicable measures from the EAP are listed below.

- **Goal 1:** Reduce energy demand through energy conservation and efficiency.
- **Goal 2:** Reduce water consumption for energy conservation.
- **Goal 3:** Promote renewable energy generation and use.
- **Goal 4:** Reduce transportation emissions through alternative vehicles, trip reduction and consolidation, and efficient flow.
- **Goal 5:** Implement smart land use to reduce vehicular trips.
- **Goal 6:** Reduce waste.

5.5.3 ENVIRONMENTAL SETTING

5.5.3.1 Electricity

The Southern California Edison Company (SCE) is the electrical purveyor in the City of Palmdale. SCE provides electricity service to more than 14 million people in a 50,000 square-mile area of central, coastal, and Southern California. According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2021 was 103,045 GWh (36,375 GWh for the residential sector and 51,057 GWh for the non-residential sector). Total electricity consumption in Los Angeles County in 2021 was 65,374.7 GWh (65,374,721,369 kilowatt-hours (kWh)). In addition, the Energy for Palmdale's Independent Choice (EPIC) has partnered with SCE as a new default power provider. EPIC is a locally managed and non-profit entity created by and for the City of Palmdale that will offer clean energy at competitive rates. Palmdale residents will automatically be enrolled in EPIC Power, unless they choose to opt out and remain with SCE only.

California utilities are experiencing increasing demands that require modernization of the electric distribution grid to, among other things, accommodate two-way flows of electricity and increase the grid's capacity. SCE is in the process of implementing infrastructure upgrades to ensure the ability to meet future demands. In addition, as described by the Edison International 2021 Annual Report, the SCE electrical grid modernization effort supports implementation of California Senate Bill 32 that requires the State to cut GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050 in order to help achieve carbon neutrality by 2045. It describes that in 2021, approximately 42 percent of power that SCE delivered to customers came from carbon-free resources (Edison International, SCE, 2021).

Existing electrical utilities at the Project site exist along Columbia Way and along 30th Street East.

5.5.3.2 Natural Gas

The Southern California Gas Company (SoCalGas) is the natural gas service provider for the Project site. SoCalGas provides natural gas to approximately 21.8 million people in a 24,000-square-mile service area throughout Central and Southern California, from Visalia to the Mexican border. According to the California Energy Commission (CEC), total natural gas consumption in the SoCalGas service area in 2021 was 6,755 million therms (2,308 million therms for the residential sector). Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms) (CEC, 2022).

Natural gas lines at the Project site exist along Columbia Way along the Project's frontage.

5.5.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- Energy-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- Energy-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.5.5 METHODOLOGY

A number of factors are considered when weighing whether a project would use a disproportionately large amount of energy or whether the use of energy would be wasteful in comparison to other projects. Factors such as the use of onsite renewable energy features, energy conservation features or programs, and relative use of transit are considered.

According to Appendix F of the CEQA Guidelines, conserving energy is defined as decreasing overall per capita energy consumption, decreasing reliance on natural gas and oil, and increasing reliance on renewable energy sources. Neither Appendix F of the CEQA Guidelines nor Public Resources Code Section 21100(b)(3) offer a numerical threshold of significance that might be used to evaluate the potential significance of energy consumption of a project. Rather, the emphasis is on reducing “the wasteful, inefficient, and unnecessary consumption of energy.”

Construction activities would result in wasteful, inefficient, or unnecessary use of energy if construction equipment is old or not well maintained, if equipment is left to idle when not in use, if travel routes are not planned to minimize vehicle miles traveled, or if excess lighting or water is used during construction activities. Energy usage during project operation would be considered wasteful, inefficient, and unnecessary if the project were to violate federal, State, and/or local energy standards, including Title 24 of the California Code of Regulations, inhibit pedestrian or bicycle mobility, inhibit access to transit, or inhibit feasible opportunities to use alternative energy sources, such as solar energy, or otherwise inhibit the conservation of energy.

This energy analysis is based on CalEEMod modeling, which quantifies energy use for project operations. Fuel consumption (diesel fuel and gasoline) from vehicle trips during operation was estimated for the opening year (2025) of the proposed Project based on trip estimates from the CalEEMod model and fuel efficiencies from the CARB Emission FACTor (EMFAC2021) model. Estimates of fuel consumption (diesel fuel and gasoline) from construction trucks and construction worker vehicles were based on trip estimates from the CalEEMod model and fuel efficiencies from the CARB EMFAC2021 model.

This analysis focuses on the sources of energy that are relevant to the proposed Project: electricity, the equipment fuel necessary for Project construction, and vehicle fuel necessary for Project operations. For the purposes of this analysis, the amount of electricity, construction fuel, and fuel use from operations are quantified and compared to that consumed in Los Angeles County. The electricity use of the proposed Project is analyzed as a whole on an annual basis. Electricity use was estimated for the Project using default energy intensities by land use type in CalEEMod.

5.5.6 ENVIRONMENTAL IMPACTS

IMPACT ENERGY-1: THE PROJECT WOULD NOT RESULT IN A POTENTIALLY SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES DURING PROJECT CONSTRUCTION OR OPERATION.

Construction

Less than Significant Impact. Construction of the proposed Project would occur over approximately 11 months and would consume energy in three general forms:

1. Petroleum-based fuels used to power off-road construction vehicles and equipment, construction worker travel to and from the Project site, and delivery truck trips;
2. Electricity associated with providing temporary power for lighting and electric equipment; and
3. Energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Construction of the proposed Project would not involve consumption of natural gas because the construction-related equipment would not be powered by natural gas.

Construction activities related to the proposed Project and the associated infrastructure are not expected to result in demand for fuel greater on a per-unit-of-development basis than other development projects in Southern California. Also, CCR Title 13, *Motor Vehicles*, Section 2449(d)(3), *Idling*, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. The energy analysis modeling for the proposed Project (included as Appendix B) details that construction-related use of off-road equipment would utilize 284,470.7 gallons of diesel fuel and 363,891.5 gallons of gasoline, as detailed in Table 5.5-1, *Estimated Construction Fuel Consumption*.

Construction contractors are required to demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. In addition, compliance with existing CARB idling restrictions and the use of newer engines and equipment would reduce fuel combustion and energy consumption.

Overall, construction activities would require limited energy consumption, would comply with all existing regulations, and would therefore not be expected to use large amounts of energy or fuel in a wasteful manner. Thus, impacts related to construction energy usage would be less than significant.

Table 5.5-1: Estimated Construction Fuel Consumption

Energy Type	Total Energy Consumption	Percentage Increase Countywide
Diesel Fuel (total gallons)	284,470.7	0.05
Gasoline (total gallons)	363,891.5	0.01

Source: *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* for the proposed Project (Appendix B).

Operation

Less than Significant Impact. Once operational, the Project building would generate demand for electricity, natural gas, and gasoline for motor vehicle trips. Operational use of energy includes the fuel used for vehicle trips associated with the Project, heating, cooling, and lighting of buildings, water heating, operation of electrical systems and plug-in appliances within buildings, parking lot and outdoor lighting, and the transport of electricity and water to areas where they would be consumed. This use of energy is typical for urban

development, and no operational activities or land uses would occur that would result in extraordinary energy consumption.

As detailed in Table 5.5-2, *Estimated Operational Energy Consumption*, operation of the Project is estimated to annually use 1,477,734.8 gallons of gasoline and 1,488,292.9 gallons of diesel fuel. The amount of operational fuel use was estimated using CARB's EMFAC2021 model. In addition, the proposed Project is estimated to annually use 649,362.0 therms of natural gas. Total natural gas consumption in Los Angeles County in 2021 was 2,880 million therms (2,880,994,891 therms). Therefore, operation of the proposed project would increase the annual natural gas consumption in Los Angeles County by approximately 0.02 percent. As shown in Table 5.5-2, the estimated electricity demand associated with the operation of the proposed Project is 17,334,952.0 kWh per year. Total electricity consumption in Los Angeles County in 2021 was 65,374.7 GWh (65,374,721,369 kWh). Therefore, operation of the proposed project would increase the annual electricity consumption in Los Angeles County by approximately 0.03 percent. Because the Project's estimate fuel and energy use is typical for urban development, no operational activities or land uses would occur that would result in extraordinary energy consumption. Additionally, through City permitting, assurance would be provided that existing regulations related to energy efficiency and consumption, such as Title 24 regulations and CCR Title 13, *Motor Vehicles*, Section 2449(d)(3) related to idling, would be implemented.

The proposed Project would adhere to 2022 California Energy Code Section 110.10 that requires the Project to that requires that the roof be, at a minimum, 15 percent solar-ready, in accordance with PPP GHG-1. Additionally, the proposed Project would also adhere to 2022 California Energy Code Section 140.10 standards that require installation of solar photovoltaic systems for warehouses based on square footage of air conditioned space, in accordance with PPP GHG-2 below. For a building with 20,000 SF of air-conditioned space (office space), the solar photovoltaic system required would be approximately 62.6-Kilowatt system. The Project would not preclude renewable energy use because the buildings would include solar panels per California Energy Code standards and solar-ready roof such that additional solar panels may be installed by a future tenant. Therefore, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during operation. In addition, the Project will comply with typical Title 24 measures including insulation; use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC); solar-reflective roofing materials; energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, operation of the Project would not use large amounts of energy or fuel in a wasteful manner, and operational energy impacts would be less than significant.

Table 5.5-2: Estimated Operational Energy Consumption

Energy Type	Annual Energy Consumption
Electricity Consumption (kWh/year)	17,334,952.0
Natural Gas Consumption (therms/year)	649,362.0
Gasoline (gallons/year)	1,477,734.8
Diesel Fuel (gallons/year)	1,488,292.9

kWh = kilowatt-hours

Source: *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* for the proposed Project (Appendix B).

IMPACT ENERGY-2: THE PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY.

Less than Significant Impact. As described previously, the proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project. The City's administration of the CCR Title 24 requirements includes review of design components and energy conservation measures during the permitting process, which ensures that all requirements are met. In addition, the Project would not conflict with the idling limits imposed by CCR Title 13, *Motor Vehicles*, Section 2449(d)(3) Idling. Furthermore, the proposed Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. Pursuant to the 2022 California Energy Code Sections 110.10 and 140.10 requirements, the Project would include solar panels that would be required to meet a percentage of the building's electricity needs based on the square footage of air-conditioned areas. Furthermore, 15 percent of the roof area would be solar-ready so the future tenant may install additional solar panels in order to offset the Project's energy demands. Thus, the Project would not obstruct use of renewable energy or energy efficiency.

CEC Integrated Energy Policy Report

The CEC's 2021 *Integrated Energy Policy Report* and 2022 *Integrated Energy Policy Report Update* provide the results of the CEC's assessments of a variety of energy issues facing California. Energy usage on the Project site during construction would be temporary in nature and consistent with typical construction energy demands in Los Angeles County. Because California's energy conservation planning actions are conducted at a regional level, and because the proposed Project's total impact on regional energy supplies would be minor, the proposed Project would not conflict with or obstruct California's energy conservation plans as described in the CEC's *Integrated Energy Policy Report*. Overall, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

City of Palmdale Energy Action Plan

The City's EAP includes energy-reduction goals to help achieve the GHG reduction target of 15% below 2005 baseline levels by 2020. As shown in Table 5.5-3 below, the proposed Project would be consistent with the goals outlined in the City's EAP. Therefore, the Project would not conflict with or obstruct a local plan for renewable energy or energy efficiency.

Table 5.5-3: Consistency with City of Palmdale Energy Action Plan

Goal	Project Consistency
Goal 1: Reduce energy demand through energy conservation and efficiency.	Consistent. As described in Section 5.3, <i>Air Quality</i> , and Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed Project would include measures to reduce energy demand. Energy-reduction measures include compliance with Title 24/CALGreen requirements, requirements for energy-efficient vendor trucks, development of a Transportation Management Association (TMA), implementation of energy efficient appliances, and design of energy-efficient buildings.
Goal 2: Reduce water consumption for energy conservation.	Consistent. Pursuant to Title 24/CALGreen requirements, all water fixtures in the proposed Project would be required to be water efficient.
Goal 3: Promote renewable energy generation and use.	Consistent. Title 24/CALGreen requirements the Project would utilize renewable energy in the form of solar panels.
Goal 4: Reduce transportation emissions through alternative vehicles, trip reduction and consolidation, and efficiency flow.	Consistent. As described in Section 5.3, <i>Air Quality</i> , and Section 5.7, <i>Greenhouse Gas Emissions</i> , the Project would incorporate mitigation measures and comply with existing regulations to reduce

Goal	Project Consistency
	transportation-related emissions. These measures include idling regulations, use of energy efficient vendor trucks, clean air vehicle and carpool parking, electric vehicle charging stations, and implementation of a TMA.
Goal 5: Implement smart land use to reduce vehicular trips.	Consistent. The proposed Project is consistent with the General Plan land use designation. As such, the Project would also be consistent with the land use vision for the City.
Goal 6: Reduce waste.	Consistent. As described in Section 5.16, <i>Utilities and Service Systems</i> , solid waste-generating construction activities are subject to the requirements set forth in the 2019 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the City's development Project permitting process. The Project would include external recycling bins at each building to assist in the implementation of recycling activities during operation.

5.5.7 CUMULATIVE IMPACTS

The geographic context for analysis of cumulative impacts regarding energy includes past, present, and future development within the County of Los Angeles. All development projects throughout the region would be required to comply with the energy efficiency standards in the Title 24 requirements. Additionally, some of the developments could provide for additional reductions in energy consumption by use of solar panels, sky lights, or other LEED-type energy efficiency infrastructure. With implementation of the existing energy conservation regulations, the electricity and fuel consumption from the proposed Project would not be cumulatively wasteful, inefficient, or unnecessary.

Petroleum consumption associated with the proposed Project and cumulative development projects would be primarily attributable to transportation, especially vehicular and truck use. However, State fuel efficiency standards and alternative fuels policies (per AB 1007 Pavely (2005)) would contribute to a reduction in fuel use, and the federal Energy Independence and Security Act and the State's Long Term Energy Efficiency Strategic Plan would reduce reliance on non-renewable energy resources. For these reasons, the consumption of petroleum would not occur in a wasteful, inefficient, or unnecessary manner and impacts would be less than cumulatively considerable.

5.5.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

The following existing standard regulations would reduce potential impacts related to energy:

- California Energy Code (Code of Regulations, Title 24 Part 6).
- CALGreen Building Standards Code as adopted in City of Hesperia Municipal Code Chapter 15.04.
- **PPP GHG-1: 2022 California Energy Code Section 110.10.** The Project shall comply with the 2022 [or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 110.10 for Mandatory Requirements for Solar Readiness. Section 110.10 includes requirements that the roof be, at a minimum, 15 percent solar ready.
- **PPP GHG-2: 2022 California Energy Code Section 140.10.** The Project shall comply with the or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 140.10 for Nonresidential Solar PV. Section 140.10 includes

requirements for solar photovoltaic systems for warehouse buildings. The size of the photovoltaic system shall be calculated based on conditioned floor area, as required by Section 140.10. For a building with 20,000 SF of air-conditioned space (office space), the solar photovoltaic system required would be approximately 62.6 Kilowatt system.

5.5.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts Energy-1 and Energy-2 would be less than significant.

5.5.10 MITIGATION MEASURES

Impacts related to energy would be less than significant and no mitigation measures are required.

5.5.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to energy would be less than significant and no mitigation measures are required.

5.5.12 REFERENCES

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5.6 Geology and Soils

5.6.1 INTRODUCTION

This section addresses potential environmental effects of the proposed Project related to paleontological resources. Other impacts related to geology and soils were analyzed in the Initial Study, included as Appendix A, and were determined to be less than significant. The analysis in this section is based, in part, on the following documents and resources:

- *Paleontological Assessment for the Avenue M Project* (Appendix G)
- *City of Palmdale General Plan Environmental Resources Element*, adopted October 2022
- *City of Palmdale 2045 General Plan Update FEIR*, certified August 2022

5.6.2 REGULATORY SETTING

5.6.2.1 State Regulations

Public Resources Code (PRC) Section 5097.5

Requirements for paleontological resource management are included in the PRC Division 5, Chapter 1.7, Section 5097.5, and Division 20, Chapter 3, Section 30244, which states, “A person shall not knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.” Violation of this section is a misdemeanor. These statutes prohibit the removal, without permission, of any paleontological site or feature from lands under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. As a result, local agencies are required to comply with PRC 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, and district) lands.

5.6.2.2 Local Regulations

City of Palmdale General Plan

The Conservation Element of the City of Palmdale General Plan contains the following policies related to paleontological resources that are applicable to the proposed Project.

Goal CON-8 **Protect historical and culturally significant resources which contribute to the community’s sense of history.**

Policy CON-8 **Preservation in new development.** Require that new development protect significant historic, paleontological, or archaeological resources.

5.6.3 ENVIRONMENTAL SETTING

5.6.3.1 Regional Setting

The proposed Project is within the Mojave Desert Geomorphic province of California, a region consisting of desert plains and isolated mountain ranges (CGS, 2002). According to the California Geological Survey, the Mojave Desert province consists of a northwest to southeast trending fault and secondary east to west trending fault in southwestern California.

The City of Palmdale is underlain by five sedimentary rock units with high potential for paleontological resources, which include the Punchbowl, Ana Verde, Harold Formations, the Nadeau Gravels/Pleistocene Old Alluvium, Pleistocene Lacustrine Sediment, and Fluvial Sediment. The City is also underlain by five igneous and metamorphic rock units with low paleontological potential, which include the Precambrian Pelona Schist, Mesozoic metavolcanics, Mesozoic granite, quartz monzonite, and diorites (City of Palmdale, 2022).

5.6.3.2 Site Setting

The Paleontological Assessment (Appendix G) details that the geology mapped within the Project site are Holocene to late Pleistocene-aged young alluvial fan deposits (Qyf) that have a low to high palaeontologic sensitivity. The alluvial fan deposits are described as unconsolidated to slightly consolidated, silt, sand, gravel, cobble, and boulder deposits (Appendix G).

As noted in the Geotechnical Investigation, included in Appendix A, soils encountered at the Project site consist of native alluvium to a depth of at least 30 feet below ground surface. The soils comprised of loose to very dense silty fine sands, fine to coarse sands, silty fine to coarse sands, fine sands, fine sandy silts and stiff to hard fine sandy clays and clayey silt.

5.6.3.3 Unique Geologic Feature

Unique geologic features refer to unique physical features or structures on the earth's crust. The Project site does not contain any unique geologic features. The site is an undeveloped area that has been heavily disturbed by previous agricultural operations, off-road vehicular access, illegal dumping, and surrounding development. As described previously, the site is underlain with Holocene to late Pleistocene-aged young alluvial fan deposits. The geologic processes that occurred on the Project site and in the vicinity are the same as those within the Mojave Desert Geomorphic province.

5.6.3.4 Paleontological Resources

Paleontological resources are the remains of prehistoric life that have been preserved in the geologic strata. These remains are called fossils and include bones, shells, teeth, and plant remains (including their impressions, casts, and molds) in the sedimentary matrix, as well as trace fossils such as footprints and burrows. Fossils are considered older than 5,000 years of age (SVP, 2010) but may include younger remains (subfossils) when viewed in the context of local extinction of the organism or habitat.

Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

According to the Paleontological Assessment, the paleontological and records search conducted for the Project site did not identify any previously recorded fossil localities on-site or adjacent to the site. The nearest

fossil locality, consisting of a Pleistocene camel, was identified approximately 5 to 6 miles northwest of the Project site. Within 8.5 miles of the Project site, specimens of Pleistocene reptiles and small mammals were discovered within 3 feet below ground surface (Appendix G). As previously stated, the Project site area is classified as having Holocene to late Pleistocene aged geology. Holocene alluvial deposits are assigned a low paleontological sensitivity due to age, while Pleistocene alluvial deposits are assigned a high paleontological sensitivity due to previous yields of Ice Age terrestrial vertebrate fossils (Appendix G).

5.6.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Geology-1	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
Geology-1i	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 4),
Geology-1ii	Strong seismic ground shaking,
Geology-1iii	Seismic-related ground failure, including liquefaction; or
Geology-1iv	Landslides;
Geology-2	Result in substantial soil erosion or the loss of topsoil;
Geology-3	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;
Geology-4	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;
Geology-5	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
Palentological-1	Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature.

The Initial Study, included in Appendix A, determined that the Project would not result in impacts related to Thresholds Geology-1i, Geology-1iv, and Geology-5, and that impacts related to Thresholds Geology-1ii, Geology-1iii, and Geology-2 through Geology-4 would be less than significant. No further assessment of these impacts is required in this Draft EIR.

5.6.5 METHODOLOGY

A Paleontological Assessment was prepared to determine the proposed Project's potential impacts to paleontological resources. The analysis included a site survey and record searches of past identified resources, consideration of the types of soils that exist, and the paleontological sensitivity of those soils. The analysis combines these factors to identify the potential of the proposed construction to impact unknown paleontological resources on the site. As described in the Paleontological Assessment, a resource records search was conducted to identify any previously discovered fossil localities in or near the Project site using

records from prior projects, the Division of Geological Sciences at the San Bernardino County Museum, the Los Angeles County Museum of Natural History, and the Western Science Center in Hemet, as well as data from published and unpublished paleontological literature (Appendix G).

5.6.6 ENVIRONMENTAL IMPACTS

IMPACT PALEONTOLOGICAL-1: THE PROJECT WOULD NOT DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE, SITE, OR UNIQUE GEOLOGIC FEATURE.

Less than Significant with Mitigation. The Project proposes the construction of two warehouses, each totaling 1,500,856 SF, and a stormwater detention basin. The proposed developments would be on 150.63 acres of land, which is currently vacant and undeveloped. In addition, approximately 17.65 acres of offsite roadway improvements and 2.0 acres of utility improvements are proposed. Earthmoving activities related to construction of the proposed Project, including grading and trenching activities, would extend to a depth of at least 4 to 6 feet below existing and proposed building pad subgrade elevations, which would have the potential to disturb previously undisturbed soil and unknown paleontological resources.

A records search of the Project site did not yield any results for previously discovered fossils. In addition, a field survey was conducted on December 22 and 23, 2021, which did not identify any paleontological resources on-site (Appendix G). However, significant fossils have been found within similar sediments in the region. Therefore, although unique paleontological resources are not anticipated to be found onsite, Mitigation Measure PAL-1 is included to require preparation and implementation of a Paleontological Resources Impact Mitigation Plan (PRIMP) and monitoring of ground disturbing activities starting at ground surface by a qualified paleontologist to identify, salvage, and recover any potential paleontological resources, such as significant fossil remains. With implementation of Mitigation Measure PAL-1, potential impacts to paleontological resources from the proposed Project would be less than significant.

5.6.7 CUMULATIVE IMPACTS

The geographic area of potential cumulative impacts related to paleontological resources includes areas that are underlain by similar geologic units from the same time period. A cumulative impact could occur if development projects incrementally result in the loss of the same types of unique paleontological resources. As detailed previously, the City of Palmdale is partially underlain by sedimentary rock units with fossiliferous potential. Thus, the Project site and the cumulative projects listed in Table 5-1, *Cumulative Projects List*, in Section 5.0, *Environmental Impact Analysis*, have the potential to be classified as having a low to high paleontological sensitivity. Therefore, all projects within the City of Palmdale that involve grading or disturbance to site soils (either native or imported from other areas within the region) would have the potential to result in impacts to paleontological resources.

However, with incorporation of Mitigation Measure PAL-1 that includes paleontological monitoring and implementation of a PRIMP to preserve the quality and integrity of any identified resources, the potential for the proposed Project to result in cumulatively considerable impacts to paleontological resources would be reduced to a less than significant level. Preservation of paleontological resources is required of all projects within the City, per Policy CON-8 of the City of Palmdale General Plan. Therefore, the potential impacts from the proposed Project would be less than cumulatively considerable with implementation of Mitigation Measure PAL-1.

5.6.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Public Resources Code (PRC) Section 5097.5.

Plans, Programs, or Policies (PPPs)

None.

5.6.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, the following impacts would be **potentially significant**:

Impact Paleontological-1: Project implementation could uncover subsurface paleontological resources.

5.6.10 MITIGATION MEASURES

MM PAL-1: Paleontological Monitoring. Prior to the issuance of grading permits, the Project Applicant shall retain a qualified paleontologist approved by the City to create and implement a Project-specific plan for monitoring site grading/earthmoving activities (Project paleontologist). The Project paleontologist retained shall review the approved development plan and grading plan and conduct any pre-construction work necessary to render appropriate monitoring and mitigation requirements as appropriate. These requirements shall be documented by the project paleontologist in a Paleontological Resources Mitigation and Monitoring Plan (PRMMP). The PRMMP shall describe the monitoring levels required during excavations, and the location of areas deemed to have a high paleontological resource potential. This PRMMP shall be submitted to the City for approval prior to issuance of a grading permit. Requirements to be included in the PRMMP are as follows:

1. Worker's Environmental Awareness Program. Prior to the start of the proposed Project activities, the PRMMP shall require that all field personnel shall receive a worker's environmental awareness training on paleontological resources. The training shall provide a description of the laws and ordinances protecting fossil resources, the types of fossil resources that may be encountered in the Project area, the role of the Project paleontologist, outline steps to follow in the event that a fossil discovery is made and provide contact information for the Project paleontologist. The training shall be developed by the Project paleontologist and can be delivered concurrent with other training including cultural, biological, safety, etc.
2. Paleontological Mitigation Monitoring. The PRMMP shall describe the monitoring levels required during excavations, and the location of areas deemed to have a high paleontological resource potential. Monitoring shall entail the visual inspection of excavated or graded areas and trench sidewalls. If the Project paleontologist determines full-time monitoring is no longer warranted, based on the geologic conditions at depth, he/she/they may recommend that monitoring be reduced or cease entirely.
3. Fossil Discoveries. If a paleontological resource is discovered, the Project paleontologist shall have the authority to temporarily divert the construction equipment around the find until it is assessed for scientific significance and, if appropriate, collected. If the resource is determined to be of scientific significance, the Project paleontologist shall complete the following:

- *Salvage of Fossils.* If fossils are discovered, all work in the immediate vicinity shall be halted to allow the Project paleontologist to evaluate the discovery and determine if the fossil may be considered significant. If the fossils are determined to be potentially significant, the Project paleontologist shall recover them following standard field procedures for collecting paleontological as outlined in the PRMMP prepared for the Project. The Project paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner.
 - *Fossil Preparation and Curation.* The PRMMP shall identify the museum that has agreed to accept fossils that may be discovered during Project-related excavations. Upon completion of fieldwork, all significant fossils collected shall be prepared in a properly equipped laboratory to a point ready for curation. Preparation may include the removal of excess matrix from fossil materials and stabilizing or repairing specimens. During preparation and inventory, the fossil specimens shall be identified to the lowest taxonomic level practical prior to curation at an accredited museum. The fossil specimens shall be delivered to the accredited museum or repository no later than 90 days after all fieldwork is completed. The cost of curation shall be assessed by the repository and shall be the responsibility of the Project Applicant.
4. Final Paleontological Mitigation Report. Upon completion of ground-disturbing activities (and curation of fossils if necessary), the Project paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

5.6.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with existing regulatory programs and implementation of Mitigation Measure PAL-1 would reduce potential impacts associated with unique paleontological resource impacts to a level that is less than significant. Therefore, no significant and unavoidable adverse impacts related to paleontological resources would occur.

5.6.12 REFERENCES

Brian F. Smith and Associates. (2022). *Paleontological Assessment for the Avenue M Project.* (**Appendix G**)

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City of Palmdale. (2022). *City of Palmdale 2045 General Plan Update Draft Environmental Impact Report.* (State Clearinghouse Number 2021060494). Retrieved January 2024 from <https://www.cityofpalmdaleca.gov/DocumentCenter/View/11872/Palmdale-General-Plan-Public-Draft-Environmental-Impact-Report-PDF>

California Geological Survey (CGS). (2002). *California geomorphic Provinces.* Retrieved January 2024 from <https://www.conservation.ca.gov/cgs/documents/publications/cgs-notes/CGS-Note-36.pdf>

5.7 Greenhouse Gas Emissions

5.7.1 INTRODUCTION

This section of the Draft EIR evaluates greenhouse gas (GHG) emissions associated with the proposed Project and its contribution to global climate change. Specifically, this section evaluates the extent to which GHG emissions from the Project contribute to elevated levels of GHGs in the Earth's atmosphere and consequently contributes to climate change. This section also addresses the Project's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing the emissions of GHGs. This analysis is based on the *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* prepared for the Project that is included as Appendix B.

5.7.2 REGULATORY SETTING

5.7.2.1 State Regulations

California Assembly Bill 1493– Pavley

In 2002, the California Legislature adopted Assembly Bill (AB) 1493 requiring the adoption of regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the California Air Resources Board (CARB) approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year (Pavley Regulations). In September 2009, CARB adopted amendments to the Pavley Regulations to reduce GHG from 2009 to 2016. CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

California Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was signed by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes the following statewide emission reduction targets through the year 2050:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill 1279

AB 1279 requires the State to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative greenhouse gas emissions thereafter. The bill also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels and directs CARB to work with relevant State agencies to achieve these goals.

California Assembly Bill 32 (AB 32), Global Warming Solutions Act of 2006 (Chapter 488, Statutes of 2006)

In 2006, the Legislature passed the California Global Warming Solutions Act of 2006 (AB 32), which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required CARB to develop a Scoping Plan that describes the approach California will take to reduce GHGs to achieve the

goal of reducing emissions to 1990 levels by 2020. The Scoping Plan was first approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been three updates to the Scoping Plan. Each of the Scoping Plans have included a suite of policies to help the State achieve its GHG targets, in large part leveraging existing programs whose primary goal is to reduce harmful air pollution. The 2017 Scoping Plan identifies how the State can reach the 2030 climate target to reduce GHG emissions by 40 percent from 1990 levels, and substantially advance toward the 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions because local governments have the primary authority to plan, zone, approve, and permit development to accommodate population growth and the changing needs of their jurisdictions. The Scoping Plan also relies on the requirements of Senate Bill 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track to achieve the 2020 GHG reduction goal. In 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update would reflect the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. In 2014, CARB released the First Update to the Scoping Plan, which builds upon the Initial Scoping Plan with new strategies and recommendations. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. This update defines CARB's climate change priorities for the next five years and sets the groundwork to reach long-term goals set forth in Executive Order S-3-05. The update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals in the original 2008 Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use.

On December 15, 2022, CARB adopted the 2022 Scoping Plan. The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the State to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, CARB direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB advocates for compliance with a local GHG reduction strategy (Climate Action Plan, or CAP) consistent with CEQA Guidelines Section 15183.5.

Senate Bill 375 (Chapter 728, Statutes of 2008)

In August 2008, the Legislature passed, and on September 30, 2008, Governor Schwarzenegger signed, Senate Bill (SB) 375, which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375

provides incentives for streamlining CEQA requirements by substantially reducing the requirements for “transit priority projects,” as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40 percent below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all State agencies with jurisdiction over sources of GHG emissions are required to continue to develop and implement emissions reduction programs to reach the State’s 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor’s Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

Senate Bill 32 (Chapter 249, Statutes of 2016)

SB 32 was signed on September 8, 2016, by Governor Jerry Brown. SB 32 requires the State to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal of 1990 levels by 2020 and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. A related bill that was also approved in 2016, AB 197 (Chapter 250, Statutes of 2016) creates a legislative committee to oversee regulators to ensure that CARB is not only responsive to the Governor, but also the Legislature.

Assembly Bill 398 – Extension of Cap-and-Trade Program to 2030 (Chapter 617, Statutes of 2017)

AB 398 was signed by Governor Brown on July 25, 2017, and became effective immediately as urgency legislation. AB 398, among other things, extended the cap-and-trade program through 2030.

Senate Bill 97 (Chapter 185, Statutes of 2007)

SB 97 (Health and Safety Code Section 21083.5) was adopted in 2007 and required the Office of Planning and Research to prepare amendments to the CEQA Guidelines for the mitigation of GHG impacts. The amendments became effective on March 18, 2010, and provided initial guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents.

CEQA Guidelines Section 15064.4, was further amended in 2018 to assist agencies in determining the significance of GHG emissions. This Section gives discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. CEQA does not provide guidance to determine whether the project’s estimated GHG emissions are significant or cumulatively considerable.

CEQA Guidelines Sections 15126.4 and 15130 address mitigation measures and cumulative impacts, respectively. GHG mitigation measures are referenced in general terms, and no specific measures are identified. However, the 2018 amendments to Section 15126.4 provide that compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards. Additionally, Section 15130 simply directs

agencies to analyze GHG emissions in an EIR when a project's incremental contribution of emissions may be cumulatively considerable; however, it does not answer the question of when emissions are cumulatively considerable.

Section 15183.5 permits programmatic GHG analysis and later project-specific tiering, as well as the preparation of Greenhouse Gas Reduction Plans. Compliance with such plans can support a determination that a project's cumulative effect is not cumulatively considerable, according to Section 15183.5(b).

Title 24 Energy Efficiency Standards and California Green Building Standards (CALGreen)

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code (CALGreen) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. CALGreen is updated on a regular basis.

The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The 2022 CALGreen standards that reduce GHG emissions and are applicable to the proposed Project include, but are not limited to, the following:

- Short-term bicycle parking. If the new project or an additional alteration is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, readily visible to passers-by, for 5% of new visitor motorized vehicle parking spaces being added, with a minimum of one two-bike capacity rack (5.106.4.1.1).
- Long-term bicycle parking. For new buildings with tenant spaces that have 10 or more tenant-occupants, provide secure bicycle parking for 5% of the tenant-occupant vehicular parking spaces with a minimum of one bicycle parking facility (5.106.4.1.2).
- Designated parking for clean air vehicles. In new projects or additions to alterations that add 10 or more vehicular parking spaces, provide designated parking for any combination of low-emitting, fuel-efficient and carpool/van pool vehicles as shown in Table 5.106.5.2 (5.106.5.2).
- EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided for is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.
- Outdoor light pollution reduction. Outdoor lighting systems shall be designed to meet the backlight, uplight, and glare ratings per Table 5.106.8 (5.106.8).
- Construction waste management. Recycle and/or salvage for reuse a minimum of 65% of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.405.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent (5.408.1).
- Excavated soil and land clearing debris. 100% of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reuse or recycled. For a phased project, such material may be stockpiled on site until the storage site is developed (5.408.3).
- Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive (5.410.1).
- Water conserving plumbing fixtures and fittings. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) shall comply with the following:

- Water Closets. The effective flush volume of all water closets shall not exceed 1.28 gallons per flush (5.303.3.1)
- Urinals. The effective flush volume of wall-mounted urinals shall not exceed 0.125 gallons per flush (5.303.3.2.1). The effective flush volume of floor-mounted or other urinals shall not exceed 0.5 gallons per flush (5.303.3.2.2).
- Showerheads. Single showerheads shall have a minimum flow rate of not more than 1.8 gallons per minute and 80 psi (5.303.3.3.1). When a shower is served by more than one showerhead, the combine flow rate of all showerheads and/or other shower outlets controlled by a single valve shall not exceed 1.8 gallons per minute at 80 psi (5.303.3.3.2).
- Faucets and fountains. Nonresidential lavatory faucets shall have a maximum flow rate of not more than 0.5 gallons per minute at 60 psi (5.303.3.4.1). Kitchen faucets shall have a maximum flow rate of not more than 1.8 gallons per minute of 60 psi (5.303.3.4.2). Wash fountains shall have a maximum flow rate of not more than 1.8 gallons per minute (5.303.3.4.3). Metering faucets shall not deliver more than 0.20 gallons per cycle (5.303.3.4.4). Metering faucets for wash fountains shall have a maximum flow rate not more than 0.20 gallons per cycle (5.303.3.4.5).
- Outdoor potable water uses in landscaped areas. Nonresidential developments shall comply with a local water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWEL0), whichever is more stringent (5.304.1).
- Water meters. Separate submeters or metering devices shall be installed for new buildings or additions in excess of 50,000 SF or for excess consumption where any tenant within a new building or within an addition that is project to consume more than 1,000 gallons per day (GPD) (5.303.1.1 and 5.303.1.2).
- Outdoor water uses in rehabilitated landscape projects equal or greater than 2,500 SF. Rehabilitated landscape projects with an aggregate landscape area equal to or greater than 2,500 SF requiring a building or landscape permit (5.304.3).
- Commissioning. For new buildings 10,000 SF and over, building commissioning shall be included in the design and construction processes of the building project to verify that the building systems and components meet the owner's or owner representative's project requirements (5.410.2).

5.7.2.2 Local and Regional Regulations

Antelope Valley Air Quality Management District (AVAQMD)

The AVAQMD has adopted GHG emissions thresholds in its CEQA Guidelines but has not adopted a comprehensive strategy for reducing GHG emissions. The AVAQMD has established thresholds of significance of GHG emissions which are applicable to both construction and operations regardless of whether they are stationary or mobile sources. The AVAQMD threshold is 100,000 tons of carbon dioxide equivalent (CO₂e) per year and 548,000 pounds of CO₂e per day.

Southern California Association of Governments (SCAG)

On September 3, 2020, SCAG adopted Connect SoCal, the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In general, the RTP/SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. For the SCAG region, CARB has set GHG reduction targets at 8 percent below 2005 per capita emissions levels by 2020, and 19 percent below 2005 per capita emissions levels by 2035. The RTP/SCS lays out a strategy for the region to meet these targets. Overall, the RTP/SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable

corridors and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles. However, the RTP/SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the RTP/SCS; SCAG is required to consider local land use controls when drafting the RTP/SCS.

City of Palmdale General Plan – Climate Action Plan

The City of Palmdale has embedded the City's Climate Action Plan (CAP) into the Sustainability, Climate Action, and Resilience Element of its General Plan. The City's CAP will serve as a guide for the community's response to challenges posed by climate change and will build on the City's ongoing efforts to mitigate and adapt to the impact of climate change. In addition, the CAP addresses issues regarding water quality and supply, waste management, ecosystem stewardship, environmental literacy, equitable access to open spaces, and supporting the health, well-being, and spirit of the community. The following policies from the CAP are applicable to the proposed project:

- **SCR 3.1: Energy Efficient New Construction.** Integrate CALGreen Tier 1 and Tier 2 green building and energy efficiency standards into new construction and major remodels.
- **SCR 3.2: All Electric Reach Code.** Consider adopting a local reach code to encourage new buildings to be all-electric.
- **SCR 3.3: Solar and Storage.** Require installation of photovoltaic panels and battery storage on all residential new construction and nonresidential new construction over 5,000 sq. ft.
- **SCR 3.4: Benchmarking Energy and Water Use.** Register municipal buildings with Energy Star Portfolio Manager and report energy and water use (AB 802).
- **SCR 4.1: Bike Facilities.** Promote bicycle use with new private development projects through requirements for bicycle parking, lockers and showers, bike share facilities, and when feasible, connections to City bike lanes.
- **SCR 4.3: Public EV Chargers.** Install EV chargers at suitable public facilities, including any parking structures, the future multi-modal High Speed Rail station, and community parks.
- **SCR 4.4: EV Reach Code.** Adopt EV requirements beyond CALGreen in both number of chargers and charger capacity.
- **SCR 4.6: Clean Fuels.** Require use of clean fuels for City construction and maintenance vehicles and lawn/ garden equipment.
- **SCR 6.2: Water Efficiency Standards.** Establish water efficiency standards that are more stringent than CALGreen and model water efficient landscape ordinance (MWEL0).
- **SCR 6.3: Low Water Use Plant List.** Implement the City's landscape plant list and use of low-water plants in new or renovated landscaped areas.
- **SCR 6.4: Rainwater Capture.** Encourage rainwater capture and use of cisterns for outdoor watering purposes.
- **SCR 7.1: Tree Planting in Public Spaces.** Plant additional trees on streets, parks, and other public spaces to sequester carbon, provide shade, contribute to stormwater management, provide habitat, and enhance community character.

5.7.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are contributing to global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts

attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential, and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO₂e). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG, with 23,900 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO₂e. Large emission sources are reported in million metric tons (MMT) of CO₂e. The principal GHGs are described below, along with their global warming potential.

Carbon dioxide: Carbon dioxide (CO₂) is an odorless, colorless, natural GHG. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.

Methane: Methane (CH₄) is a flammable gas and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.

Nitrous oxide: Nitrous oxide (N₂O) (laughing gas) is a colorless GHG that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.

Sulfur hexafluoride: Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, and nontoxic nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,900. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.

Perfluorocarbons: Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.

Hydrofluorocarbons: Hydrofluorocarbons (HFCs) are a group of GHGs containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from 100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects of global warming in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years. Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects:

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and

- More intense precipitation events.

There are also many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

According to *California Greenhouse Gas Emissions for 2000 to 2019 Trends of Emissions and Other Indicators*, prepared by CARB, July 28, 2021, the State of California created 418.2 million metric tons of carbon dioxide equivalent (MMTCO_{2e}) in 2019. The 2019 emissions were 7.2 MMTCO_{2e} lower than 2018 levels and almost 13 MMTCO_{2e} below the State adopted year 2020 GHG limit of 431 MMTCO_{2e}. The breakdown of California GHG emissions by sector consists of 39.7 percent from transportation; 21.1 percent from industrial; 14.1 percent from electricity generation; 7.6 percent from agriculture; 10.5 percent from residential and commercial buildings; 4.9 percent from high global warming potential sources; and 2.1 percent from waste.

5.7.3.1 Existing Project Site Conditions

The Project site consists of approximately 150.18 acres of land that is currently vacant and undeveloped with an additional 17.65 acres of offsite improvements for roadway improvements and utility infrastructure installation and connections. The Project site does not currently generate GHG emissions. However, developed land uses throughout the City generate GHG emissions from natural gas used for heating and hot water, electricity usage, related vehicle trips, use of landscaping equipment, use of consumer cleaning products, water demand, wastewater generation, and solid waste generation.

The City of Palmdale's most recent GHG inventory for calendar year 2017 estimates total community emissions of 1,042,284 MT CO_{2e}. Table 5.7-1 summarizes the total annual community GHG emissions from 2005–2017 by sector and subsector. The transportation related emissions are the largest contributor to GHG emissions in the community, accounting for approximately 59 percent. The second largest contributors are energy emissions, with residential energy emissions accounting for approximately 19 percent and nonresidential energy emissions accounting for approximately 16 percent. The remaining 6 percent of emissions are generated by solid waste, off-road equipment, water and wastewater, and industrial sources.

Table 5.7-1: Total Annual Community Emissions

Sector	Subsector	2005 (MT CO ₂)	2017 (MT CO ₂)
Residential Energy	Residential Electricity	98,080	90,470
	Residential Natural Gas	114,620	107,180
Nonresidential Energy	Nonresidential Electricity	142,570	119,700
	Nonresidential Natural Gas	77,510	42,310
Transportation	On-Road Transportation	379,810	615,601
Solid Waste	Landfill Waste	44,050	30,490
Off-Road	Off-Road Equipment	31,300	8,634
Water	Water and Wastewater	46,745	27,900

Sector	Subsector	2005 (MT CO ₂)	2017 (MT CO ₂)
Total Emissions		934,415	1,042,284

Source: Appendix B

5.7.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- Greenhouse Gas Emissions-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- Greenhouse Gas Emissions-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

CEQA Guidelines Section 15064.4 provides discretion to the lead agency whether to: (1) use a model of methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. In addition, CEQA does not provide guidance to determine whether the project's estimated GHG emissions are significant, but recommends that lead agencies consider several factors that may be used in the determination of significance of project related GHG emissions, including:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15130(f) describes that the effects of GHG emissions are by their very nature cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Additionally, CEQA Guidelines Section 15064(h)(3) states that a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides requirements to avoid or lessen the cumulative problem.

According to CARB, CEQA allows the significance criteria established by the applicable air quality management or air pollution control district to be used to assess impacts of a project on climate change. The AVAQMD has established thresholds of significance for GHG emissions, applicable to both construction and operations regardless of whether they are stationary or mobile sources. The AVAQMD has established thresholds of significance of GHG emissions which are applicable to both construction and operations regardless of whether they are stationary or mobile sources. The AVAQMD's GHG emissions thresholds are 548,000 pounds per day (lbs/day) CO₂e or 100,000 tons per year CO₂e. However, to be conservative, the City's methodology is to evaluate project's GHG emissions based on the following **more stringent** South Coast Air Quality Management District (SCAQMD) GHG thresholds:

- **Tier 1. Exemptions:** If a project is exempt from CEQA, project level and cumulative GHG emissions are less than significant.
- **Tier 2. Consistency with a Locally Adopted GHG Reduction Plan:** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project level and cumulative GHG emissions are less than significant.

- **Tier 3. Numerical Screening Threshold:** If GHG emissions are less than the numerical screening-level threshold, project-level and cumulative GHG emissions are less than significant. For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD, under Option 1, is proposing a “bright-line” screening-level threshold of 3,000 metric tons (MT) of CO₂e (or MT CO₂e) per year (or MT CO₂e/yr) for all land use types or, under Option 2, the following land use-specific thresholds: 1,400 MT CO₂e commercial projects; 3,500 MT CO₂e for residential projects; or 3,000 MT CO₂e for mixed-use projects. This bright-line threshold is based on a review of the OPR database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the bright-line threshold would have a nominal and therefore less than cumulatively considerable impact on GHG emissions.
- **Tier 4. Performance Standards:** If emissions exceed the numerical screening threshold, a more detailed review of the project’s GHG emissions is warranted. The SCAQMD has proposed an efficiency target for projects that exceed the bright-line threshold. The current recommended approach is per-capita efficiency targets. The SCAQMD does not recommend use of a percentage emissions reduction target. Instead, the SCAQMD proposes a 2020 efficiency target of 4.8 MT CO₂e per year per service population for project-level analyses and 6.6 MT CO₂e per year per service population for plan-level projects (e.g., program-level projects such as General Plans).

For the purpose of this analysis, the proposed Project is compared to the Tier 3 numerical screening threshold of 3,000 MT CO₂e/yr for all land use types, and the Tier 4 performance standards. The Project is also evaluated for compliance with the Scoping Plan and SCAG’s RTP/SCS.

5.7.5 METHODOLOGY

The California Emissions Estimator Model (CalEEMod) v2022.1.1.12 has been used to determine construction and operational GHG emissions for the proposed Project, based on the development assumptions outlined in Section 3, *Project Description*.

The purpose of this model is to calculate construction-source and operational-source GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from measures incorporated into the Project to reduce or minimize GHG emissions. For construction phase Project emissions, GHGs are quantified per both AVAQMD and SCAQMD methodology. The proposed project will be compared to the GHG threshold of 3,000 MT CO₂e/yr. The SCAQMD then requires the construction GHG emissions to be amortized over the life of the project, defined by the SCAQMD as 30 years, added to the operational emissions, and compared to the applicable interim GHG significance threshold tier.

In addition, CEQA requires the lead agency to consider the extent to which the Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Therefore, this section addresses whether the Project complies with various State, regional, and City programs and measures designed to reduce GHG emissions.

5.7.6 ENVIRONMENTAL IMPACTS

IMPACT GREENHOUSE GAS EMISSIONS-1: THE PROJECT WOULD GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT.

Significant and Unavoidable Impact.

Construction

As described in Section 3, *Project Description*, construction of the proposed Project is anticipated to occur over approximately 11 months. The construction-related activities involve the following: site preparation, excavation, grading, paving, construction of structures and infrastructure, and architectural coatings. These construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips.

As discussed above, neither the AVAQMD nor SCAQMD have an adopted threshold of significance for construction related GHG emissions but have recommended methodologies and recommended thresholds. Lead agencies are required to quantify and disclose GHG emissions that would occur during construction. Total estimated construction related GHG emissions from construction of the proposed Project were amortized over 30 years per both AVAQMD and SCAQMD methodology. Using CalEEMod, it is estimated that the Project would generate approximately 3,233 MT CO₂e during construction. When annualized over the 30-year life of the Project, annual emissions would be 107.8 MT CO₂e (modeling results detailed in Appendix B).

Operation

Operation of the proposed Project would generate GHG emissions from vehicle trips, electricity and natural gas consumption, water and wastewater transport (the energy used to pump water), and solid waste generation. GHG emissions from electricity consumed by the proposed Project would be generated off site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. GHG emissions from solid waste disposal are associated with the anaerobic breakdown of material.

As shown in Table 5.7-2, the proposed Project's total unmitigated increase in GHG emissions would be 40,110.6 MTCO₂e annually, which exceeds the 3,000 MTCO₂e screening threshold. Therefore, the following discussion compares the proposed Project to the efficiency-based threshold (Tier 4).

Table 5.7-2: Unmitigated Long-Term Operational Greenhouse Gas Emissions

Emissions Source	Operational Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	CO ₂ e	Percentage of Total
Mobile Sources – Vehicle and Light Duty Trucks	15,794.0	0.5	0.8	16,089.0	40%
Mobile Sources – Heavy Duty Trucks	13,044.0	<0.1	2.1	13,671.0	34%
Area Sources	43.8	<0.1	<0.1	44.0	<1%
Energy Sources	7,288.8	0.5	<0.1	7,312.9	18%
Water Sources	1,200.0	22.6	0.5	1,927.7	5%
Waste Sources	260.0	26.0	0.0	909.0	2%
Stationary Sources	49.0	<0.1	<0.1	49.2	<1%
Total Project Operational Emissions				40,002.8	100%
Amortized Construction Emissions				107.8	-
Total Annual Emissions				40,110.6	-
Threshold				3,000	-
Exceed?				Yes	-

CH₄ = methane, CO₂ = carbon dioxide, N₂O = nitrous oxide, CO₂e = carbon dioxide equivalent, MT/yr = metric tons per year, SCAQMD = South Coast Air Quality Management District
Source: Appendix B.

The proposed Project would construct two warehouse buildings with a combined total building square footage of 3,001,712 square feet that would accommodate approximately 1,977 employees. The proposed Project would not provide residential units and therefore would not accommodate new residents; therefore, the total service population would be 2,512 people. As shown in Table 5.7-3, the proposed Project's total unmitigated increase in GHG emissions of 15.9 MT CO₂e/yr per service population would exceed the SCAQMD's Tier 4 threshold of 4.8 MT CO₂e/yr per service population. As such, mitigation measures are included below in Section 5.7.10, *Mitigation Measures*.

Table 5.7-3: Summary of Total Project Generated Increase in Greenhouse Gas Emissions Per Capita

Total Project Emissions	40,110.6
Service Population	2,512
GHG per Service Population	15.9
CSCAQMD Significance Threshold	4.8
Threshold Exceeded?	Yes

Source: Appendix B.

The *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report* (Appendix B) describes that a majority of the GHG emissions (81 percent, unmitigated) generated from the proposed Project are associated with non-construction related mobile sources, such as vehicle and truck trips. Mitigation Measure AQ-4, *Energy Efficient Vendor Trucks*, Mitigation Measure AQ-7, *Electric Vehicle Charging Stations*, and Mitigation Measure AQ-10, *Transportation Management Association* would reduce GHG emissions from commuting. Mitigation Measure AQ-11, *Energy Efficient Appliances*, would reduce operational GHG emissions.

PPP GHG-1 requires the Project to adhere to 2022 California Energy Code Section 110.10 that requires that the roof be, at a minimum, 15 percent solar-ready. PPP GHG-2 require the Project to adhere to 2022 California Energy Code Section 140.10 standards that require installation of solar photovoltaic systems for warehouses based on square footage of air conditioned space. Mitigation Measure GHG-3 is included to require that the building be energy efficient exceeding Title 24 standard. Consistency with CALGreen requirements would be verified by the City during the permitting process.¹

Additionally, Mitigation Measure GHG-1 is included to require the proposed Project to include recycling bins for collection truck pick-ups. Mitigation Measure GHG-2 is included to require drought tolerant landscaping throughout the Project site and recycled water usage for irrigation.

Table 5.7-4, *Mitigated Long-Term Operational Greenhouse Gas Emissions*, shows that implementation of these mitigation measures would reduce GHG emissions to approximately 39,911.4 MTCO₂e. The majority, or 40 percent, of the proposed Project's GHG emissions are generated by mobile emissions. Further, mitigation to reduce the proposed Project's mobile GHG emissions is not feasible due to the limited ability of the Project Applicant and City of Palmdale to reduce emissions from mobile sources. Neither the Project Applicant nor the Lead Agency (City of Palmdale) can substantively or materially affect reductions in proposed Project mobile-source emissions. Therefore, GHG emissions from the proposed Project would be significant and unavoidable.

¹ The installation of solar photovoltaic panels was not quantified in the CalEEMod Model for this Project. The calculations in Table 5.3-7, *Project Operational Emissions Without Mitigation*, in Section 5.3, *Air Quality*, of this Draft EIR, are conservative.

Table 5.7-4: Mitigated Long-Term Operational Greenhouse Gas Emissions

Emissions Source	Operational Emissions (MT/yr)				
	CO ₂	CH ₄	N ₂ O	CO ₂ e	Percentage of Total
Mobile Sources – Vehicle and Light Duty Trucks	15,794.0	0.5	0.8	16,089.0	40
Mobile Sources – Heavy Duty Trucks	13,044.0	<0.1	2.1	13,671.0	34
Area Sources	43.8	<0.1	<0.1	44.0	<1
Energy Sources	7,286.6	0.5	<0.1	7,310.7	18
Water Sources	1,074.3	20.4	0.5	1,731.0	4
Waste Sources	260.0	26.0	0.0	909.0	2
Stationary Sources	49.0	<0.1	<0.1	49.2	<1
Total Project Operational Emissions				39,803.6	100
Amortized Construction Emissions				107.8	-
Total Annual Emissions				39,911.4	-
Threshold				3,000	-
Exceed?				Yes	-

CH₄ = methane, CO₂ = carbon dioxide, N₂O = nitrous oxide, CO₂e = carbon dioxide equivalent, MT/yr = metric tons per year, SCAQMD = South Coast Air Quality Management District

Source: Appendix B.

IMPACT GREENHOUSE GAS EMISSIONS-2: THE PROJECT WOULD NOT CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES.

Less than Significant.

The Project would provide contemporary, energy-efficient/energy-conserving design features and operational procedures. The proposed Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it does not interfere with implementation of the GHG reduction measures listed in CARB's Updated Scoping Plan (2022), as demonstrated in Table 5.7-5. CARB's 2022 Scoping Plan reflects the 2045 target of an 85 percent reduction below 1990 levels, set by Executive Order B-55-18, and codified by AB 1279. In addition, the Project would be consistent with the following State policies that were adopted for the purpose of reducing GHG emissions.

- **Pavley Emissions Standard and Low Carbon Fuel Standard:** Pavley emissions standards (AB 1493) apply to all new passenger vehicles starting with model year 2009, and the Low Carbon Fuel Standard became effective in 2010 and regulates the transportation fuel used. The second phase of implementation of the Pavley regulations per AB 1493 is referred to as the Advanced Clean Car program, which combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for model years 2017 through 2025. The regulation will reduce GHGs from new cars by 34 percent from 2016 levels by 2025. The proposed Project is consistent with these requirements as they apply to all new passenger vehicles and vehicle fuel purchased in California.
- **Medium/Heavy-Duty Vehicle Regulations:** Medium/heavy-duty vehicle regulations are implemented by the State to reduce emissions from trucks. Since the proposed Project has a large truck component, these regulations would aid in reducing GHG emissions from the Project. The proposed Project is consistent with this measure and its implementation as medium and heavy-duty vehicles associated with

construction and operation of the Project would be required to comply with the requirements of this regulation.

- **Tractor-Trailer Greenhouse Gas Regulation:** Tractor-trailers subject to this State regulation are primarily 53-foot or longer box-type trailers and are required to either use EPA SmartWay certified tractors and trailers or retrofit their existing fleet with SmartWay verified technologies. The proposed Project is consistent with this regulation, as it applies to specific trucks that are used throughout the State.
- **Energy Efficiency – Title 24/CALGreen:** The proposed Project is subject to the CALGreen Code Title 24 building energy efficiency requirements that offer builders better windows, insulation, lighting, ventilation systems, and other features as listed in Section 5.7.2, *Regulatory Setting*, that reduce energy consumption. Compliance with the CALGreen standards would be verified by the City during the building permitting process.
- **Renewable Portfolio Standard:** As a customer of Southern California Edison (SCE), the proposed Project would purchase from an increasing supply of renewable energy sources and more efficient baseload generations which reduce GHG emissions and would be consistent with this requirement.
- **Million Solar Roofs Program:** The proposed Project is consistent with this scoping plan measure as the Project structure would include a 15 percent solar-ready roof.
- **Water Efficiency and Waste Diversion:** Development and operation of the proposed Project would be implemented in consistency with water conservation requirements (as included in Title 24) and solid waste recycling and landfill diversion requirements of the State.

Table 5.7-5: Project Consistency with the CARB 2022 Scoping Plan

Action	Consistency
GHG Emissions Reductions Relative to the SB 32 Target	
40% below 1990 levels by 2030.	Consistent. The Project would comply with the 2022 Title 24, Part 6 building energy requirements along with other local and State initiatives that aim to achieve the 40% below 1990 levels by 2030 goal. Mitigation Measure GHG-3 requires that, prior to issuance of building permits, the Project applicant provides documentation to the City of Palmdale demonstrating that the project is designed to achieve energy efficient buildings exceeding Title 24 standards.
Smart Growth/Vehicle Miles Traveled VMT	
VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , of this Draft EIR, the proposed Project would result in significant and unavoidable VMT impacts per the LA County TIA Guidelines. However, although the Project would have significant and unavoidable impact per the LA County TIA Guidelines, the Project would take VMT reduction measures. The Project would include Mitigation Measure T-1, which requires implementation of a commute trip reduction marketing program, and Mitigation Measure T-2, which requires a mandatory rideshare program. The proposed Project would introduce an employment generating use in a housing rich community, as discussed in Section 5.12, <i>Population and Housing</i> . The Project's mitigation measures would support policies aimed at reducing VMT, and therefore, would be consistent.

Action	Consistency
Light-Duty Vehicle (LDV) Zero-Emission Vehicles (ZEVs)	
100% of LDV sales are ZEV by 2035.	Consistent. The proposed Project would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes ZEV designated parking spaces and charging stations.
Truck ZEVs	
100% of medium-duty (MDV)/HDC sales are ZEV by 2040 (AB 74 University of California Institute of Transportation Studies [ITS] report).	Consistent. The proposed Project would be designed and constructed in accordance with the 2022 Title 24 Part 6 and Part 11 requirements, which includes installation of conduit for future Truck ZEV charging stations at designated loading docks. Therefore, the project would support this goal.
Aviation	
20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	Not Applicable. The proposed Project would not utilize aviation fuel.
Ocean-going Vessels (OGV)	
2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	Not Applicable. The proposed Project would not utilize any OGVs.
Port Operations	
100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Not Applicable. The proposed Project would not impact any operations at any ports.
Freight and Passenger Rail	
100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	Not Applicable. The proposed Project would not involve any freight or passenger rail operations.
Oil and Gas Extraction	
Reduce oil and gas extraction operations in line with petroleum demand by 2045.	Not Applicable. The proposed Project would not involve any oil or gas extraction.
Petroleum Refining	
CCS on majority of operations by 2030, beginning in 2028. Production reduced in line with petroleum demand.	Not Applicable. The proposed Project would not involve any petroleum refining.
Electricity Generation	
Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO _{2e}) in 2030 and 30 MMTCO _{2e} in 2035. Retail sales load coverage 20 gigawatts (GW) of offshore wind by 2045. Meet increased demand for electrification without new fossil gas-fired resources.	Consistent. The Project would meet the 2022 California Energy Code requirements for solar photovoltaic systems to be included in warehouse projects, based on square footage of conditions paces. Therefore, the Project would not preclude achievement of this goal.

Action	Consistency
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030.	Consistent. All appliances within the Project would be energy star-rated, consistent with MM AQ-11. As such, the Project would not preclude achievement of this goal.
Existing Residential Buildings	
80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve any existing residential buildings.
Existing Commercial Buildings	
80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	Not Applicable. The proposed Project would not involve any existing commercial buildings.
Food Products	
7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045.	Not Applicable. The proposed Project would not include cold storage, and no perishable food products would be associated with the operation of the proposed warehouse. The Project would not preclude achievement of this goal.
Construction Equipment	
25% of energy demand electrified by 2030 and 75% electrified by 2045.	Consistent. The proposed Project would be required to use construction equipment that are registered by CARB and meet CARB's standards. CARB sets its standards to be in line with the goal of reducing energy demand by 25% in 2030 and 75% electrified in 2045. As such, the Project would be consistent with CARB Scoping Plan because it will be required to use CARB-compliant equipment.
Chemicals and Allied Products; Pulp and Paper	
Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045. Electrify 100% of other energy demand by 2045.	Consistent. The proposed Project would not preclude achievement of this state goal. The Project proposes two speculative warehouse buildings with 10 percent manufacturing and no cold storage. The future tenant would be required to be consistent with this goal and implement this goal by 2045, if applicable to the tenant uses.
Stone, Clay, Glass, and Cement	
Carbon Capture and Sequestration (CCS) on 40% of operations by 2035 and on all facilities by 2045. Process emissions reduced through alternative materials and CCS.	Consistent. The proposed Project would not preclude achievement of this state goal. The Project proposes two speculative warehouse buildings with 10 percent manufacturing. The future tenant would be required to be consistent with this goal and implement the use of CCS by 2045, if applicable to the tenant uses.
Other Industrial Manufacturing	
0% energy demand electrified by 2030 and 50% by 2045.	Consistent. As stated above, the Project would meet the 2022 California Energy Code requirements for solar photovoltaic systems to be included in warehouse

Action	Consistency
	projects, based on square footage of conditions spaces. Furthermore, the buildings would be 15 percent solar-ready, in accordance with 2022 California Energy Code. Therefore, the Project would not preclude achievement of this goal
Combined Heat and Power	
Facilities retire by 2040.	Not Applicable. The proposed Project would not involve any existing combined heat and power facilities.
Agriculture Energy Use	
25% energy demand electrified by 2030 and 75% by 2045.	Not Applicable. The proposed Project would not involve any agricultural uses.
Low Carbon Fuels for Transportation	
Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	Not Applicable. The proposed Project would not involve any production of biofuels.
Low Carbon Fuels for Buildings and Industry	
In 2030s, biomethane 135 blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040. In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	Not Applicable. The proposed Project would not involve any production of fuels for buildings and industry.
Non-combustion Methane Emissions	
Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies. Moderate adoption of enteric strategies by 2030. Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line with reduced fossil gas demand	Not Applicable. The proposed Project would not involve any landfill and/or dairy uses.
High GWP Potential Emissions	
Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions.	Consistent. The proposed Project would not include cold storage. The proposed Project would comply with the Title 24, Part 6 building energy requirements, including use of low GWP refrigerants, which would be verified through the City's existing development permitting process.

Source: California's 2022 Climate Change Scoping Plan Table 2-1: Actions for the Scoping Plan Scenario: AB 32 GHG Inventory Sectors

Further, the proposed Project is consistent with AB 32 and SB 32 through implementation of measures that address GHG emissions related to building energy, solid waste management, wastewater, and water conveyance. Thus, the Project would be consistent with the State's requirements for GHG reductions.

General Plan Sustainability, Climate Action, and Resilience Element

The Sustainability, Climate Action, and Resilience Element (Chapter 14) of the City's General Plan serves as the Climate Action Plan (CAP) for the City of Palmdale. The CAP outlines the City's GHG reduction and sustainability strategies. As described in Table 5.7-6, the proposed Project would be consistent with the relevant goals and policies of the City's CAP.

Table 5.7-6: Project Consistency with Palmdale Climate Action Plan

Measure	Description	Project Consistency
SCR-1: Achieve a carbon neutral community by 2045 (EO B-55-18).	<p>SCR-1.1 CAP Maintenance. Maintain and regularly update a Climate Action Plan to reduce GHGs generated within the City.</p> <p>SCR-1.2 GHG Inventory. Conduct community GHG inventories every 3-5 years to track progress toward achieving the City's GHG reduction goal.</p> <p>SCR-1.3 Funding Sources. Seek funding to support implementation of GHG reduction projects for the City, residents, and businesses.</p> <p>SCR-1.4 Community Engagement. Develop and implement comprehensive community engagement including educational outreach, issue-specific awareness campaigns, and technical assistance.</p>	Consistent. The proposed Project would comply with the existing policies and regulations to support achieving a carbon neutrality community by 2045. The Project would include installation of photovoltaic panels and 15 percent solar-ready roof, as required per the 2022 California Energy Code Section 140.10.
SCR-2: Utilize a fossil fuel free energy system (SB 100).	<p>SCR-2.1 Carbon Free Energy. Direct EPIC to provide 75% carbon-free or renewable electricity to residents and businesses by 2030, achieving 100% carbon-free electricity by 2045.</p> <p>SCR-2.2 Community Solar. Explore the development of community solar projects and microgrids.</p> <p>SCR-2.3 Battery Permitting. Establish a streamlined approval process for battery storage systems</p>	Consistent. As stated above, the proposed Project would comply with the existing policies and regulations to support achieving a carbon neutrality community by 2045. The Project would include installation of photovoltaic panels and 15 percent solar-ready roof, as required per the 2022 California Energy Code Section 140.10.
SCR-3: Green and decarbonized buildings for new construction and major renovations.	<p>SCR-3.1 Energy Efficient New Construction. Integrate CALGreen Tier 1 and Tier 2 green building and energy efficiency standards into new construction and major remodels.</p> <p>SCR-3.2 All-Electric Reach Code. Consider adopting a local reach code to encourage new buildings to be all-electric.</p> <p>SCR-3.3 Solar and Storage. Require installation of photovoltaic panels and battery storage on all residential new construction and nonresidential new construction over 5,000 sq. ft.</p> <p>SCR-3.4 Energy Efficient Existing Buildings. Establish an energy and water efficiency upgrade program for existing buildings, focusing resources on the most underserved populations.</p> <p>SCR-3.4 Benchmarking Energy and Water Use. Register municipal buildings with Energy Star Portfolio Manager and report energy and water use (AB 802).</p>	Consistent. The proposed Project would comply with the existing policies and regulations regarding building energy efficiency. The buildings would be constructed to exceed energy efficiency standards per Title 24 Standards, as included in Mitigation Measure GHG-3. Furthermore, the buildings would include installation of photovoltaic panels as required per the 2022 California Energy Code Section 140.10. In addition, the Project would be designed to be energy and water efficient.
Goal SCR-4: Reduced greenhouse gas emissions from transportation	<p>SCR-4.1 Bike Facilities. Promote bicycle use with new private development projects through requirements for bicycle parking, lockers and showers, bike share facilities, and when feasible, connections to City bike lanes.</p> <p>SCR-4.2 Public Transit. Expand the public transit system, increase frequency of service, and provide shade at transit stops.</p>	<p>SCR-4.1: Consistent. The proposed Project would include bicycle parking facilities and EV chargers.</p> <p>SCR-4.2 through SCR-4.6: Not Applicable. This measures are not applicable as the City</p>

Measure	Description	Project Consistency
	<p>SCR-4.3 Public EV Chargers. Install EV chargers at suitable public facilities, including any parking structures, the future multi-modal High Speed Rail station, and community parks.</p> <p>SCR-4.4 EV Reach Code. Adopt EV requirements beyond CALGreen in both number of chargers and charger capacity.</p> <p>SCR-4.5 ZEV Purchasing. When purchasing City vehicles give preference to fuel efficient vehicles, including the use of zero emission vehicles.</p> <p>SCR-4.6 Clean Fuels. Require use of clean fuels for City construction and maintenance vehicles and lawn/ garden equipment.</p> <p>SCR-4.7 Pedestrian and Cyclist Safety. Promote bicycle and pedestrian modes of travel by promoting pedestrian and cyclist safety.</p>	<p>would be responsible for implementing these measures.</p> <p>SCR-4.7: Consistent. The proposed Project includes the sidewalk improvements and installation of 240 bicycle parking spaces for employees to use. In addition, the Project would construct a 12-foot-wide bike trail along East Avenue M/Columbia Way. As such, the Project would promote bicycle and pedestrian modes of travel through installation of sidewalks, bicycle lane, and bicycle parking spaces that promote pedestrian and cyclist safety.</p>
SCR-5. Increased resource capture and reduced waste sent to landfills (SB 1383).	<p>SCR-5.1 Zero Waste Plan. Create a zero-waste plan that institutes cost-effective diversion programs for municipal operations and the community.</p> <p>SCR-5.2 Organic Waste Diversion. Establish programs to comply with State-established requirements for organics and food waste diversion.</p> <p>SCR-5.3 Waste Diversion Education and Assistance. Develop an education and technical assistance program for residents and businesses on composting, recycling, and reuse of materials.</p> <p>SCR-5.4 Nonresidential Collection Efficiency. Continue to review waste franchise agreements to establish rate structures that encourage less frequent nonresidential collection.</p>	<p>Consistent: This measure is not applicable as the City would be responsible for implementing this measure. However, the Project would implement existing solid waste recycling and green waste requirements.</p>
SCR-6. Safe and secure water supply.	<p>SCR-6.1 Recycled Water. Increase municipal reuse of local recycled water. Support the efforts of the Palmdale Water District and the Joint Powers Authority (JPA) Palmdale Recycled Water Authority (PRWA) in its proof of concept and implementation of aquifer augmentation through advanced treatment of recycled water.</p> <p>SCR-6.2 Water Efficiency Standards. Establish water efficiency standards that are more stringent than CALGreen and model water efficient landscape ordinance (MWELO).</p> <p>SCR-6.3 Low-Water Use Plant List. Implement the City's landscape plant list and use of low-water plants in new or renovated landscaped areas.</p> <p>SCR-6.4 Rainwater Capture. Encourage rainwater capture and use of cisterns for outdoor watering purposes.</p> <p>SCR-6.5 Graywater Permitting. Establish a streamlined permitting process for graywater systems.</p>	<p>SCR-6.1, SCR-6.2, SCR-6.4, SCR-6.5. These measures are not applicable as the City would be responsible for implementing these measure. The Project would implement existing water efficiency requirements.</p> <p>SCR-6.3 Consistent. The Project would utilize low-water use plants for landscaping and install efficient irrigation throughout the site.</p>

Measure	Description	Project Consistency
<p>SCR-7. Open spaces designed to provide multiple climate and sustainability functions.</p>	<p>SCR-7.1 Tree Planting in Public Spaces. Plant additional trees on streets, parks, and other public spaces to sequester carbon, provide shade, contribute to stormwater management, provide habitat, and enhance community character.</p> <p>SCR-7.2 Preferred Tree and Plant List. Establish a preferred tree list of species appropriate for the urban forest which are more resilient to drought, heat, and pests. Prioritize native plants and pollinator-friendly plants.</p> <p>SCR-7.3 Tree Planting on Private Property. Adopt a tree preservation ordinance to encourage tree preservation and additional planting on private property as appropriate.</p> <p>SCR-7.4 Green Infrastructure. Integrate green infrastructure stormwater management practices into the design of open spaces and public rights-of-way.</p> <p>SCR-7.5 Cool Pavement. Incorporate cool pavement practices into street maintenance activities to reduce the urban heat island effect.</p>	<p>Consistent: The Project would include 951,135 SF (or 21.84 acres) of ornamental landscaping, including 36-inch and 24-inch box trees, and 15-gallon trees, to screen the proposed buildings, infiltration/detention basin, and parking and loading areas from offsite viewpoints</p>
<p>SCR-8. Proactively advance community resilience.</p>	<p>SCR-8.1 Local Hazard Mitigation Plan. Build on the existing LHMP and acknowledge the LHMP in the General Plan per AB 2140.</p> <p>SCR-8.2 Areas of Physical and Social Vulnerability. Focus investments on areas of high vulnerability, exposure, and sensitivity for both physical infrastructure and social communities.</p> <p>SCR-8.3 Public Safety Power Shutoffs. Work with Southern California Edison (SCE) to minimize the impacts of Public Safety Power Shutoffs.</p> <p>SCR-8.4 Resilience Features. Add resilience features to community facilities to provide basic services during disruptive events or disasters.</p> <p>SCR-8.5 Pre-Disaster Recovery Plan. Create a pre-disaster recovery plan that sets up post-disaster policies and programs indicating which areas will be replanned and when, and that shows where and how rebuilding will occur.</p> <p>SCR-8.6 Disaster Rebuilding and Recovery. Develop policies to ensure that housing units damaged during a natural disaster are repaired or replaced in ways that advance the policies, objectives, and actions of the General Plan.</p> <p>SCR-8.7 Heat and wildfire mitigation. Develop policies and building standards that reduce the urban heat island effect and the risk and damage of wildfire such as:</p> <p>Encourage the use of high-albedo roofs and paving</p> <p>Incorporate more robust temperature and air quality controls in facility retrofits and designs</p>	<p>Not Applicable: This measure is not applicable as the City would be responsible for implementing this measure. The Project would implement existing resiliency requirements.</p>

Measure	Description	Project Consistency
	Provide consolidated public messaging about wildfire preparation, evacuation, and communications avenues in multiple languages Encourage fire-wise landscaping including alternatives to wood fencing Require ember-resistant attic ventilation openings Encourage the installation of air filters to protect against indoor air quality impacts during wildfire smoke exposure events Identify and modify vulnerable infrastructure in high wildfire risk areas, such as replacing wooden utility poles or undergrounding utility lines	
SCR-9. Awareness of Palmdale's environmental past and present.	<p>SCR-9.1 Integration of Sustainability. Integrate environmental and sustainability issues into City decision-making processes, operations, community activities, and criteria in budgeting and prioritization efforts through a "triple bottom line" approach.</p> <p>SCR-9.2 Acknowledge Indigenous History. Acknowledge and celebrate the Indigenous history and tradition of the area now known as Palmdale.</p> <p>SCR-9.3 Raise Awareness about Natural Systems. Provide interpretive displays and other information on natural systems at parks, nature centers, and trailheads.</p>	Not Applicable: This measure is not applicable as the City would be responsible for implementing this measure.

Source: City of Palmdale, 2022

2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The 2020–2045 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2020–2045 RTP/SCS, would reach the regional target of reducing GHG emissions from autos and light-duty trucks by 19 percent by 2035 (compared to 2005 levels).

Under CEQA, a Project has the potential to be regionally significant if it would house more than 1,000 persons, occupy more than 40 acres of land, or encompass more than 650,000 SF of floor. As such, the proposed Project would be considered regionally significant. As discussed in Section 5.12, *Population and Housing*, implementation of the proposed Project would generate approximately 1,977 jobs in Palmdale. According to SCAG's 2020–2045 RTP/SCS, the City's population, households, and employment are forecast to increase by approximately 48,400 residents, 18,000 households, and 9,200 jobs, respectively, between 2016 and 2045 (SCAG, 2020). The additional employees would fall within the 9,200 projected jobs for the City. In addition, as discussed in Section 5.12, *Population and Housing*, the employees that would fulfill these roles are anticipated to come from within the region, as the unemployment rate of the City of Palmdale as of December 2023 was 6.4 percent, City of Lancaster was 6.6 percent and County of Los Angeles was 5 percent (California Employment Development Department, 2023). As such, it is anticipated that the Project's labor demand would not substantially increase population, households, or employment in the City. As such, the project would be consistent with the SCAG's employment forecast for the region. Therefore, the proposed project would not interfere with SCAG's ability to achieve the region's GHG reduction target of 19 percent below 2005 per capita emissions levels by 2035 and would not conflict with the SCAG RTP/SCS targets

since those targets were established and are applicable on a regional level. It is anticipated that implementation of the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS.

Summary

Overall, the proposed Project would not result in a conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. The Project would be implemented in compliance with State energy standards provided in Title 24, in addition to provision of sustainable design features. The Project would not interfere with the State's implementation of AB 1279's target of 85 percent below 1990 levels and carbon neutrality by 2045 because it would be consistent with the CARB 2022 Scoping Plan, which is intended to achieve the reduction targets required by the State. In addition, the proposed Project would be consistent with the relevant City General Plan goal and policies as described in Table 5.7-6, *Project Consistency with Palmdale Climate Action Plan*. Thus, the proposed Project would not result in a conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, and impacts would be less than significant.

5.7.7 CUMULATIVE IMPACTS

GHG emissions impacts are inherently cumulative since no single project can cause a discernible change to climate. Climate change impacts are the result of incremental contributions from natural processes, and past and present human-related activities. Therefore, the area in which a proposed Project in combination with other past, present, or future projects, could contribute to a significant cumulative climate change impact would not be defined by a geographical boundary such as a project site or combination of sites, city, or air basin. GHG emissions have high atmospheric lifetimes and can travel across the globe over a period of 50 to 100 years or more. Even though the emissions of GHGs cannot be defined by a geographic boundary and are effectively part of the global issue of climate change, CEQA places a boundary for the analysis of impacts at the State's borders. Thus, the geographic area for analysis of cumulative GHG emissions impacts is the State of California.

Executive Order S-3-05, Executive Order B-30-15, Executive Order B-55-18, AB 1279, AB 32, and SB 32 recognize that California is a source of substantial amounts of GHG emissions; recognize the significance of the cumulative impact of GHG emissions from sources throughout the state; and set performance standards for reduction of GHGs.

The analysis of GHG emissions impacts required under CEQA and contained in this EIR effectively constitutes an analysis of the Project's contribution to the cumulative impact of GHG emissions. CEQA Guidelines Section 15183.5(b) states that compliance with GHG-related plans can support a determination that a Project's cumulative effect is not cumulatively considerable.

Although the Project would be implemented in compliance with applicable plans for the reduction of GHG emissions, as described in this Section, and is presumed that future projects in the City would similarly be required to comply with the Palmdale CAP and other applicable State and local GHG reduction regulations and policies, the Project would result in a project-specific significant and unavoidable impact. Therefore, contribution of the Project to significant GHG impacts would also be significant and cumulatively considerable.

5.7.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

State

- Clean Car Standards – Pavley AB 1493
- California Executive Order S-3-05
- CARB 2022 Scoping Plan
- AB 32 (Global Warming Solutions Act of 2006)
- SB 375
- California Executive Order B-30-15
- SB 32
- California Green Building Standards Code (Code of Regulations, Title 24 Part 6)

Local

City of Palmdale Climate Action Plan

Plans, Programs, or Policies

PPP GHG-1: 2022 California Energy Code Section 110.10. The Project shall comply with the 2022 [or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 110.10 for Mandatory Requirements for Solar Readiness. Section 110.10 includes requirements that the roof be, at a minimum, 15 percent solar ready.

PPP GHG-2: 2022 California Energy Code Section 140.10. The Project shall comply with the or most recent at time of permitting of the Project (at the time of Construction Drawing Plan Check Submittal)] California Energy Code Section 140.10 for Nonresidential Solar PV. Section 140.10 includes requirements for solar photovoltaic systems for warehouse buildings. The size of the photovoltaic system shall be calculated based on conditioned floor area, as required by Section 140.10. For a building with 20,000 SF of air-conditioned space (office space), the solar photovoltaic system required would be approximately 62.6 Kilowatt system.

5.7.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact Greenhouse Gas Emissions-1 is significant before mitigation as the proposed Project would exceed applicable thresholds of significance. As a result of compliance with existing regulatory requirements, impact Greenhouse Gas Emissions-2 would be less than significant.

The Project would result in a project-specific significant and unavoidable impact. Therefore, the contribution of the Project to significant GHG impacts would also be cumulatively considerable and significant and unavoidable.

5.7.10 MITIGATION MEASURES

MM AQ-4: Energy Efficient Vendor Trucks. As listed previously in Section 5.3, *Air Quality*.

MM AQ-7: Electric Vehicle Charging Stations. As listed previously in Section 5.3, *Air Quality*.

MM AQ-10: Transportation Management Association. As listed previously in Section 5.3, *Air Quality*.

- MM AQ-11: Energy Efficient Appliances.** As listed previously in Section 5.3, *Air Quality*.
- MM GHG-1: Recycling Bins.** The Project plans and specifications shall include external recycling bins at central locations for collection truck pick-up.
- MM GHG-2: Drought Tolerant Landscaping.** The Project plans and specifications shall include a requirement that all landscaping and trees throughout the Project site be drought tolerant low-water and use water with drip irrigation and weather based smart irrigation controllers.
- MM GHG-3: Exceed Energy Efficient Building Requirements.** Prior to the issuance of building permits, the Project applicant or successor in interest shall provide documentation to the City of Palmdale demonstrating that the Project is designed to achieve energy efficient buildings exceeding the 2022 Title 24 standards with the following design criteria:
1. Building envelop insulation of conditioned space within the building shall be R15 or greater for walls and R30 or greater for attics/roofs.
 2. Windows shall have an insulation factor of 0.28 or less Ufactor and 0.22 or less SHGC.
 3. All roofing material shall be CRRC Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance.
 4. All heating/cooling ducting within the buildings shall be insulated with R6 or greater insulation.
 5. All heating and cooling equipment shall be ERR 14/78 percent AFUE, or 7.7 HSPF levels of efficiency or greater.
 6. All water heaters shall be high efficiency electric water heaters with a minimum 0.72 Energy Factor or greater.
 7. Lighting within the building shall be high efficiency LED lighting with a minimum of 40 lumens/watt for 15 watt or less fixtures, 50 lumens/watt for 15–40-watt fixtures, 60 lumens/watt for fixtures greater than 40 watts.

5.7.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts Greenhouse Gas Emissions-1 would be significant and unavoidable after implementation of mitigation measures.

Impact Greenhouse Gas Emissions-2 would remain less than significant.

Cumulative impacts would remain cumulatively considerable and significant and unavoidable.

5.7.12 REFERENCES

- California Employment Development Department. (2023). *Unemployment Rate and Labor Force*. Accessed: <https://labormarketinfo.edd.ca.gov/data/unemployment-and-labor-force.html>
- City of Palmdale. (October 22, 2022). *Envision Palmdale 2045 City of Palmdale General Plan*. Retrieved November 20, 2023, from <https://palmdale2045gp.org/>
- City of Palmdale, Rincon Consultants. (2022, August). *City of Palmdale 2045 General Plan Update Final Environmental Impact Report (SCH# 2021060494)*. Retrieved November 20, 2023. https://static1.squarespace.com/static/5c7dc93065a707492aca3e47/t/631fa8d1f119fa360cd7f0ee/1663019242025/Palmdale+2045+GPU+FEIR_reduce.pdf
- LSA. (2024). *Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report. Palmdale Logistics Industrial Warehouse Project City of Palmdale, California. (Appendix B)*

State of California, Department of Justice. Rob Bonta, Attorney General. (2022). Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf> (accessed November 2023).

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5.8 Hazards and Hazardous Materials

5.8.1 INTRODUCTION

This section considers the nature and range of foreseeable hazardous materials, airport hazards, and physical hazards and impacts that would result from implementation of the Project. It identifies the ways that hazardous materials, airport hazards, and other types of hazards could expose people and the environment to various health and safety risks during construction activities and operation of Project.

This section also describes routine hazardous materials that are likely to be used, handled, or processed within the Project area, and the potential for upset and accident conditions in which hazardous materials could be released. The impact analysis identifies ways in which hazardous materials might be routinely used, stored, handled, processed, or transported, and evaluates the extent to which existing and future populations could be exposed to hazardous materials. This analysis also addresses ways in which the Project may result in safety hazards for the public or future employees onsite.

The term “hazardous material” is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (State of California, Health and Safety Code, Chapter 6.95, Section 25501(o)). The analysis in this section is based, in part, on the following documents and resources:

- *City of Palmdale General Plan, October 2022*
- *City of Palmdale 2045 General Plan Update Draft Environmental Impact Report, July 2022*
- *City of Palmdale Code of Ordinances*
- *Phase I Environmental Site Assessment, Avocet Environmental, January 2022*

5.8.2 REGULATORY SETTING

5.8.2.1 Federal Regulations

Resource Conservation and Recovery Act of 1976

Federal hazardous waste regulations are generally promulgated under the Resource Conservation and Recovery Act (RCRA). Pursuant to RCRA, the U.S. Environmental Protection Agency (USEPA) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste in a “cradle to grave” manner. RCRA was designed to protect human health and the environment, reduce/eliminate the generation of hazardous waste, and conserve energy and natural resources. The USEPA has largely delegated responsibility for implementing the RCRA program in California to the State, which implements this program through the California Hazardous Waste Control Law.

RCRA regulates landfill siting, design, operation, and closure (including identifying liner and capping requirements) for licensed landfills. In California, RCRA landfill requirements are delegated to the California Department of Resources Recycling and Recovery (CalRecycle), which is discussed in detail below.

RCRA allows the USEPA to oversee the closure and post-closure of landfills. Additionally, the federal Safe Drinking Water Act, 40 CFR Part 141, gives the USEPA the power to establish water quality standards and beneficial uses for waters from below- or above-ground sources of contamination. For the Project area, water quality standards are administered by the Regional Water Quality Control Board (RWQCB).

RCRA also allows the USEPA to control risk to human health at contaminated sites. Vapor intrusion presents a significant risk to human populations overlying contaminated soil and groundwater and is considered when conducting human health risk assessments and developing Remedial Action Objectives.

Occupational Safety and Health Act of 1970

Federal and State occupational health and safety regulations also contain provisions regarding hazardous waste management through the Occupational Safety and Health Act of 1970 (amended), which is implemented by the U.S. Department of Labor Occupational Safety and Health Administration (OSHA). Title 29 of the Code of Federal Regulations (29 CFR) requires special training of handlers of hazardous materials; notification to employees who work in the vicinity of hazardous materials; acquisition from the manufacturer of material safety data sheets (MSDS), which describe the proper use of hazardous materials; and training of employees to remediate any hazardous material accidental releases. OSHA regulates the administration of 29 CFR.

OSHA also establishes standards regarding safe exposure limits for chemicals to which construction workers may be exposed. Safety and Health Regulations for Construction (29 CFR Part 1926.65 Appendix C) contains requirements for construction activities, which include occupational health and environmental controls to protect worker health and safety. The guidelines describe the health and safety plan(s) that must be developed and implemented during construction, including associated training, protective equipment, evacuation plans, chains of command, and emergency response procedures.

Adherence to applicable hazard-specific OSHA standards is required to maintain worker safety. For example, methane is regulated by OSHA under 29 CFR Part 1910.146 with regard to worker exposure to a “hazardous atmosphere” within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, labeling, and the marking of hazardous material transport. Title 42, Part 82 governs solid waste disposal and resource recovery.

Hazardous Materials Transportation Act

The transportation of hazardous materials is regulated by the Hazardous Materials Transportation Act (HMTA), which is administered by the Research and Special Programs Administration (RSPA) of the U.S. Department of Transportation (USDOT). The Hazardous Materials Transportation Act provides the USDOT with a broad mandate to regulate the transport of hazardous materials, with the purpose of adequately protecting the nation against risk to life and property, which is inherent in the commercial transportation of hazardous materials. The USDOT has regulations that govern the transportation of hazardous materials are applicable to any person who transports, ships, causes to be transported or shipped, or are involved in any way with the manufacture or testing of hazardous materials packaging or containers. USDOT regulations pertaining to the actual movement govern every aspect of the movement, including packaging, handling, labeling, marking, placarding, operational standards, and highway routing. Additionally, the USDOT is responsible for developing curriculum to train for emergency response and administers grants to states and Indian tribes for ensuring the proper training of emergency responders. Hazardous Materials Transportation Act was enacted in 1975 and was amended and reauthorized in 1990, 1994, and 2005.

Title 49, Code of Federal Regulations, Chapter I

Under Code of Federal Regulations (CFR) Title 49, Chapter I, the USDOT’s Pipeline and Hazardous Materials Safety Administration regulates the transport of hazardous materials. Title 49, Chapter I sets forth regulations for response to hazardous materials spills or incidents during transport and requirements for shipping and packaging of hazardous materials.

Emergency Planning and Community Right-to-Know Act

Title III of the Superfund Amendments and Reauthorization Act (SARA) authorized the Emergency Planning and Community Right-to-Know Act (EPCRA) (42 USC § 11001 et seq.) to inform communities and citizens of chemical hazards in their areas by requiring businesses to report the locations and quantities of chemicals stored onsite to state and local agencies; releases to the environment of more than 600 designated toxic chemicals; offsite transfers of waste; and pollution prevention measures and activities and to participate in chemical recycling. The USEPA maintains and publishes an online, publicly available, national database of toxic chemical releases and other waste management activities by certain industry groups and federal facilities—the Toxics Release Inventory. To implement EPCRA, each state appointed a state emergency response commission to coordinate planning and implementation activities associated with hazardous materials. The commissions divided their states into emergency planning districts and named a local emergency planning committee for each district. The federal EPCRA program is implemented and administered in California Governor's Office of Emergency Services (Cal OES), a state commission, 6 local committees, and 81 Certified Unified Program agencies. Cal OES coordinates and provides staff support for the commission and local committees.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 (15 USC § 2601 et seq.) gave the USEPA the ability to track the 75,000 industrial chemicals produced or imported into the United States. The USEPA repeatedly screens these chemicals; can require reporting or testing of any that may pose an environmental or human health hazard; and can ban the manufacture and import of chemicals that pose an unreasonable risk. The USEPA tracks the thousands of new chemicals each year with unknown or dangerous characteristics. The act supplements other federal statutes, including the Clean Air Act and the Toxics Release Inventory under EPCRA.

Code of Federal Regulations Title 29, Section 1926.62

CFR Title 29, Section 1926.62, provides federal regulations for construction work where an employee may be occupationally exposed to lead. It includes standards for exposure assessment, worker protection, methods of compliance, biological monitoring, and medical surveillance.

Code of Federal Regulations Title 40, Part 761

CFR Title 40, Part 761, provides federal regulations for the manufacturing, processing, distribution, use, and cleanup of polychlorinated biphenyls (PCBs). It provides remediation standards for the cleanup of PCB waste in soils.

5.8.2.2 State Regulations

Hazardous Materials Management and Waste Handling

In the regulation of hazardous waste management, California law often mirrors or is more stringent than federal law. The California Environmental Protection Agency (CalEPA) and California Occupational Safety and Health Administration (CalOSHA) are the primary state agencies responsible for hazardous materials management. Additionally, the California Emergency Management Agency (CalEMA) administers the California Accidental Release Prevention (CalARP) program. The California Department of Toxic Substances Control (DTSC), which is a branch of CalEPA, regulates the generation, transportation, treatment, storage, and disposal of hazardous waste, as well as the investigation and remediation of hazardous waste sites. The California DTSC program incorporates the provisions of both federal (RCRA) and State hazardous waste

laws. The California Department of Pesticide Regulation, which is a branch of CalEPA, regulates the sale, use, and cleanup of pesticides (CCR, Title 3).

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws and regulations are overseen by a variety of state and local agencies. The California Integrated Waste Management Board and the RWQCB specifically address management of hazardous materials and waste handling in their adopted regulations (CCR, Title 14 and CCR, Title 27).

The primary local agency, known as the Certified Unified Program Agency (CUPA), with responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management is the Los Angeles County Fire Department. The Unified Program is the consolidation of six state environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by CalEPA to implement the six State environmental programs within the local agency's jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (CalARP)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures (SPCC) requirements)
- Uniform Fire Code (UFC) Article 80 Hazardous Material Management Program (HMMP) and Hazardous Material Identification System (HMIS)

As CUPA, Los Angeles County Fire manages six hazardous material and hazardous waste programs, described below. The CUPA program is designed to consolidate, coordinate, and uniformly and consistently administer permits, inspection activities, and enforcement activities throughout Los Angeles County. This approach strives to reduce overlapping and sometimes conflicting requirements of different governmental agencies independently managing these programs.

California Accidental Release Prevention Program

This program aims to reduce risks involving regulated substances through the evaluation of hazards and consequences and the development of risk management plans and prevention programs. The program requires certain facilities (referred to as "stationary sources") that handle specified chemicals (termed "regulated substances") to take specified actions to prevent and prepare for chemical accidents.

Aboveground Petroleum Storage Act /Spill Prevention, Control, and Countermeasure Plan

Facilities that have cumulative aboveground storage capacities of petroleum products at or exceeding 1,320 gallons are subject to the Aboveground Petroleum Storage Act. Facilities that are subject to this act must prepare a Spill Prevention, Control, and Countermeasure Plan. Facilities handling petroleum or any other hazardous material require a business emergency/contingency plan. Both petroleum and nonpetroleum aboveground storage tanks are subject to the fire code requirements of the authority having fire code jurisdiction.

Hazardous Waste Generation and Onsite Treatment

The Hazardous Waste Inspection Program works to ensure that all hazardous waste generated by Los Angeles County facilities are properly managed. Specialists in this program inspect facilities that generate hazardous waste, investigate complaints of unlawful hazardous waste disposal, and participate in public education. These programs are designed to provide information about laws and regulations relating to safe management of hazardous waste.

Hazardous Materials Management Plans (HMMPs) and Hazardous Materials Inventory Statements (HMISs)

The Uniform Fire Code has a provision for the local fire agency to collect information regarding hazardous materials at facilities for purposes of fire code implementation. A fire chief may require additional information for a Business Plan to meet the California Fire Code HMMP/HMIS requirements.

Hazardous Waste Control Act

The Hazardous Waste Control Act was passed in 1972 and established the California Hazardous Waste Control Program within the Department of Health Services. California's hazardous waste regulatory effort became the model for the federal RCRA. California's program, however, was broader and more comprehensive than the federal system, regulating wastes and activities not covered by the federal program. California's Hazardous Waste Control Law was followed by emergency regulations in 1973 that clarified and defined the hazardous waste program.

California Government Code Section 65962.5

Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board as having underground storage tank (UST) leaks and which have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

California Code of Regulations (CCR), Title 22 – Hazardous Waste Control Law, Chapter 6.5

The DTSC regulates the generation, transportation, treatment, storage, and disposal of hazardous waste under RCRA and the California Hazardous Waste Control Law. Both laws impose “cradle-to-grave” regulatory systems for handling hazardous waste in a manner that protects human health and the environment. CalEPA has delegated some of its authority under the Hazardous Waste Control Law to county health departments and other Certified Unified Program Agencies.

CCR, Title 27 – Solid Waste

Title 27 of the CCR contains a waste classification system that applies to solid wastes that cannot be discharged directly or indirectly to waters of the State and which therefore must be discharged to waste management sites for treatment, storage, or disposal. CalRecycle and its certified Local Enforcement Agency regulate the operation, inspection, permitting, and oversight of maintenance activities at active and closed solid waste management sites and operations.

California Human Health Screening Levels

The California Human Health Screening Levels (CHHSLs or “Chisels”) are concentrations of 54 hazardous chemicals in soil or soil gas that CalEPA considers to be below thresholds of concern for risks to human health. The CHHSLs were developed by the Office of Environmental Health Hazard Assessment on behalf of CalEPA. The CHHSLs were developed using standard exposure assumptions and chemical toxicity values published by the EPA and CalEPA. The CHHSLs can be used to screen sites for potential human health concerns where releases of hazardous chemicals to soils have occurred. Under most circumstances, the presence of a chemical in soil, soil gas, or indoor air at concentrations below the corresponding CHHSL can be assumed to not pose a significant health risk to people who may live or work at the site. There are separate CHHSLs for residential and commercial/industrial sites.

CCR, Title 8 – Occupational Safety

CalOSHA administers federal occupational safety requirements and additional state requirements in accordance with CCR, Title 8. CalOSHA requires preparation of an Injury and Illness Prevention Program (IIPP), which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. This program is administered via inspections by the local CalOSHA enforcement unit.

CalOSHA regulates lead exposure during construction activities under CCR Title 8, Section 1532.1, Lead, which establishes the rules and procedures for conducting demolition and construction activities such that worker exposure to lead contamination is minimized or avoided.

Compliance with CalOSHA regulations and associated programs would be required for the Project due to the potential hazards posed by onsite construction activities and contamination from former uses.

Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local government, and private agencies. The plan is administered by the California Emergency Management Agency and includes response to hazardous materials incidents. The California Emergency Management Agency coordinates the response of other agencies, including CalEPA, California Highway Patrol, California Department of Fish and Wildlife, Regional Water Quality Control Board, South Coast Air Quality Management District, County Fire Department, and the County Department of Environmental Health.

California Emergency Services Act

The California Emergency Services Act (Government Code Section 8550 et seq.) was adopted to establish the State’s roles and responsibilities during human-made or natural emergencies that result in conditions of disaster and/or extreme peril to life, property, or the resources of the State. This act is intended to protect health and safety by preserving the lives and property of the people of the State.

5.8.2.3 Regional Regulations

AB 617, Community Air Protection Program In Response to Assembly Bill

(AB) 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB has established the Community Air Protection Program. AB 617 requires local air districts to monitor and implement air pollution control strategies that reduce localized air pollution in communities that bear the greatest burdens. Air districts are required to host workshops in order to help identify disadvantaged communities disproportionately affected by poor air

quality. Once the criteria for identifying the highest priority locations has been identified and the communities have been selected, new community monitoring systems would be installed to track and monitor community-specific air pollution goals. Under AB 617, CARB must prepare an air monitoring plan by October 1, 2018, that evaluates the availability and effectiveness of air monitoring technologies and existing community air monitoring networks. Under AB 617, CARB is also required to prepare a statewide strategy to reduce toxic air contaminants (TACs) and criteria pollutants in impacted communities; provide a statewide clearinghouse for best available retrofit control technology (BARCT), adopt new rules requiring the latest BARCT for all criteria pollutants for which an area has not achieved attainment of California AAQS, and provide uniform state-wide reporting of emissions inventories. Air districts are required to adopt a community emissions reduction program to achieve reductions for the air pollution impacted communities identified by CARB.

5.8.2.4 Local Regulations

Los Angeles County Airport Land Use Plan

The Los Angeles County Airport Land Use Plan (LAC ALUP) was prepared by the Los Angeles Department of Regional Planning and adopted by the Los Angeles County Airport Land Use Commission and includes compatibility policies for several airports within the County including Palmdale Regional Airport. In accordance with provisions of the California State Aeronautics Act (Public Utilities Code Section 21670 *et seq.*), the Los Angeles County Airport Land Use Commission has the responsibility of airport land use compatibility planning for 15 airports in Los Angeles County. The LAC ALUP sets forth policies that apply to airport planning and developments within the vicinity of the airports, including Palmdale Regional Airport.

Los Angeles County Emergency Operations Plan

Under Los Angeles County's Chief Executive Office, the Office of Emergency Management (OEM) is responsible for countywide emergency planning, mitigation, response and recovery activities, including planning for the City of Paramount. OEM manages the County's emergency operations center and develops and maintains the County's emergency operations and hazard mitigation plans. The current emergency operations plan, adopted by the County Board of Supervisors in 2012, specifies roles and responsibilities of various county and other local agencies in each of the four phases of emergency management: preparedness/planning, response, recovery, and mitigation. The Los Angeles County Multi-Jurisdictional Hazard Mitigation Plan, approved by the Federal Emergency Management Agency (FEMA) in September 2017, includes risk assessments for many types of hazards, both natural and human-made; an assessment of community capabilities for hazard mitigation; and mitigation strategies. County-identified evacuation routes consist of major and secondary highways.

Los Angeles County implements an extensive emergency preparedness system that adheres to the National Incident Management System (NIMS), which provides a comprehensive and standardized incident management system. Because Los Angeles County is NIMS compliant, it is eligible for federal preparedness grants. The county also follows the Standardized Emergency Management System (SEMS) adopted by California, which makes it eligible for reimbursement of response-related costs under state disaster assistance programs.

Los Angeles County Multi-Jurisdictional Hazard Mitigation Plan

The Los Angeles County Multi-Jurisdictional Hazard Mitigation Plan documents plans for reducing and/or eliminating risk in the unincorporated area of the County and Supervisorial Districts 1–5, the City of Palmdale is included in Supervisorial District 5.

City of Palmdale Emergency Operations Plan

The City of Palmdale has developed and adopted an Emergency Operations Plan (EOP), which describes how the City of Palmdale will respond to large-scale emergencies and disasters in the community. In response to an emergency, the City uses the EOP to implement operational procedures and protocols that concentrate on public welfare and minimizing damage to property. The plan is intended to be for extraordinary situations and is not intended for use in response to typical, day-to-day emergency situations. Further, the City's EOP has been designed to comply with California's Standardized Emergency Management System (SEMS) and the National Incident Management System (NIMS) guidelines, recommendations, and requirements.

City of Palmdale Local Hazard Mitigation Plan

The City of Palmdale has developed and adopted a Local Hazard Mitigation Plan (LHMP) intended to evaluate the City's capabilities to respond to and recover from major disasters and to identify cost effective mitigation actions and projects to address vulnerabilities in case of an emergency. The LHMP is further intended to be consistent with the goals and objectives expressed in the City of Palmdale's General Plan and Emergency Operations Plan.

City of Palmdale General Plan

The City of Palmdale General Plan contains the following policies related to hazards and hazardous materials that are applicable to the Project:

Noise Element

Goal N-2 **Maintain acceptable noise environments throughout the City.**

N-2.1 **Extreme Noise Sources.** Avoid locating new extreme noise sources adjacent to noise sensitive land uses unless mitigation measures can mitigate noise impacts to the sensitive uses.

Goal N-3 **Promote noise compatible land uses within the 65 dBA CNEL contour and the Frequent Overflight Area of Air Force Plant 42.**

N-3.1 **Frequent Overflight Area.** Designate and permit employment flex, industrial, aerospace industrial, and similar uses within the 65 dBA CNEL contour and the Frequent Overflight Area.

N-3.2 **Areas Within 65 dBA CNEL.** Restrict noise sensitive land uses (such as residential uses, religious institutions, schools, assisted living facilities, or similar uses) within areas designated within both the 65 dBA CNEL contour and the Frequent Overflight Area, unless mitigation measures prevent adverse health impacts from high noise emissions.

N-3.3 **Areas Outside 65 dBA CNEL.** In areas outside of the 65 dBA CNEL contours but within the Frequent Overflight Area, encourage land uses that are not noise-sensitive, to the extent feasible.

N-3.4 **Require Disclosure Statement.** Through the development review process, require a disclosure statement indicating that the property is subject to frequent overflight and aircraft noise upon sale of property within the Accident Potential Zone (APZ) and Air Installations Compatible Use Zones (AICUZ).

N-3.5 **Aviation Easement.** Through conditions of approval, require that any owner of property within the 65 dBA CNEL noise contour or the low altitude overflight area of Plant 42 seeking

a land use action from the City to provide an aviation easement to the Los Angeles Department of Airports, the U.S. Air Force, and the City of Palmdale.

Safety Element

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

SE-2.1 Critical Facilities. Prohibit new public or critical facilities in Very High Fire Hazard Severity Zones, except when other options do not exist.

SE-2.2 Redevelopment Compliance. After a large fire, ensure that re-development located in the in the High and Very High Fire Hazard Severity Zones complies with fire safety requirements for construction, accounting for any increased risk related to climate change.

SE-2.3 Wildland Development. Require that developments located in VHFSZ incorporate and enforce standards for construction, including a fuel modification program (i.e., brush clearance, planting of fire-retardant vegetation) to reduce the threat of wildfires, accounting for any increased risk related to climate change.

SE-2.4 Landscaped Buffer Zones. Provide fire-resistant landscaped buffer zones between high-risk fire hazard areas and urban development with fire clearance located on private land and maintained by the property owner(s).

SE-2.5 Maintain Firesafe Zones. Require property owners to clear brush and high fuel vegetation and maintain firesafe zones (a minimum distance of 30 feet from the structure or to the property line, whichever is closer) to reduce the risk of fires. For structures located within a Very High Fire Hazard Severity Zone, the required brush clearance distance is 200 feet from structures to the property line.

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

SE-2.9 Development Requirements. As part of the city's development review process, require that all new buildings and facilities comply with Los Angeles County, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards and work with the Fire Department to ensure the provision of adequate fire stations, personnel, and equipment to meet the City's needs over time.

SE-2.10 Water system requirements. Require all new development to be served by a water system that meets applicable fire flow requirements.

SE-2.11 Non-conforming Development. Require existing non-conforming development to comply with contemporary fire safe standards during a permit or entitlement process, in terms of road standards and vegetative hazard, and meet or exceed SRA Fire Safe Regulations.

SE-2.12 Fire Protection Plans. Require fire protection plans for all new development in the VHFSZ.

SE-2.13 Long-term Maintenance. Continue annual brush inspections and enforce clearance requirements on public and private property within the Very High Fire Hazard Severity Zone (VHFHSZ), as dictated by CAL FIRE, in accordance with the Board of Forestry and Fire Protection Fire Safe Regulations, California Building Standards Code, and Palmdale Municipal Code related to ongoing maintenance of vegetation clearance on public and private roads, roadside fuel reduction plan, and defensible space clearances (including fuel breaks).

- SE-2.14** **Water Evaluation.** Evaluate the location and capacity of the City’s water supply availability to suppress wildfire as part of the City’s Local Hazard Mitigation Plan Updates.
- Goal SE-3** **Minimize risks associated with the transport, storage, use, and disposal of hazardous materials.**
- SE-3.3** **Soil and Groundwater Cleanup.** Require clean-up of soil and/or groundwater containing hazardous materials exceeding regulatory action levels to the satisfaction of the agency having jurisdiction prior to granting permits for new development.
- SE-3.4** **Hazardous Materials Transport.** Require transport of hazardous materials along designated routes that minimize risks to the public and sensitive environmental areas and cooperate with regional agencies in developing and maintaining such routes.
- SE-3.5** **Review Development Near Hazardous Materials.** Review proposed development in proximity to any existing or proposed facility that uses, stores, or transports large amounts of hazardous materials to ensure adequate mitigation of impacts related to hazardous materials (e.g., appropriate site design, setbacks, and buffering).
- SE-3.6** **Hazardous Waste Facility Compliance.** Require all proposed hazardous waste facilities to comply with the City’s hazardous waste management plan and the Hazardous and Waste Facilities Section of the Palmdale Municipal Code.
- Goal SE-6** **Minimize impacts to public safety and property resulting from aircraft accidents.**
- SE-6.1** **Consistent development with Department of Defense.** Require all development to be consistent with Department of Defense regulations as outlined in the Air Force Plant 42 Air Installation Compatibility Use Zone (AICUZ) Report and comply with applicable FAA regulations that affect development in the Accident Potential Zones.
- SE-6.2** **Linear corridor in Accident Potential Zones.** Through the design review process, ensure that new buildings are located in a manner that will promote clear linear corridors through the developed area in any Accident Potential Zones.
- SE-6.3** **Evaluate incompatible land uses near the airport.** Review and evaluate currently existing incompatible development within the low altitude overflight areas uses and determine the potential for redevelopment to convert those land uses to airport compatible uses.
- SE-7.3** **Review Development Consistency.** Review all new development for consistency with applicable evacuation plans and ensure access to at least two evacuation routes.
- SE-7.4** **Emergency Evacuation Evaluation.** Continue to evaluate evacuation route capacity, safety, and viability under a range of emergency scenarios.
- SE-7.5** **Evacuation in VHFSZ and HFSZ.** Require developers proposing development on properties within VHFSZ and HFSZ areas to evaluate and provide adequate evacuation routes.
- SE-8.4** **Legible Signs.** Require all residences and businesses to maintain visible and clearly legible signs and/or street numbers to shorten the response times of emergency personnel.

City of Palmdale Municipal Code

Chapter 8.06; Recycling and Diversion of Construction and Demolition (C&D) Waste. Chapter 8.06 of the Palmdale Municipal Code sets forth provisions and standards for the handling and compliance of

construction and demolition waste including the diversion of waste and the preparation/submission of a waste management plan.

Chapter 13.11; Industrial Waste. Chapters 13.11 of the Palmdale Municipal Code sets forth provisions and standards for the handling and compliance of industrial waste including hazardous materials and release response plans and inventory such as establishing fees to be paid by persons handling hazardous waste.

5.8.3 ENVIRONMENTAL SETTING

5.8.3.1 Environmental Site Conditions

The Project site is currently undeveloped and contains sparse vegetation consisting of grasses and weeds. The Phase I Environmental Site Assessment (Phase I ESA, included as Appendix H) prepared for the Project describes that the Project site was historically used for agricultural uses that included row crops. The current condition of the site includes ground cover of weeds and grasses including some vegetation in the southern half of the site, tumbleweeds in the northern half and areas of bare dirt. The site has remained unimproved apart from the two inactive water wells in the southeast portion of the site and a steel pipe in the northwest corner. As such, there is a potential that agricultural chemicals such as pesticides, herbicides, and fertilizers were used on site and exist in site soils. However, as described in the Phase I ESA, any such pesticides would not have significantly impacted near-surface soil in terms of the ongoing presence of residual pesticides and/or related degradation byproducts, and do not consist of a hazardous materials concern.

The Phase I ESA found that there are several sites in the proximity of the Project site that are listed on hazardous materials databases, shown below in Table 5.8-1. However, it determined that none of these sites have the potential to cause a hazardous materials effect on the Project site. There are also no off-site hazardous material sources of environmental concern surrounding the Project site.

Table 5.8-1: Hazardous Materials Sites Near Project Site

Property	Location in Relation to Project Site (miles)	Listed Database	Significant?
1. Air Force Plant #42, East Avenue M/Columbia Way And 30 th Street East	0.009 SW	SWF/LF	No
2. Northrop/ AFP 42, Site 3, 3000 E Ave M	0.020 SW	UST	No
3. Northrop Corporation, 3500 Ave M E	0.057 SE	LUST, Cortese, HIST CORTESE	No
4. Site 4 Northrop Grumman, 3520 E Ave M	0.016 SE	LUST	No
5. Northrop Grumman Corp 3520 East Avenue M	0.076 SE	RCRA-LQG	No
6. Site 4 Northrop Grumman 3520 M	0.076 SE	HIST CORTESE	No
7. Air Force Plant 42 – Site 3 Clarifier C3-19 & C3-20 And Sump 3520 Ave M E	0.076 SE	UST	No
8. Air Force Plant 42 – Site 3 Clarifier C3-19 & C3-20 And Sump 3520 Ave M E	0.076 SE	CERS TANKS	No

Property	Location in Relation to Project Site (miles)	Listed Database	Significant?
9. Air Force Plant 42 – Site 3 Ust T3-26 3520 Ave M E	0.076 SE	CERS TANKS	No
10. Air Force Plant 42 – Site 4 Ust T4-601 & T4-603 (Bldg. 431) P 3520 East Ave M	0.076 SE	UST	No
11. Air Force Plant 42 – Site 3 Clarifier C3-28 3520 Ave M E	0.076 SE	CERS TANKS	No
12. Air Force Plant 42 – Site 3 Ust T3-1 3520 Ave M E	0.076 SE	CERS TANKS	No
13. Northrop Corp B2 Division Palmdale Ranch 3520 E Avenue M	0.076 SE	SWEEPS UST, CA FID UST	No
14. Air Force Plant 42 – Site 4 Northrop Grumman 3520 E Ave M	0.076 SE	CERS TANKS	No
15. Air Force Plant 42 – Site 3 Clarifier C3-28 3520 Ave M E	0.076 SE	UST	No
16. Air Force Plant 42 – Site 3 Ust T3-1 3520 Ave M E	0.076 SE	UST	No
17. Air Force Plant 42 – Site 3 Clarifier C3-16 3520 Ave M E	0.076 SE	UST	No
18. Air Force Plant 42 – Site 4 Northrop Grumman 3520 E Ave M	0.076 SE	UST	No
19. Air Force Plant 42 – Site 3 Ust T3-18 & T3-24 3520 Ave M E	0.076 SE	CERS TANKS	No
20. Northrop/ Afp 42, Site 4 3520 E Avenue M	0.076 SE	UST	No
21. 3520 E Avenue M	0.076 SE	AST	No
22. Air Force Plant 42 – Site 3 Ust T3-18 & T3-24 3520 Ave M E	0.076 SE	UST	No
23. Air Force Plant 42 – Site 3 Ust T3-26 3520 Ave M E	0.076 SE	UST	No
24. Air Force Plant 42 – Site 4 Surface Release Ust T4-201 (bldg 3520 East Ave. M	0.076 SE	UST	No
25. Air Force Plant 42 – Site 4 Surface Release UST T4-201 (bldg 3520 East Ave. M	0.076 SE	CERS TANKS	No
26. Air Force Plant 42 – Site 4 Ust T4-601 & T4-603 (Bldg. 431) P 3520 East Ave M	0.076 SE	CERS TANKS	No
27. Air Force Plant 42 – Site 3 Clarifier C3-16 3520 Ave M E	0.076 SE	CERS TANKS	No
28. Northrop Corp – Afp42, Site 4 3520 E Ave M	0.076 SE	SWEEPS UST	No
29. Northrop Grumman Systems Corp (site 3) 3000 E Avenue M	0.109 SW	RCRA-SQG	No

Property	Location in Relation to Project Site (miles)	Listed Database	Significant?
30. Site 3 Air Force Plant 42 3000 East Avenue M	0.109 SW	HIST UST	No
31. Detachment 15 Olaa 3000 Ave M	0.109 SW	RCRA-SQG, MANIFEST	No
32. Chevron #9-9915 3000	0.109 SW	HIST CORTESE, SWEEPS UST	No
33. USAF Plant 42, Site 3 3000 E Avenue M	0.109 SW	RCRA NonGen / NLR	No
34. Rockwell International, No. Amer Aircraft Plant 42/3, 3000 E. Avenue M	0.109 SW	ENVIROSTOR	No
35. Site 2 Tank 2-11 Bldg 211, 2500 Ave M E	0.372 WSW	LUST	No
36. Site 2 Tank 2-6/7/8/9/10 B 210, 2500 Ave M E	0.372 WSW	LUST	No
37. Site 2 Tank 2-11 Bldg 211, 2500 Ave M E	0.372 WSW	LUST, Cortese	No
38. USAF Plant 42 Site 4, 3520 East Avenue M	0.076 SE	PFAS ECHO	No
39. Rockwell International, Site 3 3000 Avenue M, Plant 42	0.571 SSW	HWP	No

*The Phase I ESA determined that the sites shaded in blue indicate that the database listing does not necessarily indicate a release or contamination. Additionally, the Phase I ESA determined that all of the above sites are hydraulically downgradient or cross gradient from the Project site and/or are cases that have been closed (Appendix H).

Palmdale Regional Airport/AFP 42

The Project site is located directly across East Avenue M/Columbia Way from the United States Air Force (USAF) Plant 42 (AFP 42), also known as the Palmdale Regional Airport. AFP 42 includes approximately 5,832 acres (about 9.1 square miles) and has two long runways bordered by various airport tenants that include private aerospace contractors, National Aeronautics and Space Administration (NASA), and small-scale commercial aviation operators.

As shown on Figure 5.8-1, *Palmdale Regional Airport/AFP 42 Noise Contours*, the Project site is located within the airport's 65 CNEL noise contour. However, the Project site is not located within an identified airport related hazard zone. The City's General Plan Figure 8.3, *Military Influence Area*, and Figure 8.4, *General Plan Land Use with Accident Potential Zone (APZ) Overlay*, detail that the Project site is not located within a military operating area, airport clear zone, APZ I, or APZ II area.

Wildland Fire Zone

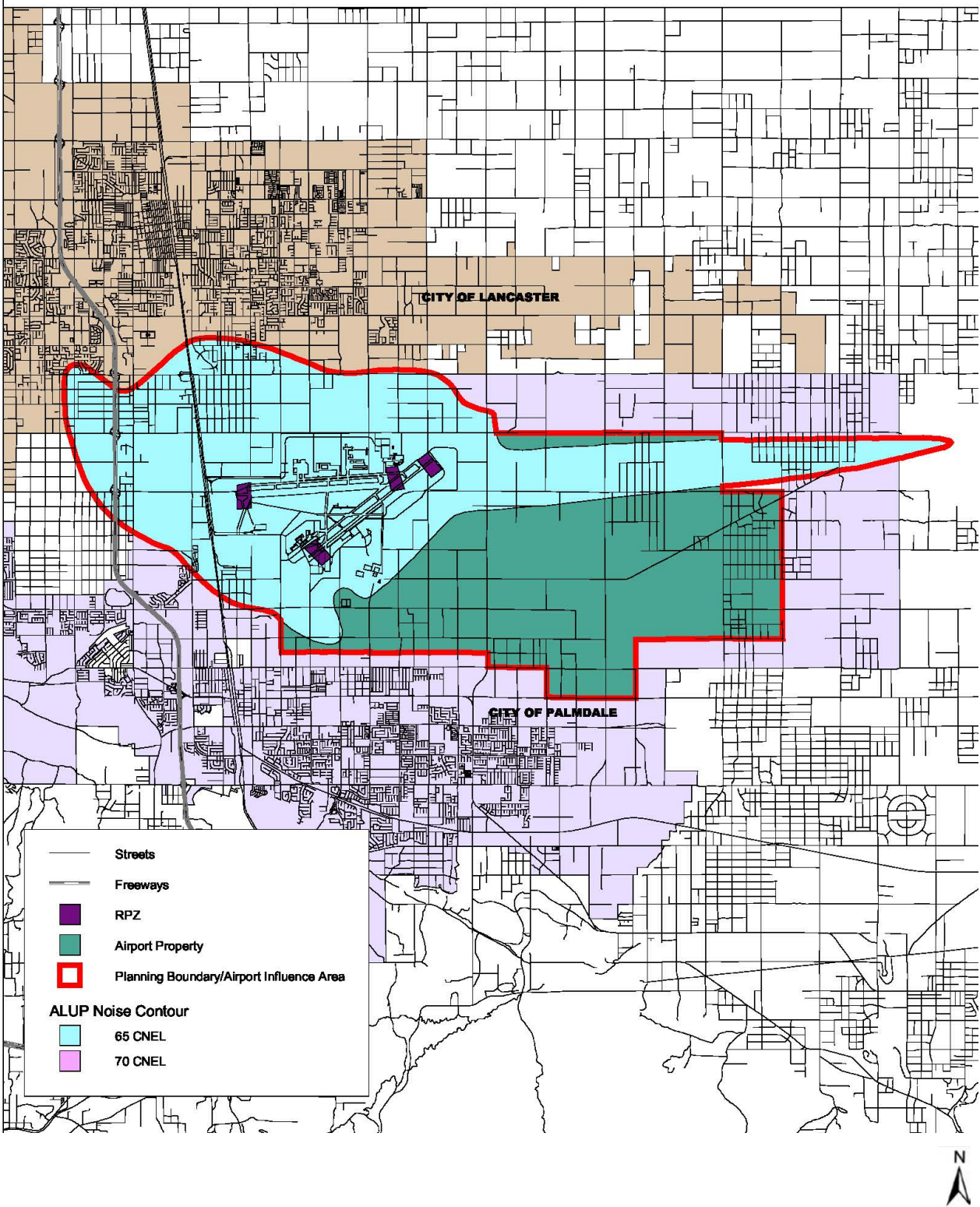
As shown on Figure 13.4, *Palmdale Fire Hazard Area*, of the City's General Plan, the Project site is not located in a fire hazard area.

Evacuation Routes

According to the Palmdale General Plan Safety Element, the City has no designated evacuation routes as there are several ways to exit the City. The City would also follow appropriate protocols listed in the City's EOP and Los Angeles County EOP as needed. Further, in case of emergency, principal responsibility would lie with the City's Emergency Services Manager (City of Palmdale, 2023.)

Existing evacuation routes from the Project area are provided by East Avenue M/Columbia Way, adjacent to the south of the site, and 30th Street, adjacent to the west of the site. Additionally, an unimproved dirt roadway is located along the eastern boundary of the site that could also be used for evacuation of the area.

Palmdale Regional Airport/AFP 42 Noise Contours



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5.8.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Hazardous-1	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; or
Hazardous-2	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; or
Hazardous-3	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or
Hazardous-4	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment; or
Hazardous-5	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, result in a safety hazard or excessive noise for people residing or working in the project area; or
Hazardous-6	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or
Hazardous-7	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

5.8.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hazards and hazardous materials considers both direct effects to the resource and indirect effects in a local or regional context. Potentially significant impacts would generally result in the loss or degradation of public health and safety or conflict with local, state, or federal agency regulations. Information for this section was obtained, in part, from the Los Angeles County Airport Land Use Plan as well as the Phase I ESA prepared for Project (Appendix H). The Phase I ESA is based on reviews of historical aerial photographs, historical topographic maps, Environmental Data Resources (EDR) database records, city directories, historical site occupants, historical site ownership records, site visits, and/or interviews of owners and tenants of the Project site.

5.8.6 ENVIRONMENTAL IMPACTS

IMPACT HAZARDOUS-1: THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE OR DISPOSAL OF HAZARDOUS MATERIALS.

Less than Significant. Development and long-term operation of the Project would require standard transport, use, and disposal of hazardous materials and wastes. If the use of these materials does not adhere to established federal, State, and local laws and regulations, workers, building occupants and residents, the public, and/or the environment could be exposed to hazards at the Project site.

Construction

Heavy construction equipment (e.g., dozers, excavators, tractors) would be operated for development of the Project site. The equipment would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored, handled, or transported. Other materials used—such as paints, adhesives, and solvents—could also result in accidental releases or spills that could pose risks to people and the environment. These risks are standard, however, on all construction sites, and the Project would not cause greater risks than would occur on other similar construction sites.

Construction contractors would be required to comply with federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Applicable laws and regulations include CFR, Title 29 – Hazardous Waste Control Act; CFR, Title 49, Chapter I; and Hazardous Materials Transportation Act requirements as imposed by the USDOT, CalOSHA, CalEPA, and DTSC. Additionally, construction activities would require a Stormwater Pollution Prevention Plan (SWPPP), which is mandated by the National Pollution Discharge Elimination System General Construction Permit (included as PPP HYD-1) and enforced by the Lahontan Regional Water Quality Control Board (RWQCB). The SWPPP will include strict onsite handling rules and BMPs to minimize potential adverse effects to workers, the public, and the environment during construction, including, but not limited to:

- Establishing a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Following manufacturers' recommendations on the use, storage, and disposal of chemical products used in construction;
- Avoiding overtopping construction equipment fuel tanks;
- Properly containing and removing grease and oils during routine maintenance of equipment; and
- Properly disposing of discarded containers of fuels and other chemicals.

Mandatory compliance with applicable laws and regulations related to the routine transport, use, and disposal of hazardous materials during construction activities at the Project site would limit potentially significant hazards to construction workers, the public, and the environment. Impacts would be less than significant.

Operation

The Project site would be developed with two industrial warehouse buildings that would support high-cube warehousing, manufacturing, and office uses. Depending on the type of business that would occupy the proposed warehouse buildings, operations would require the use of various types and quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, and batteries (lead acid, nickel cadmium, nickel, iron, carbonate). These hazardous materials would be used, stored, and disposed of in accordance with applicable regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263; and Los Angeles County Code Sections 105.5.22 and 12.64.030) that are enforced by the USEPA, USDOT, CalEPA, CalOSHA, and DTSC.

Under California Health and Safety Code Section 25531 et seq., CalEPA requires businesses operating with a regulated substance that exceeds a specified threshold quantity to register with a managing local agency, known as the Certified Unified Program Agency (CUPA). In Palmdale, the Los Angeles County Fire Department is the CUPA. If the operations of future tenants of the proposed warehouse facility exceed established thresholds, CUPA permits would be required. The County requires businesses subject to any of the CUPA permits to file a Hazardous Materials Business Plan, included as PPP HAZ-3. Additionally, businesses would be required to provide workers with training on the safe use, handling, and storage of hazardous materials. Additionally, businesses would be required to maintain equipment and supplies for

containing and cleaning up spills of hazardous materials that can be safely contained and cleaned by onsite workers and to immediately notify emergency response agencies in the event of a hazardous materials release that cannot be safely contained and cleaned up by onsite personnel. Compliance with existing laws and regulations governing hazard and hazardous materials would be verified by the City during operational permitting and would reduce potential impacts related to the routine transport, use, and disposal of the hazardous materials to less than significant.

IMPACT HAZARDOUS-2: THE PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET OR ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT.

Less than Significant.

Construction

As described previously, construction of the proposed Project would involve the limited use and disposal of hazardous materials. Equipment that would be used in construction of the project has the potential to release gas, oils, greases, solvents, and spills of paint and other finishing substances. However, the amount of hazardous materials onsite would be limited, and construction activities would be required to adhere to all applicable regulations regarding hazardous materials storage and handling, as well as to implement construction BMPs (through implementation of a required SWPPP implemented by City conditions of approval, and included as PPP HYD-1) to prevent a hazardous materials release and to promptly contain and clean up any spills, which would minimize the potential for harmful exposures. With compliance to existing laws and regulations, which is mandated by the City through construction permitting, the Project's construction-related impacts would be less than significant.

Operation

As discussed in Impact Hazardous-1, the future tenants within the Project site may use, store, and dispose of various types and quantities of hazardous materials that would be required to comply with regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263; Los Angeles County regulations; and City of Palmdale regulations enforced by the USEPA, USDOT, CalEPA, CalOSHA, DTSC, and Los Angeles County Fire Department). The Los Angeles County Fire Department, as CUPA, would require that future tenants that handle significant quantities of hazardous materials prepare Hazardous Materials Business Plans, which provide information to emergency responders and the general public regarding hazardous materials, and coordinates reporting of releases and spill response among businesses and local, state, and federal government authorities, as included as PPP HAZ-3. The proposed development Project would also require implementation of a WQMP, included as PPP HYD-2. BMPs would be incorporated in the WQMP that would protect human health and the environment should any accidental spills or releases of hazardous materials occur during operation of the Project, including onsite collection and treatment of potentially polluted runoff, as well as nonstructural maintenance implemented to prevent potentially hazardous spills or leaks of stored materials. Therefore, operations of the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset and accident involving hazardous material. Impacts related to hazardous materials from operation would be less than significant.

IMPACT HAZARDOUS-3: THE PROJECT WOULD NOT EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES OR WASTE WITHIN 0.25 MILE OF AN EXISTING OR PROPOSED SCHOOL.

No Impact. The closest school site is Eastside High School, located at 3200 E Ave J 8, Lancaster, CA 93535, which is approximately 2.11 miles north of the Project site. Therefore, there are no schools located within a

0.25 mile of the Project site. As such, there would be no impacts that would occur to any schools in the vicinity of the Project.

As described previously, the use of hazardous materials related to the proposed industrial warehouse uses would be limited and used and disposed of in compliance with federal, state, and local regulations, which would reduce the potential of accidental release into the environment. Thus, the proposed Project would not emit hazardous or handle acutely hazardous materials, substances, or waste within 0.25 mile of school, and no impacts would occur.

IMPACT HAZARDOUS-4: THE PROJECT WOULD NOT BE LOCATED ON A SITE THAT IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT.

No Impact. The Phase I ESA prepared for the Project site included database searches of federal, state, and local databases to determine whether hazardous materials sites were within and/or surrounding the Project. The Phase I determined that the Project site is not identified as a hazardous materials site. The site is not listed in the databases searched by the Phase I including GeoTracker and the California DTSC EnviroStor database of hazardous material sites; and is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, impacts would not occur.

In addition, Table 5.8-1 lists sites in the vicinity of the Project site that are identified by the Phase I as being listed in hazardous materials databases. As shown in Table 5.8-1, there are several sites located within 0.5 mile that are listed as hazardous materials databases. The Phase I ESA explains that the Air Force Plant 42 (AFP 42), located to the south of the Project site contains hazardous substances, including aviation fuels, which were stored in numerous USTs and ASTs; degreasing solvents; metal plating solutions; and related wastes. However, the Phase I ESA details that the potential impact of hazardous substances storage and use operations at AFP 42 on the subsurface environment has been assessed through numerous investigations, which determined that contamination has not spread to the Project site area, and that groundwater occurs between 340 and 450 feet below ground surface and generally flows away from the Project site. Thus, any groundwater contaminants would not affect the Project site. As such, impacts related to hazardous materials sites would not occur.

IMPACT HAZARDOUS-5: THE PROJECT WOULD NOT RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, BE WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT.

Less than Significant. The Project is located approximately 0.25 mile north of Palmdale Regional Airport which is temporarily operating at the U.S. Air Force Plant 42, a military airport. Thus, the Project site is located in Palmdale Airport/USAF Plant 42 ALUCP military airport influence area. However, the Project is not located in any of the designated zones with high relative potential for accidents. The Project is located within the 65 dBA noise contour, as shown on Figure 5.8-1, which the ALUCP has determined is satisfactory for industrial land uses and meets the City's noise criteria for industrially zoned areas as detailed in Section 5.11, Noise. Given that the Project consists of the development of two industrial warehouses, impacts related to excessive airport-related noise would be less than significant.

In addition, on September 13, 2023, a Minor Aviation Application was submitted to the Los Angeles County Airport Land Use Commission (ALUC) for the proposed Project pursuant to ALUC Review Procedures. On November 1, 2023, ALUC determined the Project would be consistent with the policies in the Airport Land Use Plan and the ALUC Review procedures for Los Angeles County. In addition, pursuant to ALUC

“Requirements to File,” a request for an Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) was filed on September 15, 2023, with the Federal Aviation Administration (FAA). The FAA thus conducted an aeronautical study for each of the proposed buildings and determined that both Building 1 and Building 2 would not exceed obstruction standards and would therefore not be a hazard to air navigation, with the condition that the Project applicant e-file FAA Form 7460-2, Notice of Actual Construction or Alteration within 5 days after the construction reaches its greatest height. Based on these findings, the FAA issued a Determination of No Hazard to Air Navigation on October 13, 2023. Thus, with the FAA’s determination and ALUC approval, the Project would not result in a safety hazard or excessive noise for people working in the Project area and impacts would be less than significant.

IMPACT HAZARDOUS-6: THE PROJECT WOULD NOT IMPAIR IMPLEMENTATION OF, OR PHYSICALLY INTERFERE WITH, AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN.

Less than Significant. The intent of the City of Palmdale’s Emergency Operation Plan is to provide comprehensive procedures and guidance for the City to prepare and respond to large-scale emergencies and disasters in the community in compliance with California’s Standardized Emergency Management System and the National Incident Management System guidelines, recommendations, and requirements. Emergency responses are coordinated through various offices within City and County government and aligned agencies. The City of Palmdale and Los Angeles County Fire provide emergency response.

Construction

The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site and would not restrict access of emergency vehicles to the Project site or adjacent areas. During construction of the Project, driveways and connections to existing infrastructure along East Avenue M/Columbia Way and 30th Street East, the roadways would remain open to ensure adequate emergency access to the Project area and vicinity. Any temporary lane closures needed for utility connections, driveway construction, or roadway improvements would be required to implement appropriate measures to facilitate vehicle circulation, as included within construction permits. In accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), prior to any activity that would encroach into a right-of-way, the area of encroachment must be safeguarded through the installation of safety devices to ensure that construction activities would not physically interfere with emergency access or evacuation. Compliance with Section 503 of the California Fire Code would be specified by the City’s Building and Safety Division during the construction permitting process. Therefore, the Project would not block any evacuation routes or conflict with an emergency response plan, and impacts related to interference with an adopted emergency response or evacuation plan during construction activities would be less than significant.

Operation

The Project would include vehicular access to the Project site from surrounding roadways including East Avenue M/Columbia Way and 30th Street East and substantial internal circulation from the various driveways that circle the proposed buildings and connect to the adjacent roadways. The Project driveways and internal circulation would be required through the City’s permitting procedures to meet the City’s design standards to ensure adequate emergency access and evacuation. The Project is also required to provide fire suppression facilities (e.g., hydrants and sprinklers) in conformance with the Fire Department standards. The City’s Building and Safety Division would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). Therefore, the Project would not impair implementation or interfere with adopted emergency response or evacuation plans. Impacts would be less than significant.

IMPACT HAZARDOUS-7: THE PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS.

No Impact. The Project site is not within an identified wildland fire hazard area or an area where residences are intermixed with wildlands. According to the CAL FIRE Hazard Severity Zone Map, the Project site is not identified as being within a high fire hazard area (CAL FIRE, 2023). The proposed Project is adjacent to arterial roadways and existing urban uses, such as the solar facility and airport, and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. In addition, the proposed Project would be constructed in compliance with the California Fire Code and CBC. The safety measures under the California Fire Code include ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system, and sealing any gaps around doors, windows, eaves, and vents to prevent intrusion by flame or embers. The CBC requirements (adopted as Chapter 8.04 of the City Municipal Code) include CCR Title 24, Part 2, which provides specific requirements related to exterior wildfire exposure. Compliance with existing regulatory requirements for implementation of fire protection measures (e.g., ignition-resistant construction materials and measures) would further reduce impacts associated with wildfire spread and would be verified by the City during the development review and permitting process. Thus, the proposed Project would not result in a significant risk related to exposure of people or structures to significant risk involving wildland fires.

5.8.7 CUMULATIVE IMPACTS

The cumulative study area for the purposes of hazardous materials and waste would be considered the City of Palmdale. This cumulative impact analysis for hazards and hazardous materials considers development of the proposed Project in conjunction with other development projects as well as the projects identified in Table 5-1, *Cumulative Projects List*, in Section 5.0, *Environmental Impact Analysis*. None of the projects identified in Table 5-1 are proposed adjacent to the Project site. However, there are multiple cumulative projects within the Palmdale area, in the general vicinity of the Project.

As described previously, the Project is not located on a hazardous materials site, not located on a high fire hazard site, and is within the Palmdale Airports 65 dBA CNEL contour. Thus, impacts related to these topics would not have the potential to cumulatively combine to be considerable. In addition, through the Project's development review and construction and operating permitting procedures, the proposed Project would be required to adhere to existing regulations related to release of hazardous materials, which would reduce the potential for hazardous materials impacts from the Project to cumulatively combine to a less than significant level.

Future cumulative development within the City could have the potential to expose future area residents, employees, and visitors to chemical hazards through the transport, storage, or use of hazardous materials. The severity of potential hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. All hazardous materials users and transporters, as well as hazardous waste generators and disposers are subject to regulations that require proper transport, handling, use, storage, and disposal of such materials to ensure public safety. Thus, if hazardous materials are found to be present on future project sites, appropriate remediation activities would be required pursuant to standard federal, state, and regional regulations. Compliance with the relevant federal, state, and local regulations, during the operation and construction of the Project, as well as during the construction and operation of related projects would ensure that cumulative impacts from hazardous materials would be less than significant.

5.8.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Federal

- United States Code of Federal Regulations Title 42, Sections 6901 et seq.: Resource Conservation and Recovery Act
- United States Code of Federal Regulations Title 42, Sections 11001 et seq.: Emergency Planning & Community Right to Know Act
- United States Code of Federal Regulations Title 49, Parts 101 et seq.: Regulations implementing the Hazardous Materials Transportation Act (United States Code of Federal Regulations Title 49 Sections 5101 et seq.)
- United States Code of Federal Regulations Title 15, Sections 2601 et seq.: Toxic Substances Control Act
- United States Code of Federal Regulations Title 49, Chapter I
- United States Code of Federal Regulations Title 29, Section 1926.62
- United States Code of Federal Regulations Title 40, Part 761
- United States Code of Federal Regulations Title 29, Section 1910.120

State

- California Occupational Safety and Health Administration Regulation 29, CFR Standard 1926.62
- California Code of Regulations Title 24, Part 2: California Building Code
- California Code of Regulations Title 24, Part 9: California Fire Code
- California Code of Regulations Title 8, Section 1532.1: Lead in Construction Standard
- California Health and Safety Code Section 39650 et seq.

Local

- PMC, Chapter 2, Civil Defense and Disasters
- PMC, Chapter 8, Health and Safety, Section 6, Recycling and Diversion of Construction and Demolition (C&D) Waste
- PMC, Chapter 8, Health and Safety, Section 8, General Hazards
- PMC, Chapter 13, Sanitary Sewers and Industrial Waste, Section 11, Industrial Waste
- PMC, Chapter 14, Environmental Management, Section 5, Water Efficient Landscape

Plans, Programs, or Policies (PPPs)

The following Plans, Programs, and Policies (PPP) related to hazards and hazardous materials are incorporated into the Project and would reduce impacts related to hazards and hazardous materials. These actions will be included in the Project's approved Demolition Permit, Grading Permit, Building Permit and/or Certificate of Occupancy, as appropriate.

PPP HAZ-1: Transportation of Hazardous Waste. Hazardous materials and hazardous wastes will be transported to and/or from the Project developed as required by the County of Los Angeles Fire Department's Health Hazardous Materials Division in compliance with any applicable state and federal requirements, including the U.S. Department of Transportation regulations listed in the Code of Federal Regulations (CFR) (Title 49, Hazardous Materials Transportation Act); California Department of Transportation standards; and the California Occupational Safety and Health Administration standards.

PPP HAZ-2: Resource Conservation and Recovery Act. Hazardous waste generation, transportation, treatment, storage, and disposal will be conducted in compliance with the Subtitle C of the Resource Conservation and Recovery Act (RCRA) (Code of Federal Regulations, Title 40, Part 263), including the management of nonhazardous solid wastes and underground tanks storing petroleum and other hazardous substances. The Los Angeles County Fire Department serves as the designated Certified Unified Program Agency (CUPA) which implements state and federal regulations for the following programs: (1) Hazardous Waste Generator Program, (2) Hazardous Materials Release Response Plans and Inventory Program (3) California Accidental Release Prevention Program (Cal-ARP), (4) Aboveground Storage Tank Program and the (5) Underground Storage Tank Program.

PPP HAZ-3: Hazardous Materials Business Plan. Prior to issuance of operational permits, for businesses that store or handle hazardous wastes shall have a Hazardous Materials Business Plan approved by the City Fire Department and/or City Building Division. Article 1 of Chapter 6.95 of the California Health and Safety Code (Sections 25500–25520) requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a hazardous materials business plan (HMBP). HMBPs are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The HMBP shall include a minimum of three sections: (1) an inventory of hazardous materials, including a site map that details their location; (2) an emergency response plan; and (3) an employee-training program.

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: Phase II Small MS4 General Permit. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the Drainage Management Plan (DMP) of the City of Palmdale which establishes the hydrologic and hydraulic requirements for development within the City limits in accordance with revised procedures developed by the County of Los Angeles Department of Public Works and adopted by the City of Palmdale. It is the policy of the City of Palmdale that each development consisting of five acres or greater in size shall attenuate on-site storm runoff as required by drainage law and shall prepare hydrology and hydraulic studies in accordance with the DMP. Each development is required by City Ordinance to attenuate post-developed flows to 85 percent of pre-developed flows through the installation of an onsite storm drain system to remove particulate pollutants and to reduce maximum runoff values associated with development.

5.8.9 PROJECT DESIGN FEATURES

None.

5.8.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, impacts Hazardous-1, Hazardous-2, and Hazardous-5, and Hazardous-6 would be less than significant. Impacts Hazardous-3, Hazardous-4, and Hazardous-7 would have no impact.

5.8.11 MITIGATION MEASURES

No mitigation measures are required.

5.8.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

The Project would result in less-than-significant impacts. Through compliance with existing regulatory programs, the already less than significant impacts associated with potential hazards and hazardous materials would further be reduced. Therefore, no significant unavoidable adverse impacts related to hazards and hazardous materials would occur.

5.8.13 REFERENCES

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5.9 Hydrology and Water Quality

5.9.1 INTRODUCTION

This section describes the existing hydrology and water quality conditions and potential impacts from implementation of the Project. The analysis in this section is based, in part, on the following:

- *City of Palmdale General Plan*, October 2022
- *City of Palmdale 2045 General Plan Update Draft Environmental Impact Report*, July 2022
- City of Palmdale Code of Ordinances
- *Palmdale Water District 2020 Urban Water Management Plan (UWMP)*
- Preliminary Hydrology Report (Appendix I)

5.9.2 REGULATORY SETTING

5.9.2.1 Federal Regulations

Clean Water Act

The Clean Water Act (CWA) established the basic structure for regulating discharges of pollutants into “waters of the United States (US)” The Act specifies a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. Key components of the Clean Water Act that are relevant to the proposed Project are:

- Sections 303 and 304, which provide water quality standards, criteria, and guidelines. Section 303(d) requires the State to develop lists of water bodies that do not attain water quality objectives (are impaired) after implementation of required levels of treatment by point-source dischargers (municipalities and industries). Section 303(d) also requires that the State develop total maximum daily loads (TMDLs) for each of the listed pollutants. The TMDL is the amount of pollutant loading that the water body can receive and still be in compliance with water quality objectives. After implementation of the TMDL, it is anticipated that the contamination that led to the 303(d) listing would be remediated. Preparation and management of the Section 303(d) list is administered by the Regional Water Quality Control Boards (RWQCBs).
- Section 401 requires activities that may result in a discharge to a federal water body to obtain a water quality certification to ensure that the proposed activity would comply with applicable water quality standards.
- Section 402 regulates point- and nonpoint-source discharges to surface waters through the National Pollutant Discharge Elimination System (NPDES) program. In California, the State Water Resources Control Board (SWRCB) oversees the NPDES program, which is administered by the local RWQCBs. The NPDES program provides both general permits (those that cover a number of similar or related activities) and individual permits.

National Pollutant Discharge Elimination System Permit Program

The NPDES permit program under the CWA controls water pollution by regulating point- and nonpoint-sources that discharge pollutants into “waters of the US” California has an approved State NPDES program. The United States Environmental Protection Agency has delegated authority for NPDES permitting to the

SWRCB, which has nine regional boards. The Lahontan RWQCB regulates water quality in Hesperia for the Mojave River. Discharge of stormwater runoff from construction areas of one acre or more requires either an individual permit issued by the RWQCB or coverage under the statewide Construction General Stormwater Permit for stormwater discharges (discussed below). Specific industries and public facilities, including wastewater treatment plants that have direct stormwater discharges to navigable waters, are also required to obtain either an individual permit or obtain coverage under the statewide General Industrial Stormwater Permit.

Federal Flood Insurance Program

The US Congress established the National Flood Insurance Program (NFIP) with the passage of the National Flood Insurance Act of 1968. The NFIP is a federal program enabling property owners in participating communities to purchase insurance as a protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages. Participation in the NFIP is based on an agreement between communities and the federal government. If a community adopts and enforces a floodplain management ordinance to reduce future flood risk to new construction in floodplains, the federal government will make flood insurance available within the community as a financial protection against flood losses. This insurance is designed to provide an insurance alternative to disaster assistance to reduce the escalating costs of repairing damage to buildings and their contents caused by floods. The Federal Insurance and Mitigation Administration (FIMA) within the Federal Emergency Management Agency (FEMA) is responsible for administering the NFIP and administering programs that provide assistance for mitigating future damages from natural hazards.

5.9.2.2 State Regulations

Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969, codified as Division 7 of the California Water Code, authorizes the SWRCB to provide comprehensive protection for California's waters through water allocation and water quality protection. The SWRCB implements the requirement of CWA Section 303, establishing that water quality standards have to be set for certain waters by adopting water quality control plans under the Porter-Cologne Act. The Porter-Cologne Act establishes the responsibilities and authorities of the nine RWQCBs, including preparing water quality plans for areas in the region, and identifying water quality objectives and waste discharge requirements (WDRs). Water quality objectives are defined as limits or levels of water quality constituents and characteristics established for reasonable protection of beneficial uses or prevention of nuisance. Beneficial uses consist of all the various ways that water can be used for the benefit of people and/or wildlife. The Porter-Cologne Act has been amended to provide the authority delegated from the US Environmental Protection Agency (USEPA) to issue NPDES permits regulating discharges to surface waters of the US.

California Anti-Degradation Policy

A key policy of California's water quality program is the State's Anti-Degradation Policy. This policy, formally known as the Statement of Policy with Respect to Maintaining High Quality Waters in California (SWRCB Resolution No. 68-16), restricts degradation of surface and ground waters. In particular, this policy protects water bodies where existing quality is higher than necessary for the protection of beneficial uses. Under the Anti-Degradation Policy, any actions that can adversely affect water quality in all surface and ground waters must (1) be consistent with maximum benefit to the people of the state; (2) not unreasonably affect present and anticipated beneficial use of the water; and (3) not result in water quality less than that prescribed in water quality plans and policies (i.e., will not result in exceedances of water quality objectives).

California Construction General Permit

The State of California adopted a Statewide NPDES Permit for General Construction Activity (Construction General Permit) on September 2, 2009 (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ). The last Construction General Permit amendment was adopted on September 8, 2022. The Construction General Permit regulates construction site stormwater management. Dischargers whose projects disturb one or more acres of soil, or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for discharges of stormwater associated with construction activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility.

To obtain coverage under this permit, project operators must electronically file Permit Registration Documents, which include a Notice of Intent (NOI), a Stormwater Pollution Prevention Plan (SWPPP), and other compliance-related documents, including a risk-level assessment for construction sites, an active stormwater effluent monitoring and reporting program during construction, rain event action plans, and numeric action levels (NALs) for pH and turbidity, as well as requirements for qualified professionals to prepare and implement the plan.

The SWPPP would include a site map, description of stormwater discharge activities, and best management practices (BMPs) taken from the menu of BMPs set forth in the California Stormwater Quality Association (CASQA) BMP Handbook that will be employed to prevent water pollution. It must describe BMPs that will be used to control soil erosion and discharges of other construction-related pollutants (e.g., petroleum products, solvents, paints, cement) that could contaminate nearby water bodies. It must demonstrate compliance with local and regional erosion and sediment control standards, identify responsible parties, provide a detailed construction timeline, and implement a BMP monitoring and maintenance schedule. The Construction General Permit requires the SWPPP to identify BMPs that will be implemented to reduce controlling potential chemical contaminants from impacting water quality. Types of BMPs include erosion control (e.g., preservation of vegetation), sediment control (e.g., fiber rolls), non-stormwater management (e.g., water conservation), and waste management. The SWPPP also includes descriptions of BMPs to reduce pollutants in stormwater discharges after all construction phases have been completed at the site (post-construction BMPs).

California Water Resources Control Board Low Impact Development Policy

The SWRCB adopted the Low Impact Development (LID) Policy which, at its core, promotes the idea of “sustainability” as a key parameter to be prioritized during the design and planning process for future development. The SWRCB has directed its staff to consider sustainability in all future policies, guidelines, and regulatory actions. LID is a proven approach to manage stormwater. The RWQCBs are advancing LID in California in various ways, including provisions for LID requirements in renewed NPDES Phase I Municipal Separate Storm Sewer System (MS4) permits.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was passed by the State of California in 2014 and sets forth a statewide framework to help protect groundwater resources over the long-term. The SGMA gives local agencies the power to sustainably manage groundwater. It required DWR to establish priority levels for groundwater basins within the State based on their level of overdraft and required Groundwater Sustainability Agencies (GSAs) to form and develop Groundwater Sustainability Plans (GSPs) for medium- and high-priority groundwater basins that would bring the basins into sustainability by 2040 or 2042. Basins

determined to be in critical overdraft were required to develop GSPs first. DWR is behind in the process of determining its approval of submitted GSPs for non-critical basins and was required to issue final notices of approval or disapproval by January 31, 2022.

5.9.2.3 Regional/Local Regulations

City of Palmdale General Plan

The City of Palmdale General Plan contains the following policies related to hydrology and water quality that are applicable to the proposed Project:

Conservation Element

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|-----------------------|--|
| Goal CON-5 | Protect the quality and quantity of local water resources. |
| Policy CON-5.1 | Ground water recharge. Ensure that ground water supplies are recharged and protect natural recharge areas such as the Little Rock and Big Rock Washes, and Amargosa and Anaverde Creeks from pollutants or other materials, which might degrade groundwater supplies. |
| Policy CON-5.2 | Groundwater protection. Ensure that no mineral resource recovery activities extend below the groundwater table. |
| Policy CON-5.4 | Flood control measures. Maximize groundwater recharge capabilities with flood control measures. |
| Goal CON-6 | Minimize the impacts of urban development on groundwater supplies. |
| Policy CON-6.1 | Encourage natural recharge. Restrict building coverage and total impervious area in the vicinity of natural recharge areas. |
| Policy CON-6.2 | Reduce landscaping irrigation needs. Require the use of water conserving native or drought resistant plants and drip irrigation systems where feasible. |
| Policy CON-6.3 | Reduce street runoff. Design streets to incorporate vegetation, soil, and engineered systems to slow, filter, and cleanse stormwater runoff. |
| Policy CON-6.4 | New construction water conservation. Require water conserving appliances and plumbing fixtures in all new construction. |
| Policy CON-7.6 | Water recycling. Encourage residents and businesses to recycle water where feasible, and where water recycling does not result in health and safety concerns. |

Safety Element

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|----------------------|---|
| Goal SE-4 | Minimize impacts to public safety and/or property as a result of flooding. |
| Policy SE-4.2 | Drainage Management Plan. Implement the City's drainage management plan through the capital improvement program and development review process. |
| Policy SE-4.3 | National Pollutant Discharge Elimination System and Low Impact Development. Ensure that new development meets National Pollutant Discharge Elimination System (NPDES) and associated Low Impact Development (LID) standards that limit peak runoff to pre-development rates. |
| Goal SE-5 | Minimize damage from catastrophic failure of infrastructure. |

Policy SE-5.1 Evaluate inundation hazards. As appropriate, evaluate inundation hazards related to the potential rupture of the following when reviewing development proposals: California Aqueduct, Palmdale Dam, Littlerock Dams and/or proposed basins.

Public Facilities, Services, and Infrastructure

Policy PFSI-3.13 Low Impact Development. Require new development to minimize storm water runoff and pollutant exposure by incorporating low impact development (LID) measures and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).

Policy PFSI-3.18 Water Conservation. Support and promote water conservation across all facets of City water infrastructure.

Palmdale Municipal Code

Title 8, Chapter 8.04 – Adoption of Health, Safety and Technical Construction Codes

Chapter 8.04 of the Palmdale Municipal Code (PMC) is the Adoption of Health, Safety and Technical Construction Codes. It establishes provisions and requirements including building codes, plumbing codes, electrical codes, and mechanical codes. PMC Chapter 8 ensures that all buildings and structures in the City of Palmdale are safe and habitable and must be constructed in accordance with the Palmdale Building Code. This code sets forth minimum standards for the design, construction, and materials used in buildings and structures.

Title 14, Chapter 14.05 – Water Efficient Landscape

PMC Chapter 14.05 establishes provisions for water management practices. It encourages stormwater best management practices to minimize run off and maximize infiltration to recharge groundwater. Several key sections include the following:

- PMC Section 14.05.090 regulates landscape design plans for efficient water use including plant material, water features, and soil preparation.
- PMC Section 14.05.100 contains irrigation design criteria, specifications, and requirements.
- PMC Section 14.05.110 regulates grading design plans including recommendations for preventing excessive erosion and runoff.
- PMC Section 14.05.200 regulates stormwater management practices to minimize runoff and increase infiltration which recharges groundwater and improves water quality.
- PMC Section 14.05.080 requires project applicants to complete a soil management report in order to reduce runoff. This requires a project applicant to submit soil samples to a laboratory for analysis and recommendations. Soil would be tested for pH, total soluble salts, sodium, percent organic matter, and other physical or chemical properties.

Title 15, Chapter 15.28 – Floodplain Management

PMC Chapter 15.28 minimizes public and private losses due to flood conditions in specific areas by legally enforceable regulations applied uniformly throughout the community to all publicly and privately owned land within flood prone mudslide (i.e., mudflow) or flood related erosion areas. This chapter of the PMC contains the basis for obtaining a development permit in flood prone areas and construction standards intended to minimize impacts of flooding.

5.9.3 ENVIRONMENTAL SETTING

5.9.3.1 Regional Hydrology

The City of Palmdale is situated within the southern region of the Antelope Valley Watershed, which is part of the Antelope Valley Groundwater Basin. The Antelope Valley Watershed spans across three counties: Los Angeles County, Kern County, and San Bernardino County, encompassing approximately 1,220 square miles in Los Angeles County, 2,006 square miles in Kern County, and 143 square miles in San Bernardino County. Numerous streams originating from the surrounding mountains and foothills flow across the valley floor, eventually converging into dry lakes adjacent to the northern county line. Unlike watersheds that drain into the Pacific Ocean, the Antelope Valley Watershed lacks defined natural and improved channels outside of the foothills, resulting in unpredictable sheet flow patterns (City of Palmdale, 2022, p. 4.10-1; LADPW, n.d.).

5.9.3.2 Watershed

The Littlerock Dam is located just south of the City of Palmdale in the San Gabriel Mountains and serves as the Palmdale Water District's (PWD) primary source of local surface water. The reservoir receives water from natural runoff of the San Gabriel Mountains, as well as from Littlerock and Santiago Canyons. The primary tributaries that supply water to the PWD service area are Littlerock and Big Rock Creeks, which flow north from the San Gabriel Mountains. The reservoir's watershed is 65 square miles in size and is located within the Angeles National Forest. The PWD's surface water is stored at both Little Rock Creek Dam Reservoir and Lake Palmdale. Little Rock Dam Reservoir has a capacity of approximately 3,270-acre-feet and is filled by natural runoff from the local San Gabriel Mountains. Water from Little Rock Reservoir is transferred to Palmdale Lake through an open channel connecting the two reservoirs. This local surface water supply has historically been of very high quality (City of Palmdale, 2022).

5.9.3.3 Groundwater Basin

The US Geological Survey (USGS) has identified a series of subbasins in the Antelope Valley Groundwater Basin, which encompasses 1,580 square miles of Los Angeles County, Kern County, and, less prominently, San Bernardino County, and has a storage capacity of approximately 70,000,000-acre-feet (City of Palmdale, Rincon Consultants, 2022). The Antelope Valley Groundwater Basin is comprised of the upper (principal) aquifer and the lower (deep) aquifer. The Project site is located within the Lancaster groundwater subbasin. The Lancaster subbasin is in the center of the Antelope Valley Groundwater Basin with its southernmost portions lying within the PWD service area. PWD operates 10 wells in the Lancaster subbasin, with a pumping capability of approximately 12,500 gallons per minute (gpm) (City of Palmdale, 2022).

5.9.3.4 Water Quality

The Project site is within the jurisdiction of the Lahontan RWQCB. The Water Quality Control Plan for the Lahontan Region (Basin Plan) is the governing water quality plan for the region. The Basin Plan notes that although high quality water supplies are available near streams in desert areas of the region, many desert waters have naturally poor quality (e.g., high concentrations of salts, and minerals such as arsenic and selenium). Water quality problems in the region are largely related to nonpoint sources (including erosion from construction, timber harvesting, and livestock grazing), stormwater, acid drainage from inactive mines, and individual wastewater disposal systems. There are relatively few point source discharges; these include several wastewater treatment plants, fish hatcheries operated by the California Department of Fish and Wildlife (CDFW), and some geothermal discharges.

5.9.3.5 Water Supply and Groundwater

Since 2004, the PWD and Los Angeles County Waterworks District No. 40 (LACWD 40) are involved in a groundwater adjudication, which aims to establish and manage groundwater rights for the Antelope Valley Groundwater Basin. This process allows for groundwater banking between entities, including the transfer of excess groundwater to other parties. In 2015, PWD and LACWD 40, along with most other involved parties, reached a stipulated judgment regarding groundwater rights allocation. PWD's groundwater production right was set at 2,770 acre-feet per year (AFY), while LACWD 40's was set at 6,789 AFY. Both entities also have access to unused federal reserved water rights and return flow credits from imported water (City of Palmdale, Rincon Consultants, 2022).

For basins that the Department of Water Resources (DWR) has identified as medium to high priority Sustainable Groundwater Management Act (SGMA) requires groundwater sustainability agencies to implement plans and achieve long-term groundwater sustainability. The basin is not currently considered overdrafted by the DWR, and it has been designated as a "low priority" basin. At present, PWD does not have a standalone groundwater management plan, and there is no regional groundwater management plan in place for the Antelope Valley Groundwater Basin. However, the DWR's Bulletin 18, *California's Groundwater* (2019), provides information on the basin's groundwater conditions and management.

5.9.3.6 Existing Flood Zone Designation

The Project site is within "Zone X" of "Other Flood Areas," as determined by the FIRM. These areas are defined as areas of 0.2 percent annual chance of flood; areas of 1 percent annual chance of flood with average depth of less than one foot or with drainage areas of less than one square mile; and areas protected by levees from 1 percent annual chance of flood (FEMA, 2023). Zone X is outside the Special Flood Hazard Areas (SFHAs), which are subject to inundation by the 1 percent chance flood.

5.9.3.7 Existing Drainage

The City of Palmdale Department of Public Works maintains the City's stormwater system and operates closed conduits, open channels, drainage basins, dry wells, and two dry creeks as natural stormwater conveyances. The site is relatively flat with a gentle slope in the northwestern direction. The Project site contains sparse vegetation consisting primarily of grasses and weeds, with a few shrubs located along the northeastern boundary of the Project site. There is no existing public storm drain infrastructure along the Project frontages or within the vicinity of the Project site.

5.9.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- | | |
|-------------|--|
| Hydrology-1 | Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; |
| Hydrology-2 | Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; |
| Hydrology-3 | 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 result in a substantial erosion or siltation on- or off-site; |

- Hydrology-4 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Hydrology-5 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 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;
- Hydrology-6 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 impede or redirect flood flows;
- Hydrology-7 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or
- Hydrology-8 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

5.9.5 METHODOLOGY

This evaluation of the significance of potential impacts related to hydrology and water quality is based on a review of published information and reports regarding regional hydrology, groundwater conditions, and surface water quality. The potential impacts on hydrology and water quality were evaluated by considering the general type of pollutants that operation of the Project would generate during construction and operation. In determining the level of significance, the analysis recognizes that development under the proposed Project would be required to comply with relevant federal, State, and regional laws and regulations that are designed to ensure compliance with applicable water quality standards and waste discharge requirements. Because the regional and local regulations related to water quality standards have been developed to reduce the potential of pollutants in the water resources (as described in Section 5.9.2, *Regulatory Setting*, above), and are implemented to specific waterbodies, such as 303(d) TMDL requirements, or development projects such as grading and construction permit regulations, implementation of all relevant water quality and hydrology requirements would limit the potential of the proposed Project to a less than significant impact.

5.9.6 ENVIRONMENTAL IMPACTS

IMPACTS HYDROLOGY-1: THE PROPOSED PROJECT WOULD NOT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY.

Construction

Less than Significant Impact. Implementation of the proposed Project includes development involving site preparation, construction of two new buildings, parking areas, and infrastructure improvements. Grading, stockpiling of materials, excavation, construction of new structures, and landscaping activities would expose and loosen sediment and building materials, which have the potential to mix with stormwater and urban runoff and degrade surface and receiving water quality. Additionally, construction generally requires the use of heavy equipment and construction-related materials and chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. In the absence of proper controls, these

potentially harmful materials could be accidentally spilled or improperly disposed of during construction activities and could wash into and pollute surface waters or groundwater, resulting in a significant impact to water quality.

Pollutants of concern during construction activities generally include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction, which would have the potential to be transported via storm runoff into nearby receiving waters and eventually may affect surface or groundwater quality. During construction activities, excavated soil would be exposed, thereby increasing the potential for soil erosion and sedimentation to occur compared to existing conditions. In addition, during construction, vehicles and equipment are prone to tracking soil and/or spoil from work areas to paved roadways, which is another form of erosion that could affect water quality.

However, the proposed Project would be required to comply with the NPDES construction regulations and the SWRCB Construction General permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ, 2012-006-DWQ, and 2022-0057-DWQ) that requires development and implementation of a SWPPP (PPP HYD-1). The SWPPP is required during the City's plan check and permitting process, as stated under PMC Chapter 14.05, and would include construction BMPs during construction activities to minimize potential pollutants from entering stormwater during Project construction. In addition, in compliance with Section 14.05.080 of the PMC, the proposed Project would also be required to prepare a soil management report to further reduce runoff.

As part of the permitting approval process, construction plans would be required to demonstrate compliance with these regulations. Plans for grading, drainage, erosion control, and water quality would be reviewed by the City's Department of Public Works prior to issuance of grading permits to ensure that the applicable and required LID BMPs are constructed during implementation of the Project.

Therefore, compliance with the State Construction General Permit, the City's General Plan policies, PMC and other applicable requirements including the CWA, which would be verified during the City's construction permitting process, would ensure that Project impacts related to construction activities resulting in a degradation of water quality would be less than significant.

Operation

Less than Significant Impact. As previously mentioned, the Project site is within the Antelope Valley Watershed and within the jurisdiction of the Lahontan Region 6 of the State RWQCB. The nearest impaired water body is Palmdale Lake, located approximately 6.8 miles southwest of the Project site; however, the Project site is not tributary to Palmdale Lake, as Palmdale Lake is located at an elevation of approximately 2,840 feet above mean sea level (amsl), while the elevations on the Project site range from approximately 2,460 feet amsl to 2,474 feet amsl. Accordingly, the Project has no potential to contribute to any existing water quality impairments in Palmdale Lake.

The Project applicant proposes a tentative parcel map to subdivide the approximately 150.63-acre Project site into three parcels. The Project would develop two warehouses, each totaling 1,500,856 square feet (SF) on two of the parcels. The third parcel would be dedicated to the construction of a stormwater detention basin that would retain stormwater runoff to minimize potential for stormwater to leave the site to other water bodies. Additional improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, pavement of parking areas and driveways, and offsite roadway improvements. In total, the proposed development would add 5,681,535 SF of impervious surface area, and have approximately 13.4 percent of the Project site as pervious landscaping. Pursuant to PMC Section

14.05, all Landscape Design Plans must be submitted to the City and must include plants approved by the City in order to ensure the use of low-water plants. In addition, irrigation design plans must follow PMC requirements in order to practice efficient water use. Adherence to the PMC Title 14 Chapter 14.05 would reduce the use of groundwater and maximize infiltration.

Additionally, the Drainage Management Plan (DMP) of the City of Palmdale establishes the hydrologic and hydraulic requirements for development within the City limits in accordance with revised procedures developed by the County of Los Angeles Department of Public Works and adopted by the City of Palmdale. It is the policy of the City of Palmdale that each development consisting of five acres or greater in size shall attenuate on-site storm runoff as required by drainage law and shall prepare Hydrology and Hydraulic Studies in accordance with the DMP. Pursuant to General Plan Policy SE-4.2, the proposed Project would be required to comply with the DMP and the City of Palmdale design standards as ensured through the development review process. The DMP would require the installation of an onsite storm drain system to remove particulate pollutants and to reduce maximum runoff values associated with development to no more than 85 percent of the predeveloped peak flow rates for the 50-year storm event. However, due to the absence of any existing or proposed nearby storm drain improvements, the proposed stormwater detention basin has been designed to retain the entire storm runoff volume for two successive 100-year storms (Appendix I). Therefore, with compliance to the DMP requirements and the City of Palmdale design standards and procedures, site design would minimize impervious surfaces, provide adequate landscaped areas, and attenuate on-site runoff.

Implementation of the proposed Project would comply with BMPs pursuant to the NPDES requirements, and the PMC, as verified by the City's development review and permitting process. Post construction BMPs and LID included in the Project drainage management plan would avoid potential quality degradation of receiving waters resulting from proposed development. BMPs would include non-structural water quality controls to further minimize potential of water quality degradation of receiving waters. Non-structural BMPs would include but are not limited to:

- Education of property operators on stormwater pollutants;
- Enclosed trash receptacle areas;
- Effective landscape design to minimize water use and maximize stormwater treatment;
- BMP maintenance activities;
- California Code of Regulation (CCR) Title 22 compliance;
- Compliance with local water quality ordinances; and
- Implementation of a spill contingency plan.

Overall, compliance with applicable laws and regulations and implementation of the City's General Plan goals and policies would minimize the potential for water quality degradation, ensure compliance with waste discharge requirements, and reduce impacts to a less-than-significant level.

IMPACT HYDROLOGY-2: THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE BASIN.

Less than Significant Impact. The Project site is underlain by the Antelope Valley Groundwater Basin, which is fully adjudicated and managed by the LACWD 40. The Sustainable Groundwater Management Act (SGMA) of 2014 created a statewide framework to help protect groundwater resources over the long-term. SGMA is comprised from a three-bill legislative package, including AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), and subsequent statewide regulations. SGMA requires local agencies form groundwater sustainability agencies (GSAs) for high and medium priority basins. GSAs are required to then

develop and implement groundwater sustainability plans (GSPs) to avoid undesirable results and mitigate overdraft within 20 years. Low priority basins are not required to form GSAs or GSPs at this time. The Antelope Valley Groundwater Basin is a low priority basin that is not required to form a GSA or GSP. Additionally, the Antelope Valley Groundwater basin is exempt from this requirement due to the adjudication (PWD, 2021). Therefore, the Project would not conflict with the SGMA.

Groundwater within the Project area is adjudicated, which manages groundwater pumping such that substantial depletion of groundwater supplies would not occur. As described previously, the PWD's groundwater production right is set at 2,770 AFY and the LACWD 40's is set at 6,789 AFY. Both entities also have access to unused federal reserved water rights and return flow credits from imported water. The water that would be provided to the Project would be through these service providers and adjudicated quantities. Therefore, the proposed Project would not conflict with the groundwater basin adjudications and would not impede existing groundwater management.

As previously analyzed in Impact Hydrology-1, approximately 13.4 percent of the Project site would include pervious landscaping that would capture and infiltrate stormwater. In addition, on-site captured stormwater would be conveyed to a detention basin that would have sufficient storage volume able to store two successive 100-year storms. This basin would retain and fully infiltrate water quality volume on-site and no runoff from the developed portions of the site would discharge off-site. Pursuant to PMC Section 14.05, all Landscape Design Plans must be submitted to the City and must include approved plants in order to ensure the use of low-water plants. In addition, irrigation design plans must follow PMC requirements in order to practice efficient water use. Adherence to the PMC Title 14 Chapter 14.05 would reduce the use of groundwater and maximize infiltration. Because all runoff generated on the developed portions of the Project site would infiltrate into the groundwater table, the Project would not interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Overall, compliance with the PMC and the MS4 permit, as verified by the City's development review and permitting process, would ensure that Project impacts related to groundwater depletion and recharge would be less than significant.

IMPACT HYDROLOGY-3: THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE.

Construction

Less than Significant Impact. Construction of the Project would require site clearing and grading. Excavation, grading, and other site preparation activities would loosen soils, which has the potential to result in erosion and the loss of topsoil. Also, the Project site is generally flat and does not contain substantial slopes that could induce erosion or siltation. As discussed above, the existing NPDES Construction General Permit, also included as PPP HYD-1, requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for construction activities that disturb one acre or more of soils. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alteration of a drainage pattern during construction activities.

Overall, with implementation of the existing construction regulations that would be verified by the City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be less than significant.

Operation

Less than Significant Impact. The existing drainage pattern for the site generally flows from the south to the north. Runoff from the site that is not captured by the stormwater detention basin, would be collected via a proposed onsite private storm drain system (including catch basins and storm drainpipes) and conveyed in the northerly direction to a proposed storm water management system. Stormwater runoff from each building would drain to its truck yard and parking lots, then drain via proposed catch basins and detention drains to the northerly detention basin. Due to the absence of nearby storm drain improvements, the proposed stormwater detention basin would retain the entire stormwater runoff volume of which would be able to store two successive 100-year storms. There are no existing drainage facilities to discharge to, thus the basin design would contain the runoff and infiltrate the stormwater to empty itself. As such, there would be no resulting erosion or siltation on- or off-site.

The Project site would be mostly developed with impervious surfaces and onsite landscaping would minimize the potential for erosion or siltation on site. As previously discussed, the Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to MS4 requirements, limiting offsite stormwater flows. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Department of Public Works to ensure that they meet the County NPDES Permit and limit the potential for erosion and siltation. Therefore, impacts related to alteration of a drainage pattern and erosion/siltation from operational activities would be less than significant.

IMPACT HYDROLOGY-4: THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF-SITE.

Construction

Less than Significant Impact. Construction of the proposed Project would include activities that could temporarily alter the existing drainage pattern of the site, for example by constructing foundations and paved areas, and could result in flooding on- or offsite if drainage is not properly controlled. However, as described previously, implementation of the Project requires compliance with the Construction General Permit, and implementation of a SWPPP that would address site-specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes diverting runoff from rooftops and other impervious surfaces to vegetated areas, when possible, to promote infiltration and controlling the perimeter of the Project site using sandbags, berms, and silt fencing. Therefore, impacts would be less than significant, because these regulations would ensure that the rate or amount of surface runoff would not substantially increase during the construction phase.

Operation

Less than Significant Impact. As described previously, the proposed Project would result in an increase in impervious area onsite, and the Project would increase surface flows compared to existing conditions. However, installation of new stormwater facilities, including a stormwater basin, pervious landscaped areas, and new storm drains. The proposed stormwater drainage system would collect onsite flows via a series of catch basins and storm drains and convey it to the stormwater detention basin for infiltration. Also, stormwater runoff would be directed towards landscaped areas wherever possible for treatment and infiltration. The

use of the drainage facilities and landscaping would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the onsite detention basin.

As determined by the Preliminary Hydrology Report (Appendix I), the proposed drainage improvements would increase peak flow rates for a 50-year peak flow rate from existing conditions of 11.7 cubic feet per second (cfs) to 136 cfs. Due to the absence of any nearby storm drain improvements, the proposed stormwater detention basin would be designed to retain the entire storm runoff volume of two successive 100-year 24-hour storms. The proposed hydromodifications would be consistent with NPDES MS4 requirements. Therefore, the proposed Project would not result in flooding conditions to upstream or downstream properties with the proposed improvements. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Department of Public Works to ensure that they meet the NPDES Permit requirements and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with the MS4 permit and the City's development requirements. Thus, implementation of the Project would not substantially increase the rate or amount of surface runoff, such that flooding would occur. Impacts would be less than significant.

IMPACT HYDROLOGY-5: THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF.

Construction

Less than Significant Impact. As described in the previous responses, the proposed Project would be required to implement a SWPPP (pursuant to PMC Chapter 8.04 and General Plan Policy SE-4.3) during construction that would implement BMPs, such as the use of silt fencing, fiber rolls, and gravel bags, that would ensure that runoff would not substantially increase during construction, and that pollutants would not discharge from the Project site, which would reduce potential impacts to drainage systems and water quality to a less than significant level. In addition, implementation of the proposed drainage improvements, the existing drainage pattern would be maintained. Furthermore, the proposed Project would be consistent with City construction standards and NPDES permit requirements, which would be verified by the City during the development review and permitting process. Therefore, Project impacts would be less than significant.

Operation

Less than Significant Impact. The proposed Project would develop an undeveloped site, resulting in the addition of 5,681,535 SF of impervious surface area and approximately 880,912 SF of pervious landscaping. The existing drainage pattern for the site generally flows from the south to the north. Runoff from the site would be collected via a proposed onsite private storm drain system (including catch basins and storm drain pipes) and conveyed in the northerly direction to a proposed stormwater detention basin. Stormwater runoff from each building would drain to its truck yard and parking lots, then drain via proposed catch basins and detention drains to the northerly detention basin. Due to the absence of nearby storm drain improvements, the proposed stormwater detention basin would retain the entire stormwater runoff volume of which would be able to store two successive 100-year storms. There are no existing drainage facilities to discharge to, thus the basin design would contain the runoff and infiltrate the stormwater to empty itself. The drainage characteristics would be maintained similar to the existing condition. As discussed above,

stormwater runoff would be collected and treated via the proposed detention basin, therefore the Project would not result in significant impacts related to water quality. Furthermore, the proposed drainage improvements would be consistent with City standards and NPDES permit requirements, which would be verified by the City during the development review and permitting process. Therefore, Project impacts would be less than significant.

IMPACT HYDROLOGY-6: THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS.

Construction

Less than Significant Impact. As described above, the Project site generally slopes south to north. Implementation of the Project would maintain existing drainage patterns of the Project site. Construction of the proposed Project would include activities that could temporarily alter the existing drainage pattern of the site and could result in flooding on- or off-site if drainage is not properly controlled. However, as described previously, implementation of the Project requires compliance with the Construction General Permit, and implementation of a SWPPP that would address site specific drainage issues related to construction of the Project and include BMPs to eliminate the potential of flooding or alteration of a drainage pattern during construction activities. This includes regular monitoring and visual inspections during construction activities. Compliance with the NPDES Permit and a SWPPP, as verified by the City through the construction permitting process, would prevent construction-related impacts related to potential impediment or redirection of flood flows. Therefore, Project impacts would be less than significant.

Operation

Less than Significant Impact. The Project is within Zone X of “Other Flood Areas,” as determined by the FIRM. Zone X is characterized by areas determined to be outside of the 1% percent annual chance of flood. As described previously, the proposed Project would result in an increase in impervious areas and an increase surface flows compared to existing conditions. However, installation of new stormwater drainage facilities, including an aboveground earthen basin, pervious landscaped areas, and new storm drains would ensure that onsite stormwater and flood flows are collected and treated.

Due to the absence of nearby storm drain improvements, the proposed basin would retain the entire stormwater runoff volume of which would be able to store two successive 100-year storms. In addition, landscaped areas would accept runoff water from impervious surfaces. The use of the detention basin and landscaping would regulate the rate and velocity of stormwater flows and would control the amount of discharge within the on-site drainage system. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City’s Department of Public Works to ensure that they meet the NPDES and would not result in flood impacts.

Overall, the drainage facilities proposed for the Project have been sized to be consistent with City standards and permit requirements. The Project site is not within an existing floodplain and would not contribute to increased flooding due to the fact that its flooding risk is low, and the Project includes all of the aforementioned stormwater drainage improvements. Thus, implementation of the Project would not substantially impede or redirect flood flows and impacts would be less than significant.

IMPACT HYDROLOGY-7: THE PROPOSED PROJECT WOULD NOT BE LOCATED IN FLOOD HAZARD, TSUMANI, OR SEICHE ZONES, AND RISK RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION.

No Impact. As defined by the Federal Emergency Management Agency (FEMA), the 1% annual chance flood (or 100-year flood) is the flood that has a 1% chance of being equaled or exceeded in any given year. The Special Flood Hazard Area is the area subject to flooding by the 1% annual chance flood (FEMA, 2023).

As described in Section 5.9.3, *Environmental Setting*, the Project site is within “Zone X” of “Other Flood Areas,” as determined by the FIRM published by FEMA (06037C0450F). These areas are defined as areas of 0.2 % annual chance flood; areas of 1% annual chance flood with average depth of less than one foot or with drainage areas of less than one square mile; and areas protected by levees from 1% annual chance flood (FEMA, 2023). As mentioned above, “Zone X” is an area located outside of the 100-year flood plain.

Tsunamis are large waves that occur in coastal areas; therefore, since the City is not located in a coastal area, no impacts due to tsunamis would occur. Although a seismic event could cause a seiche to occur at Lake Palmdale, which could potentially overtop the dam, the design report for the dam considers a reflection of the wave on return unlikely. Also, wave volume above the dam would not be substantial and would not result in damaging floods (City of Palmdale, Rincon Consultants 2022). Therefore, the Project would result in no impacts related to a flood hazard, tsunami, or seiche and release of pollutants due to Project inundation.

IMPACT HYDROLOGY-8: THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN.

Less than Significant Impact. The Project site is undeveloped, and the proposed Project would result in a substantial increase of impervious surfaces. As described above, the proposed storm drain system is sized to adequately accommodate increased stormwater flows from the Project area and would maintain the existing drainage pattern of the site. Runoff would discharge and be treated into the onsite detention basin that would filter and infiltrate the stormwater into site soils and potentially the groundwater. Therefore, the Project would not conflict with the SGMA. As detailed previously, groundwater within the Project area is adjudicated, which manages groundwater pumping. The water that would be provided to the Project would be from LACWD 40 and from the adjudicated quantities of groundwater. Therefore, the proposed Project would not conflict or obstruct a sustainable groundwater management plan.

The City of Palmdale is within the jurisdiction of the Lahontan RWQCB (Region 6), which sets water quality standards for all ground and surface waters within its region through implementation of a Water Quality Control Plan (Basin Plan). This Basin Plan gives direction on the beneficial uses of the State waters within Region 6, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the established standards. The NPDES and City’s General Plan require proposed projects in the Project area to prepare a SWPPP; this requirement is also included as PPP HYD -1. A SWPPP is required to include BMPs for source control, pollution prevention, site design, and structural treatment control BMPs. As part of the permitting approval process, construction plans would be required to demonstrate compliance with these regulations to minimize the potential of the Project to result in a degradation of water quality. Plans for grading, drainage, and erosion control, required in accordance with PPP HYD -2, would be reviewed by the City’s Department of Public Works prior to issuance of grading permits to ensure compliance. Thus, impacts would be less than significant.

5.9.7 CUMULATIVE IMPACTS

The areas considered for cumulative impacts to hydrology and water quality are the Antelope Valley Watershed for drainage and water quality impacts, and the Antelope Valley Groundwater Basin for groundwater impacts.

Water Quality

The geographic scope for cumulative impacts related to hydrology and water quality includes the Antelope watershed because cumulative projects and developments pursuant to the proposed Project could incrementally exacerbate the existing impaired condition and could result in new pollutant-related impairments.

Related developments within the watershed would be required to implement water quality control measures pursuant to the same NPDES General Construction Permit that requires implementation of a SWPPP (for construction), and BMPs to eliminate or reduce the discharge of pollutants in stormwater discharges, reduce runoff, reduce erosion and sedimentation, and increase filtration and infiltration. The NPDES requirements have been set by the SWRCB and implemented by the RWQCB (and PMC) to reduce incremental effects of individual projects so that they would not become cumulatively considerable. Therefore, overall potential impacts to water quality associated with present and future development in the watershed would not be cumulatively considerable upon compliance with all applicable laws, permits, ordinances and plans. As detailed previously, the proposed Project would be implemented in compliance with all regulations, as would be verified during the permitting process. Therefore, cumulative impacts related to water quality would be less than significant.

Drainage

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above the proposed Project includes installation of a detention basin that would retain, filter, and infiltrate two successive 100-year storms. These facilities would retain runoff and reduce erosion and siltation. In addition, pursuant to State and regional regulations that require development projects to maintain pre-project hydrology, no net increase of off-site stormwater flows would occur. As a result, the proposed Project would not generate runoff that could combine with additional runoff from cumulative projects that could cumulatively combine to impact erosion, siltation, flooding, and water quality. Thus, cumulative impacts related to drainage would be less than significant.

Groundwater Basin

The geographic scope for cumulative impacts related to the groundwater basin is the Antelope Valley Groundwater Basin. As described above, the proposed Project includes installation of a detention basin that would recharge stormwater into the groundwater basin. In addition, the volume of water that would be needed by the Project is within the anticipated groundwater pumping volumes since the basin is adjudicated. Therefore, the Project would not result in changes to the projected groundwater pumping that would decrease groundwater supplies. As a result, the proposed Project would not generate impacts related to the groundwater basin that have the potential to combine with effects from other projects to become cumulatively considerable. Therefore, cumulative impacts related to the groundwater basin would be less than significant.

5.9.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

5.9.8.1 Existing Regulations

- National Pollutant Discharge Elimination System (NPDES) Construction General Permit, Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ, 2012-0006-DWQ, and 2022-0057-DWQ
- California Water Resources Control Board Low Impact Development (LID) Policy
- Regional MS4 permit (Order No. 013-0001-DWQ)
- Municipal Code Chapter 8.04 - Grading and Excavation

5.9.8.2 Plans Programs and Policies

The following Plans, Programs, and Policies (PPPs) that are listed below would reduce impacts related to hydrology and water quality. These actions will be included in the project's mitigation monitoring and reporting program:

PPP HYD -1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: Phase II Small MS4 General Permit. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the Drainage Management Plan (DMP) of the City of Palmdale which establishes the hydrologic and hydraulic requirements for development within the City limits in accordance with revised procedures developed by the County of Los Angeles Department of Public Works and adopted by the City of Palmdale. It is the policy of the City of Palmdale that each development consisting of five acres or greater in size shall attenuate on-site storm runoff as required by drainage law and shall prepare hydrology and hydraulic studies in accordance with the DMP. Each development is required by City Ordinance to attenuate post-developed flows to 85 percent of pre-developed flows through the installation of an onsite storm drain system to remove particulate pollutants and to reduce maximum runoff values associated with development.

5.9.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts Hydrology-1, Hydrology-2, Hydrology-3, Hydrology-4, Hydrology-5, Hydrology-6, Hydrology-7, and Hydrology-8 would be less than significant.

5.9.10 MITIGATION MEASURES

No mitigation measures are required.

5.9.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable adverse impacts related to hydrology and water quality have been identified and impacts would be less than significant.

5.9.12 REFERENCES

- California Water Boards State Water Resources Control Board. (Last amended June 2022). *Lahontan Basin Plan*. Retrieved November 19, 2023, from https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.html
- City of Palmdale. (October 22, 2022). *Envision Palmdale 2045 City of Palmdale General Plan*. Retrieved November 20, 2023, from <https://palmdale2045gp.org/>
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- Los Angeles County Department of Public Works (LADPW). (n.d.) *Antelope Valley Watershed*. Retrieved November 19, 2023, from <https://dpw.lacounty.gov/wmd/watershed/av/>
- Palmdale Municipal Code (PMC). (May 3, 2022). *Municipal Code*. Retrieved November 22, 2023, from <https://www.codepublishing.com/CA/Palmdale/>
- Palmdale Water District. (2021). *2020 Urban Water Management Plan*. Retrieved November 19, 2023, from https://www.palmdalewater.org/wp-content/uploads/2021/08/PWD_Final_2020_UWMP.pdf
- State Water Resources Control Board Construction Stormwater Program. (2024). Retrieved November 20, 2023, from http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.html.
- Thienes Engineering, Inc. (January 13, 2022). *Preliminary Hydrology Report. (Appendix I)*

5.10 Land Use and Planning

This section describes the existing land use and planning conditions of the Palmdale Logistics Center Project (Project) site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts. Information contained in this section is based on review of local, regional, and statewide policies and regulations encompassing the Project site, including:

- Southern California Association of Governments (SCAG) *Connect SoCal Regional Transportation Plan/Sustainable Communities Plan* (RTP/SCS)
- *City of Palmdale General Plan*, adopted October 2022
- City of Palmdale Municipal Code

5.10.1 REGULATORY SETTING

5.10.1.1 State Regulations

California Planning and Zoning Law

The legal framework under which California cities and counties exercise local planning and land use functions is set forth in California Planning and Zoning Law, Government Code Sections 65000-66499.58. Under State planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how a jurisdiction may create a general plan, but there are fundamental requirements that must be met. As stated in Section 65302 of the California Government Code, “The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principle, standard, and plan proposals.” While a general plan will contain the community vision for future growth, California law also requires each plan to address the mandated elements listed in Section 65302. The mandatory elements for all jurisdictions are land use, circulation, housing, conservation, open space, noise, and safety. Each of the elements must contain text and descriptions setting forth objectives, principles, standards, policies, and plan proposals.

Senate Bill 743

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under the California Environmental Quality Act (CEQA) to balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions. An in-depth discussion of SB 743 is provided in Section 5.14, *Transportation*. In summary, SB 743 changes the focus of environmental review of transportation impacts. In the past, environmental review of transportation impacts focused on the delay that vehicles experience at intersections and on roadway segments, which is often measured using levels of service (LOS). Under SB 743, LOS can no longer be used to determine significant transportation impacts under CEQA. The State CEQA Guidelines were updated in 2018 to require use of the vehicle miles traveled (VMT) methodology for assessing transportation impacts.

5.10.1.2 Regional Regulations

Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated Metropolitan Planning Organization (MPO) for six Southern California counties (Los Angeles, Ventura, Orange, San Bernardino,

Riverside, and Imperial), and is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. The City of Palmdale is one of the many jurisdictions that fall under SCAG. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (also known as the Connect SoCal Plan) was adopted on September 3, 2020, and presents the land use and transportation vision for the region through the year 2045, providing a long-term investment framework for addressing the region's challenges (SCAG, 2020). The RTP/SCS explicitly lays out goals related to housing, transportation, equity and resilience in order to adequately reflect the increasing importance of these topics in the region, and where possible the goals have been developed to link to potential performance measures and targets. The RTP/SCS development process involved working closely with local governments throughout the region to collect and compile data on land use and growth trends. The core vision of the RTP/SCS is to build upon and expanded land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern.

Antelope Valley Air Quality Management Plan

The Antelope Valley Air Quality Management District (AVAQMD) and SCAG are responsible for preparing the air quality management plan (AQMP) of the Air Basin the Project is located in, addressing federal and State Clean Air Act requirements. The AQMP details goals, policies, and programs for improving air quality in the Basin. The AVAQMD's most recent air quality plans are the *Federal 70 ppb Ozone Attainment Plan* (2023) and the *75 ppb Ozone Attainment Plan* (2017).

5.10.1.3 Local Regulations

City of Palmdale General Plan

The City of Palmdale General Plan is intended to provide direction for future development of the City. It represents a formal expression of community goals and desires, provides guidelines for decision making about the City's development, and fulfills the requirements of California Government Code Section 65302 requiring local preparation and adoption of General Plans. The General Plan should be viewed as a dynamic guideline to be refined as the physical environment of the City changes. The General Plan includes the following mandated and optional elements:

- Land Use and Community Design Element
- Circulation and Mobility Element
- Economic Development Element
- Military Compatibility Element
- Equitable and Healthy Communities Element
- Parks, Recreation, and Open Space Element
- Conservation Element
- Public Facilities, Services, and Infrastructure Element
- Safety Element
- Sustainability, Climate Action, and Resilience Element
- Air Quality Element
- Noise Element
- Housing Element

The goals and policies of the existing General Plan that are relevant to the proposed Project are listed below, organized by General Plan Element.

Land Use and Community Design Element

Policy LUD-3.5 Ensure that there will be adequate water and wastewater system capacity to meet projected demand by continuing to oversee the development of adequate and dependable public services and facilities to support both existing and future development.

Policy LUD-3.6 Continue to implement comprehensive water and wastewater management programs and ensure that future developments pay their fair share for any infrastructure improvements demand necessary.

Goal LUD-4	High-quality architecture and site design in the renovation and construction of all buildings.
Policy LUD-4.1	Use simple, urban building forms made with permanent materials with high-quality detailing that stands the test of time.
Policy LUD-4.2	Use building organization and massing to derive scale and articulation rather than surface ornamentation.
Policy LUD-4.3	Convey façade articulation through the strength, depth, and permanence of building materials. Thinner cladding materials, such as stucco, masonry veneers, and wood or simulated wood, may be used when finished to appear as durable and authentic as the materials they simulate.
Policy LUD-4.5	Use visual and physical design cues within the design of a building and within building entries to emphasize the building entrance and connections to public spaces and public pathways/networks.
Policy LUD-4.6	Require four-sided architecture - all facades of a building are designed with quality, care, and visual interest - in the urban core (primarily RN3, RN4 and MU3). Encourage four-sided architecture in other areas.
Goal LUD-6	Pedestrian-oriented, human-scale and well-landscaped streets and civic spaces.
Policy LUD-7.2	Use Crime Prevention through Environmental Design strategies (CPTED) in new and existing development to improve public safety, including the following: <ul style="list-style-type: none"> • Active public space • Building design to promote “eyes on the street” • Clear delineation between private and public space • Natural access control between public and private space • Maintenance of public places • Removal or repair of vandalism or broken property
Goal LUD-14	Facilitate employment growth through expanded operations onsite and by preserving the buffer between Air Force Plant 42 and the rest of the city.
Goal LUD-14.2	Continue to buffer this area from adjacent, non-compatible residential and commercial uses.
Goal LUD-16	Increased job opportunities in Palmdale through expanded flex, light industrial, production/ distribution/repair (PDR), and creative/flex land uses.
Policy LUD-16.1	Strive for a ratio of at least 1 job per employed resident (which effectively means growing jobs faster than housing during the Plan timeframe).
Policy LUD-17.1	Minimize land use compatibility conflicts that discourage attraction and retention of production, distribution, and service and repair businesses in areas zoned for industrial use.
Policy LUD-18.2	Expand a core area of light industrial and service uses that provide middle-income jobs for Palmdale residents.
Policy LUD-18.3	Buffer heavy industrial uses and light industrial uses, such as general services, light manufacturing, and storage uses from residential neighborhoods.

Circulation and Mobility Element

Goal CM-1	Build and maintain a transportation system that is safe and comfortable for travelers of all modes regardless of age or ability.
Policy CM-1.1	Design and maintain the public right-of-way through a complete streets approach that facilitates safe, comfortable, and efficient travel for all roadway users.
Policy CM-1.3	Identify and program mitigation measures for gaps and deficiencies in the transportation system to accommodate each major transportation mode.
Goal: CM-2	Build and maintain a transportation system that accommodates future growth and maintains transportation networks for all modes.
Policy CM-2.8	Ensure that the cumulative and regional impacts of new development on the circulation system are mitigated to the extent feasible, concurrent with development. Concurrent shall mean that required facilities are installed as needed during various stages of development.
Policy CM-3.7	Work with large employers to implement programs that expand access to non-drive alone commute options for all commuters, including hourly staff and contract workers.
Policy CM-6.3	Promote trip reduction strategies, including telecommuting, through land-use decisions and TDM programming strategies.
Policy CM-6.4	Require TDM Plans for major employers, as defined by the Air Quality Management District.

Economic Development

Goal ED-1	Preserve the existing economic base of high-quality jobs in the City.
Policy ED 1.1	Attract supply chain employers for the manufacturing and defense industries to strengthen Palmdale's economic viability and competitiveness within these sectors.
Goal ED-2	Attract diverse and high-quality job options that contribute to the City's economic growth by diversifying the economic base.

Military Compatibility Element

Goal MC-1	Compatible adjacent land uses that support continued operation of Plant 42.
Policy MC-1.1	Maintain appropriate land use designations surrounding Plant 42 to limit incompatible uses and to ensure continued safe operation of airport activities.
Policy MC-1.2	Continue to buffer Plant 42 from adjacent, non-compatible residential and commercial uses by reviewing development applications in the Military Influence Area for potential conflicts.
Goal MC-2	Mitigate and/or avoid encroachment of incompatible development into space utilized by Plant 42 air operations.
Policy MC-2.1	<p>Within the Accident Potential Zones (APZ), review all development proposals for hazards to aircraft in flight including uses that release into the air any substance such as:</p> <ul style="list-style-type: none"> • Steam, dust, or smoke, which could impair pilot visibility; uses that produce light emissions, glare, or distracting lights, which could interfere with pilot vision or be

mistaken for airfield lighting; sources of electrical emissions, which could interfere with aircraft communications or navigation; and uses that could attract birds or waterfowl to the extent that they would pose a danger to aircraft operation in the vicinity of Plant 42.

- Require project applicants to notify Plant 42 and the City of any potential hazards, including but not limited to the above list.

Policy MC-3.1 Ensure that all new land use proposals comply with the noise and overflight policies of the most recent AICUZ for Plant 42.

Policy MC-3.5 New development within the 65 DBL noise contour area must adhere to the recommended noise level reductions incorporated into the design and construction.

Equitable and Healthy Communities Element

Policy EHC-16.3 Use Crime Prevention Through Environmental Design (CPTED) strategies in new and existing development to improve public safety, including the following:

- Active public space
- Building design to promote “eyes on the street”
- Maintenance of public places
- Removal or repair of vandalism or broken property

Conservation Element

Goal CON-1 **Protect Significant Ecological Areas in and around the City, including, but not limited to, sensitive flora and fauna habitat areas.**

Policy CON-1.1 Ensure local compliance with the California Endangered Species Act and the Federal Endangered Species Act (ESA).

Policy CON-1.2 Continue enforcing the City’s Native Vegetation Ordinance to protect western Joshua trees and Juniper trees.

Policy CON-1.3 Comply with the required implementation of the West Mojave Plan for protection of desert tortoise and Mohave ground squirrel.

Goal CON-5 **Protect the quality and quantity of local water resources.**

Policy CON-5.1 Ensure that ground water supplies are recharged and protect natural recharge areas such as the Little Rock and Big Rock Washes, and Amargosa and Anaverde Creeks from pollutants or other materials, which might degrade groundwater supplies.

Policy CON-5.4 Maximize groundwater recharge capabilities with flood control measures.

Goal CON-6 **Minimize the impacts of urban development on groundwater supplies.**

Policy CON-6.2 Require the use of water conserving native or drought resistant plants and drip irrigation systems where feasible.

Policy CON-6.4 Require water conserving appliances and plumbing fixtures in all new construction.

Policy CON-7.1 Assess and implement, when and where feasible, reclaimed water for landscape irrigation.

- Policy CON-7.5** Promote implementation of water reduction and recycling systems that are feasible and appropriate to the Planning Area.
- Goal CON-8** **Protect historical and culturally significant resources, which contribute to the community's sense of history.**
- Policy CON-8.4** Require that new development preserve significant historic, paleontological, or archaeological resources.
- Policy CON-8.5** Conduct Native American consultation consistent with the applicable regulations when new development is proposed in potentially culturally sensitive areas.
- Policy CON-8.6** When human remains suspected to be of Native American origin are discovered, coordinate with the Native American Heritage Commission and any local Native American groups to determine the most appropriate course of action.

Public Facilities, Services, and Infrastructure Element

- Goal PFSI-1** **Maintain superior public facilities to support the Palmdale community.**
- Goal PFSI-2** **Maintain superior public safety services to protect the community and meet the need of residents, businesses, and visitors.**
- Policy PFSI-2.1** Maintain existing or superior average response times for fire and police services as the City's population expands.
- Policy PFSI-2.3** Regularly assess the need for service level expansion for fire and police services as the City's population expands.
- Policy PFSI-2.4** Coordinate with the Los Angeles County Sheriff's Department to ensure that service availability, resources, and staffing are appropriate for the community need.
- Policy PFSI-2.5** Coordinate with the Los Angeles County Fire Department to ensure that service availability, resources, and staffing are appropriate for the community need.
- Goal PFSI-3** **Ensure that all development in Palmdale is served by adequate water distribution and sewage facilities.**
- Policy PFSI-3.4** Through the development review process, reserve land in appropriate locations for construction of drainage facilities.
- Policy PFSI-3.7** Require that all commercial, industrial, institutional, and multiple family uses be connected to a public sewer system with only limited use of private sewage disposal systems.
- Policy PFSI-3.11** Require new development to pay necessary fees for expansion and ongoing maintenance of the sewage disposal system to the appropriate agencies, to handle the increased load, which it will generate.
- Policy PFSI-3.12** Utilize best management practices (BMPs) in the purveyance of water resources and management of wastewater.
- Policy PFSI-3.13** Require new development to minimize storm water runoff and pollutant exposure by incorporating low impact development (LID) measures and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).

- Policy PFSI-3.14** Ensure the provisions of adequate water and wastewater services to all new development.
- Policy PFSI-3.16** Provide sufficient levels of water, sewer, and storm drain services throughout the City.
- Policy PFSI-5.2** Require all new development, including major modifications to existing development, to construct required on-site infrastructure improvements pursuant to City standards.
- Policy PFSI-5.3** Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.
- Policy PFSI-5.5** Require that on and off-site improvements are constructed prior to occupancy of a new development project, or phase thereof, unless otherwise approved by the City.
- Policy PFSI-5.7** Require that individual development projects integrate with adjacent development with respect to backbone infrastructure (streets, sewer, water, and drainage). If adjacent property is undeveloped, a conceptual plan should be prepared to show that the pending development will allow for future integration and development of adjacent properties in a manner which is reasonable from a design, construction, and cost standpoint.
- Policy PFSI-6.3** When feasible, require new utility lines to be constructed underground and along existing utility corridors.
- Policy PFSI-6.4** Coordinate installation of utility line placement with street construction to minimize cost, where possible.
- Policy PFSI-6.5** Coordinate with electricity, gas, and waste providers to ensure adequacy of services for future and current needs.
- Policy PFSI-6.7** When feasible, require new utility lines to be constructed away from fault lines, flood zones, fire zones, and other vulnerable areas.

Safety Element

- Goal SE-1** **A city with minimal public health, safety, and welfare impacts resulting from seismic hazards.**
- Policy SE-1.1** Review development within or adjacent to geologic hazard zones and provide copies of geotechnical reports and studies to be reviewed by a qualified geologist and implement recommendations to ensure adequate provisions for public safety.
- Policy SE-1.2** Require appropriate structural setbacks from active fault rupture traces in accordance with Alquist-Priolo standards and continue to follow California Building Code.
- Goal SE-2** **Minimize public health, safety, and welfare impacts resulting from wildfire hazards.**
- Policy SE-2.9** As part of the city's development review process, require that all new buildings and facilities comply with Los Angeles County, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards and work with the Fire Department to ensure the provision of adequate fire stations, personnel, and equipment to meet the City's needs over time.

Goal SE-3	Minimize risks associated with the transport, storage, use, and disposal of hazardous materials.
Policy SE-3.3	Require clean-up of soil and/or groundwater containing hazardous materials exceeding regulatory action levels to the satisfaction of the agency having jurisdiction prior to granting permits for new development.
Policy SE-3.4	Require transport of hazardous materials along designated routes that minimize risks to the public and sensitive environmental areas and cooperate with regional agencies in developing and maintaining such routes.
Policy SE-3.5	Review proposed development in proximity to any existing or proposed facility that uses, stores, or transports large amounts of hazardous materials to ensure adequate mitigation of impacts related to hazardous materials (e.g., appropriate site design, setbacks, and buffering).
Goal SE-4	Minimize impacts to public safety and/or property as a result of flooding.
Policy SE-5.1	As appropriate, evaluate inundation hazards related to the potential rupture of the following when reviewing development proposals: California Aqueduct, Palmdale Dam, Littlerock Dams and/ or proposed basins.
Goal SE-6	Minimize impacts to public safety and property resulting from aircraft accidents.
Policy SE-6.1	Require all development to be consistent with Department of Defense regulations as outlined in the Air Force Plant 42 Air Installation Compatibility Use Zone (AICUZ) Report and comply with applicable FAA regulations that affect development in the Accident Potential Zones.
Goal SE-7	Ensure safe evacuation of residents in the event of an emergency requiring evacuation.
Policy SE-7.3	Review all new development for consistency with applicable evacuation plans and ensure access to at least two evacuation routes.
Policy SE-7.6	Continue to assess current and projected emergency service needs, and goals or standards for emergency services training for City staff and volunteers as part of the City's Emergency Operation Plan Updates.
Policy SE-8.4	Require all residences and businesses to maintain visible and clearly legible signs and/or street numbers to shorten the response times of emergency personnel.
Policy SE-10.4	Require all commercial and industrial developments to provide adequate lighting for buildings and parking areas as well as sufficient visibility for patrol vehicles to assist in law enforcement surveillance.

Sustainability, Climate Action, and Resilience Element

Goal SCR-3	Green and decarbonized buildings for new construction and major renovations.
Policy SCR-3.1	Integrate CALGreen Tier 1 and Tier 2 green building and energy efficiency standards into new construction and major remodels.
Policy SCR-3.3	Require installation of photovoltaic panels and battery storage on all residential new construction and nonresidential new construction over 5,000 sq. ft.

Goal SCR-4 Reduced greenhouse gas emissions from transportation (SB 379, EO N-79-20).

Policy SCR-4.1 Promote bicycle use with new private development projects through requirements for bicycle parking, lockers and showers, bike share facilities, and when feasible, connections to City bike lanes.

Goal SCR-5 Increased resource capture and reduced waste sent to landfills (SB 1383).*Air Quality Element***Goal AQ-1 Minimize local air pollution caused by motor vehicles.**

Policy AQ-1.1 Reduce the number and length of work-related trips through such means as providing a balance of jobs and housing in the community, promoting alternate work schedules, telecommuting, teleconferencing, company-sponsored ride-share and alternative fuel vehicle programs, use of commuter trains and other alternative modes of transportation to the workplace, creation of additional park and ride facilities, and improving the fiber optic network and connectivity.

Policy AQ-1.3 Reduce vehicle emissions by maintaining and improving traffic flow per the Mobility Element.

Policy AQ-1.8 Use the environmental review process for new development applications to assess and, as necessary, mitigate the impacts of new development related to increased vehicle miles traveled.

Policy AQ-1.10 Restrict freight to certain routes and times by adopting rules and regulations that prohibit the use of trucks in certain areas within Palmdale.

Goal AQ-2 Minimize particulates less than 10 microns in size (PM₁₀) and minimizes activities that generate dust.

Policy AQ-2.2 Require measures at construction sites to prevent deposition of soil onto public right-of-way.

Policy AQ-2.3 Encourage developers to maintain natural contours to the greatest degree possible, to eliminate the need for extensive land clearing, blasting, ground excavation, grading and cut and fill operations.

Policy AQ-2.4 Require erosion and dust control measures for new construction, including covering soil with straw mats or use of chemical soil and dust binders during site grading, followed by hydroseeding and watering disturbed construction areas as soon as possible after grading to prevent fugitive dust.

Goal AQ-3 Reduction and/or elimination of unnecessary sources of air pollution.

Policy AQ-3.1 Promote the AVAQMD program to encourage local entities to install public electric vehicle charging stations to offer incentivize residents to purchase electric vehicles (e.g., vehicle buyback program), and the Carl Moyer program, which aims to improve the local air quality by funding local, cost-effective projects to upgrade heavy-duty equipment (Gross Vehicle Weight Rating greater than 14,000 lbs.) using proven technologies.

Policy AQ-3.4 Reduce reactive organic gas (ROG) and particulate emissions from building materials and construction methods, by promoting the use of nonsolvent-based, high solid, or water-based coatings, and requiring compliance with all pertinent AVAQMD rules.

- Policy AQ-3.5** Minimize emissions of toxic air contaminants that contribute to climate change and ozone depletion, and that create potential health risks for residents, workers, and visitors.
- Policy AQ-3.7** Through the environmental review process for new development applications, ensure that emissions of toxic air contaminants are minimized and that any significant health effects associated with such contaminants are appropriately mitigated.
- Goal AQ-4** **Reduce air pollution caused by energy consumption.**
- Policy AQ-4.2** Encourage energy conservation from all sectors of the community by promoting and/or requiring the use of energy efficient appliances, processes, and equipment, and promoting energy audits and retrofits of existing structures.
- Policy AQ-4.3** Require local government, Palmdale citizens, and local businesses and industries to recycle, as mandated by state law, and to otherwise recycle to the maximum extent possible in accordance with the requirements of the Palmdale Municipal Code.
- Policy AQ-4.4** Require new developments to minimize obstruction of direct sunlight for solar energy systems on adjacent properties.

Noise Element

- Goal N-1** **Minimize resident exposure to excessive noise.**
- Policy N-1.2** Restrict noise sensitive land uses near existing or future air, rail, or highway transportation noise sources unless mitigation measures have been incorporated into the design of the project to reduce the noise levels at the noise sensitive land use to less than 65 dBA CNEL at all exterior living spaces including but not limited to, single-family yards and multi-family patios, balconies, pool areas, cook-out areas and related private recreation areas.
- Policy N-1.3** When proposed stationary noise sources could exceed an exterior noise level of 65 dBA CNEL at the property line or could impact future noise sensitive land uses, require preparation of an acoustical analysis and mitigation measures to reduce exterior noise levels to no more than 65 dBA CNEL at the property line.
- Policy N-1.4** Explore the use of noise abatement strategies such as natural barriers, sound walls, and other buffers to mitigate excessive noise.
- Goal N-2** **Maintain acceptable noise environments throughout the City.**
- Policy N-2.3** Utilize any or all the following measures to maintain acceptable noise environments throughout the city:
- Control of noise at its source, including noise barriers and other muffling devices built into the noise source.
 - Provision of buffer areas and/or wide setbacks between the noise source and other development.
 - Reduction of densities, where practical, adjacent to the noise source (freeway, airport, railroad).
 - Use of sound insulation, blank walls, double paned windows and other design or architectural techniques to reduce interior noise levels.
 - Designation of appropriate land uses adjacent to known noise sources.

- Policy N-2.4** Where deemed appropriate based upon available information, require acoustical analysis and appropriate mitigation for noise-sensitive land uses proposed in areas that may be adversely impacted by significant intermittent noise sources. Such noise sources may include but not be limited to railroads, racetracks, stadiums, aircraft overflights and similar uses.
- Goal N-3** **Promote noise compatible land uses within the 65 dBA CNEL contour and the Frequent Overflight Area of Air Force Plant 42.**
- Policy N-3.1** Designate and permit employment flex, industrial, aerospace industrial, and similar uses within the 65 dBA CNEL contour and the Frequent Overflight Area.
- Policy N-3.2** Restrict noise sensitive land uses (such as residential uses, religious institutions, schools, assisted living facilities, or similar uses) within areas designated within both the 65 dBA CNEL contour and the Frequent Overflight Area, unless mitigation measures prevent adverse health impacts from high noise emissions.
- Policy N-3.4** Through the development review process, require a disclosure statement indicating that the property is subject to frequent overflight and aircraft noise upon sale of property within the Accident Potential Zone (APZ) and Air Installations Compatible Use Zones (AICUZ).
- Goal N-4** **Minimize adverse noise impacts associated with transportation.**

City of Palmdale Zoning Ordinance

The City of Palmdale Zoning Ordinance, contained within the City of Palmdale Municipal Code, is one of the primary means of implementing the General Plan. The Zoning Ordinance establishes standards for development of individual properties (through their zoning designation), including standards regulating allowed uses, setbacks from neighboring properties, and the intensity, height, and appearance of development. State law requires that a city's Zoning Ordinance be consistent with the City's General Plan and that the Zoning Ordinance be revised to reflect the adopted General Plan within a reasonable period of time from its adoption, which is typically one year. The purpose of the Development Code is to encourage, classify, designate, regulate and restrict the highest and best locations and uses of buildings and structures, for residential, commercial, and industrial or other purposes.

5.10.2 ENVIRONMENTAL SETTING

5.10.2.1 Existing Project Site Conditions

The 150.63-acre Project site consists of undeveloped and vacant land that has been previously disturbed by agricultural operations, off-road vehicular access, illegal dumping, and surrounding development. The site is relatively flat with a gentle slope to the northwest. The Project site is currently undeveloped and contains sparse vegetation consisting primarily of grasses and weeds, with a few shrubs located along the northeastern boundary of the Project site.

5.10.2.2 Current General Plan Land Use Designation and Zoning Designation

The Project site has a General Plan land use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI). The IND land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses up to a maximum floor area ratio (FAR) of 0.5. The Heavy Industrial zone provides for a range of medium to high intensity industrial uses such as manufacturing,

assembly, warehousing, and distribution, and also allows a maximum FAR of 0.5. The Project's site existing land use designation and zoning are shown in Figure 3-5, *General Plan Land Use Designation* and Figure 3-6, *Zoning Designation*, in Section 3.0, *Project Description*.

5.10.2.3 Airport

The Project site is located directly across East Avenue M/Columbia Way from the United States Air Force Plant 42 (AFP 42), aka Palmdale Regional Airport. AFP 42 includes approximately 5,832 acres (about 9.1 square miles) and has two long runways bordered by various airport tenants that include private aerospace contractors, the National Aeronautics and Space Administration (NASA), and small-scale commercial aviation operators.

As shown on Figure 5.8-1, *Palmdale Regional Airport/AFP 42 Noise Contours*, in Section 5.8, *Hazards and Hazardous Materials*, the Project site is located within the airport's 65 CNEL noise contour. However, the Project site is not located within an identified airport related hazard zone. The City's General Plan Figure 8.3, *Military Influence Area*, and Figure 8.4, *General Plan Land Use with Accident Potential Zone (APZ) Overlay*, detail that the Project site is not located within a military operating area, airport clear zone, APZ I, or APZ II area.

5.10.2.4 Surrounding Land Uses

Land uses surrounding the Project site include vacant land with some scattered solar and airport uses. Specific land uses located in the immediate vicinity of the Project site include the following:

- **North:** Vacant and undeveloped land (future vehicle storage facility Site Plan Review (SPR) 19-012 to the northeast).
- **East:** Vacant and undeveloped land.
- **South:** East Avenue M/Columbia Way followed by airport logistics.
- **West:** 30th Street East followed by a solar farm.

5.10.3 THRESHOLDS OF SIGNIFICANCE

Appendix G of the State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Land Use-1	Physically divide an established community.
Land Use-2	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

The Initial Study (Appendix A) established that the proposed Project would not result in impacts related to Land Use-1; therefore, no further assessment of this threshold is required in this Draft EIR.

5.10.4 METHODOLOGY

The evaluation of impacts to land use and planning is based on the potential of the Project to physically divide an established community and a comparison of the Project to the applicable plans, policies, and regulations to determine if implementation of the Project would conflict with a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

5.10.5 ENVIRONMENTAL IMPACTS

IMPACT LAND USE-2: THE PROJECT WOULD NOT CAUSE A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT.

Less than Significant Impact.

City of Palmdale Land Use Plans, Policies, and Regulations. The General Plan currently designates the Project site as IND and zoned for HI. The Project is consistent with the land use designation of IND (with approval of a Conditional Use Permit). Additionally, the General Plan contains several goals and policies that address land use and planning that are applicable to the Project. An analysis of the Project's consistency with these goals and policies is provided in Table 5.10-1.

Table 5.10-1: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Land Use Element	
Policy LUD-3.5: Ensure that there will be adequate water and wastewater system capacity to meet projected demand by continuing to oversee the development of adequate and dependable public services and facilities to support both existing and future development.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the Project would install new infrastructure that would connect to existing water and sewer infrastructure that has capacity to meet the Project need. The Project would install offsite 16-inch water lines along the perimeter of the Project site that would connect to a proposed 24-inch offsite water main at East Avenue M/Columbia Way and 30th Street E. The proposed offsite 24-inch water line would extend approximately 13,400 linear feet west within the East Avenue M/Columbia Way right-of-way to 5th Street E and connect to the existing 30-inch water line in East Avenue M/Columbia Way (as shown in Figure 3-13a). Additionally, the Lancaster Water Reclamation Plant (LWRP) has an excess treatment capacity of approximately 3.3 million gallons per day.
Policy LUD-3.6: Continue to implement comprehensive water and wastewater management programs and ensure that future developments pay their fair share for any infrastructure improvements demand necessary.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the Project would install low-flow and water efficient facilities that meet the Title 24/CALGreen Requirements and the proposed Project would be required to pay fair share development fees prior to receipt of operational permits.
Goal LUD-4: High-quality architecture and site design in the renovation and construction of all buildings.	Consistent. As described in Section 3.0, <i>Project Description</i> , the proposed Project would consist of simple, urban building forms with high quality and consistent material uses and a color scheme of blues and grays. Trees, shrubs, and groundcovers would be incorporated within the perimeter landscaping to screen buildings and loading docks would be screened by 14-foot high screening walls. The use of landscaping, building layout, screening walls, finish materials, and architectural accenting on the Project site would be consistent with this policy.
Policy LUD-4.1: Use simple, urban building forms made with permanent materials with high-quality detailing that stands the test of time.	Consistent. As described in Section 3, <i>Project Description</i> , the proposed Project would consist of simple, urban building forms with high quality and consistent material uses and a color scheme of blues and grays. Trees, shrubs, and groundcovers would be incorporated within the perimeter

General Plan Policy or Goal	Project Consistency
	landscaping to screen buildings and loading docks would be screened by 14-foot high screening walls. The use of landscaping, building layout, screening walls, finish materials, and architectural accenting on the Project site would be consistent with this policy.
Policy LUD-4.2: Use building organization and massing to derive scale and articulation rather than surface ornamentation.	Consistent. As discussed in Section 5.1, <i>Aesthetics</i> , the proposed Project would include a materials board showing the proposed building color palette for review and approval prior to issuance of the first building permit. The Project would use various building materials, windows, building heights and setback variations with landscaping in order to reduce the visual mass and scale of the building.
Policy LUD-4.3 Convey façade articulation through the strength, depth, and permanence of building materials. Thinner cladding materials, such as stucco, masonry veneers, and wood or simulated wood, may be used when finished to appear as durable and authentic as the materials they simulate.	Consistent. As shown in Figure 3-9c, <i>Elevations and Material Board</i> , the proposed buildings would consist of a variety of durable materials that would include blue reflective glazing, grizzle gray paints at canopy, and pure whites and grays. The materials and color schemes would be reviewed and approved by the City during the permitting process.
Policy LUD-4.5: Use visual and physical design cues within the design of a building and within building entries to emphasize the building entrance and connections to public spaces and public pathways/networks.	Consistent. As shown in Figure 3-9a, <i>Building 1 Elevations</i> , and 3-9b, <i>Building 2 Elevations</i> , the buildings would include four-sided architecture. The building design, colors, and materials would be consistent throughout all sides of the buildings. In addition, landscaping and trees would be located around the perimeter of the buildings to protect the view. The building entrance would feature large windows and landscaping connecting to the sidewalk to create a unique and welcoming entrance.
Policy LUD-4.6: Require four-sided architecture – all facades of a building are designed with quality, care, and visual interest – in the urban core (primarily RN3, RN4 and MU3). Encourage four-sided architecture in other areas.	Consistent. As shown in Figures 3-9a, <i>Building 1 Elevations</i> , and 3-9b, <i>Building 2 Elevations</i> , the buildings would include four-sided architecture. The building design, colors, and materials would be consistent throughout all sides of the buildings. In addition, landscaping and trees would be located around the perimeter of the buildings to enhance views of the site.
Policy LUD-4.9: Create pedestrian-oriented streetscapes by establishing unified street tree planting, sidewalk dimensions and maintenance, pedestrian amenities, and high-quality building frontages in all new development.	Consistent. The proposed Project would include 951,135 SF (or 21.84 acres) of ornamental landscaping, including trees around the perimeter of the building. In addition, the Project would also construct an 8-foot-wide and a 12-foot-wide sidewalk around the Project's property line. As described previously, the buildings would consist of high-quality architectural frontages.
Policy LUD-7.2: Use Crime Prevention through Environmental Design strategies (CPTED) in new and existing development to improve public safety, including the following: <ul style="list-style-type: none"> • Active public space • Building design to promote “eyes on the street” • Clear delineation between private and public space • Natural access control between public and private space • Maintenance of public places • Removal or repair of vandalism or broken property 	Consistent. As discussed in Section 3, <i>Project Description</i> , the Project would provide lighting in parking and loading areas. Access to trailer stalls and loading dock areas would be controlled through the use of gates. The proposed Project would include one metal, manually operated gate at each entrance/exit of the truck loading areas, for a total of eight gates. As discussed in Section 5.13, <i>Public Services</i> , the City would review plans to provide for safety and adequate lighting as part of development review and permitting of the Project.

General Plan Policy or Goal	Project Consistency
Goal LUD-14: Facilitate employment growth through expanded operations onsite and by preserving the buffer between Air Force Plant 42 and the rest of the city.	Consistent. The Project site has a General Plan land use designation of Industrial (IND), a zoning designation of Heavy Industrial) and is located north of the Palmdale Regional Airport (Plant 42). As such, the Project is consistent with the intended uses and could serve to buffer Plant 42 from non-compatible residential and commercial uses. In addition, the proposed light industrial buildings would provide for employment growth that is consistent with the General Plan.
Policy LUD-14.2: Continue to buffer this area from adjacent, non-compatible residential and commercial uses.	Consistent. The Project site has a General Plan land use designation of Industrial (IND), a zoning designation of Heavy Industrial) and is located north of the Palmdale Regional Airport (Plant 42). As such, the Project is consistent with the intended uses and could serve to buffer Plant 42 from non-compatible residential and commercial uses.
Goal LUD-16: Increased job opportunities in Palmdale through expanded flex, light industrial, production/ distribution/repair (PDR), and creative/flex land uses.	Consistent. The Project site is located on vacant land and involves the construction of an industrial distribution warehouse in an area zoned for Heavy Industrial (HI) and has a General Plan designation of Industrial (IND). Further, the Project would be developed to comply with the City's Municipal Code.
Policy LUD-16.1: Strive for a ratio of at least 1 job per employed resident (which effectively means growing jobs faster than housing during the Plan timeframe).	Consistent. As discussed in Section 5.12, <i>Population and Housing</i> , in 2016, the City of Palmdale had a jobs to housing ratio of 0.84, which is considered "housing rich." The proposed Project would introduce 1,977 jobs to the area, thus increasing the jobs to housing ratio.
Policy LUD-17.1: Minimize land use compatibility conflicts that discourage attraction and retention of production, distribution, and service and repair businesses in areas zoned for industrial use.	Consistent. The Project site is located on vacant land and involves the construction of an industrial distribution warehouse in an area zoned for Heavy Industrial (HI) and a General Plan designation of Industrial (IND). The Project site is adjacent to a solar facility, vacant lands, and across from airport uses and would not result in a land use conflict. Further, the Project would be developed to comply with the City's Municipal Code.
Policy LUD-18.2: Expand a core area of light industrial and service uses that provide middle-income jobs for Palmdale residents.	Consistent. The Project would expand light industrial uses and would provide for employment, as detailed in Section 5.12, <i>Population and Housing</i> .
Policy LUD-18.3: Buffer heavy industrial uses and light industrial uses, such as general services, light manufacturing, and storage uses from residential neighborhoods.	Consistent. The Project site is located on vacant land that is adjacent to a solar facility, vacant land designated for industrial development, and airport related uses. There are no residences within the vicinity of the proposed Project. Further, the Project would be developed to comply with the City's Municipal Code.
Circulation and Mobility Element	
Goal CM-1: Build and maintain a transportation system that is safe and comfortable for travelers of all modes regardless of age or ability.	Consistent. As discussed under Section 3, <i>Project Description</i> , the Project would include installation of sidewalks and the construction of a 12-foot bike trail along East Avenue M/Columbia Way, along the Project's frontage. The Project would also add new pavement, curb and gutter, and sidewalk to 30th Street that would provide efficient access to State Route (SR) 14.
Policy CM-1.1: Design and maintain the public right-of-way through a complete streets approach that	Consistent. As discussed under Section 3, <i>Project Description</i> , the Project would include installation of sidewalks and the construction of a 12-foot bike trail along

General Plan Policy or Goal	Project Consistency
facilitates safe, comfortable, and efficient travel for all roadway users.	East Avenue M/Columbia Way, along the Project's frontage. The Project would also add new pavement, curb and gutter, and sidewalk to 30th Street that would provide efficient access to State Route (SR) 14.
Policy CM-1.3: Identify and program mitigation measures for gaps and deficiencies in the transportation system to accommodate each major transportation mode.	Consistent. As discussed under Section 5.14, <i>Transportation</i> , the Project would implement CAPCOA Measures as Mitigation Measure T-1 and Mitigation Measure T-2 as VMT reduction measures.
Goal: CM-2: Build and maintain a transportation system that accommodates future growth and maintains transportation networks for all modes.	Consistent. As discussed under Section 3, <i>Project Description</i> , the Project would include installation of sidewalks and the construction of a 12-foot bike trail along East Avenue M/Columbia Way, along the Project's frontage. The Project would also add new pavement, curb and gutter, and sidewalk to 30th Street that would accommodate the Project and provides multi-modal transportation.
Policy CM-2.8: Ensure that the cumulative and regional impacts of new development on the circulation system are mitigated to the extent feasible, concurrent with development. Concurrent shall mean that required facilities are installed as needed during various stages of development.	Consistent. As discussed under Section 5.14, <i>Transportation</i> , the Project would implement CAPCOA Measures as Mitigation Measure T-1 and Mitigation Measure T-2 as VMT reduction measures. Impacts related to geometric design and emergency access were found to be less than significant and the Project would be constructed according to the required development standards that would be verified during the development review and permitting process.
Policy CM-3.7: Work with large employers to implement programs that expand access to non-drive alone commute options for all commuters, including hourly staff and contract workers.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , would implement CAPCOA Measures as Mitigation Measure T-1 and Mitigation Measure T-2 as VMT reduction measures. Mitigation Measure T-1 requires the future tenants to develop and market a commute trip reduction (CTR) program. Mitigation Measure T-2 requires the future tenant to implement a rideshare program for employees accessing the site.
Policy CM-6.3: Promote trip reduction strategies, including telecommuting, through land-use decisions and TDM programming strategies.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , would implement California Air Pollution Control Officers Association (CAPCOA) Measures as Mitigation Measure T-1 and Mitigation Measure T-2 as VMT reduction measures. Mitigation Measure T-1 requires the future tenants to develop and market a commute trip reduction (CTR) program. Mitigation Measure T-2 requires the future tenant to implement a rideshare program for employees accessing the site.
Policy CM-6.4: Require TDM Plans for major employers, as defined by the Air Quality Management District.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , would implement CAPCOA Measures as Mitigation Measure T-1 and Mitigation Measure T-2 as VMT reduction measures. Mitigation Measure T-1 requires the future tenants to develop and market a commute trip reduction (CTR) program to provide alternative modes of transportation from single passenger vehicle trips. Mitigation Measure T-2 requires the future tenant to implement a rideshare program for employees accessing the site. As per Table T-8.1 in 2021 CAPCOA handbook, the reduction percentage for suburban areas, such as the City of Palmdale, is up to 4 percent.

General Plan Policy or Goal	Project Consistency
Economic Development Element	
Goal ED-1: Preserve the existing economic base of high-quality jobs in the City.	Consistent. As discussed in Section 5.12, <i>Population and Housing</i> , the proposed Project would introduce 1,977 jobs to the area, thus increasing the jobs in the City.
Policy ED-1.1: Attract supply chain employers for the manufacturing and defense industries to strengthen Palmdale's economic viability and competitiveness within these sectors.	Consistent. The Project site has a General Plan land use designation of Industrial (IND) and is located north of the Palmdale Regional Airport (Plant 42). As such, the Project is consistent with the intended uses and could serve to buffer Plant 42 from non-compatible residential and commercial uses.
Goal ED-2: Attract diverse and high-quality job options that contribute to the City's economic growth by diversifying the economic base.	Consistent. As discussed in Section 5.12, <i>Population and Housing</i> , the proposed Project would introduce 1,977 jobs to the area, thus increasing the job diversification of the economic base.
Military Compatibility Element	
Goal MC-1: Compatible adjacent land uses that support continued operation of Plant 42.	Consistent. The Project would include construction of an industrial warehouse. The Project site is designated as IND within the City's General Plan and would support the expansion of industrial development and would be compatible with the uses of Plant 42.
Policy MC-1.1: Maintain appropriate land use designations surrounding Plant 42 to limit incompatible uses and to ensure continued safe operation of airport activities.	Consistent. The Project would include construction of an industrial warehouse. The Project site is designated as IND within the City's General Plan and the proposed Project be compatible with Plant 42.
Policy MC-1.2: Continue to buffer Plant 42 from adjacent, non-compatible residential and commercial uses by reviewing development applications in the Military Influence Area for potential conflicts.	Consistent. The Project would include construction of an industrial warehouse. The Project site is designated as IND within the City's General Plan and the proposed Project be compatible with Plant 42.
Goal MC-2: Mitigate and/or avoid encroachment of incompatible development into space utilized by Plant 42 air operations.	Consistent. The Project site is not utilized by Plant 42 air operations, and would not result in encroachment into air operation uses. The Project site is not located within the Military Influence Area, military operating area, airport clear zone, APZ I, or APZ II area.
Policy MC-2.1: Within the Accident Potential Zones (APZ), review all development proposals for hazards to aircraft in flight including uses that release into the air any substance such as: <ul style="list-style-type: none"> • Steam, dust, or smoke, which could impair pilot visibility; uses that produce light emissions, glare, or distracting lights, which could interfere with pilot vision or be mistaken for airfield lighting; sources of electrical emissions, which could interfere with aircraft communications or navigation; and uses that could attract birds or waterfowl to the extent that they would pose a danger to aircraft operation in the vicinity of Plant 42. • Require project applicants to notify Plant 42 and the City of any potential hazards, including but not limited to the above list. 	Consistent. As described previously, the Project site is not located within an APZ.

General Plan Policy or Goal	Project Consistency
Policy MC-3.1: Ensure that all new land use proposals comply with the noise and overflight policies of the most recent AICUZ for Plant 42.	Consistent. As discussed in Section 5.11, <i>Noise</i> , the Project is located within the 65 dBA noise contour which the ALUCP has determined is satisfactory for industrial land uses. Given that the Project consists of the development of two industrial warehouses, impacts related to noise would be less than significant. In addition, the Project was reviewed by the Los Angeles County Airport Land Use Commission (ALUC) on November 1, 2023. ALUC determined the Project would be consistent with the MARB ALUCP.
Policy MC-3.5: New development within the 65 DBL noise contour area must adhere to the recommended noise level reductions incorporated into the design and construction.	Consistent. As discussed in Section 5.11 <i>Noise</i> , the Project is located within the 65 dBA noise contour which the ALUCP has determined is satisfactory for industrial land uses. On November 1, 2023, ALUC determined the Project would be consistent with the policies in the Airport Land Use Plan and the ALUC Review procedures for Los Angeles County.
Equitable and Healthy Communities Element	
Policy EHC-16.3: Use Crime Prevention Through Environmental Design (CPTED) strategies in new and existing development to improve public safety, including the following: <ul style="list-style-type: none"> • Active public space • Building design to promote “eyes on the street” • Maintenance of public places • Removal or repair of vandalism or broken property 	Consistent. As discussed in Section 3, <i>Project Description</i> , the Project would provide lighting in parking and loading areas. Access to trailer stalls and loading dock areas would be controlled through the use of gates. The proposed Project would include one metal, manually operated gate at each entrance/exit of the truck loading areas, for a total of eight gates. As discussed in Section 5.13, <i>Public Services</i> , the City would review plans to provide for safety and adequate lighting as part of development review and permitting of the Project.
Conservation Element	
Goal CON-1: Protect Significant Ecological Areas in and around the City, including, but not limited to, sensitive flora and fauna habitat areas.	Consistent. As discussed in Section 5.4, <i>Biological Resources</i> , the proposed Project is not located within a Significant Ecological Area.
Policy CON-1.1: Ensure local compliance with the California Endangered Species Act and the Federal Endangered Species Act (ESA).	Consistent. As discussed in Section 5.4, <i>Biological Resources</i> , the proposed Project would comply with the CESA and FESA. The Project would implement Mitigation Measure BIO-1 which would reduce impacts to migrating birds and BIO-2 which would reduce impacts to burrowing owls.
Policy CON-1.2: Continue enforcing the City’s Native Vegetation Ordinance to protect western Joshua trees and Juniper trees.	Consistent. As discussed in Section 5.4, <i>Biological Resources</i> , there are no Joshua trees or Juniper trees onsite.
Policy CON-1.3: Comply with the required implementation of the West Mojave Plan for protection of desert tortoise and Mohave ground squirrel.	Consistent. The City of Palmdale is located in the West Mojave Conservation Plan area. However, as discussed in the General Biological Assessment (included as Appendix C), the Project site is not located within Critical habitat for desert tortoise and there is no suitable habitat for the Mohave ground squirrel on-site.
Goal CON-5: Protect the quality and quantity of local water resources.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , the Project would implement a SWPPP which would include construction BMPs during construction activities (PPP HYD-1). As part of the SWPPP, erosion and sediment control measures would be included to minimize potential pollutants from entering stormwater during Project construction. In addition, the proposed Project is required to prepare a soil management report, in compliance with PMC Chapter 14.05 Section 14.05.080 of

General Plan Policy or Goal	Project Consistency
	the PMC, in order to reduce runoff. For operation of the proposed Project, the Project would include implementation of BMPs designed to fully capture and infiltrate stormwater pursuant to MS4 requirements (PPP HYD-2), limiting offsite stormwater flows. As part of the permitting approval process, the proposed drainage and water quality design and engineering plans would be reviewed by the City's Department of Public Works to ensure that they meet the County NPDES Permit and limit the potential for erosion and siltation.
Policy CON-5.1: Ensure that ground water supplies are recharged and protect natural recharge areas such as the Little Rock and Big Rock Washes, and Amargosa and Anaverde Creeks from pollutants or other materials, which might degrade groundwater supplies.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , stormwater runoff would be directed towards landscaped areas wherever possible for treatment and infiltration. The stormwater storage facilities would retain and infiltrate the volume of water for two 100-year 24-hour storms that would maximize onsite groundwater recharge.
Policy CON-5.4: Maximize groundwater recharge capabilities with flood control measures.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , stormwater runoff would be directed towards landscaped areas wherever possible for treatment and infiltration. The stormwater storage facilities would retain and infiltrate the volume of water for two 100-year 24-hour storms that would maximize onsite groundwater recharge capabilities.
Goal CON-6: Minimize the impacts of urban development on groundwater supplies.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , post construction BMPs consistent with the City's Drainage Management Plan (DMP) would avoid potential groundwater quality degradation. As part of the permitting approval process, construction plans would be required to demonstrate compliance with these regulations. Plans for grading, drainage, erosion control and water quality would be reviewed by the City's Department of Public Works prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.
Policy CON-6.2: Require the use of water conserving native or drought resistant plants and drip irrigation systems where feasible.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , the Project would comply with PMC Section 14.05.090 which regulates landscape design plans for efficient water use including plant material, water features, and soil preparation.
Policy CON-6.4: Require water conserving appliances and plumbing fixtures in all new construction.	Consistent. As discussed in Section 5.5, <i>Energy</i> , the Project would comply with the 2022 CALGreen standards for efficient appliances and fixtures.
Policy CON-7.1: Assess and implement, when and where feasible, reclaimed water for landscape irrigation.	Not Applicable. There is no reclaimed water infrastructure that currently serves the Project area.
Policy CON-7.5: Promote implementation of water reduction and recycling systems that are feasible and appropriate to the Planning Area.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the proposed Project would be consistent with the CALGreen Building Code regulations that set forth water efficiency standards for all new plumbing and irrigation fittings and fixtures.
Goal CON-8: Protect historical and culturally significant resources, which contribute to the community's sense of history.	Consistent. As discussed in Initial Study Section 5.5, <i>Cultural Resources</i> , (included as Appendix A) the Project site is

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	currently vacant and undeveloped and does not contain any historical or culturally significant resources.
Policy CON-8.4: Require that new development preserve significant historic, paleontological, or archaeological resources.	Consistent. As discussed in Initial Study Section 5.5, <i>Cultural Resources</i> , (included as Appendix A) the Project site is currently vacant and undeveloped and does not contain any historical or culturally significant resources. As detailed in Section 5.6, <i>Geology and Soils</i> , the proposed Project would implement Mitigation Measure PAL-1 to reduce potential impacts to paleontological resources to preserve resources.
Policy CON-8.5: Conduct Native American consultation consistent with the applicable regulations when new development is proposed in potentially culturally sensitive areas.	Consistent. As discussed in Section 5.15, <i>Tribal Cultural Resources</i> , the Project teams has reached out to consult with local Native American Tribes consistent with AB 52. Mitigation measures were developed in coordination with the consulting tribes and are included in Section 5.15. Coordination is ongoing as of the time of this Draft EIR.
Policy CON-8.6: When human remains suspected to be of Native American origin are discovered, coordinate with the Native American Heritage Commission and any local Native American groups to determine the most appropriate course of action.	Consistent. As discussed in Section 5.15, <i>Tribal Cultural Resources</i> , the State Health and Safety Code Section 7050.5 provides for coordination with Native American Tribes when human remains are suspected to be of Native American origin.
Public Facilities, Services, and Infrastructure Element	
Goal PFSI-1: Maintain superior public facilities to support the Palmdale community.	Consistent. As discussed in Section 5.13 <i>Public Services</i> , the Project would be required to pay development impact fees that would contribute to public services pursuant to Palmdale's Municipal Code, Chapter 3.45.
Goal PFSI-2: Maintain superior public safety services to protect the community and meet the need of residents, businesses, and visitors.	Consistent. As discussed in Section 5.13, <i>Public Services</i> , the Project would be required to pay development impact fees that would contribute to public services pursuant to Palmdale's Municipal Code, Chapter 3.45. In addition, impacts related to police and fire services were determined to be less than significant.
Policy PFSI-2.1: Maintain existing or superior average response times for fire and police services as the City's population expands.	Consistent. As discussed in Section 5.13, <i>Public Services</i> , the City would have sufficient fire and police protection capacity, staff, and equipment to accommodate the proposed Project.
Policy PFSI-2.3: Regularly assess the need for service level expansion for fire and police services as the City's population expands.	Consistent. As discussed in Section 5.13, <i>Public Services</i> , the Project would be required to pay development impact fees that would contribute to public services pursuant to Palmdale's Municipal Code, Chapter 3.45. In addition, impacts related to police and fire service facilities were determined to be less than significant, and no expansions are required to service the proposed Project.
Policy PFSI-2.4: Coordinate with the Los Angeles County Sheriff's Department to ensure that service availability, resources, and staffing are appropriate for the community need.	Consistent. As discussed in Section 5.13, <i>Public Services</i> , the City would have sufficient capacity to accommodate police services needed for the Project.
Policy PFSI-2.5: Coordinate with the Los Angeles County Fire Department to ensure that service availability, resources, and staffing are appropriate for the community need.	Consistent. As discussed in Section 5.13, <i>Public Services</i> , the City would have sufficient capacity, staff, and equipment to accommodate fire protection services for the Project.

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Goal PFSI-3: Ensure that all development in Palmdale is served by adequate water distribution and sewage facilities.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the Project includes installation of water and sewage facilities that would connect to existing infrastructure with the capacity to serve the Project. The Project would install offsite 16-inch water lines along the perimeter of the Project site that would connect to a proposed 24-inch offsite water main at East Avenue M/Columbia Way and 30th Street E. The proposed offsite 24-inch water line would extend approximately 13,400 linear feet west within the East Avenue M/Columbia Way right-of-way to 5th Street E and connect to the existing 30-inch water line in East Avenue M/Columbia Way (as shown in Figure 3-13a, <i>Utility Improvements (Water)</i>).
Policy PFSI-3.4: Through the development review process, reserve land in appropriate locations for construction of drainage facilities.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , the stormwater runoff would be directed towards landscaped areas wherever possible for treatment and infiltration. The use of the drainage facilities and landscaping would regulate the rate and velocity of stormwater flows and would control the amount of discharge into the on-site detention basin. As determined by the Preliminary Hydrology Report (Appendix I), the proposed drainage improvements would increase peak flow rates for a 50-year peak flow rate from existing conditions of 11.7 cubic feet per second (cfs) to 136 cfs.
Policy PFSI-3.7: Require that all commercial, industrial, institutional, and multiple family uses be connected to a public sewer system with only limited use of private sewage disposal systems.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the proposed Project would install infrastructure that would connect to the existing public sewer system.
Policy PFSI-3.11: Require new development to pay necessary fees for expansion and ongoing maintenance of the sewage disposal system to the appropriate agencies, to handle the increased load, which it will generate.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the proposed Project would include installation of new onsite and offsite sewer lines in order to serve proposed Project and any additional development to the surrounding area. In addition, the Project would be required to pay necessary fees prior to receipt of operational permits from the City.
Policy PFSI-3.12: Utilize best management practices (BMPs) in the purveyance of water resources and management of wastewater.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , post construction BMPs consistent with the City's Drainage Management Plan (DMP) would avoid potential water quality degradation of receiving waters resulting from proposed development. As part of the permitting approval process, construction plans would be required to demonstrate compliance with these regulations. Plans for grading, drainage, erosion control and water quality would be reviewed by the City's Department of Public Works prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.
Policy PFSI-3.13: Require new development to minimize storm water runoff and pollutant exposure by incorporating low impact development (LID) measures and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , post construction BMPs consistent with the City's Drainage Management Plan (DMP) would be reviewed by the City's Department of Public Works prior to issuance of grading permits to ensure that the applicable and required BMPs are constructed during implementation of the Project.

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Policy PFSI-3.14: Ensure the provisions of adequate water and wastewater services to all new development.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , based on the LACWD40 Urban Water Management Plan (UWMP), buildout of the Project would not substantially affect LACWD's water supply. Additionally, the LWRP has an excess treatment capacity of approximately 3.3 million gallons per day. Thus, the Project would not result in the need for additional infrastructure improvements.
Policy PFSI-3.16: Provide sufficient levels of water, sewer, and storm drain services throughout the City.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , based on the LACWD40 UWMP, buildout of the Project would not substantially affect LACWD's water supply. Additionally, the LWRP has an excess treatment capacity of approximately 3.3 million gallons per day. Also, the Project would infiltrate stormwater onsite and would not affect storm drains throughout the City.
Policy PFSI-5.2: Require all new development, including major modifications to existing development, to construct required on-site infrastructure improvements pursuant to City standards.	Consistent. As discussed in Section 5.16 <i>Utilities and Service Systems</i> , the proposed Project would include installation of new onsite and offsite sewer lines in order to serve the proposed Project and any additional development to the surrounding area.
Policy PFSI-5.3: Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.	Consistent. As discussed in Section 5.16 <i>Utilities and Service Systems</i> , the proposed Project would include installation of new onsite and offsite sewer lines in order to serve the proposed Project and any additional development to the surrounding area. In addition, as discussed in Section 5.13 <i>Public Services</i> , the Project would be required to pay development impact fees that would contribute to public services pursuant to Palmdale's Municipal Code, Chapter 3.45.
Policy PFSI-5.5: Require that on and off-site improvements are constructed prior to occupancy of a new development project, or phase thereof, unless otherwise approved by the City.	Consistent. The proposed offsite improvements would be constructed prior to occupancy.
Policy PFSI-5.7: Require that individual development projects integrate with adjacent development with respect to backbone infrastructure (streets, sewer, water, and drainage). If adjacent property is undeveloped, a conceptual plan should be prepared to show that the pending development will allow for future integration and development of adjacent properties in a manner which is reasonable from a design, construction, and cost standpoint.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the proposed Project would include installation of new onsite and offsite sewer lines in order to serve the proposed Project and any additional development to the surrounding area.
Policy PFSI-6.3: When feasible, require new utility lines to be constructed underground and along existing utility corridors.	Consistent. The proposed Project would construct the proposed sewer and water lines in coordination with the proposed new road improvements and in coordination with existing utility corridors.
Policy PFSI-6.4: Coordinate installation of utility line placement with street construction to minimize cost, where possible.	Consistent. The proposed Project would construct the proposed sewer and water lines in coordination with the proposed new road improvements.
Policy PFSI-6.5: Coordinate with electricity, gas, and waste providers to ensure adequacy of services for future and current needs.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , the proposed Project would be adequately served by existing electricity, gas and waste providers.

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Policy PFSI-6.7: When feasible, require new utility lines to be constructed away from fault lines, flood zones, fire zones, and other vulnerable areas.	Consistent. As discussed in the Initial Study Section 5.7, <i>Geology and Soils</i> (included as Appendix A), the Project site is not located near a fault zone. As discussed in EIR Section 5.9, <i>Hydrology and Water Quality</i> , the Project site is not within a floodplain. Finally, as described in the Initial Study Section 5.20, <i>Wildfire</i> , the Project site is not within a Very High Fire Hazard Severity Zone.
Safety Element	
Goal SE-1: A city with minimal public health, safety, and welfare impacts resulting from seismic hazards.	Consistent. As discussed in Section 5.7, <i>Geology and Soils</i> , of the Initial Study (included as Appendix A), the Project site is not within an Alquist-Priolo Earthquake Fault Zone. The closest active fault zone is the Little Rock Fault in the San Andreas Fault Zone, which is located approximately 6.5 miles southwest of the site. Therefore, the Project would result in less than significant impacts on exposure of people or structures to risk of loss, injury, or death involving rupture of an earthquake fault on a state-designated Alquist-Priolo Earthquake Fault Zone.
Policy SE-1.1: Review development within or adjacent to geologic hazard zones and provide copies of geotechnical reports and studies to be reviewed by a qualified geologist and implement recommendations to ensure adequate provisions for public safety.	Consistent. As discussed in Section 5.7, <i>Geology and Soils</i> , of the Initial Study (included as Appendix A), a Geotechnical investigation was completed for the Project site and found that geologic hazards were less than significant.
Policy SE-1.2: Require appropriate structural setbacks from active fault rupture traces in accordance with Alquist Priolo standards and continue to follow California Building Code.	Consistent. As discussed in Section 5.7, <i>Geology and Soils</i> , of the Initial Study (included as Appendix A), the Project site is not within an Alquist- Priolo Earthquake Fault Zone. The closest active fault zone is the Little Rock Fault in the San Andreas Fault Zone, which is located approximately 6.5 miles southwest of the site. The proposed Project would be required to comply with the California Building code which is included in PMC Chapter 8.04.201.
Goal SE-2: Minimize public health, safety, and welfare impacts resulting from wildfire hazards.	Consistent. As discussed in Initial Study Section 5.20, <i>Wildfire</i> , (included as Appendix A) the Project site is not within a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone. The proposed Project would provide adequate emergency access to the site via eight driveways from the existing road, 30th Street East and from the proposed new road 35th Street East that would be constructed along the east side of the Project.
Policy SE-2.9: As part of the city's development review process, require that all new buildings and facilities comply with Los Angeles County, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards and work with the Fire Department to ensure the provision of adequate fire stations, personnel, and equipment to meet the City's needs over time.	Consistent. As discussed in 5.13, <i>Public Services</i> , access to and from the Project site for emergency vehicles would be reviewed and approved by the Los Angeles County Fire Department and the City Planning Division as part of the Project approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access.
Goal SE-3: Minimize risks associated with the transport, storage, use, and disposal of hazardous materials.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , construction contractors would be required to comply with federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous materials. Depending on the type of business that would occupy the proposed warehouse buildings, operations would require the use of various types and

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	quantities of hazardous materials, including lubricants, solvents, cleaning agents, wastes, paints and related wastes, petroleum, wastewater, and batteries (lead acid, nickel cadmium, nickel, iron, carbonate). These hazardous materials would be used, stored, and disposed of in accordance with applicable regulations and standards (such as CFR, Title 49, Chapter I; CCR, Title 8; CFR, Title 40, Part 263; and Los Angeles County Code Sections 23.0602 and 23.0107) that are enforced by the USEPA, USDOT, CalEPA, CalOSHA, and DTSC.
Policy SE-3.3: Require clean-up of soil and/or groundwater containing hazardous materials exceeding regulatory action levels to the satisfaction of the agency having jurisdiction prior to granting permits for new development.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , the Phase I Environmental Site Assessment (included as Appendix H) determined that the Project site is not identified as a hazardous materials site. The site is not listed in the databases searched by the Phase I, listed in the California Department of Toxic Substances Control (DTSC) EnviroStor database of hazardous material sites; and is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.
Policy SE-3.4: Require transport of hazardous materials along designated routes that minimize risks to the public and sensitive environmental areas and cooperate with regional agencies in developing and maintaining such routes.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , construction contractors would be required to comply with federal, state, and local laws and regulations regarding the transport, use, and storage of hazardous materials.
Policy SE-3.5: Review proposed development in proximity to any existing or proposed facility that uses, stores, or transports large amounts of hazardous materials to ensure adequate mitigation of impacts related to hazardous materials (e.g., appropriate site design, setbacks, and buffering).	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , the Phase I ESA (included as Appendix H) explains that the Air Force Plant 42 (AFP 42), located to the south of the Project site contains hazardous substances, such as including aviation fuels, which were stored in numerous USTs and ASTs; degreasing solvents; metal plating solutions; and related wastes. However, the Phase I ESA details that the potential impact of hazardous substances storage and use operations at AFP 42 on the subsurface environment has been assessed through numerous investigations, which determined that contamination has not spread to the Project site area, and that groundwater occurs between 340 and 450 feet below ground surface and generally flows away from the Project site. Thus, any contaminants would not affect the Project site.
Goal SE-4: Minimize impacts to public safety and/or property as a result of flooding.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , according to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) (06037C0450F), the Project site is within a "0.2% Annual Chance Flood Hazard, Zone X" flood plain area defined as areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile. Therefore impacts from flooding onsite would be minimal. In addition, the Project would implement a SWPPP which would include construction BMPs during construction activities (PPP HYD-1). As part of the SWPPP, erosion and sediment control measures would be included to minimize potential pollutants from entering stormwater during Project construction. For operation of the proposed Project, the Project would include implementation of BMPs designed to fully capture and infiltrate stormwater

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	pursuant to MS4 requirements (PPP HYD-2), limiting offsite stormwater flows.
Policy SE-5.1: As appropriate, evaluate inundation hazards related to the potential rupture of the following when reviewing development proposals: California Aqueduct, Palmdale Dam, Littlerock Dams and/ or proposed basins.	Consistent. As discussed in Section 5.9, <i>Hydrology and Water Quality</i> , although a seismic event could cause a seiche to occur at Lake Palmdale, which could potentially overtop the dam, the design report for the dam considers a reflection of the wave on return unlikely. Also, wave volume above the dam would not be substantial and would not result in damaging floods (City of Palmdale, Rincon Consultants, 2022).
Goal SE-6: Minimize impacts to public safety and property resulting from aircraft accidents.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , the Project site is not located within a zone designated for a high potential for accidents. The Project is located within the 65 DBL noise contour which the ALUCP has determined is satisfactory for industrial land uses. Given that the Project consists of the development of two industrial warehouses, the impacts related to noise would be less than significant. In addition, the Project was reviewed by the Los Angeles County Airport Land Use Commission (ALUC).
Policy SE-6.1: Require all development to be consistent with Department of Defense regulations as outlined in the Air Force Plant 42 Air Installation Compatibility Use Zone (AICUZ) Report and comply with applicable FAA regulations that affect development in the Accident Potential Zones.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , the Project site is not located within a zone designated for a high potential for accidents. The Project is located within the 65 DBL noise contour which the ALUCP has determined is satisfactory for industrial land uses. Given that the Project consists of the development of two industrial warehouses, the impacts related to noise would be less than significant. In addition, the Project was reviewed by the Los Angeles County Airport Land Use Commission (ALUC) and the FAA issued a Determination of No Hazard to Air Navigation on October 13, 2023..
Goal SE-7: Ensure safe evacuation of residents in the event of an emergency requiring evacuation.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), prior to any activity that would encroach into a right-of-way, the area of encroachment must be safeguarded through the installation of safety devices to ensure that construction activities would not physically interfere with emergency access or evacuation. The Project would include vehicular access to the Project site from surrounding roadways including East Avenue M/Columbia Way and 30th Street East. As described in Section 5.14, <i>Transportation</i> , development would comply with Municipal Code standards, which will require design and construction specifications to allow adequate emergency access to the site and ensure that roadway improvements would meet public safety requirements.
Policy SE-7.3: Review all new developments for consistency with applicable evacuation plans and ensure access to at least two evacuation routes.	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), prior to any activity that would encroach into a right-of-way, the area of encroachment must be safeguarded through the installation of safety devices to ensure that construction activities would not physically interfere with emergency access or evacuation.

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	The Project would include vehicular access to the Project site from surrounding roadways including East Avenue M/Columbia Way and 30th Street East. As described in Section 5.14, <i>Transportation</i> , development would comply with Municipal Code standards, which will require design and construction specifications to allow adequate emergency access to the site and ensure that roadway improvements would meet public safety requirements.
Policy SE-7.6: Continue to assess current and projected emergency service needs, and goals or standards for emergency services training for City staff and volunteers as part of the City's Emergency Operation Plan Updates.	Consistent. As discussed in Section 5.13, <i>Public Services</i> , the City would have sufficient capacity, staff, and equipment to accommodate fire and police protection.
Policy SE-8.4: Require all residences and businesses to maintain visible and clearly legible signs and/or street numbers to shorten the response times of emergency personnel.	Consistent. As discussed in Section 3, <i>Project Description</i> , the Project would provide lighting in parking and loading areas. The Project would feature well-lit and visible signs to ensure that the building address is clearly legible for emergency services.
Policy SE-10.4: Require all commercial and industrial developments to provide adequate lighting for buildings and parking areas as well as sufficient visibility for patrol vehicles to assist in law enforcement surveillance.	Consistent. As discussed in Section 3, <i>Project Description</i> , the Project would provide lighting in parking and loading areas.
Sustainability, Climate Action, and Resilience Element	
Goal SCR-3: Green and decarbonized buildings for new construction and major renovations.	Consistent. As discussed in Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed Project would comply with the existing policies and regulations regarding building energy efficiency. The buildings would be constructed to exceed energy efficiency standards per Title 24 Standards, as included in Mitigation Measure GHG-3. Furthermore, the building would include installation of photovoltaic panels as required per the 2022 California Energy Code Section 140.10. In addition, the Project would be designed to be energy and water efficient.
Policy SCR-3.1: Integrate CALGreen Tier 1 and Tier 2 green building and energy efficiency standards into new construction and major remodels.	Consistent. As discussed in Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed Project would comply with the CALGreen Code, regarding building energy efficiency. The buildings would be constructed to include photovoltaic panels and 15 percent of the roof would be solar ready, in accordance with the 2022 California Energy Code. In addition, the Project would be designed to be energy and water efficient.
Policy SCR-3.3: Require installation of photovoltaic panels and battery storage on all residential new construction and nonresidential new construction over 5,000 sq. ft.	Consistent. As discussed in Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed Project would comply with the CALGreen Code, regarding building energy efficiency. . The buildings would be constructed to include photovoltaic panels and 15 percent of the roof would be solar ready, in accordance with the 2022 California Energy Code.
Goal SCR-4: Reduced greenhouse gas emissions from transportation (SB 379, EO N-79-20).	Consistent. As discussed in Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed Project would include bicycle parking facilities and EV chargers.

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Policy SCR-4.1: Promote bicycle use with new private development projects through requirements for bicycle parking, lockers and showers, bike share facilities, and when feasible, connections to City bike lanes.	Consistent. As discussed in Section 5.7, <i>Greenhouse Gas Emissions</i> , the proposed Project would include bicycle parking facilities.
Goal SCR-5: Increased resource capture and reduced waste sent to landfills (SB 1383).	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , all solid waste-generating activities within the County are subject to the requirements set forth in the 2019 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all state regulations, as ensured through the County's development project permitting process.
Air Quality Element	
Goal AQ-1: Minimize local air pollution caused by motor vehicles.	Consistent. As discussed in Section 5.3, <i>Air Quality</i> , operational emissions mainly caused by mobile emissions would exceed the maximum emissions thresholds set by AVAQMD. Mitigation Measures AQ-2 through AQ-12 would help reduce mobile emissions to the greatest extent feasible, although these measures would not be sufficient enough to reduce the CO and PM ₁₀ emissions to below the thresholds. Neither the Project applicant nor the City have regulatory authority to control tailpipe emissions. Furthermore, the Project could result in potential benefits in the form of contribution to a closer place of employment for Palmdale residents, which may reduce significant commuting times and vehicle emissions in the area.
Policy AQ-1.1: Reduce the number and length of work-related trips through such means as providing a balance of jobs and housing in the community, promoting alternate work schedules, telecommuting, teleconferencing, company-sponsored ride-share and alternative fuel vehicle programs, use of commuter trains and other alternative modes of transportation to the workplace, creation of additional park and ride facilities, and improving the fiber optic network and connectivity.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , would implement CAPCOA Measures as MM T-1 and MM T-2 as VMT reduction measures. MM T-1 requires the future tenants to develop and market a commute trip reduction (CTR) program to provide alternative modes of transportation from single passenger vehicle trips. The City of Palmdale is housing-rich; Palmdale residents currently commute to other cities or counties for employment. The proposed Project would create approximately 2,000 jobs, which may contribute to shorter commutes within the region.
Policy AQ-1.3: Reduce vehicle emissions by maintaining and improving traffic flow per the Mobility Element.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , would implement CAPCOA Measures as MM T-1 and MM T-2 as VMT reduction measures. MM T-1 requires the future tenants to develop and market a commute trip reduction (CTR) program. MM T-2 requires the future tenant to implement a rideshare program for employees accessing the site.
Policy AQ-1.8: Use the environmental review process for new development applications to assess and, as necessary, mitigate the impacts of new development related to increased vehicle miles traveled.	Consistent. As discussed in Section 5.14, <i>Transportation</i> , would implement CAPCOA Measures as MM T-1 and MM T-2 as VMT reduction measures. MM T-1 requires the future tenants to develop and market a commute trip reduction (CTR) program. MM T-2 requires the future tenant to

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	implement a rideshare program for employees accessing the site.
Policy AQ-1.10: Restrict freight to certain routes and times by adopting rules and regulations that prohibit the use of trucks in certain areas within Palmdale.	Consistent. As discussed in Section 5.14, Transportation, truck movement to and from the Project site would directly access the City of Palmdale General Plan truck routes utilizing the SR-14 and East Avenue M/Columbia Way) interchange and continuing east to the Project site.
Goal AQ-2: Minimize particulates less than 10 microns in size (PM ₁₀) and minimizes activities that generate dust.	Consistent. As discussed in Section 5.3, Air Quality, the proposed Project would incorporate PPP AQ-2: Rule 403 into construction plans in order to minimize dust.
Policy AQ-2.2: Require measures at construction sites to prevent deposition of soil onto public right-of-way.	Consistent. As discussed in Section 5.3, Air Quality, the proposed Project would incorporate PPP AQ-2: Rule 403 into construction plans in order to minimize dust.
Policy AQ-2.3: Encourage developers to maintain natural contours to the greatest degree possible, to eliminate the need for extensive land clearing, blasting, ground excavation, grading and cut and fill operations.	Consistent. The site is balanced and would not require any import or export of soils.
Policy AQ-2.4: Require erosion and dust control measures for new construction, including covering soil with straw mats or use of chemical soil and dust binders during site grading, followed by hydroseeding and watering disturbed construction areas as soon as possible after grading to prevent fugitive dust.	Consistent. According to Section 5.3, Air Quality, the proposed Project would be consistent with rule 403.2 of the AVAQMD ensuring that NAAQS for PM ₁₀ will not be exceeded due to anthropogenic sources of fugitive dust.
Goal AQ-3: Reduction and/or elimination of unnecessary sources of air pollution.	Consistent. As discussed in Section 5.3, Air Quality, operation of the proposed Project would result in an exceedance of AVAQMD daily thresholds in CO and PM ₁₀ and yearly thresholds for PM ₁₀ . The Project would implement MM AQ-1 through AQ-14 in order to minimize TAC impacts to the greatest extent feasible. In addition, Tables 5.3-7 and 5.3-8 show that the Project would result in a less than significant health risk impact during Project construction and Operation.
Policy AQ-3.1: Promote the AVAQMD program to encourage local entities to install public electric vehicle charging stations to offer incentivize residents to purchase electric vehicles (e.g., vehicle buyback program), and the Carl Moyer program, which aims to improve the local air quality by funding local, cost-effective projects to upgrade heavy-duty equipment (Gross Vehicle Weight Rating greater than 14,000 lbs.) using proven technologies.	Consistent. As discussed in Section 5.3, Air Quality, the proposed Project would implement Mitigation Measure AQ-7, which requires the Project to provide electric vehicle charging stations. The Project would also utilize Tier 4 construction equipment.
Policy AQ-3.5: Minimize emissions of toxic air contaminants that contribute to climate change and ozone depletion, and that create potential health risks for residents, workers, and visitors.	Consistent. As discussed in Section 5.3, Air Quality, operation of the proposed Project would result in an exceedance of AVAQMD daily thresholds in CO and PM ₁₀ and yearly thresholds for PM ₁₀ . The Project would implement MM AQ-1 through AQ-14 in order to minimize TAC impacts to the greatest extent feasible.
Policy AQ-3.7: Through the environmental review process for new development applications, ensure that emissions of toxic air contaminants are minimized and that any significant health effects associated with such contaminants are appropriately mitigated.	Consistent. As discussed in Section 5.3, Air Quality, operation of the proposed Project would result in an exceedance of AVAQMD daily thresholds in CO and PM ₁₀ and yearly thresholds for PM ₁₀ . The Project would implement MM AQ-1 through AQ-14 in order to minimize TAC impacts to the greatest extent feasible. In addition, Tables 5.3-7 and 5.3-8 show that the Project would result

General Plan Policy or Goal	Project Consistency
	in a less than significant health risk impact during Project construction and Operation.
Goal AQ-4: Reduce air pollution caused by energy consumption.	Consistent. As discussed in Section 5.5, <i>Energy</i> , the proposed Project would be consistent with the City of Palmdale's Energy Action Plan, as shown on Table 5.5-3.
Policy AQ-4.2: Encourage energy conservation from all sectors of the community by promoting and/or requiring the use of energy efficient appliances, processes, and equipment, and promoting energy audits and retrofits of existing structures.	Consistent. As discussed in Section 5.5, <i>Energy</i> , the proposed Project would comply with California Code s and Regulations Title 24 requirements for energy efficient appliances.
Policy AQ-4.3: Require local government, Palmdale citizens, and local businesses and industries to recycle, as mandated by state law, and to otherwise recycle to the maximum extent possible in accordance with the requirements of the Palmdale Municipal Code.	Consistent. As discussed in Section 5.16, <i>Utilities and Service Systems</i> , all solid waste-generating activities within the County are subject to the requirements set forth in the 2019 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all state regulations, as ensured through the County's development project permitting process.
Policy AQ-4.4: Require new developments to minimize obstruction of direct sunlight for solar energy systems on adjacent properties.	Consistent. As discussed in Section 5.1, <i>Aesthetics</i> , the proposed Project would be constructed to a maximum height of 56-feet-9-inches. Building 1 would be set back approximately 441 feet from Avenue L-8, 196 feet from 35th Street East, and 208 feet from 30th Street East. Building 2 would be set back 275 feet from East Avenue M/Columbia Way, 205 feet from 35th Street East, and 203 feet from 30th Street East. Thus, the Project would not obstruct sunlight from the adjacent solar energy systems.
Noise Element	
Goal N-1: Minimize resident exposure to excessive noise.	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL.
Policy N-1.2: Restrict noise sensitive land uses near existing or future air, rail, or highway transportation noise sources unless mitigation measures have been incorporated into the design of the project to reduce the noise levels at the noise sensitive land use to less than 65 dBA CNEL at all exterior living spaces including but not limited to, single-family yards and multi-family patios, balconies, pool areas, cook-out areas and related private recreation areas.	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL.
Policy N-1.3: When proposed stationary noise sources could exceed an exterior noise level of 65 dBA CNEL at the property line or could impact future noise sensitive land uses, require preparation of an acoustical analysis and mitigation measures to reduce exterior noise levels to no more than 65 dBA CNEL at the property line.	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site

General Plan Policy or Goal	Project Consistency
	would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL.
Policy N-1.4: Explore the use of noise abatement strategies such as natural barriers, sound walls, and other buffers to mitigate excessive noise.	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL. Additionally, as shown on Table 5.10-6, construction noise from the proposed Project at the nearby receptor locations would range from 48 to 57 dBA L_{eq} .
Goal N-2: Maintain acceptable noise environments throughout the City.	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL. Additionally, as shown on Table 5.11-6, construction noise from the proposed Project at the nearby receptor locations would range from 48 to 57 dBA L_{eq} .
<p>Policy N-2.3: Utilize any or all the following measures to maintain acceptable noise environments throughout the city:</p> <ul style="list-style-type: none"> • Control of noise at its source, including noise barriers and other muffling devices built into the noise source. • Provision of buffer areas and/or wide setbacks between the noise source and other development. • Reduction of densities, where practical, adjacent to the noise source (freeway, airport, railroad). • Use of sound insulation, blank walls, double paned windows and other design or architectural techniques to reduce interior noise levels. • Designation of appropriate land uses adjacent to known noise sources. 	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL. Additionally, as shown on Table 5.10-6, construction noise from the proposed Project at the nearby receptor locations would range from 48 to 57 dBA L_{eq} .
Policy N-2.4: Where deemed appropriate based upon available information, require acoustical analysis and appropriate mitigation for noise-sensitive land uses proposed in areas that may be adversely impacted by significant intermittent noise sources. Such noise sources may include but not be limited to railroads, racetracks, stadiums, aircraft overflights and similar uses.	Consistent. As discussed in Section 5.11, <i>Noise</i> , the Project would be required to provide an interior noise level environment that does not exceed an hourly equivalent level of 50 dBA L_{eq} in occupied areas during any hour of operation. In addition, once final building plans are available, a Final Acoustical Report would be completed to confirm that exterior wall and roof construction would supply the necessary noise reduction to achieve compliance with the 50 dBA L_{eq} noise standard, which would be verified through the City's Project review and approval process for the Project.
Policy N-3.1: Designate and permit employment flex, industrial, aerospace industrial, and similar uses within the 65 dBA CNEL contour and the Frequent Overflight Area.	Consistent. As discussed in Section 5.11, <i>Noise</i> , the proposed Project is compatible with the 65 dBA CNEL zone as warehouse uses are allowed within the 65 dBA CNEL.

General Plan Policy or Goal	Project Consistency
Policy N-3.2: Restrict noise sensitive land uses (such as residential uses, religious institutions, schools, assisted living facilities, or similar uses) within areas designated within both the 65 dBA CNEL contour and the Frequent Overflight Area, unless mitigation measures prevent adverse health impacts from high noise emissions.	Consistent. As discussed in Section 5.11, <i>Noise</i> , the proposed Project is compatible with the 65 dBA CNEL zone as warehouse uses are allowed within the 65 dBA CNEL.
Policy N-3.4: Through the development review process, require a disclosure statement indicating that the property is subject to frequent overflight and aircraft noise upon sale of property within the Accident Potential Zone (APZ) and Air Installations Compatible Use Zones (AICUZ).	Consistent. As discussed in Section 5.8, <i>Hazards and Hazardous Materials</i> , the Project site is not located within an Accident Potential Zone.
Goal N-4: Minimize adverse noise impacts associated with transportation.	Consistent. As discussed in Section 5.11, <i>Noise</i> , most of the new noise introduced by the proposed Project would come from increased traffic noise. As shown on Table 5.11-7, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL. Additionally, as shown on Table 5.11-6, construction noise from the proposed Project at the nearby receptor locations would range from 48 to 57 dBA L_{eq} .

SCAG Regional Transportation Plan/ Sustainable Communities Strategy Policies. SCAG's RTP/SCS policies focus largely on regional transportation and the efficiency of transportation, which are implemented by counties and cities within the SCAG region, as part of the overall planning and maintenance of the regional transportation system. The policies are not directly applicable to the Project. As shown in Table 5.10-2, the Project would not conflict with the adopted RTP/SCS. Therefore, impacts would be less than significant.

Table 5.10-2: SCAG RTP/SCS Consistency Analysis

RTP/SCS Goal Statements	Project Consistency Discussion
1. Encourage regional economic prosperity and global competitiveness.	Consistent. The Project would increase employment opportunities within the City of Palmdale and enhance the region's overall economic development and competitiveness.
2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. As an individual development, the Project is limited in its ability to maximize mobility and access for people and goods in the SCAG region. The Project would not create substantial traffic impediments to the improvement of the accessibility of goods in the region.
3. Enhance the preservation, security, and resilience of the regional transportation system.	Consistent. As an individual development, the Project is limited in its ability to ensure security and resilience of the regional transportation system. There are no components of the Project that would result in the deterioration of the transportation system. However, as a measure to safeguard security, the Project would comply with applicable policies included in the City of Palmdale Safety Element, including development outside 100-year flood zones, dam inundation areas, Alquist-Piolo earthquake fault zones, and very high fire severity zones.

RTP/SCS Goal Statements	Project Consistency Discussion
4. Increase person and goods movement and travel choices within the transportation system.	Consistent. As an individual development, the Project is limited in its ability to maximize the goods movement and travel choices within the SCAG region. The Project would not create substantial traffic impediments and would improve the accessibility of goods to the surrounding area.
5. Reduce greenhouse gas emissions and improve air quality.	Consistent. While the Project would not improve air quality, it would not prevent SCAG from implementing actions that would improve air quality within the region. Regulatory requirements are specified to reduce the Project's air quality impacts to the maximum extent feasible, and the Project would incorporate various measures related to building design, landscaping, and energy systems to promote the efficient use of energy, pursuant to Title 24 CALGreen Code and Building Energy Efficiency Standards. Furthermore, the Project could result in potential benefits in the form of contribution to a closer place of employment for Palmdale residents, which may reduce significant commuting times in the area.
6. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	Consistent. This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system.

5.10.6 CUMULATIVE IMPACTS

Cumulative projects in the City of Palmdale would have the potential to result in a cumulative impact if they would, in combination, conflict with existing land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental impact. Cumulative projects in the City of Palmdale would utilize regional planning documents such as SCAG's RTP/SCS during planning, and the City's General Plan would be consistent with the regional plans, to the extent that they are applicable. Cumulative projects in this jurisdiction would be required to comply with the applicable land use plan or they would not be approved without a general plan amendment.

The proposed Project would be consistent with the General Plan land use designation and zoning designation. Past and present cumulative projects do not involve amendments that would eliminate application of policies that were adopted for the purpose of avoiding or mitigating environmental effects. Determining whether any future project might include such amendments and determining the cumulative effects of any such amendments would be speculative since it cannot be known what applications that are not currently filed might request. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant.

5.10.7 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- City of Palmdale Zoning Ordinance.

Plans, Programs, or Policies

- City of Palmdale General Plan
- SCAG Regional Transportation Plan/ Sustainable Communities Strategy Policies

5.10.8 PROJECT DESIGN FEATURES

None.

5.10.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Impact Land Use-2 would have a less-than-significant impact.

5.10.10 MITIGATION MEASURES

No mitigation measures related to land use and planning are required.

5.10.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts associated with land use and planning for Impact Land Use-2 would be less than significant.

5.10.12 REFERENCES

City of Palmdale. (2023). City of Palmdale General Plan.

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SCAG (Southern California Association of Governments). (2020). *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*. Adopted September 2020. Accessed February 2021.

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5.11 Noise

5.11.1 INTRODUCTION

This Draft EIR section evaluates the potential noise impacts that would result from implementation of the proposed Project. It discusses the existing noise environment within and around the Project area, as well as the regulatory framework for regulation of noise. This section analyzes the effect of the proposed Project on the existing ambient noise environment during construction and operational activities; and evaluates the Project's noise effects for consistency with relevant local agency noise policies and regulations. This section includes data from the following documents:

- *City of Palmdale General Plan*, adopted October 2022
- *City of Palmdale Municipal Code (PMC)*
- *Noise and Vibration Impact Analysis*, December 2023 (Appendix F)
- *Vehicle Miles Traveled (VMT) Analysis*, EPD Solutions, Inc., August 2023 (Appendix J)
- *Traffic Impact Analysis*, EPD Solutions, 20233

5.11.1.1 Noise and Vibration Terminology

Various noise descriptors are utilized in this Draft EIR analysis, and are summarized as follows:

dB: Decibel, the standard unit of measurement for sound pressure level.

dBA: A-weighted decibel, an overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.

Leq: The equivalent sound level, which is used to describe noise over a specified period of time, typically one hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.

Lmax: The instantaneous maximum noise level experienced during a given period of time.

Lmin: The instantaneous minimum noise level experienced during a given period of time.

Lx: The sound level that is equaled or exceeded "x" percent of a specified time period. The "x" thus represents the percentage of time a noise level is exceeded. For instance, L₅₀ and L₉₀ represents the noise levels that are exceeded 50 percent and 90 percent of the time, respectively.

Ldn: Also termed the "day-night" average noise level (DNL), Ldn is a measure of the average of A-weighted sound levels occurring during a 24-hour period, accounting for the greater sensitivity of most people to nighttime noise by weighting noise levels at night ("penalizing" nighttime noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of nighttime noises.

CNEL: The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 p.m. to 10:00 p.m. and after an addition of 10 dBA to noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

The "ambient noise level" is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

5.11.1.2 Effects of Noise

Noise is generally loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity that is a nuisance or disruptive. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance)
- Interference effects (e.g., communication, sleep, and learning interference)
- Physiological effects (e.g., startle response)
- Physical effects (e.g., hearing loss)

Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects refer to interruption of daily activities and include interference with human communication activities, such as normal conversations, watching television, telephone conversations, and interference with sleep. Sleep interference effects can include both awakening and arousal to a lesser state of sleep. With regard to the subjective effects, the responses of individuals to similar noise events are diverse and are influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity.

In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be by those hearing it. With regard to increases in A-weighted noise levels, the following relationships generally occur:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived.
- Outside of the laboratory, a 3 dBA change in noise levels is considered to be a barely perceivable difference.
- A change in noise levels of 5 dBA is considered to be a readily perceivable difference.
- A change in noise levels of 10 dBA is subjectively heard as doubling of the perceived loudness.

5.11.1.3 Noise Attenuation

Stationary point sources of noise, including mobile sources such as idling vehicles, attenuate (lessen) at a rate of 6 dBA per doubling of distance from the source over hard surfaces to 7.5 dBA per doubling of distance from the source over soft surfaces, depending on the topography of the area and environmental conditions (e.g., atmospheric conditions, noise barriers [either vegetative or manufactured]). Thus, a noise measured at 90 dBA 50 feet from the source over hard surfaces would attenuate to about 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, and so forth. Widely distributed noise, such as a large industrial facility spread over many acres or a street with moving vehicles, would typically attenuate at a lower rate, approximately 4 to 6 dBA per doubling of distance from the source.

Hard sites are those with a reflective surface between the source and the receiver, such as asphalt or concrete surfaces or smooth bodies of water. No excess ground attenuation is assumed for hard sites and the changes in noise levels with distance (drop-off rate) is simply the geometric spreading of the noise from the source. Soft sites have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. In addition to geometric spreading, an excess ground attenuation value of 1.5 dBA (per doubling distance) is normally assumed for soft sites. Line sources (such as traffic noise from vehicles) attenuate at a rate between 3 dBA for hard sites and 4.5 dBA for soft sites for each doubling of distance from the reference measurement.

5.11.1.4 Fundamentals of Vibration

Vibration is energy transmitted in waves through the ground or man-made structures. These energy waves generally dissipate with distance from the vibration source. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. PPV is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body. Decibel notation (VdB) is commonly used to measure RMS. VdB serves to reduce the range of numbers used to describe human response to vibration. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. Sensitive receivers for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment.

The background vibration-velocity level in residential areas is generally 50 VdB. Groundborne vibration is normally perceptible to humans at approximately 65 VdB. For most people, a vibration-velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration-velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

5.11.2 REGULATORY SETTING

5.11.2.1 Federal Regulations

Federal Transit Administration

Because the City does not have daytime construction noise level limits for activities that occur within the specified hours of the Palmdale Municipal Code (PMC) to determine potential CEQA noise impacts, construction noise was assessed using criteria from the 2018 Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment Manual* (FTA Manual). Table 5.11-1 shows the FTA's detailed assessment construction noise criteria based on the composite noise levels per construction phase.

Table 5.11-1: Federal Construction Noise Criteria

Land Use	Daytime 1-hour Leq (dBA)
Residential	80
Commercial	85
Industrial	90

dBA = A-weighted decibels

Leq = equivalent continuous sound level

Source: Appendix F

Vibration standards included in the FTA Manual are used in this analysis for groundborne vibration impacts on human annoyance. The criteria for environmental impact from groundborne vibration and noise are based on the maximum levels for a single event. Table 5.11-2 provides the criteria for assessing the potential for interference or annoyance from vibration levels in a building.

Table 5.11-2: Interpretation of Vibration Criteria

Land Use	Max L _v (VdB) ¹	Description of Use
Workshop	90	Vibration that is distinctly felt. Appropriate for workshops and similar areas not as sensitive to vibration.
Office	84	Vibration that can be felt. Appropriate for offices and similar areas not as sensitive to vibration.
Residential Day	78	Vibration that is barely felt. Adequate for computer equipment and low-power optical microscopes (up to 20×).
Residential Night and Operating Rooms	72	Vibration is not felt, but groundborne noise may be audible inside quiet rooms. Suitable for medium-power microscopes (100×) and other equipment of low sensitivity.

¹As measured in 1/3-octave bands of frequency over the frequency range 8 to 80 hertz.

FTA = Federal Transit Administration LV = velocity in decibels

Max = maximum

VdB = vibration velocity decibels

Source: Appendix F

Table 5.11-3 lists the potential vibration building damage criteria associated with construction activities, as suggested in the FTA Manual. FTA guidelines show that a vibration level of up to 0.5 in/sec in PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For non-engineered timber and masonry buildings, the construction building vibration damage criterion is 0.2 in/sec in PPV.

Table 5.11-3: Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Reinforced concrete, steel, or timber (no plaster)	0.50
Engineered concrete and masonry (no plaster)	0.30
Non-engineered timber and masonry buildings	0.20
Buildings extremely susceptible to vibration damage	0.12

FTA = Federal Transit Administration

PPV = peak particle velocity

in/sec = inch/inches per second

Source: Appendix F

5.11.2.2 State Regulations

State of California Green Building Standards Code

The State of California's Green Building Standards Code (CALGreen Code) contains mandatory measures for nonresidential building construction in Section 5.507 on Environmental Comfort. These noise standards are applied to new construction in California for controlling interior noise levels resulting from exterior noise sources. The regulations specify that acoustical studies must be prepared when nonresidential structures are developed in areas where the exterior noise levels exceed 65 dBA CNEL, such as within a noise contour of an airport, freeway, railroad, or other noise source. If the development falls within an airport or freeway 65 dBA CNEL noise contour, buildings shall be constructed to provide an interior noise level environment attributable to exterior sources that does not exceed an hourly equivalent level of 50 dBA Leq in occupied areas during any hour of operation.

5.11.2.3 Local and Regional Regulations

City of Palmdale General Plan, Noise Element

The Noise Element of the City's General Plan provides the City's goals and strategies related to noise, including the land use compatibility guidelines for community exterior noise environments. Figure 16.1 from the City's General Plan (Figure 5.11-1, *California Noise Land Compatibility Standards*, of this document) outlines the noise standards for land use compatibility. The following are goals and policies in the Noise Element that are applicable to the Project:

Goal N-1 Minimize resident exposure to excessive noise.

Policy N-1.1 Future Noise Levels. Use the state-recommended noise level guidelines shown in Figure 16.1 [Figure 5.11-1 of this document] to determine the compatibility of proposed land uses with the existing and future noise environment of each proposed development site.

Policy N-1.3 Acoustical Analysis for Stationary Noise Sources. When proposed stationary noise sources could exceed an exterior noise level of 65 dBA CNEL at the property line or could impact future noise sensitive land uses, require preparation of an acoustical analysis and mitigation measures to reduce exterior noise levels to no more than 65 dBA CNEL at the property line.

Policy N-1.4 Noise Abatement Strategies: Explore the use of noise abatement strategies such as natural barriers, sound walls, and other buffers to mitigate excessive noise.

Goal N-2 Maintain acceptable noise environments throughout the City.

Policy N-2.1 Extreme Noise Sources. Avoid locating new extreme noise sources adjacent to noise sensitive land uses unless mitigation measures can mitigate noise impacts to the sensitive uses.

Policy N-2.2 Restrict Construction Activities. Restrict construction activities in the vicinity of sensitive receptors during the evening, early morning, and weekends and holidays.

Policy N-2.3 Maintain Acceptable Noise Environments. Utilize any or all the following measures to maintain acceptable noise environments throughout the city:

- Control of noise at its source, including noise barriers and other muffling devices built into the noise source.
- Provision of buffer areas and/or wide setbacks between the noise source and other development.
- Reduction of densities, where practical, adjacent to the noise source (freeway, airport, railroad).
- Use of sound insulation, blank walls, double paned windows and other design or architectural techniques to reduce interior noise levels.
- Designation of appropriate land uses adjacent to known noise sources.

Goal N-3 Promote noise compatible land uses within the 65 CNEL contour and the Frequent Overflight Area of Air Force Plant 42.

Policy N-3.1 Frequent Overflight Area. Designate and permit land uses within the 65 CNEL contour and the Frequent Overflight Area which are primarily industrial, business park, commercial and recreational uses which are not noise sensitive; permit other uses only when it is found that no adverse noise impacts will result.

Policy N-3.2 Areas within 65 dBA CNEL. Restrict noise sensitive land uses (such as residential uses, religious institutions, schools, assisted living facilities, or similar uses) within areas designated within both the 65 dBA CNEL contour and the Frequent Overflight Area, unless mitigation measures prevent adverse health impacts from high noise emissions.

Policy N-3.5 Aviation Easement. Through conditions of approval, require that any owner of property within the 65 dBA CNEL noise contour or the low altitude overflight area of Plant 42 seeking a land use action from the City to provide an aviation easement to the Los Angeles Department of Airports, the U.S. Air Force, and the City of Palmdale.

City of Palmdale Municipal Code

The City of Palmdale Noise Ordinance included in the PMC (Chapter 9.18) establishes restrictions on permissible noise levels. Section 9.18.010, *Noise*, states that:

“it shall be unlawful for any person to willfully make or continue, or cause or permit to be made or continued, any loud, unnecessary, or unusual noise which unreasonably disturbs the peace and quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. The characteristics and conditions, which may be considered in determining whether such noise violates the provisions of this section, shall include, but not be limited to, the following:

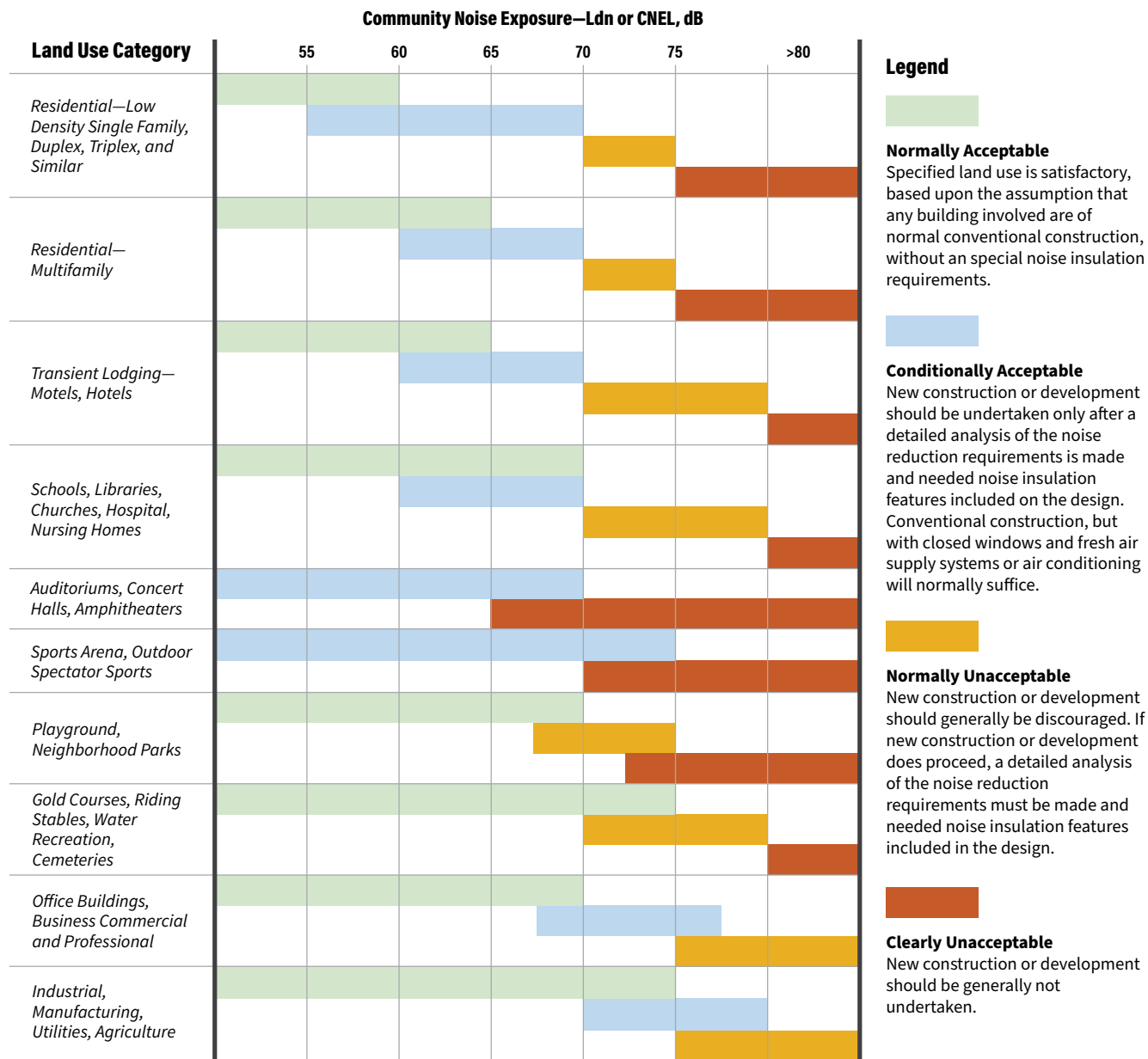
1. The volume of the noise;
2. The intensity of the noise;
3. Whether the nature of the noise is usual or unusual;
4. Whether the origin of the noise is natural or unnatural;
5. The volume and intensity of the background noise, if any;
6. The proximity of the noise to sleeping facilities;
7. The nature and zoning of the area within which the noise emanates;
8. The density of the inhabitation of the area within which the noise emanates;
9. The time of the day or night the noise occurs;
10. The duration of the noise;
11. Whether the noise is recurrent, intermittent, or constant;
12. Whether the noise is produced by a commercial or noncommercial activity.”

Section 9.18.020, *Acts constituting disturbing, excessive, loud, offensive noise*, states that “Any of the following shall constitute evidence of a prima facie violation of this subsection; provided, however, that inclusion herein shall not be construed as limiting the activities which may be found to violate this section:

(2)(a) The operation of any such sound production or reproduction device, radio receiving set, musical instrument, drum, phonograph, television set, machine, loudspeaker and sound amplifier, or similar machine or device between the hours of 10:00 p.m. and 8:00 a.m. in such a manner as to be plainly audible at a distance of 50 feet from the building, structure, or vehicle in which it is located.

Chapter 8.28, *Building Construction Hours of Operation and Noise Control*, of the PMC contains provisions that restrict construction between the hours of 8:00 p.m. and 6:30 a.m. Construction is not allowed on Sundays in any residential zone or within 500 feet of any residence, hotel, motel, or recreational vehicle park. Construction occurring consistent with these provisions is exempt from regulation.

California Noise Land Compatibility Standards



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5.11.3 ENVIRONMENTAL SETTING

5.11.3.1 Existing Noise Levels

To assess existing noise levels of the environment, long-term (24-hour) noise level measurements were conducted on July 25 through July 26, 2023, at two locations as shown on Figure 5.11-2, *Noise Measurement Locations*. The background ambient noise levels in the Project area are dominated by the transportation-related noise associated with East Avenue M/Columbia Way, 30th Street, and 40th Street, as well as faint construction noise in the vicinity of the Project site. Table 5.11-4, *Summary of 24-Hour Ambient Noise Level Measurements*, provides a summary of the measured hourly noise levels and calculated CNEL level from the long-term noise level measurements, which shows that the calculated CNEL levels range from 69.0 dBA CNEL to 74.5 dBA CNEL.

Table 5.11-4: Summary of 24-Hour Ambient Noise Level Measurements

Location		Daytime Noise Levels ¹ (dBA Leq)	Evening Noise Levels ² (dBA Leq)	Nighttime Noise Levels ³ (dBA Leq)	Daily Noise Levels (dBA CNEL)
LT-1	South of single-family residence at 42164 40th St. on a tree, approximately 930 ft away from the East Avenue M/Columbia Way centerline.	54.5 – 80.7	53.2 – 76.1	49.8 – 60.6	74.5
LT-2	East of the entrance to the Lancaster National Soccer center at 43000 30th St., approximately 1,400 ft away from the 30th St. centerline.	64.5 – 70.2	61.0 – 64.0	54.3 – 64.5	69.0

Note: Noise measurements were conducted from July 25 to July 26, 2023, starting at 1:00 p.m.

1 Daytime Noise Levels = noise levels during the hours from 7:00 a.m. to 7:00 p.m.

2 Evening Noise Levels = noise levels during the hours from 7:00 p.m. to 10:00 p.m.

3 Nighttime Noise Levels = noise levels during the hours from 10:00 p.m. to 7:00 a.m.

CNEL = Community Noise Equivalent Level

ft = foot/feet

dBA = A-weighted decibels

Leq = equivalent continuous sound level

Source: Noise and Vibration Impact Analysis (Appendix F).

5.11.3.2 Existing Vibration

Aside from periodic construction work that may occur in the vicinity of the Project area, other sources of groundborne vibration include heavy-duty trucks, including garbage trucks, on area roadways. Trucks traveling at a distance of 50 feet typically generate groundborne vibration velocity levels of around 63 VdB (approximately 0.006 in/sec PPV) and could reach 72 VdB (approximately 0.016 in/sec PPV) when trucks pass over bumps in the road (FTA, 2006).

5.11.3.3 Existing Airport Noise

The Project site is located across East Avenue M/Columbia Way from the United States Air Force (USAF) Plant 42 (also referred to as Palmdale Regional Airport). The Project site is within the 65 dBA airport noise impact zone (Los Angeles County Airport Land Use Commission, 2004). Aircraft flyovers may be audible on the Project site due to aircraft activity in the vicinity.

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Noise Measurement Locations



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5.11.3.4 Sensitive Receptors

Noise sensitive receptors are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include residences, schools, hospitals, and recreation areas.

There are no close sensitive receptors within a 1,000-foot radius of the Project site. The nearest sensitive receptors are a single-family residence located approximately 3,900 feet east of the Project boundary line and single-family residences located approximately 4,143 feet north of the Project boundary line.

5.11.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to result in:

- Noise-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Noise-2 Generation of excessive groundborne vibration or groundborne noise levels; or
- Noise-3 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, expose people residing or working in the project area to excessive noise levels.

5.11.4.1 Construction Noise and Vibration

A potentially significant noise impact would occur if Project related construction activities:

- Occur between the hours of 8:00 p.m. and 6:30 a.m. of the next day, or on Sundays in any residential zone or within 500 feet of any residence, hotel, motel or recreational vehicle park. (*PMC Chapter 8.28, Building Construction Hours of Operation and Noise Control*); or
- Create noise levels which exceed the acceptable noise level thresholds of 80 dBA Leq at the nearby sensitive receiver locations (*FTA Transit Noise and Vibration Impact Assessment Manual*);

A potentially significant vibration impact would occur if Project-related construction activities generate vibration levels which exceed the FTA Manual guidelines, which state that a vibration level of up to 0.5 in/sec in PPV is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. For non-engineered timber and masonry buildings, the construction building vibration damage criterion is 0.2 in/sec in PPV.

5.11.4.2 Roadway Vehicular Noise

The City of Palmdale has not established noise standards for traffic-related noise; therefore, for purposes of this CEQA analysis, the standard for a perceivable difference in noise levels (3 dBA CNEL) has been applied as the vehicle noise threshold. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. For example, if the ambient noise environment is very quiet and a new noise source substantially increases localized noise levels, a perceived impact may occur even though the numerical noise threshold might not be exceeded. Therefore, for the purpose of this analysis, a potentially significant impact would occur when the noise levels at existing noise sensitive land uses (e.g., residential, etc.):

- Are less than 60 dBA CNEL and the Project creates a readily perceptible 5 dBA CNEL or greater Project-related noise level increase; or
- Range from 60 to 65 dBA CNEL and the Project creates a barely perceptible 3 dBA CNEL or greater Project-related noise level increase; or
- Already exceeds 65 dBA CNEL, and the Project creates a community noise level impact of greater than 1.5 dBA CNEL.

5.11.4.3 Onsite Operational Noise

A potentially significant impact regarding onsite operational noise of the Project would occur if Project-related operational (stationary source) noise levels:

- Exceed the exterior 60 dBA Leq daytime or 45 dBA Leq nighttime noise level standards (Development Code, Title 8, Section 83.01.080).

5.11.5 METHODOLOGY

5.11.5.1 Construction Noise

To identify the temporary construction noise contribution to the existing ambient noise environment, the construction noise levels anticipated from usage of construction equipment needed to implement the proposed Project were identified. The PMC limits construction hours to reduce noise, but does not establish numeric maximum acceptable construction source noise levels at potentially affected receivers, which would allow for a quantified determination of what CEQA constitutes a *substantial temporary or periodic noise increase*. Therefore, a numerical construction threshold based on the FTA Manual is used for analysis of daytime construction impacts and has been used in past City CEQA documents for noise analysis purposes. The FTA considers a daytime exterior construction noise level of 80 dBA Leq as a reasonable threshold for noise sensitive residential land use and 90 dBA Leq for industrial uses. The construction noise levels are compared against the FTA thresholds to assess the level of significance associated with temporary construction noise level impacts.

5.11.5.2 Operational Noise

The primary source of noise associated with the operation of the proposed Project would be from vehicular and truck trips. The expected roadway noise level increases from vehicular/truck traffic were calculated using the Federal Highway Administration Traffic Noise Prediction Model (FHWA-RD-77 108) and the average daily traffic volumes from the Traffic Impact Analysis prepared for the proposed Project (EPD, 2023b).

As detailed in Section 5.14, *Transportation*, the proposed Project is anticipated to generate approximately 5,208 daily trips, 420 AM (318 inbound and 102 outbound), and 494 PM (151 inbound and 343 outbound) peak hour trips. The increase in noise levels generated by the vehicular/truck trips has been quantitatively estimated and compared to the applicable noise standards and thresholds of significance listed previously.

Stationary sources of noise would include heating, ventilation, air conditioning (HVAC) equipment, truck deliveries, and loading and unloading activities. To determine the future noise impacts from Project operations to the noise sensitive uses, a 3-D noise model, SoundPLAN, was used to incorporate the site topography as well as the shielding from the proposed building on site. To provide a conservative analysis, the Noise and Vibration Report for the Project (Appendix F) assumed that operations would occur equally during all daytime hours of the day and that half of the 258 loading docks at each proposed building would

be active at all times. Additionally, it is assumed that within any given hour, 80 heavy trucks would maneuver to park near or back into one of the proposed loading docks.

The projected use at this time is unknown because the building is speculative with unknown tenants.

5.11.5.3 Vibration

Aside from noise levels, groundborne vibration would also be generated during construction of the Project by various construction-related activities and equipment; and could be generated by truck traffic traveling to and from the Project site. The potential groundborne vibration levels resulting from construction activities occurring from the proposed Project were estimated by data published by the FTA. Thus, the groundborne vibration levels generated by these sources have also been quantitatively estimated and compared to the applicable thresholds of significance listed previously.

5.11.6 ENVIRONMENTAL IMPACTS

IMPACT NOISE-1: THE PROJECT WOULD NOT RESULT IN GENERATION OF A SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE VICINITY OF THE PROJECT IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES.

Construction

Less than Significant Impact. Potential noise impacts associated with the construction of the proposed Project would be from construction-generated vehicular traffic on the nearby roadways and from noise generated from construction equipment onsite. Construction crew commutes and the transport of construction equipment and materials to the site for the proposed Project would incrementally increase noise levels on access roads leading to the site. The results of the California Emissions Estimator Model (CalEEMod) for the proposed Project indicate that during the building construction phase, an additional 2,737 vehicles in passenger car equivalent (PCE) volume, consisting of worker and hauling trips, would be added to the roadway adjacent to the Project site (Appendix J), which would generate an approximate 1.2 dBA CNEL noise increase (Appendix F). A noise level increase of less than 3 dBA would not be perceptible to the human ear in an outdoor environment. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the Project site would be less than significant

Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that can reach high levels when combined. Construction is expected to occur in the following stages: site preparation and grading, building construction, architectural coating, and paving. Table 5.11-5 lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, taken from the Federal Highway Administration's (FHWA) Roadway Construction Noise Model (2006). The noise level at each construction phase was calculated using the reference information from Table 5.11-5 and the construction equipment list. The Project construction composite noise levels at a distance of 50 feet would range from 77 dBA Leq to 88 dBA Leq with the highest noise levels occurring during the site preparation and grading phases.

Table 5.11-5: Construction Reference Noise Levels

Equipment Description	Acoustical Usage Factor (%) ¹	Maximum Noise Level (Lmax) at 50 Feet ²
Auger Drill Rig	20	84
Backhoes	40	80

Equipment Description	Acoustical Usage Factor (%)¹	Maximum Noise Level (Lmax) at 50 Feet²
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Paver	50	77
Pickup Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Trencher	50	80
Welder	40	73

Note: Noise levels reported in this table are rounded to the nearest whole number.

1. Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.

2. Maximum noise levels were developed based on Specification 721.560 from the Central Artery/Tunnel program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.

FHWA = Federal Highway Administration

ft=foot/feet

Lmax = maximum instantaneous sound level

Source: Appendix F

Per PMC Chapter 8.28, noise sources associated with construction activities are exempt from the City's established noise standards if the activities do not take place between the hours of 8:00 p.m. of any one day and to 6:30 a.m. of the next day, or on Sundays in any residential zone or within 500 feet of any residence, hotel, motel, or recreational vehicle park. The proposed Project's construction activities would occur pursuant to these regulations. Thus, the construction activities would be in compliance with the City's construction-related noise standards.

Construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. The typical operating cycle for a piece of construction equipment involves one or two minutes of full power operation followed by three or four minutes at lower power settings. The construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators.

While construction noise will vary, it is expected that composite noise levels during construction at the nearest industrial uses to the south of the Project site would reach 57 dBA Leq and at the nearest residential uses to the north of the Project site would reach 48 dBA Leq during daytime hours (see Table 5.11-6).

These predicted noise levels would only occur when all construction equipment is operating simultaneously, and therefore, are assumed to be rather conservative in nature. While construction-related short-term noise levels have the potential to be higher than existing ambient noise levels in the Project area under existing conditions, the noise impacts would no longer occur once Project construction is completed. As construction noise from the proposed Project at the nearby receptor locations would range from 48 to 57 dBA Leq, construction-related noise impacts would remain well below the 90 dBA Leq and 80 dBA Leq 1-hour construction noise level criteria for daytime construction noise for industrial and residential uses, respectively. Therefore, impacts related to construction noise would be less than significant.

Table 5.11-6: Construction Noise Levels at Nearest Receptors

Receptor (Location)	Composite Noise Level at 50 feet ¹ (dBA Leq)	Distance from Center of Construction Activities (feet)	Composite Noise Level (dBA Leq)
Industrial (South)	88	1,900	57
Residence (East)		5,200	48
Residence (North)		5,450	48

Source: Noise and Vibration Impact Analysis, 2023 (Appendix J)

Operation

Less than Significant Impact. The proposed Project would consist of the development of two warehouses and a stormwater detention basin. Each building would include 258 loading dock doors, totaling 516 doors for the Project. Also, Building 1 would include 499 trailer stalls and Building 2 would include 491 trailer stall, totaling 990 trailer stalls. In addition, Building 1 would provide 753 parking stalls and Building 2 would provide 764 parking stalls, for a total of 1,754 parking stalls for the Project. Potential noise impacts associated with the operations of the proposed Project would be from project-generated vehicular traffic on the nearby roadways and from onsite activities, which have been analyzed separately below.

Traffic Noise Impacts

Vehicle noise is a combination of the noise produced by the engine, exhaust and tires. The level of traffic noise depends on three primary factors (1) the volume of traffic, (2) the speed of traffic, and (3) the number of trucks in the flow of traffic. Table 5.11-7 provides the traffic noise levels for the existing with and without Project scenarios and opening year with and without Project scenarios. These noise levels represent the worst-case scenario, which assumes no shielding is provided between the traffic and the location where the noise contours are drawn.

As shown in Table 5.11-7, the increase in Project-related traffic noise would be no greater than 1.9 dBA which is below the threshold of a 3.0 dBA noise level increase. Therefore, traffic noise impacts from Project-related traffic on offsite sensitive receptors would be less than significant, and no mitigation measures are required.

Offsite Stationary Noise Impacts

Adjacent offsite land uses would be potentially exposed to stationary-source noise impacts from the proposed onsite heating, ventilation, and air conditioning (HVAC) equipment, trash bin emptying activities, and truck deliveries and loading and unloading activities. To provide a conservative analysis, it is assumed that truck arrivals and departure activities could occur at 80 spaces for a period of less than 5 minutes each

and unloading activities could occur at 258 docks simultaneously for a period of more than 30 minutes in a given hour.

The Project would include eight rooftop HVAC units on each building (16 total). The HVAC equipment could operate 24 hours per day and would generate sound power levels (SPL) of up to 87 dBA SPL or 72 dBA Leq at 5 feet, based on manufacturer data (Trane, n.d.).

The Project is estimated to have four trash dumpsters near the corners of the proposed buildings. The trash emptying activities would take place for a period of less than 1 minute and would generate SPLs of up to 118.6 dBA, or 84 dBA Leq at 50 ft, based on reference information within SoundPLAN. Trash bin emptying activities would only occur during daytime hours.

Delivery trucks are anticipated to generate a noise level of 75 dBA Leq at 20 feet (Appendix J). Delivery trucks would arrive onsite and maneuver their trailers so that trailers would be parked within the loading docks. During this process, noise levels are associated with the truck engine noise, air brakes, and back-up alarms while the truck is backing into the dock. These noise levels would likely occur for a shorter period of time (less than 5 minutes). After a truck enters the loading dock, the doors would be closed and the remainder of the truck loading activities would be enclosed, and therefore, much less perceptible. The noise level calculations assumed that truck arrivals and departure activities could occur at 80 spaces for a period of less than 5 minutes each and unloading activities could occur at 258 docks simultaneously for a period of more than 30 minutes in a given hour.

As shown in Figure 5.11-3, *SoundPLAN Noise Model*, the noise levels at the existing commercial uses to the south and residential uses to the east and north of the Project site would experience noise level impacts that would not exceed the exterior noise level standard of 65 dBA CNEL. Therefore, the impact would be less than significant, and no noise reduction measures are required.

Table 5.11-7: Traffic Noise Levels Without and With Proposed Project

Roadway Segment	Opening Year 2026 – Without Project		Opening Year 2026 – With Project		
	ADT	CNEL (dBA) 50 ft from Centerline of Nearest Lane	ADT	CNEL (dBA) 50 ft from Centerline of Nearest Lane	Increase from Existing Conditions (dBA)
Columbia Way west of 30 th Street	17,490	70.6	23,290	71.8	1.2
Columbia Way east of 30 th Street	17,700	71.0	19,870	71.5	0.5
30 th Street north of Columbia Way	6,690	67.9	10,320	69.8	1.9

Note: Shaded cells indicate roadway segments adjacent to the project site.

ADT = average daily traffic

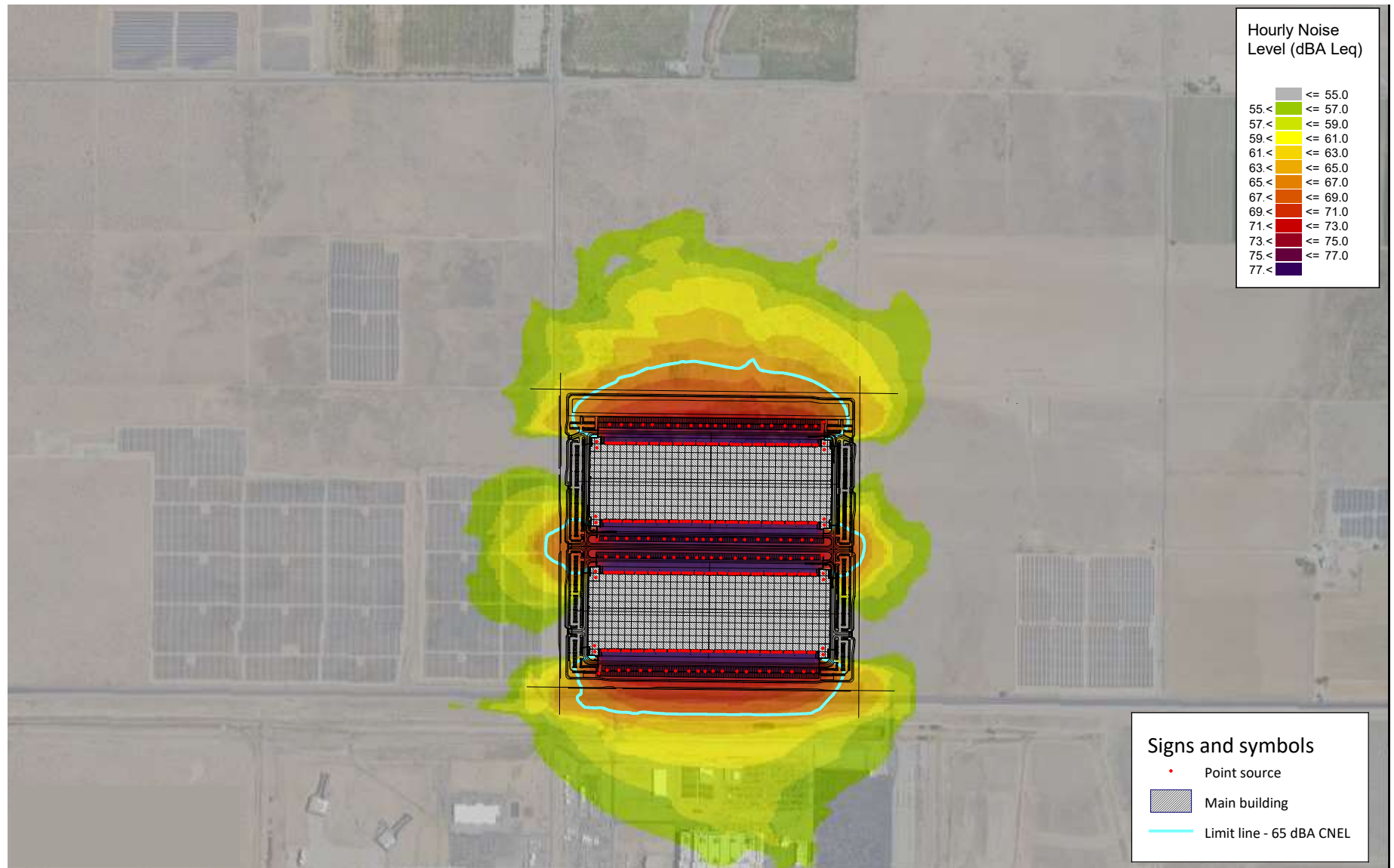
CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

ft = foot/feet

Source: Appendix F.

SoundPLAN Noise Model



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IMPACT NOISE-2: THE PROJECT WOULD NOT RESULT IN GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS.

Construction

Less than Significant Impact. Construction activities for development of the proposed Project would include excavation and grading activities, which have the potential to generate low levels of groundborne vibration. People working in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Site ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can be perceived in the audible range and be felt in buildings very close to a construction site.

The excavation and grading activities that are required for implementation of the Project can result in varying degrees of ground vibration, depending on the equipment and methods used, distance to the affected structures and soil type. Table 5.11-8 shows the PPV and VdB values at 25 ft from the construction vibration source. Based on the reference vibration levels provided by the FTA and the equipment that would be used for the proposed Project, a large bulldozer represents the peak source of vibration with a reference velocity of 0.089 PPV in/sec or 87 VdB of groundborne vibration when measured at 25 feet, as shown on Table 5.11-8.

Table 5.11-8: Vibration Source Levels for Construction Equipment

Equipment	Reference PPV/Lv at 25 feet	
	Peak Particle Velocity (inches/second)	Approximate Vibration Level (Lv) at 25 feet
Pile Driver (Impact), Typical	0.644	104
Pile Driver (Sonic), Typical	0.170	93
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer²	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks²	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

1. RMS vibration velocity in decibels (VdB) is 1 μ in/sec.

2. Equipment shown in bold is expected to be used on site.

μ in/sec = microinches per second; ft = foot/feet; FTA = Federal Transit Administration; in/sec = inch/inches per second; LV = velocity in decibels; PPV = peak particle velocity; RMS = root-mean-square; VdB = vibration velocity decibels

Source: Noise and Vibration Impact Analysis, 2023 (Appendix F)

The primary source of vibration during construction would be from the operation of a bulldozer. As shown in Table 5.11-8, a large bulldozer would create a vibration level of 0.089 inch per second PPV at 25 feet. Based on typical propagation rates, the vibration level at the nearest offsite structure (650 feet) would be 0.001 inch per second PPV (see Table 5.11-9), which is well below the City's 0.2 PPV inch per second threshold. Additionally, because construction activities are regulated by the PMC which states temporary construction, maintenance, or demolition activities are not allowed between the hours of 8:00 p.m. on one

day and 6:30 a.m. of the following day, vibration impacts would not occur during the more sensitive nighttime hours. Therefore, impacts related to construction vibration would be less than significant.

Table 5.11-9: Construction Vibration Levels at Nearest Receptors

Receptor (Location)	Reference Vibration Level (PPV) at 25 feet ¹	Distance (feet) ²	Vibration Level (PPV)
Industrial (South)	0.089	650	0.001
Residence (East)		3,900	<0.001
Residence (North)		4,143	<0.001

1. The reference vibration level is associated with a large bulldozer which is expected to be representative of the heavy equipment used during construction.

2. The reference distance is associated with the peak condition, identified by the distance from the perimeter of construction activities to surrounding structures

Ft=foot/feet

PPV=peak particle velocity

Source: Noise and Vibration Impact Analysis, 2023 (Appendix F)

Operation

Less than Significant Impact. Operation of the proposed Project would include operation of heavy trucks, deliveries, moving trucks, and garbage trucks for solid waste disposal. Truck vibration levels are dependent on vehicle characteristics, load, speed, and pavement conditions. However, vibration levels generated from Project-related traffic within the Project site and on the adjacent roadways are unusual for on-road vehicles because the rubber tires and suspension systems of on-road vehicles provide vibration isolation. Vibration levels generated from Project-related traffic on the adjacent roadways would be less than significant.

IMPACT NOISE-3: THE PROJECT WOULD NOT, 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, EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS.

Less than Significant.

The nearest airport to the Project site is the Palmdale Regional Airport/Air Force Plant 42, located directly across East Avenue M/Columbia Way from the Project site (<0.1 mile) to the south. The Project site is within the 65 dBA CNEL airport noise contour as shown in Figure 5.8-1, *Palmdale Regional Airport/AFP 42 Noise Contours*, in Section 5.8, *Hazards and Hazardous Materials*. The proposed Project would be required to comply with the City's General Plan goals and policies related to noise compatibility land uses within the 65 dBA CNEL contour and the Frequent Overflight Area of Air Force Plant 42. In accordance with General Plan Policy N-3.2, the proposed Project is compatible with the 65 dBA CNEL zone because industrial warehouse uses are permitted within areas with ambient noise of 65 dBA CNEL. Therefore, the Project would not expose people working in the Project area to excessive airport related noise levels, and impacts would be less than significant.

5.11.7 CUMULATIVE IMPACTS

Cumulative noise assessment considers development of the proposed Project in combination with ambient growth and other development projects within the vicinity of the Project area. As noise is a localized phenomenon, and drastically reduces in magnitude as distance from the source increases, only projects and ambient growth in the nearby area could combine with the proposed Project to result in cumulative noise impacts.

Development of the proposed Project in combination with the related projects would result in an increase in construction-related and traffic-related noise. However, PMC Chapter 8.28, *Building Construction Hours of Operation and Noise Control*, requires construction activities to not occur between the hours of 8:00 p.m. and 6:30 a.m. on weekdays, and construction is not allowed on Sundays in any residential zone or within 500 feet of any residence hotel, motel, or recreational vehicle park; therefore, vibration impacts would not occur during the more sensitive nighttime hours.

As shown in Figure 5-1, *Cumulative Projects*, included in Section 5.0 of this Draft EIR, the closest cumulative project is the Warehouse and Mechanic Facilities Project site, located approximately 2,600 feet east of the Project site. The Warehouse and Mechanic Facilities Project is currently under construction as of the writing of this Draft EIR. Construction of the proposed Project is anticipated to last approximately 11 months and is planned to begin the second quarter of 2024 and end the second quarter of 2025. Therefore, construction activities of the two projects could slightly overlap. However, cumulative noise increases due to construction would be temporary and localized. As discussed throughout this section, construction noise from the proposed Project at the nearby receptor locations would range from 48 to 57 dBA Leq, which is comparable to the existing ambient noise levels ranging between 54.5 dBA Leq during nighttime and 74.5 dBA Leq during daytime. Therefore, due to the distance from nearby receptors and timing differences between the projects, construction noise and vibration levels from the proposed Project would not combine to become cumulatively considerable, and cumulative noise and vibration impacts associated with construction activities would be less than significant.

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the proposed Project and related projects within the study area. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the proposed Project traffic volumes on the roadways in the Project vicinity. The increase in noise levels associated with the traffic volumes of the proposed Project were previously identified. As detailed, development of the proposed Project would result in noise levels much lower than the 3 dBA threshold. Therefore, the Project would not result in a cumulatively considerable impact when combined with existing and future development. Cumulative impacts would be less than significant.

5.11.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Palmdale Municipal Code

- Section 9.18.010, *Noise*
- Section 8.28.030, *Building Construction Hours of Operation and Noise Control*

5.11.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

The Project's impacts would be less than significant.

5.11.10 MITIGATION MEASURES

No mitigation measures are required because the Project's impacts are less than significant.

5.11.11 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required because the Project's impacts are less than significant.

5.11.12 REFERENCES

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5.12 Population and Housing

5.12.1 INTRODUCTION

This section examines the existing population, housing, and employment conditions in the City of Palmdale and assesses the Project's impacts on regional growth and potential displacement of people and housing. The demographic data and analysis in this section is based, in part, on the following documents and resources:

- *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, Southern California Association of Governments (SCAG), September 2020
- *Local Profiles Report 2019, Profile of the City of Palmdale*, SCAG, May 2019
- *City of Palmdale General Plan*, October 2022
- *City of Palmdale General Plan Environmental Impact Report*, July 2022
- City of Palmdale Code of Ordinances

Although evaluation of population, housing, and employment typically involves economic and social, rather than physical environmental issues, population, housing, and employment growth are often precursors to physical environmental impacts. According to Section 15382 of the CEQA Guidelines, "[a]n economic or social change by itself shall not be considered a significant impact on the environment." Socioeconomic characteristics should be considered in an EIR only to the extent that they create adverse impacts on the physical environment.

5.12.2 REGULATORY SETTING

5.12.2.1 Federal Regulations

No federal laws, regulations, or executive orders apply to the Project.

5.12.2.2 State Regulations

Housing Crisis Act of 2019 - Senate Bill 330 (SB 330)

Commonly known as Senate Bill (SB) 330 (Chapter 654, Statutes of 2019), this law was passed to respond to the California housing crisis. Effective January 1, 2020, and slated to sunset on January 1, 2025, SB 330 aims to increase residential unit development, protect existing housing inventory, and expedite permit processing. This law makes a number of modifications to existing legislation, such as the Permit Streamlining Act and the Housing Accountability Act and institutes the Housing Crisis Act of 2019. Under this legislation, municipal and county agencies are restricted in ordinances and policies that can be applied to residential development.

While many of SB 330's provisions (including those related to vested rights and permit streamlining) apply to all cities and counties, the restrictions on local actions contained in Government Code Section 66300 apply only in "affected" cities and counties as defined by the California Department of Housing and Community Development (HCD). In the case of counties, it is areas within counties and not necessarily an entire county that is affected. Palmdale is considered an affected city, as defined by Government Code Section 66300.

SCAG Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, SCAG Regional Council adopted “Connect SoCal,” the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal integrates transportation planning with economic development and sustainability planning to comply with State greenhouse gas (GHG) emissions reduction goals, such as Senate Bill 375.

According to the RTP/SCS, Southern California will grow from 9 million people, 6 million households, and 8 million jobs in 2020 to 22.5 million people, 7.6 million households, and 10 million jobs in 2045. During that time, transportation infrastructure will need to substantially expand while also meeting the greenhouse gas (GHG) emissions-reduction targets set by the California Air Resources Board.

SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region’s counties and cities. The determination of each city’s and county’s share of regional housing needs that is required by law to be reflected in municipal general plan housing elements is based on the growth projections of the RTP/SCS.

5.1.2.2.3 Regional/Local Regulations

City of Palmdale General Plan 2045

The current City of Palmdale General Plan Housing Element (2021-2029) was approved and adopted by the City Council on October 22, 2022. Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community through the adoption of a Housing Element in their respective General Plans. The State-approved 2021-2029 Housing Element is organized into six sections: (1) introduction; (2) community outreach; (3) housing needs assessment; (4) constraints; (5) housing resources; and (6) housing plan.

5.1.2.3 ENVIRONMENTAL SETTING

The Project site consists of vacant and undeveloped land that was previously used for agricultural uses and has no history of housing. The Project site has a General Plan land use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI). The Industrial (IND) land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses. The Heavy Industrial (HI) zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution. Neither the existing General Plan land use or zoning designations provide for housing or other residential uses, but do provide for growth of employment within the City.

There are no residential areas located directly adjacent the Project site. The nearest residences are located approximately 3,900 feet east of the Project site and approximately 4,143 feet north of the Project site.

5.1.2.3.1 Population

According to SCAG’s 2020-2045 RTP/SCS growth forecast, the population of Palmdale is anticipated to increase from 158,600 residents to 207,000 residents (an increase of 48,400 residents) between 2016 and 2045. Comparatively, the entire population of Los Angeles County is anticipated to increase from 10,110,000 residents in 2016 to 11,674,000 residents in 2045, an increase of 1,564,000 residents. Assuming the County’s population increases at a consistent rate between 2016 and 2045, the County population would grow approximately 0.5 percent annually. As shown in Table 5.12-1, population growth within the City is projected to be almost double than the County as a whole.

Table 5.12-1: Population Trends in the City of Palmdale

	2016	2045	2016 – 2045 Increase
City of Palmdale	158,600	207,000	48,400 (31%)
Los Angeles County	10,110,000	11,674,000	1,564,000 (16%)

Source: SCAG, 2020

5.12.3.2 Housing

According to SCAG's 2020-2045 RTP/SCS forecast, the City of Palmdale is projected to add approximately 18,000 households between 2016 and 2045 (from 43,800 to 61,800). Assuming the City of Palmdale adds to the housing stock at a consistent rate between 2016 and 2045, the City would add approximately 621 dwelling units per year. Comparatively, the County as a whole is expected to add approximately 800,000 households between 2016 to 2045 (from 3,319,000 to 4,119,000). Assuming the County added to the housing stock at a consistent rate between 2016 and 2045, the County would increase dwelling units 24 percent overall, or 0.8 percent annually. As shown in Table 5.12-2, housing growth within the City is projected to be 17 percent greater than the County as a whole between 2016 and 2045.

Table 5.12-2: Housing Trends in the City of Palmdale

	2016	2045	2016 – 2045 Increase
City of Palmdale	43,800	61,800	18,000 (41%)
Los Angeles County	3,319,000	4,119,000	800,000 (24%)

Source: SCAG, 2020

5.12.3.3 Employment

According to SCAG's 2020-2045 RTP/SCS growth forecast, the City of Palmdale anticipates an employment increase of 9,200 additional jobs (from 36,700 to 45,900), yielding a 25 percent growth rate between 2016 and 2045. Comparatively, the entire County is projected to add approximately 909,000 jobs between 2016 and 2045. Assuming the entire County added employment opportunities at a consistent rate between 2016 and 2045, the County would add approximately 31,344 jobs per year. As shown in Table 5.12-3, employment growth within the City is projected to be 5 percent greater than the County as a whole between 2016 and 2045.

Table 5.12-3: Employment Trends in the City of Palmdale

	2016	2045	2016 – 2045 Increase
City of Palmdale	36,700	45,900	9,200 (25%)
Los Angeles County	4,473,000	5,382,000	909,000 (20%)

Source: SCAG, 2020

5.12.3.4 Jobs – Housing Ratio

The jobs-housing ratio is a general measure of the total number of jobs and housing units in a defined geographic area, without regard to economic constraints or individual preferences. SCAG applies the jobs-housing ratio at the regional and subregional levels to analyze the fit between jobs, housing, and infrastructure. A major focus of SCAG's regional planning efforts has been to improve this balance. SCAG defines the jobs-housing balance as follows:

Jobs and housing are in balance when an area has enough employment opportunities for most of the people who live there and enough housing opportunities for most of the people who work there. The

region as a whole is, by definition, balanced.... Job-rich subregions have ratios greater than the regional average; housing-rich subregions have ratios lower than the regional average. Ideally, job-housing balance would... assure not only a numerical match of jobs and housing but also an economic match in type of jobs and housing.

There is no ideal ratio adopted in State, regional, or city policies. However, the American Planning Association recommends a target ratio of 1.5 jobs per housing unit; communities with more than 1.5 jobs per dwelling unit are considered jobs-rich; those with fewer than 1.5 are “housing rich,” meaning that more housing is provided than employment opportunities in the area (Weitz, 2003). A jobs-housing imbalance can indicate potential air quality and traffic problems associated with commuting. Table 5.12-4 provides the projected jobs-housing ratios, based on SCAG’s 2020-2045 RTP/SCS, for the City and the County.

Table 5.12-4: Jobs - Housing Trends in the City of Palmdale

	Employment in 2016	Number of Dwelling Units in 2016	2016 Jobs to Housing Ratio	Employment in 2045	Number of Dwelling Units in 2045	2045 Jobs to Housing Ratio
City of Palmdale	36,700	43,800	0.84	45,900	61,800	0.74
Los Angeles County	4,743,000	3,319,000	1.43	5,382,000	4,119,000	1.31

Source: SCAG, 2020

As shown in Table 5.12-4, the projected 2045 jobs-to-housing ratio for the City of Palmdale and Los Angeles County are 0.74 and 1.31, respectively; that is, the City of Palmdale and Los Angeles County are currently and are projected to be housing-rich. Residents in the City of Palmdale currently commute to other incorporated cities or other counties for employment. According to the American Community Survey (ACS) 2022 survey, the mean travel time to work for Palmdale residents is 45.5 minutes, which is 1.5 times the LA-Metro area and California.

5.12.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- Population-1 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);
- Population-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

The Initial Study, included in Appendix A, determined that the Project would not result in impacts related to Threshold Population and Housing-2. No further assessment of this impact is required in this Draft EIR.

5.12.5 METHODOLOGY

State CEQA Guidelines Section 15064(e) states that a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical adverse change. Additionally, CEQA Guidelines Appendix G indicates that a project could have a significant effect if it would induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Therefore, population impacts are considered potentially significant if growth associated with a project would exceed projections

for the area and if such an exceedance would have the potential to create a significant adverse physical change to the environment.

The methodology used to determine population, housing, and employment impacts includes data collection on population and housing trends, which was obtained from California Department of Finance (DOF), the Palmdale General Plan, and SCAG. If projected growth from the Project would exceed SCAG and Palmdale growth projections and as a result could create a significant change to the environment, the resulting growth would be considered “substantial,” and a significant impact would result.

5.12.6 ENVIRONMENTAL IMPACTS

IMPACT POPULATION-1: THE PROJECT WOULD NOT INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH IN AN AREA, EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE).

Less Than Significant Impact. As discussed in Section 3, *Project Description*, of this Draft EIR, the proposed Project would construct two industrial warehouses, each 1,500,856 square feet (SF), resulting in a total of 3,001,712 SF. The proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City’s population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation.

Because the future tenant of the proposed warehouse is unknown, the number of jobs generated from the operation of the Project cannot be precisely determined. However, based on SCAG’s *Employment Density Study Summary Report*, which lists a generation factor for Los Angeles County of 1,518 SF of warehouse space per employee, implementation of the proposed Project would create approximately 1,977 jobs in Palmdale (SCAG, 2001).

As shown in Table 5.12-3, *Employment Trends in the City of Palmdale*, employment in the City of Palmdale is expected to increase by 9,200 jobs between 2016 and 2045 and in the County of Los Angeles to increase by 909,000 jobs between 2016 and 2045. Based on these growth projections, full buildout of the Project would represent approximately 21.5 percent of projected employment growth within the City of Palmdale and less than one percent of projected employment growth within the County of Los Angeles. Additionally, the proposed Project would be consistent with the site’s land use designation of IND and zoning of HI, therefore employment generating uses have been planned for. Thus, the employment growth that would occur from the Project is within the growth projections used to prepare SCAG’s 2020-2045 RTP/SCS.

Construction. Construction of the proposed Project would result in a temporarily increased demand for construction workers. Workers are anticipated to come from the City and surrounding jurisdictions and would commute daily to the jobsite. Although it is possible that the demand for workers could induce some people to move to the region, this consideration would be de minimis, relative to the total number of construction workers in the region. According to the U.S. Census Bureau, 5,361 individuals are employed in the construction industry in the City of Palmdale (United States Census Bureau, 2023a) and 316,237 individuals are employed in the construction industry in Los Angeles County as a whole (United States Census Bureau, 2023b). The supply of general construction labor in the vicinity of the Project area is not expected to be constrained due to the current 6.4 percent unemployment rate in the City and the 5 percent unemployment rate in Los Angeles County as well as the temporary nature of construction projects (California Employment Development Department, 2023). As such, the existing labor pool can meet the construction needs of the Project, and this labor pool would increase with the continued projected growth of Los Angeles County. Therefore,

implementation of the Project would not induce substantial unplanned population growth directly or indirectly through construction employment that could cause substantial adverse physical changes in the environment.

Operation. Implementation of the Project would result in long-term employment opportunities in the Project region. Because the future tenants are unknown, the number of jobs generated from operation cannot be precisely determined. However, as discussed above, based on the SCAG *Employment Density Study Summary Report* generation factor for Los Angeles County of 1,518 SF of warehouse space per employee (SCAG, 2001), implementation of the proposed Project would create approximately 1,977 jobs in Palmdale. As such, the proposed Project would positively contribute to employment growth in the City of Palmdale, as well as the inland Southern California region.

The employees that would fill these roles are anticipated to come from within the region, as the unemployment rate of the City of Palmdale as of December 2023 was 6.4 percent, City of Lancaster was 6.6 percent and County of Los Angeles was 5 percent (California Employment Development Department, 2023). Due to these levels of unemployment, it is anticipated that new employees at the Project site would already reside within commuting distance and would not generate needs for any housing. As discussed previously, the City of Palmdale is considered housing-rich, therefore the Project would provide jobs for the existing workforce and would reduce the need to commute to farther jobs.

Further, any employees relocating for Project-related employment would be accommodated by the existing vacant housing in the region. According to the 2022-2023 housing estimates provided by the California Department of Finance, there are 50,094 housing units within the City of Palmdale, 2.7 percent of which are vacant (California Department of Finance, 2023). Thus, direct impacts related to population growth in an area would be less than significant.

Infrastructure. Development of the Project would require installation of new onsite water, sewer, and stormwater drainage lines that would connect to existing offsite infrastructure and improved roadways as outlined in Section 3, *Project Description*. The improvements would serve only the operations of the proposed development. The Project would include development of driveways as well as roadway improvements along the Project site frontage to provide adequate access and circulation for passenger automobiles and truck traffic. In addition, the Project would include the extension of a water line approximately 13,400 linear feet west of the Project site. However, as explained in Section 5.16, *Utilities*, given that the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed water infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified within this EIR, such as agricultural resource impacts, operational VMT impacts, architectural coating and operational vehicle emissions impacts, and operational greenhouse gas impacts, are not related to the construction of the proposed water infrastructure. Therefore, the proposed Project would not induce unplanned population growth via infrastructure expansions either directly or indirectly that could cause substantial adverse physical changes in the environment, and impacts would be less than significant.

5.12.7 CUMULATIVE IMPACTS

Impacts from cumulative population growth are considered in the context of their consistency with local and regional planning efforts. As discussed, SCAG's 2020-2045 RTP/SCS serves as a long-range vision plan for development in the counties of San Bernardino, Imperial, Los Angeles, Orange, Riverside, and Ventura. The Project would not exceed the SCAG population, housing, and employment growth projections for the City and would represent a small percentage of SCAG's overall projections for the City of Palmdale and County of Los Angeles. The Project would be developed consistent with the existing General Plan land use designation and would result in a generation of approximately 1,977 permanent jobs at full buildout. Based on the growth projections analyzed in SCAG's 2020-2045 RTP/SCS, full buildout of the Project would

represent approximately 21.5 percent of projected employment growth within the City of Palmdale and less than one percent within the County of Los Angeles. The Project is within the growth projections used to prepare the RTP/SCS; thus, impacts related to cumulative growth would be less than significant and not cumulatively considerable.

5.12.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- California Government Code Section 65300
- Government Code Sections 65580–65589

Plans, Programs, or Policies (PPPs)

None.

5.12.9 PROJECT DESIGN FEATURES

None.

5.12.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of standard conditions of approval, Impact Population-1 would be less than significant.

5.12.11 MITIGATION MEASURES

No mitigation measures are required.

5.12.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant and unavoidable adverse impacts related to population and housing would occur.

5.12.13 REFERENCES

California Department of Finance. (2023). *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2023, with 2020 Benchmark*. Accessed:

<https://dof.ca.gov/forecasting/demographics/estimates/>

California Employment Development Department. (2023). *Unemployment Rate and Labor Force*. Accessed:

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<https://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6IXOU%3D>

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<https://scag.ca.gov/data-tools-local-profiles>

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United States Census Bureau. (2023a). *City of Palmdale – S2403 Industry by Sex for the Civilian Employed Population 16 Years and Over*. Accessed: <https://data.census.gov/table?q=fontana&t=Industry>

United States Census Bureau. (2023b). *County of Los Angeles – S2403 Industry by Sex for the Civilian Employed Population 16 Years and Over*. Accessed: <https://data.census.gov/table/ACSST1Y2022.S2403?q=Los%20Angeles%20County,%20California%20Employment>

Weitz, J. (2003). *Jobs-Housing Balance*. Planning Advisory Service Report Number 516. American Planning Association.

5.13 Public Services

5.13.1 INTRODUCTION

This section of the Draft EIR addresses impacts of the Project on public services, including fire protection and emergency services, police protection, school services, parks, and other public services, such as library, community, and health services. This section analyzes whether any *physical changes*, such as new or expanded public facilities, resulting from a potential increase in service demands from Project implementation could result in significant adverse physical environmental effects. Thus, an increase in staffing associated with public services, or an increase in calls for services, would not, by itself, be considered a physical change in the environment. However, when a proposed Project results in the construction of new facilities or an expansion of existing facilities to accommodate increased staff or equipment needs, which could result in significant environmental effect, the Project could constitute a significant impact. The analysis in this section is based, in part, on the following documents and resources:

- *City of Palmdale General Plan Environmental Resources Element*, adopted October 2022
- *City of Palmdale 2045 General Plan Update FEIR*, certified August 2022
- City of Palmdale Municipal Code

5.13.2 REGULATORY SETTING

5.13.2.1 Federal Regulations

There are no federal regulations pertaining to public services that would be applicable to the Project.

5.13.2.2 State Regulations

Fire Protection and Emergency Services

California Building Code

The California Building Code (CBC) includes fire safety requirements, including the installation of sprinklers in all commercial and residential buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CBC is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023).

California Fire Code

California Code of Regulations (CCR) Title 24, Part 9 (2022 California Fire Code [CFC]) contains regulations relating to construction and maintenance of buildings, the use of premises, and the management of wildland-urban interface areas, among other issues. The CFC is updated every three years by the California Building Standards Commission and was last updated in 2022 (effective January 1, 2023).

The CFC sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended

to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. Development under the Project would be subject to applicable regulations of the CFC.

School Services

California Government Code (Section 65995(b)) and Education Code (Section 17620)

California Senate Bill 50 (SB 50), which passed in 1998, amended California Government Code Sections 65995.5 through 65998, which contain limitations on Education Code Section 17620. The statute authorizes school districts to assess development fees within school district boundaries. Government Code Section 65995(b)(3) requires the maximum square footage assessment for development to be increased every two years, according to inflation adjustments.

According to California Government Code Section 65995(3)(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

California State Assembly Bill 2926: School Facilities Act of 1986

In 1986, Assembly Bill 2926 (AB 2926) was enacted to authorize the levy of statutory fees on new residential and commercial/industrial development to pay for school facilities. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of statutory fees by developers serves as CEQA mitigation to satisfy the impact of development on school facilities.

Parks

Quimby Act

The Quimby Act (California Government Code, Section 66477) was established by the California legislature in 1965 to develop new or rehabilitate existing neighborhood or community park or recreation facilities. This legislation was enacted in response to the need to provide parks and recreation facilities for California's growing communities. The Quimby Act gives the legislative body of a city or county the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreational purposes as a condition of approval of a tract map or parcel map.

5.13.2.3 Local Regulations

Fire Protection and Emergency Services

Palmdale General Plan

The City of Palmdale General Plan includes the following public safety goals and policies that are related to fire protection and the proposed Project:

Goal PFSI-2 **Maintain superior public safety services to protect the community and meet the need of residents, businesses, and visitors.**

Policy PFSI-2.1 Maintain existing or superior average response times for fire and police services as the City's population expands.

- Policy PFSI-2.2** Coordinate with and assist the Los Angeles County Fire Department in planning for future fire station sites in Palmdale and facilitate location and construction of fire stations in conjunction with other City facilities (such as parks or municipal buildings) where feasible.
- Policy PFSI-2.3** Regularly assess the need for service level expansion for fire and police services as the City's population expands.
- Policy PFSI-2.5** Coordinate with the Los Angeles County Fire Department to ensure that service availability, resources, and staffing are appropriate for the community need.
- Goal SE-2** **Minimize public health, safety, and welfare impacts resulting from wildfire hazards.**
- Policy SE-2.9** As part of the city's development review process, require that all new buildings and facilities comply with Los Angeles County, state, and federal regulatory standards such as the California Building and Fire Codes as well as other applicable fire safety standards and work with the Fire Department to ensure the provision of adequate fire stations, personnel, and equipment to meet the City's needs over time.
- Goal SE-7** **Ensure safe evacuation of residents in the event of an emergency requiring evacuation.**
- Policy SE-7.3** Review all new development for consistency with applicable evacuation plans and ensure access to at least two evacuation routes.
- Policy SE-7.6** Continue to assess current and projected emergency service needs, and goals or standards for emergency services training for City staff and volunteers as part of the City's Emergency Operation Plan Updates.
- Goal SE-9** **Improve public safety.**
- Policy SE-9.1** Ensure safe and sanitary living and working conditions throughout the City and coordinate with other agencies, including but not limited to Los Angeles County Department of Health, Los Angeles County Fire Department, and Los Angeles County Sheriff's Department to maintain the goals, standards, resources, and training for enforcement and emergency services.

Palmdale Municipal Code

Chapter 3.42, Fire Facilities Impact Fee Requirements. Developments within the City of Palmdale are required to comply with the provisions of City Ord. 1142 § 1, 1999, which establishes fire facilities impact fees to mitigate the cost of fire facilities improvements needed to offset the impact of new development.

Police Services

Palmdale General Plan

The City of Palmdale General Plan includes the following public safety goals and policies that are related to police services and the proposed Project:

- Goal EHC-16** **A City that improves public safety for all residents by reducing crime and injuries.**
- Policy EHC-16.2** Continue to coordinate with Los Angeles County Sheriff's Department for improvements to public safety.
- Policy EHC-16.3** Use Crime Prevention Through Environmental Design (CPTED) strategies in new and existing development to improve public safety, including the following:

- Active public space
- Building design to promote “eyes on the street”
- Maintenance of public places
- Removal or repair of vandalism or broken property

Goal PFSI-2 **Maintain superior public safety services to protect the community and meet the need of residents, businesses, and visitors.**

Policy PFSI-2.1 Maintain existing or superior average response times for fire and police services as the City’s population expands.

Policy PFSI-2.3 Regularly assess the need for service level expansion for fire and police services as the City’s population expands.

Policy PFSI-2.4 Coordinate with the Los Angeles County Sheriff’s Department to ensure that service availability, resources, and staffing are appropriate for the community need.

Goal SE-9 **Improve public safety.**

Policy SE-9.1 Ensure safe and sanitary living and working conditions throughout the City and coordinate with other agencies, including but not limited to Los Angeles County Department of Health, Los Angeles County Fire Department, and Los Angeles County Sheriff’s Department to maintain the goals, standards, resources, and training for enforcement and emergency services.

Policy SE-10.4 Require all commercial and industrial developments to provide adequate lighting for buildings and parking areas as well as sufficient visibility for patrol vehicles to assist in law enforcement surveillance.

Palmdale Municipal Code

Chapter 3.45, Public Facility Development Impact Fee Requirements. Developments within the City of Palmdale are required to comply with the provisions of City Ordinance 1233 § 1, 2004 which establishes development impact fees (DIF) to mitigate the cost of public facilities needed to offset the impact of new development. Public facilities include the public safety and library facilities.

School Services

Palmdale General Plan

Goal PFSI-4 **Maximize the use of infrastructure facilities through appropriate land use strategies.**

Policy PFSI-5.3 Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.

Parks and Other Public Facilities

Palmdale General Plan

The City of Palmdale General Plan includes the following public safety goals and policies that are related to public services and facilities and the proposed Project:

- Goal PFSI-4** **Maximize the use of infrastructure facilities through appropriate land use strategies.**
- Policy PFSI-5.3** Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.

Palmdale Municipal Code

Chapter 3.45, Public Facility Development Impact Fee Requirements. Developments within the City of Palmdale are required to comply with the provisions of City Ordinance 1233 § 1, 2004, which establishes development impact fees (DIF) to mitigate the cost of public facilities needed to offset the impact of new development. Public facilities include the public safety and library facilities.

5.13.3 ENVIRONMENTAL SETTING

5.13.3.1 Fire Services

The City of Palmdale contracts fire protection and emergency response services through the County of Los Angeles Fire Department (LACoFD) to provide fire suppression, rescue services, and emergency medical services. The Project site is within the service area of Battalion 11 (County of Los Angeles, n.d.). The nearest LACoFD stations to the Project site are both in Lancaster. Station 135, which would be the first responding station to the Project site is approximately 3.3 roadway miles away and Station 129 is approximately 4.3 roadway miles away. Fire Station 135 is staffed with a three-person engine company (one captain, one fire fighter specialist, and one firefighter) and a two-person paramedic square (two firefighters/paramedics) (Kien Chin, personal communication, February 1, 2024). The nearest Palmdale station is LACoFD Station 37, located at 38318 9th Street East. Station 37 is approximately 8.3 roadway miles southwest of the Project site. The stations within the vicinity of the Project site have been determined to largely be in good condition, based on physical deterioration, age, and functionality (LACoFD, 2020). Table 5.13-1 below summarizes the characteristics of each station within 9 miles of the Project site.

Table 5.13-1: Fire Stations Within Project Vicinity

Fire Station	Location	Distance from Site (Roadway Miles)	Station Condition ¹
Station 135	1846 East Avenue K-4, Lancaster, CA 93535	3.3	Good
Station 129	42110 6 th Street, West Lancaster, CA 93534	4.3	Good
Station 117	44851 30 th Street, East Lancaster, CA 93535	5.0	Fair
Station 33	44947 Date Avenue, Lancaster, CA 93534	7.5	Excellent

Fire Station	Location	Distance from Site (Roadway Miles)	Station Condition ¹
Station 37	38318 East 9 th Street, East Palmdale, CA 93550	8.3	Poor

¹Source: LACoFD, 2020

To forecast the needs of stations, LACoFD established a tier threshold based on yearly responses to service calls. The LACoFD Master Plan describes that Battalion 11 exceeds the 6,000-response tier threshold and would require an additional firefighting and paramedic unit to relieve the current volume of calls for service (LACoFD, 2020). The LACoFD is planning to expand Station 33 that is 7.5 miles from the Project site to accommodate an additional engine company, which would be funded through development impact fees (LACoFD, 2022).

To evaluate the adequacy of service, LACoFD uses the national guidelines of a 12-minute response time for the first arriving unit for fire and EMD responses and a 20-minute response time for the advanced life support unit in rural areas (Kien Chin, personal communication, February 1, 2024).

5.13.3.2 Police Services

Police services in the City are provided by the Los Angeles County Sheriff's Department. The City is served by one station located at 750 East Avenue Q in the central portion of Palmdale, which is approximately 7.6 roadway miles southwest of the Project site. The station is staffed by approximately 2 captains, 11 custody assistants, 146 sworn deputies, 5 lieutenants, 24 sergeants, 12 law enforcement technicians, and 26 clerical staff members. (Bee Bee Pee, personal communication, February 22, 2024). The City's sheriff's department uses the following industry standard thresholds to evaluate adequacy of response times for each priority level: 10 minutes (emergent), 20 minutes (priority), and 60 minutes (routine).

5.13.3.3 School Services

The Project site is within the Eastside Union School District for the elementary and middle school district, and the Antelope Valley Union School District for the high school district. The Eastside Union School District currently operates four schools, including three elementary schools and one middle school (CDE, n.d.). The Antelope Valley Union High School District currently operates eight high schools (Antelope Valley Union High School District, n.d.).

The nearest elementary school to the Project site is Enterprise Elementary School, located at 3730 E Avenue J-4, Lancaster, CA 93535, approximately 4.3 roadway miles north of the site. The nearest middle school is Gifford C. Cole Middle School, located at 3126 E Avenue I, Lancaster, CA 93535, approximately 5.0 roadway miles north of the site. Finally, the nearest high school is Eastside High School, located at 3200 E Avenue J-8, Lancaster, CA 93535, approximately 3.1 roadway miles north of the site.

5.13.3.4 Park Services

Existing parks within the City of Palmdale include 19 parks totaling 370 acres (City of Palmdale, 2022). At the estimated population of 165,917 in 2023, the ratio of existing parkland acres per 1,000 residents is 2.24 (DOF, 2023). The parks and recreation facilities closest to the Project site include Desert Sands Park at 39117 3rd Street E (approximately 7.5 roadway miles from the Project site), Melville J. Courson Park at 38226 10th St E, (approximately 9 roadway miles from the Project site), and William J. McAdam Park at 38115 30th St E (approximately 9 roadway miles from the Project site).

Existing parks within the City of Lancaster include 19 parks and recreational facilities comprising over 450 acres (City of Lancaster, n.d.). City of Lancaster parks and recreational facilities closest to the Project site

are: Skytower park, located approximately 1 mile north of the Project site at 43434 Vineyard Drive; and Tierra Bonita Park, located approximately 3.5 miles north of the Project site at 44910 27th Street East.

Los Angeles County Department of Parks and Recreation operates over 181 parks throughout the county (LA County Parks and Recreation, n.d.). County parks and recreation facilities closest to the Project site include: Jackie Robinson Park, located approximately 7.5 miles southeast of the Project site at 8773 East Avenue R; Big Rock Wash, located approximately 9 miles southeast of the Project site at 11550 East Avenue O; and Alpine Butte Wildlife Sanctuary, located approximately 10 miles southeast of the Project site at Palmdale, CA 93591.

5.13.3.5 Other Public Facilities

Other governmental services include a variety of public and quasi-public services including libraries, medical facilities, social service centers, senior centers, and other facilities. The library closest to the Project site and surrounding area is the Palmdale City Library, located at 700 E Palmdale Boulevard, approximately 8.2 miles southwest of the Project site.

Additionally, the nearest medical facilities to the Project site are the South Valley Health Center, located approximately 7.9 miles southeast and the Wesley Health Centers located approximately 9.6 miles southwest.

5.13.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of CEQA Guidelines indicates that a project could have a significant effect if it were to 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, to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- Public Services-1 – Fire protection
- Public Services-2 – Police protection
- Public Services-3 – Schools
- Public Services-4 – Parks
- Public Services-5 – Other public facilities

5.13.5 METHODOLOGY

The evaluation of impacts to public services is based on whether the existing public services can meet the demands of the proposed Project, based on established thresholds, including maintaining acceptable service ratios, staffing levels, adequate equipment, response times, and other performance objectives or if the proposed Project results in the need for new or the expansion of existing government services and facilities, including fire and police stations, schools, parks, and other public facilities such as libraries, community centers, public health facilities, etc.

5.13.6 ENVIRONMENTAL IMPACTS

IMPACT PUBLIC SERVICES-1: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH FIRE PROTECTION SERVICES OR THE PROVISION OF NEW OR PHYSICALLY ALTERED FIRE STATION FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES.

Less than Significant Impact. Impacts to fire services are considered significant if Project implementation would result in increased demand for services that would require the construction of new or expansion of existing fire facilities. The LACoFD uses an acceptable service threshold of 12 minutes for the first arriving unit for fire and EMS responses and 20 minutes for the advanced life support unit in rural areas (Kien Chin, personal communication, 2024). Development of the proposed Project would consist of the construction of two warehouses, each totaling 1,500,856 square feet, and a stormwater detention basin. The proposed developments would be on 150.18 acres of land, which is currently vacant and undeveloped. In addition, approximately 17.65 acres of offsite roadway improvements are proposed. Construction and operation of the Project would increase the number of structures and employees in the Project area, which may increase demand for fire protection and emergency medical services. However, according to LACoFD, the proposed Project would not result in the need for expansion of existing or construction of new fire stations, as existing fire protection serving the area would be adequate (Kien Chin, personal communication, February 1, 2024). In addition, the proposed Project is consistent with the General Plan land use designation; thus, buildout of the Project site has been accounted for and would not result in unanticipated growth within the City.

Proposed improvements would reduce the overall existing fire hazard risk from removal of dry vegetation and the roadway improvements would also improve emergency access to the Project vicinity. The proposed Project would be accessible via 30th Street East or 35th Street East. Proposed access to the Project site would be reviewed by the City and the Los Angeles County Fire Department to ensure compliance with fire protection standards. Additionally, the proposed Project would be required to adhere to the CFC, which would minimize the demand upon fire stations, personnel, and equipment. The proposed warehouse would be concrete tilt up construction which contains a low fire hazard risk rating (Concrete Centre, n.d.). The building would be equipped with fire extinguishers, wet and dry sprinkler systems, pre-action sprinkler systems, fire alarm systems, fire pumps, backflow devices, and clean agent waterless fire suppression systems pursuant to the CFC adopted under Section 8.04.400 of the Municipal Code, CBC, and other existing regulations regarding fire safety.

There are five existing fire stations operated by LACoFD within 9 miles of the Project site. The closest fire station to the Project site, Station 135, is located at 1846 East Avenue K-4, Lancaster, 93535, approximately 3.3 roadway miles northwest. Under the 2020 *Los Angeles County Fire District Facilities Master Plan*, it was identified that Battalion 11 needs an additional unit to adequately respond to the current volume of service calls within the region (LACoFD, 2020). As previously mentioned, there are planned expansions for Station 33 to support an additional firefighting and paramedic unit that would not serve the Project site, but other areas in the Battalion 11 area. Funding for new and expanded fire stations is acquired through the payment of development impact fees, which are imposed on development projects. The proposed Project would be required to pay a fire facilities impact fee pursuant to the City of Palmdale's Municipal Code, Chapter 3.42, also included as PPP PS-1. The fire facilities impact fees collected would ensure the level of fire protection services are maintained and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of facilities as needed. Therefore, Project impacts to fire services would be less than significant.

IMPACT PUBLIC SERVICES-2: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH POLICE SERVICES OR THE PROVISION OF NEW OR PHYSICALLY ALTERED POLICE FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES.

Less than Significant Impact. Impacts to police services are considered significant if Project implementation would result in increased demand for services that would require the construction of new or expansion of existing police facilities. The police station that would serve the Project site is located at 750 East Avenue Q, which is approximately 7.6 roadway miles southwest of the Project site. As previously described, approximately 200 sworn staff members serve the Palmdale Station.

Implementation of the proposed Project would result in the development of two warehouses, each totaling 1,500,856 square feet on 150.18 acres of land. Crime and safety issues during Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. During operation, the proposed Project may generate a typical range of police service calls, such as burglaries, thefts, and employee disturbances. The proposed Project would address typical operational security concerns by providing low-intensity security lighting and fencing. Pursuant to the City's existing permitting process, the Police Department would review and approve the final site plans to ensure that the City's CPTED measures (General Plan Policy EHC-16.3) are incorporated appropriately to provide a safe environment.

Although the proposed Project would generate additional long-term employees within the Project site, this increase in employment is not anticipated to result in an increase in population that would generate an additional need for law enforcement services. As discussed in Section 5.12, *Population and Housing*, operation of the proposed Project is estimated to generate a need for 1,977 employees; however, it is anticipated that these employees would come from within the region, due to current unemployment rates, and thus would not contribute to a large increase in population. In addition, growth resulting from the proposed Project has been accounted for within the 2045 General Plan, as the proposed Project is consistent with the General Plan land use designation. Since the Project would not contribute to a large population increase, the Project would not result in the need for new or expanded police facilities to support the Project.

However, the proposed Project would be required to pay public facility development impact fees pursuant to the City of Palmdale Municipal Code, Chapter 3.45, included as PPP PS-1. The collection of development impact fees would ensure the level of police protection services is maintained and can be applied to the purchase of equipment, maintenance of existing facilities, and the construction of facilities as needed. Therefore, Project impacts to police services would be less than significant.

IMPACT PUBLIC SERVICES-3: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH SCHOOL SERVICES OR THE PROVISION OF NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES.

Less than Significant Impact. The Project site is within the boundaries of the Eastside School District and the Antelope Valley High School District. As discussed previously, the proposed Project would result in the construction of two warehouses. No residential development is planned as a part of this proposed Project. As such, the proposed Project would not result in a direct demand for new or expanded school services within

the area. As described in Section 5.12, *Population and Housing*, the employees needed to operate the proposed Project are anticipated to come from within the Project region. Thus, a substantial in-migration of employees that could generate new students is not anticipated to occur.

Additionally, under State law, development projects are required to pay school impact fees in accordance with Senate Bill 50 (SB 50) at the time of building permit issuance. The funding program established by SB 50 allows school districts to collect fees from new developments to offset the costs associated with increasing school capacity needs and has been found by the legislature to constitute “full and complete mitigation of the impacts of any legislative or adjudicative act...on the provision of adequate school facilities” (Government Code Section 65995[h]). With payment of the required development impact fees, impacts to school services would be less than significant.

IMPACT PUBLIC SERVICES-4: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH PARK AND RECREATIONAL SERVICES OR THE PROVISION OF NEW OR PHYSICALLY ALTERED PARK FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES.

Less than Significant Impact. There are 19 parks and recreational facilities comprising over 450 acres, located in the City of Lancaster (City of Lancaster, n.d.). The closest parks to the Project site are located within the City of Lancaster. Skytower park is located approximately 1 mile north of the Project site at 43434 Vineyard Drive, and Tierra Bonita Park is located approximately 3.5 miles north of the Project site at 44910 27th Street East.

The City of Palmdale Parks and Recreation Department maintains 19 parks and recreational facilities (City of Palmdale, n.d.). The closest park maintained by the City of Palmdale is Desert Sands Park, located approximately 7.5 roadway miles away at 39117 3rd Street E, Palmdale, CA 93550. Typically, residential development increases the use of existing citywide park facilities, which increases the need for new parks. The proposed warehouse development would not provide new housing opportunities. Furthermore, employees needed to operate the proposed Project are anticipated to come from within the Project region as described in Section 5.12, *Population and Housing*. Although employees may occasionally use local parks, such an increase in use would be limited and would not result in deterioration of facilities such that the construction or expansion of recreational facilities would be necessary. In addition, the proposed Project would be required to pay a public facility development impact fee to offset potential impacts to parks, as established in the Palmdale Municipal Code Chapter 3.45. Therefore, any increased demand on public parks within the City would have a less-than-significant impact.

IMPACT PUBLIC SERVICES-5: THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS ASSOCIATED WITH OTHER GOVERNMENT SERVICES OR THE PROVISION OF NEW OR PHYSICALLY ALTERED PUBLIC FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL IMPACTS, IN ORDER TO MAINTAIN ACCEPTABLE SERVICE RATIOS, RESPONSE TIMES OR OTHER PERFORMANCE OBJECTIVES.

Less than Significant Impact. As with the previously discussed impacts, increased residential development would typically drive increased need for government services or public facilities. The proposed Project involves the development of two warehouses and would not provide new housing opportunities within the City. Therefore, the proposed Project would not result in a significant increase in the use of other public facilities such as libraries, community centers, and public health facilities. However, the Project would be

required to pay a public facility development impact fee to offset potential impacts to other government services, as established in the Palmdale Municipal Code Chapter 3.45. Such fees would be used by the City to improve public facilities as needed. Therefore, the Project would result in a less-than-significant impact related to other public facilities.

5.13.7 CUMULATIVE IMPACTS

Fire Protection. The cumulative assessment for fire services considers the development of the proposed Project in conjunction with projected growth in the area served by the LACoFD 11th Battalion. The proposed Project, as with any development within the service area, would incrementally increase the demand for fire services. Consequently, the proposed Project and other development projects would be required to pay development impact fees which would provide the necessary funding to offset impacts to fire services.

Any future improvements to Station 33, such as those currently planned by the LACoFD, to serve cumulative development throughout the LACoFD service area would be subject to the City of Lancaster's policies, which are designed to protect environmental resources, as well as environmental review under CEQA, separate from this proposed Project. Further, Station 33 is located 7.5 miles from the Project site; and is not the first or second responding station to the Project site. As shown in Table 5.13-1, *Fire Stations Within Project Vicinity*, there are three other LACoFD stations that are closer to the Project site; thus, this expansion is not a direct cumulative result from the proposed Project. Related projects in the region would be required to demonstrate their level of impact on fire protection services and also pay their proportionate development fees in order to provide funding for future expansions or stations. The proposed Project is within 3.3 miles of the closest fire station and within 5 miles of three fire stations. Furthermore, the Project would develop low fire hazard rated sprinklered concrete buildings and parking areas that are consistent with the General Plan and zoning designations of the site pursuant to the CFC as verified through the City's development permitting process. Therefore, the Project's cumulative contribution to the potential impacts related to needs for future new or expanded fire stations would be less than significant.

Police Protection. The cumulative assessment for police services considers the development of the proposed Project in conjunction with projected growth in the area served by the Palmdale Sheriff's Station. The proposed Project is consistent with the General Plan land use designation and would install onsite security features, such as fencing and low-intensity security lighting to reduce the potential for crime to occur on the Project site. In addition, the Project applicant would pay the required development impact fees pursuant to Palmdale Municipal Code Chapter 3.45. Additional development within the City of Palmdale would generate a proportional increase in calls for law enforcement services. Each development project would be reviewed by the City and/or Sheriff's Department staff, prior to development permit approval, to ensure adequate security measures are provided for each site-specific development in the City. It is anticipated that future development, such as the Project, that is consistent with the General Plan would result in the need for additional sworn officers and equipment, but implementation of the proposed Project would not create a cumulatively considerable need for a new or expanded Sheriff's Station, the construction of which could result in an environmental impact. Therefore, cumulative impacts associated with law enforcement services from implementation of the proposed Project would be less than cumulatively significant.

School services. The cumulative assessment for school services considers the development of the proposed Project in conjunction with projected growth in the area served by the Eastside Union School District and the Antelope Valley Union High School District. The main driver for increased student attendance is substantial population growth. As previously described, the proposed Project would not contribute to substantial population growth within the City, as no residential units would be constructed. While the proposed Project would result in increased employee growth within the City, as described in Section 5.12, *Population and Housing*, employees are anticipated to come from within the region, due to current unemployment rates.

Therefore, the proposed Project would not result in substantial student growth resulting from residential growth.

In addition, as described above, the State provided authority for school districts to assess impact fees for both residential and non-residential development projects. Fees collected in accordance with Government Code Section 65995(b) allow the two school districts to plan and construct for future growth. Furthermore, the payment of those fees constitutes full mitigation for the impacts generated by new development, per Government Code Section 65995, which would reduce potential impacts related to the Project's cumulative school service impacts to a less than significant level.

Parks and Other Public Facilities. The cumulative assessment for parks and other public facilities considers the development of the proposed Project in conjunction with other development projects in the City of Palmdale, as listed in Section 5.0, *Environmental Impact Analysis*, of this EIR. The main driver for the use of park and other government facilities is substantial population growth. As previously described, the proposed Project would not contribute to substantial population growth within the City, as no residential units would be constructed. Although employees may occasionally use local parks, employees are anticipated to be residents of the region and such use would be limited and not cumulatively considerable in such a manner that would result in the need for expansion or creation of new parks or other public facilities. In addition, the proposed Project would pay the required development impact fees pursuant to Palmdale Municipal Code Chapter 3.45, which may be used by the City to improve parks and other public facilities as needed. Therefore, the proposed Project would not increase the use of existing park facilities such that new facilities would be required and impacts related to parks or other public facilities would be less than cumulatively considerable.

5.13.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

Fire Protection and Emergency Services

- City of Palmdale Municipal Code, Chapter 3.42
- California Fire Code (CFC; California Code of Regulations, Title 24, Part 9)

Police Services

- City of Palmdale Municipal Code, Chapter 3.45

School Services

- Government Code Section 65995(b)
- California State Assembly Bill 2926: School Facilities Act of 1986
- California Senate Bill 50: School Facilities Bond Act of 1998

Park Services

- City of Palmdale Municipal Code, Chapter 3.45
- California Government Code, Section 66477

Other Public Services

- California Government Code Sections 66000 et seq.

Plans, Programs, or Policies (PPPs)

PPP PS-1: Development Impact Fees. Prior to the issuance of either a certificate of occupancy or prior to building permit final inspection, the Applicant shall provide payment of the appropriate fees set forth by in the Palmdale Municipal Code Chapter 3.42 and 3.45, as applicable, related to the funding of public safety and other public facilities.

5.13.9 PROJECT DESIGN FEATURES

None.

5.13.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts Public Services-1, Public Services-2, Public Services-3, Public Services-4, and Public Services-5 would be less than significant.

5.13.11 MITIGATION MEASURES

No mitigation measures are required.

5.13.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Compliance with regulatory requirements would reduce potential impacts related to public services to less than significant. Therefore, no significant and unavoidable adverse impacts would occur.

5.13.13 REFERENCES

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5.14 Transportation

5.14.1 INTRODUCTION

This section describes the existing transportation and circulation conditions of the Project site, identifies applicable regulations, evaluates the Project's consistency with applicable goals and policies, identifies and analyzes potential environmental impacts, and recommends measures to reduce or avoid adverse impacts that could occur from implementation of the proposed Project. This analysis in the section is based, in part, on the following resources:

- *City of Palmdale General Plan, 2023*
- *City of Palmdale 2045 General Plan Update Final Environmental Impact Report, August 2022*
- *City of Palmdale Municipal Code*
- *Traffic Impact Analysis, EPD Solutions, Inc., August 2023*
- *Vehicle Miles Traveled (VMT) Analysis, EPD Solutions, Inc., August 2023 (Appendix J)*

5.14.2 REGULATORY SETTING

5.14.2.1 State Regulations

Senate Bill 743

Senate Bill 743 (SB 743) was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines beginning January 1, 2019. Section 15064.3 states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

5.14.2.2 Local and Regional Regulations

SCAG 2020 – 2045 Regional Transportation Plan/Sustainable Communities Strategy

The Southern California Association of Governments (SCAG) is the designated metropolitan planning organization for six Southern California counties (Ventura, Los Angeles, San Bernardino, Riverside, Orange, and Imperial). As the designated metropolitan planning organization, SCAG is mandated by the federal and State governments to prepare plans for regional transportation and air quality conformity. The most recent plan adopted by SCAG is the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), also known as Connect SoCal, which was adopted in September 2020. The RTP/SCS integrates transportation planning with economic development and sustainability planning and aims to comply with State GHG emissions reduction goals, such as SB 375. With respect to transportation infrastructure, SCAG anticipates in the RTP/SCS that the six-county region will have to accommodate 22.5 million residents by 2045 while also meeting the GHG emissions reduction targets set by the California Air

Resources Board. SCAG is empowered by State law to assess regional housing needs and provide a specific allocation of housing needs for all economic segments of the community for each of the region's counties and cities. In addition, SCAG has taken on the role of planning for regional growth management.

Palmdale Municipal Code Chapter 17.191

Chapter 17.101, *Transportation Demand Management*, of the Palmdale Municipal Code discusses the related development standards for any development project in the City. Prior to approval of any development project, the applicant must make provisions for all applicable transportation demand management and trip reduction measures. All facilities and improvements constructed or otherwise shall be maintained in a state of good repair. The property owner shall be responsible for complying with the provisions of this Chapter either directly or by delegating such responsibility as may be appropriate to a tenant or to an agent (City of Palmdale, Rincon Consultants, 2022).

City of Palmdale General Plan

The City of Palmdale General Plan Circulation Element contains the following policies related to transportation that are applicable to the proposed Project:

- TM-2.2** **Multimodal travel.** Prioritize safety, operations, and comfort for active and transit modes on streets that have been identified as part of the multimodal network.
- TM-3.7** **Commute trip reduction.** Work with large employers to implement programs that expand access to non-drive alone commute options for all commuters, including hourly staff and contract workers.
- TM-6.3** **Transportation demand management.** Promote trip reduction strategies, including telecommuting, through land-use decisions and TDM programming strategies.
- TM-5.5** **Secure bicycle parking.** Install secure short- and long-term bicycle parking near key destinations, civic buildings, and transit facilities.
- PFSI-3.11** **New Development Fees.** Require new development to pay necessary fees for expansion and ongoing maintenance of the sewage disposal system to the appropriate agencies, to handle the increased load, which it will generate.

5.14.3 ENVIRONMENTAL SETTING

Existing Roadway Network

State Route 14 (SR-14) is a north-south State highway in the State of California that connects Los Angeles to the northern Mojave Desert.

Sierra Highway is a north-south regional road which connects Los Angeles to the Mojave Desert. The roadway is a designated truck route. There is an existing bicycle path along a portion of Sierra Highway.

East Avenue M/Columbia Way is an east-west regional roadway between 30th Street West and 50th Street East. The posted speed limit is 55 mph. There are no existing bike facilities along the roadway; however, a bicycle path is planned to extend to 50th Street East. The roadway is a designated truck route.

Traffic counts at the existing study area intersections determined that the following intersections operate at a deficient Level of Service (LOS) in the existing year (2023): Columbia Way/SR-14 southbound, Columbia Way/SR-14 northbound, and Columbia Way/50th Street East.

Avenue L is east-west regional roadway.

Avenue L-8 is a future east-west connector roadway.

10th Street West is a north-south regional roadway. The posted speed limit is 50 mph. There are no existing bike facilities along the roadway. The roadway is a designated truck route.

50th Street East is a north-south regional roadway. The posted speed limit is 55 mph. There are no existing bike facilities along the roadway. The roadway is a designated truck route.

Existing Truck Routes Services

East Avenue M/Columbia Way to the south, , 50th Street East to the east, Sierra Highway, 10th Street West, and SR-14 to the west are the General Plan Circulation Element truck routes in the vicinity of the Project site, as shown in Figure 5.14-1, *Truck Routes*.

Other truck routes in the city include Avenue P and Highway 138, and Avenue T to the south and 90th Street East to the East.

Existing Site Access

Regional access to the City is provided by State Route (SR) 14 and SR 138. Local access to the site is provided from East Avenue M/Columbia Way, a designated regional arterial and 30th Street East, a designated major arterial. The Project site is northeast of the 30th Street East and East Avenue M/Columbia Way intersection.

Existing Transit Services

Public transportation services within the City are provided by Metrolink and the Antelope Valley Transit Authority (AVTA). The Palmdale Metrolink Station is located approximately 4.5 miles southwest of the Project site at 39000 Clock Tower Plaza Drive East. AVTA provides bus transit services within the City. AVTA also offers on-request ride service that connects passengers to and from rural communities within the rest of AVTA's local transit system. The nearest AVTA bus stop to the Project site is located near the Avenue J and 20th Street East intersection, approximately 2.7 miles to the northeast of the Project site. There are no bus stops within one mile of the Project site.

Existing Bicycle and Pedestrian Facilities

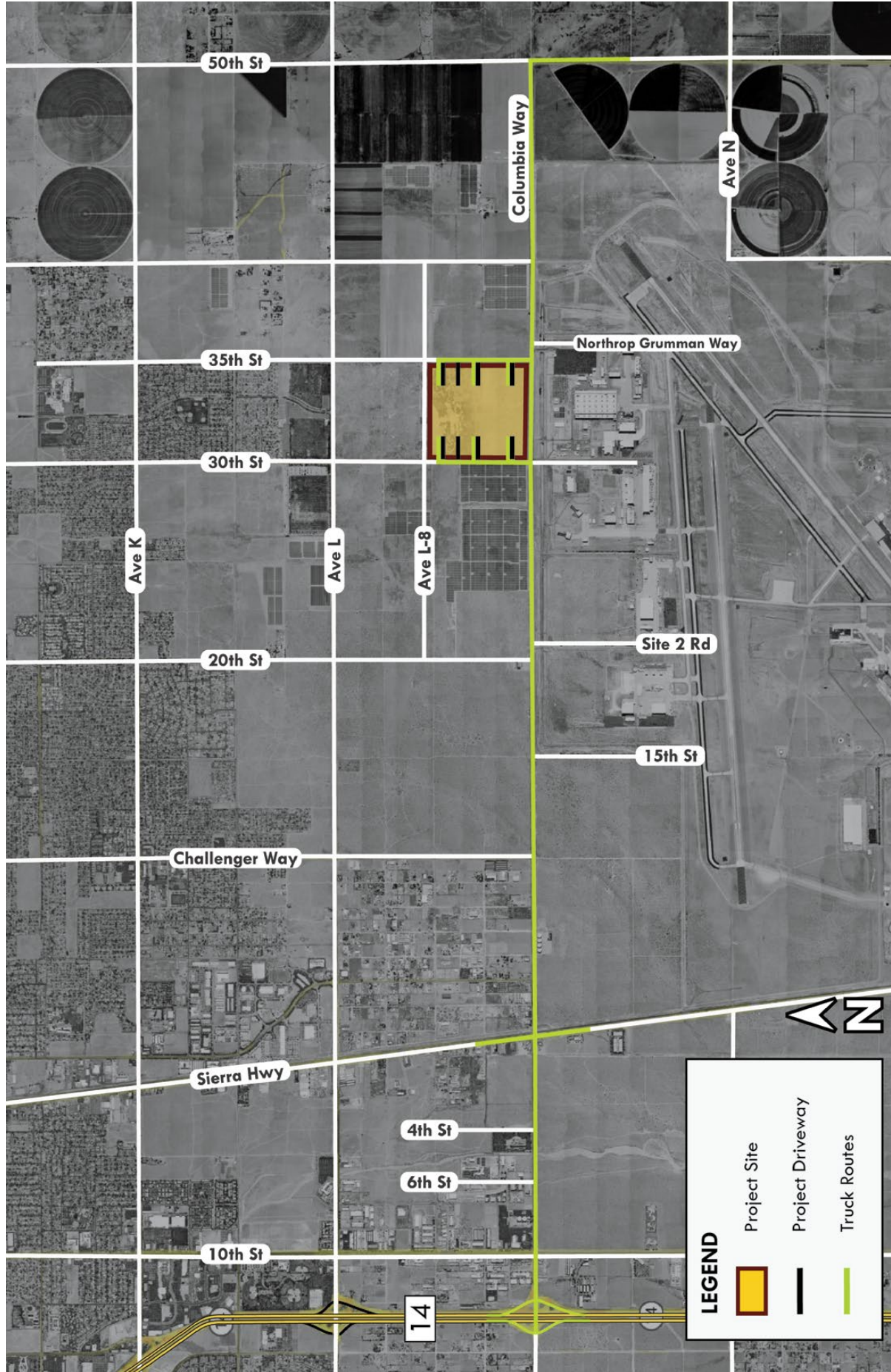
The streets near the Project site do not contain any existing bicycle facilities. The City's General Plan Circulation and Mobility Element identifies 30th Street East west of the Project site as a proposed bikeway. The nearest existing bikeway is located on Sierra Highway, approximately 2.96 miles east of the Project site. There are no existing sidewalks adjacent to the Project site.

Existing Vehicle Miles Traveled

Vehicle Miles Traveled (VMT) is defined as one vehicle traveling on a road for one mile. The Project site is currently vacant and undeveloped. The Project site does not generate regular vehicle trips that would result in VMT from the site. The Traffic Analysis Zone (TAZ) in which the Project is located, "Zone" (TAZ 20325000), has a current VMT per employee of 18.2.

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Truck Routes



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5.1.4.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

Transportation-1	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
Transportation-2	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).
Transportation-3	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
Transportation-4	Result in inadequate emergency access.

As the City of Palmdale has not adopted its own VMT guidelines, the City determined that the Los Angeles (LA) County *Transportation Impact Analysis (TIA) Guidelines* (July 23, 2020) were applicable to use for this analysis. These guidelines include screening criteria to determine if a project would have a less-than-significant impact on VMT, thus potentially eliminating the need for further VMT analysis. The screening criteria, as stated in Section 3.1.2 of the LA County TIA Guidelines, include:

1. Non-Retail Project Trip Generation Screening
2. Retail Project Site Plan Screening
3. Proximity to Transit Based Screening
4. Residential Land Use Based Screening

As stated in LA County TIA Guidelines, projects that are not screened through the thresholds listed above would require VMT modeling using the SCAG RTP/SCS Travel Demand Forecasting Model, henceforth referred to as the "SCAG Model" to determine if they would have a significant VMT impact.

The LA County TIA Guidelines provide Baseline VMT for the North and South areas of the County for development projects. These guidelines indicate that a project's employment VMT per employee should be reduced by 16.8 percent from the existing VMT per employee for the Baseline Area. According to Figure 3.1.3.-1 and Table 3.1.3.-2 in the LA County TIA Guidelines, the City of Palmdale, which is located in North County, has a target of 15.8 employment VMT per employee. This target represents a 16.8 percent reduction from the baseline VMT of 19.0 employment VMT per employee.

5.1.4.5 METHODOLOGY

As outlined in CEQA Guidelines Section 15064.3, except as provided for roadway capacity transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, this analysis has been prepared in accordance with CEQA requirements to evaluate potential transportation impacts based on VMT. The LA County TIA Guidelines provides criteria for projects that would be considered to have a less-than significant impact on VMT and therefore could be screened out from further analysis; and those that would have the potential to result in a VMT impact and therefore, require a VMT analysis based on VMT reduction thresholds. Consistent with the County Guidelines, the VMT screening thresholds were used to identify if the Project could have an impact on VMT, as detailed below.

When a project fails to meet any of the aforementioned screening criteria, a more comprehensive VMT analysis is warranted. A VMT analysis was conducted in accordance with the LA County TIA Guidelines for VMT analysis. Per the County's criteria, the Project VMT analysis (included in Appendix J) used the SCAG Model. A data request was submitted to the City of Palmdale, and in response, the City provided updated land use data for the SCAG Model. Therefore, this analysis was conducted using the SCAG Model with the updated Palmdale land use data. Per the LA County TIA Guidelines, the model output for employment VMT

is assessed based on home-based work trips and is compared to the County target VMT per employee to determine if a potential impact would occur.

5.14.6 ENVIRONMENTAL IMPACTS

IMPACT TRANSPORTATION-1: THE PROJECT WOULD NOT CONFLICT WITH A PROGRAM, PLAN, ORDINANCE, OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE, AND PEDESTRIAN FACILITIES.

Less than Significant.

Transit, Bicycle, and Pedestrian Facilities

Transit. As described previously, the Project vicinity is served by Metrolink and AVTA. There are no bus stops within one mile of the Project site. The nearest AVTA bus stop is located near Avenue J and 20th Street East intersection, approximately 2.7 miles to the northeast of the Project site. This existing transit service would continue to serve its ridership in the area and may also serve employees of the Project. Although there are no existing or planned bus stops in the immediate vicinity of the Project site, future employees could potentially utilize a rideshare program, implemented through Mitigation Measure T-8, to travel between the nearest bus stop and the Project site. Accordingly, the proposed Project would not alter or conflict with existing transit stops and schedules, and impacts related to transit services would not occur.

Bicycle Facilities. As shown in Figure 6.11 of the General Plan, within the Project vicinity, the City of Palmdale General Plan Circulation and Mobility Element identifies 30th Street East, located immediately to the west of the Project site, as a proposed bikeway (City of Palmdale, Rincon Consultants, 2022). Also, 10th Street East to the west, and 45th Street East and 70th Street East to the east, are proposed as proposed bikeways. The nearest existing bikeway is on Sierra Highway, approximately 2.96 miles east of the Project site. East Avenue M/Columbia Way is also a proposed bikeway.

As detailed in Section 3, *Project Description*, the Project includes the construction of a 12-foot bike trail along East Avenue M/Columbia Way, along the Project's frontage. The Project would also add new pavement, curb and gutter, and sidewalk to 30th Street. The City of Palmdale General Plan and the Palmdale Municipal Code includes various standards and guidelines for the provision of onsite and offsite roadway improvements, vehicular and non-vehicular circulation, and site access. Moreover, the proposed street improvements would be developed in accordance with the City of Palmdale General Plan and the Palmdale Municipal Code standards and guidelines. As a result, the Project would not result in any conflicts with the existing bike lanes. Conversely, the Project would provide new bicycle facilities and expand bicycle circulation. Thus, impacts related to bicycle facilities would not occur.

Pedestrian Facilities. As mentioned previously, there are no existing sidewalks adjacent to the Project site. As detailed in Section 3, *Project Description*, the proposed Project would include the construction of an 8-foot-wide sidewalk around the entire Project's site along Avenue L-8, East Avenue M/Columbia Way, 30th Street East and 35th Street East. As previously stated, the proposed street improvements would be developed in accordance with the City of Palmdale General Plan and the Palmdale Municipal Code standards and guidelines. As a result, the Project would provide new pedestrian facilities and expand pedestrian circulation. Thus, impacts related to pedestrian facilities would not occur.

Truck Route Facilities. The existing truck routes designated in the General Plan Circulation and Mobility Element that currently serve the Project vicinity include East Avenue M/Columbia Way to the south, Avenue P to the south, 50th Street East to the east, Sierra Highway to the west, and SR-14 to the west. As discussed in Section 3, *Project Description*, the Project would include truck access along 30th Street East and along 35th

Street East. Truck movement to and from the Project site would directly access the City of Palmdale General Plan designated truck routes utilizing the SR-14 and East Avenue M/Columbia Way interchange and continuing east to the Project site. Therefore, the proposed Project is consistent with the truck routes identified in the City of Palmdale General Plan Circulation and Mobility Element, and impacts related to truck route facilities would not occur.

Roadway Facilities

Operation. The proposed Project would construct two new roadways adjacent to the Project site: 35th Street East would run along the east side of the Project site, and Avenue L-8 would run along the north side of the Project site. These roadways would extend along the Project frontage limits. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project vicinity. As discussed in Section 3, *Project Description*, access to the Project site would be provided from eight driveways, including one automotive only driveway, two automotive/truck driveways, and one truck only driveway on 30th Street East; and one automotive only driveway, two automotive/truck driveways, and one truck only driveway on 35th Street East. The Project includes installation of a shared 28-foot private driveway/fire lane in between the two buildings.

Table 5.14-1, *Proposed Project Trip Generation*, identifies the number of trips that would be generated by the Project. The trip rates for High-Cube Transload and Short-Term Storage Warehouse (Land Use Code 154) and Manufacturing (Land Use Code 140) were used to evaluate the proposed land use. As shown, the Project would generate a total of 5,208 daily trips, 420 AM (318 inbound and 102 outbound), and 494 PM (151 inbound and 343 outbound) peak hour trips. When converted to passenger car equivalent (PCE) trips, the proposed Project is estimated to generate approximately 7,418 daily PCE trips, 599 PCE AM trips and 705 PCE PM trips (Appendix J).

Construction. Construction of the proposed Project is anticipated to occur over an 11-month period. Construction-related trips generated on a daily basis throughout various construction activities would be derived from construction workers and delivery of materials. It is anticipated Project construction would generate haul trips distributed throughout the day. During construction, there would also be passenger car construction trips associated with crew arrivals and departures. The weekday AM peak period is 7:00 AM to 9:00 AM, and the weekday PM peak period is 4:00 PM to 6:00 PM. It is anticipated the majority of construction crews would arrive and depart outside the peak hours, while delivery trucks would arrive and depart throughout the day. As detailed in Section 3, *Project Description*, Project grading is anticipated to result in no export or import of soils. As shown in Table 5.14-2, *Daily Construction Vehicle Trips*, the building construction phase of the construction process would generate the most vehicular trips per day from approximately 1,261 workers and 492 vendors per day, resulting in a total of 1,753 daily trips.

All construction equipment, including construction worker vehicles, would be staged on the Project site for the duration of the construction period. In addition, as part of the grading and building plan review processes, the City construction permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures (as applicable). Therefore, construction impacts related to conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

Table 5.14-1: Proposed Project Trip Generation

Land Use	Units	AM Peak Hour				PM Peak Hour			
		Daily	In	Out	Total	In	Out	Total	
<u>Trip Rates</u>									
High Cube Transload and Short-Term Storage Warehouse ¹	TSF	1.40	0.06	0.02	0.08	0.03	0.07	0.10	
Manufacturing ²	TSF	4.75	0.52	0.16	0.68	0.23	0.51	0.74	
<u>Palmdale Logistics Center Proposed Project</u>	3,001.712	TSF							
<u>High Cube Transload and Short-Term Storage Warehouse (90%)¹</u>									
Palmdale Logistic Center ¹	2,701.541	TSF	3,782	162	54	216	81	189	270
<u>Vehicle Mix³</u>	<u>Percent</u>								
Passenger Vehicles	72.50%	2,742	118	39	157	59	137	196	
2-Axle Trucks	4.60%	174	7	2	9	4	9	13	
3-Axle Trucks	5.70%	215	9	3	12	5	11	16	
4+-Axle Trucks	17.20%	651	28	10	38	14	33	47	
Total Trip Generation	100%	3,782	162	54	216	82	190	272	
<u>Manufacturing (10%)¹</u>									
Palmdale Logistic Center ²	300.171	TSF	1,426	156	48	204	69	153	222
<u>Vehicle Mix³</u>	<u>Percent</u>								
Passenger Vehicles	72.50%	1,034	113	35	148	50	111	161	
2-Axle Trucks	4.60%	66	7	2	9	3	7	10	
3-Axle Trucks	5.70%	81	9	3	12	4	9	13	
4+-Axle Trucks	17.20%	245	27	8	35	12	26	38	
Total Trip Generation	100%	1,426	156	48	204	69	153	222	
Total Project Trip Generation		5,208	318	102	420	151	343	494	

TSF = Thousand Square Feet

¹ Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual*, 11th Edition, 2021 . Land Use Code 154 - High Cube Transload and Short-Term Storage Warehouse.² Trip rates from the Institute of Transportation Engineers, *Trip Generation Manual*, 11th Edition, 2021 . Land Use Code 140 - Manufacturing.³ Vehicle Mix from the Warehouse Truck Trip Study Data Results and Usage, July 17, 2014. Without Cold Storage**Table 5.14-2: Daily Construction Vehicle Trips**

Construction Activity	Worker Tips Per Day	Vendor Trips Per Day	Hauling Trips Per Day
Site Preparation	18	0	0
Grading	20	0	0
Building Construction	1261	492	0
Paving	15	0	0
Architectural Coating	252	0	0

Source: Air Quality Impact Analysis (CalEEMod) (Appendix B)

IMPACT TRANSPORTATION-2: THE PROJECT WOULD CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES § 15064.3, SUBDIVISION (B).

Significant and Unavoidable. As described previously, State CEQA Guidelines Section 15064.3(b) focus on determining the significance of VMT-related transportation impacts. As detailed previously, the LA County *TIA Guidelines* contain the following screening thresholds to assess whether a project has the potential to result in an impact and further VMT analysis is required. If the Project meets any of the following screening thresholds, then the VMT impact of the Project is considered less than significant and further VMT analysis is not required.

1. Non-Retail Project Trip Generation Screening
2. Retail Project Site Plan Screening
3. Proximity to Transit Based Screening
4. Residential Land Use Based Screening

Of the aforementioned screening criteria, Criteria 1 (Non-Retail Project Trip Generation Screening) and Criteria 3 (Proximity to Transit Based Screening) are applicable to this Project. The applicability of each screening criteria in comparison to the proposed Project is discussed below.

Non-Retail Project Trip Generation Screening: According to footnote 3 on page 3 of the LA County TIA Guidelines, the term ‘vehicle’ refers specifically to on-road passenger vehicles, namely cars and light trucks. Therefore, only passenger vehicle trips are considered in the VMT screening assessment. Further, as per CEQA Guidelines Section 15064.3(a), the VMT assessment involves the “amount and distance of automobile travel attributable to a project,” hence truck trips are not included. The proposed Project is projected to generate 5,208 daily vehicle trips, which includes 3,776 daily passenger vehicle trips, as shown in Table 5.14-1, *Proposed Project Trip Generation*, above. Therefore, the Project does not meet Non-Retail Project Trip Generation Screening because the proposed Project's trip generation is above the threshold of 110 daily vehicle trips.¹

Proximity to Transit Based Screening: If a project is within a half-mile radius of a major transit stop or an existing stop along a high-quality transit corridor, it needs to answer the following questions:

- Is the project's floor area ratio less than 0.75?
- Does the project provide more parking than required by the County Code?
- Is the project inconsistent with the SCAG RTP/SCS?
- Does the project replace residential units set aside for lower-income households with a smaller number of market-rate residential units?

The Project is not located in a Transit Priority Area (TPA) (i.e., within a half-mile radius of a major transit stop or existing stop along a high-quality transit corridor). Thus, the Project does not meet Proximity to Transit Based Screening.

Since the Project failed to meet the screening criteria, a more comprehensive VMT analysis was prepared, and the results of the VMT analysis are shown in Table 5.14-3, *VMT Analysis of Project Impact*. As indicated, the Project would have a significant impact on employment VMT per employee when compared to both the baseline and cumulative thresholds. The projected VMT per employee for the Project would be 18.2 in 2023 and 18.4 in 2045, which is 15.19 percent above the baseline threshold and 16.46 percent above the

¹ As referenced in the Governor's Office of Planning and Research (OPR), Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018).

cumulative threshold. Therefore, the Project would result in a significant project level and cumulative impact to VMT.

Table 5.14-3: VMT Analysis of Project Impact

	2017	2045	2023
Project Zone VMT	37,163	37,649	37,267
TAZ 20325000 Employment	2,051	2,051	2,051
Project VMT/Employee	18.1	18.4	18.2
Baseline Threshold¹	Baseline Project VMT/Employee	% Above/Below Threshold	Baseline VMT Impact?
15.8	18.2	15.19%	Yes
Cumulative Threshold¹	Cumulative Project VMT/Employee	% Above/Below Threshold	Cumulative VMT Impact?
15.8	18.4	16.46%	Yes

1: A 16.8% decrease from the baseline VMT amounts to 15.8 as recommended by the Los Angeles County Public Works Transportation Impact Analysis Guidelines.

Source: VMT Analysis (Appendix J)

Table 36, *VMT Reduction Strategies*, in the Palmdale General Plan Update and Program EIR Traffic Report, lists examples of mitigation options that are most effective in areas such as Palmdale. The strategies are based on the 2010 California Air Pollution Control Officers Association (CAPCOA) guidelines. However, a more recent version of the CAPCOA guidelines was published in 2021. The updated CAPCOA guidelines identify a total of 34 transportation-related GHG emission reduction measures with 32 measures that reduce VMT as a quantified co-benefit. A majority of the measures, based on their description and their measure scale, are not applicable to the light industrial warehouse Project. Two of the 34 VMT reduction measures were determined to be applicable to the proposed Project, as described in Section 5.14.11, *Mitigation Measures*, below.

CAPCOA measure T-7 requires implementation of a marketing strategy and information sharing to promote and educate employees about their travel choices to the employment location; and CAPCOA measure T-8 requires implementation of a rideshare program to encourage carpool vehicles, thereby reducing the number of trips, VMT, and GHG emissions. With compliance with existing rules and implementation of CAPCOA measures T-7 and T-8 that are included as Mitigation Measures T-1 and T-2, the Project VMT would be reduced by 7.84 percent, as described in Appendix J (page 7). Despite this reduction, the Project VMT would continue to exceed both the baseline and cumulative thresholds. Therefore, the Project VMT impact would be significant and unavoidable.

IMPACT TRANSPORTATION-3: THE PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT).

Less than Significant Impact.

Construction. The Project proposes development of the site in one phase lasting approximately 11 months. During construction, worker vehicles, haul trucks, and vendor trucks would be staged on the portion of the Project site under construction for the duration of the construction period. As part of the grading plan and building plan review processes, City permits would require appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures and measures to properly route heavy-duty construction vehicles entering and leaving the site (as applicable). As a result, impacts related to

vehicular circulation design features and incompatible uses during construction of the proposed Project would be less than significant.

Operation. As previously stated, access to the Project site would be provided via eight driveways, including four on 30th Street East and four on 35th Street East. Additionally, there would be a shared 28-foot private driveway/fire lane in between the two proposed buildings. Vehicular traffic to and from the Project site would utilize the existing network of regional and local roadways that currently serve the Project area. As previously stated in Section 3, *Project Description*, trucks traveling to the Project site would travel via SR-14 to East Avenue M/Columbia Way and enter the site through the driveways located on 30th Street East or 35th Street East.

As stated in Section 3, *Project Description*, the Project would include construction of a 12-foot-wide Class 1 bike path and 8-foot-wide sidewalk along East Avenue M/Columbia Way. In addition, the Project would also install new pavement, curb and gutter, and a sidewalk on 30th Street. Trucks would utilize existing City-designated truck routes to access SR-14, which would limit potential safety conflicts between passenger vehicles and trucks.

Onsite traffic signing and stripping would also be implemented in conjunction with detailed construction plans with implementation of the Project. Additionally, sight distance at the Project's access points would be reviewed with respect to City standards at the time of final grading, landscape, and street improvement plan reviews. Project frontage improvements and site access points would be constructed to be consistent with the identified roadway classifications and respective cross-sections in accordance with the City of Palmdale General Plan Circulation and Mobility Element. Compliance with existing regulations would be ensured through the City's construction permitting process. As a result, impacts related to vehicular circulation design features would be less than significant.

IMPACT TRANSPORTATION-4: THE PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS.

Less than Significant Impact. The proposed Project would not result in inadequate emergency access. Direct access to the proposed Project would be from four driveways along 30th Street East and four driveways along 35th Street East, which are directly adjacent to the site. Construction activities would occur within the proposed Project site and associated offsite improvements and would not restrict access of emergency vehicles to the site or adjacent areas. The proposed Project is required to design and construct internal access, and size and location of fire suppression facilities (e.g., hydrants and sprinklers) to conform to the 2022 (most recent) California Fire Code standards. The County of Los Angeles Fire Department (LACoFD) would review the development plans prior to approval to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As such, the proposed Project would not result in inadequate access, and impacts would be less than significant.

5.14.7 CUMULATIVE IMPACTS

Conflict with Circulation Plan or Program

The cumulative traffic study area for the proposed Project includes the City of Palmdale and is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Impact TR-1 concluded that the proposed Project would not result in significant impacts related to transportation or policies addressing the circulation system. The proposed Project was determined to not impact transit and roadway facilities and would provide new bicycle and pedestrian facilities that would expand non-vehicular circulation facilities. The truck route usage and roadway operations of the Project were determined to not

conflict with the City's circulation system. Cumulative development in the City would be subject to site-specific reviews, including reviews of sidewalk, bike lane, and bus stop designs that would reduce the potential for cumulatively considerable impacts. As the Project would result in a less-than-significant impact and cumulative projects require compliance with existing circulation regulations, potential impacts from the Project would not cumulatively combine with other projects to result in cumulatively considerable impacts. Thus, cumulative impacts related to conflict with circulation plans and programs would be less than significant.

Vehicle Miles Traveled

The cumulative traffic study area for the proposed Project includes the City of Palmdale, and the information utilized in the analysis of VMT are the City's land use data and the projections contained within the SCAG Model. The results of the VMT Analysis are shown in Table 5.14-3, *VMT Analysis of Project Impact*, above. The Project would have a significant impact on employment VMT per employee when compared to both the baseline and cumulative thresholds. The projected VMT per employee for the Project would be 18.2 in 2023 and 18.4 in 2045. This is 15.19 percent above the baseline threshold and 16.46 percent above the cumulative threshold. Although the Project would be required to implement feasible mitigation, the VMT would remain above both the baseline and cumulative thresholds. Therefore, the Project would result in a significant and unavoidable project level and cumulative impact related to VMT.

Design and Roadway Hazards

The cumulative traffic study area for the proposed Project includes the City of Palmdale and is based on projections of land use and development from the General Plan, as the proposed Project is consistent with the General Plan land use designation, zoning designation, and allowable buildout. The evaluation of Impact TR-3 concluded that the proposed Project would not result in significant impacts related to incompatible uses or hazards due to roadway design. The proposed circulation layout would be required to be installed in conformance with City design standards to ensure that no potentially hazardous design features or inadequate emergency access would be introduced by the Project that could combine with potential hazards from other projects. In addition, cumulative development in the City and surrounding jurisdictions would be subject to site-specific reviews, including reviews by police and fire protection authorities, and the City of Palmdale's own traffic safety engineers, that would reduce the potential of cumulatively considerable design hazards. Therefore, potential impacts related to circulation design features would not occur from the Project and would not combine with hazards from other projects. Thus, cumulative impacts would be less than significant.

5.1 4.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

Existing Regulations

- SB 743
- SCAG 2020 - 2045 Regional Transportation Plan/Sustainable Communities Strategy

Plans, Programs, or Policies (PPPs)

None.

5.1 4.9 PROJECT DESIGN FEATURES

PDF TR-1: Sidewalks. The Project would construct 8-foot-wide sidewalks along the Project's frontage on Avenue L-8, East Avenue M/Columbia Way, 30th Street East and 35th Street East.

PDF TR-2: Bicycle Facilities. The Project would construct a 12-foot-wide Class 1 bike path along East Avenue M/Columbia Way.

5.14.10 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Upon implementation of regulatory requirements, Impacts Transportation-1, Transportation-3, and Transportation-4 would be less than significant.

Upon implementation of regulatory requirements, Impact TR-2 would be significant and unavoidable.

Upon implementation of regulatory requirements, cumulative impacts related to VMT would be cumulatively considerable and significant and unavoidable.

5.14.11 MITIGATION MEASURES

Mitigation Measure T-1: CAPCOA Measure T-7, Implement Commute Trip Reduction Marketing. The City's operational and occupancy permitting shall include that the tenant shall be required (by contract specifications) to implement a marketing strategy to promote the Project site employer's CTR program. Information sharing and marketing to promote and educate employees about their travel choices to the employment location beyond driving such as carpooling, transiting, and biking. As per Table T-8.1 in 2021 CAPCOA handbook, the reduction percentage for suburban areas, such as the City of Palmdale, is up to 4 percent.

Mitigation Measure T-2: CAPCOA Measure T-8, Provide Rideshare Program. The City's operational and occupancy permitting shall include that the tenant shall implement a ridesharing program and establish a permanent transportation management association with funding requirements for employers. Ridesharing encourages carpooled vehicle trips in place of single-occupied vehicle trips, thereby reducing the number of trips, VMT, and GHG emissions. As per Table T-8.1 in 2021 CAPCOA handbook, the reduction percentage for suburban areas, such as the City of Palmdale, is up to 4 percent.

5.14.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of existing regulatory requirements and feasible mitigation measures, impacts related to VMT (Impact Transportation-2) would be significant and unavoidable.

Upon implementation of regulatory requirements and feasible mitigation measures, cumulative impacts related to VMT would be cumulatively considerable and significant and unavoidable.

5.14.13 REFERENCES

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City of Palmdale. (October 22, 2022). *Envision Palmdale 2045 City of Palmdale General Plan*. Retrieved November 20, 2023, from <https://palmdale2045gp.org/>

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EPD Solutions, Inc. (2023a, August). *Traffic Impact Analysis Report*.

EPD Solutions, Inc. (2023b, August). *Vehicle Miles Traveled (VMT) Analysis*. (**Appendix J**).

5.15 Tribal Cultural Resources

5.15.1 INTRODUCTION

This section addresses potential impacts to tribal cultural resources (TCRs) from implementation of the Project. The primary source of this analysis is based upon Project-specific coordination and consultation with California Native American tribes that are traditionally and culturally affiliated with the Project region. The analysis in this section is also based, in part, on the following documents and resources:

- *City of Palmdale General Plan, Conservation Element, 2023*
- *City of Palmdale 2045 General Plan Update Final Environmental Impact Report, August 2022*
- *Phase I Cultural Resources Assessment for Avenue M Project, January 2024 (Appendix D)*

5.15.2 REGULATORY SETTING

5.15.2.1 Federal Regulations

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979 regulates the protection of archaeological resources and sites on federal and Native American lands. The ARPA regulates authorized archaeological investigations on federal lands; increased penalties for looting and vandalism of archaeological resources; and required that the locations and natures of archaeological resources be kept confidential in most cases. In 1988, amendments to the ARPA included a requirement for public awareness programs regarding archaeological resources.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants or culturally affiliated Indian tribes.

5.15.2.2 State Regulations

California Assembly Bill 52

Assembly Bill (AB) 52 established a new requirement under CEQA to consider “tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation.” Public Resources Code (PRC) Section 21074(a) defines “tribal cultural resources” (TCRs) as “[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” that are either “[i]ncluded or determined to be eligible for inclusion in the California Register of Historical Resources” or “in a local register of historical resources.” Additionally, defined cultural landscapes, historical resources, and archaeological resources may be considered TCRs. (PRC § 21074(b), (c)). The lead agency may also in its discretion treat a resource as a TCR if it is supported with substantial evidence.

Projects for which a Notice of Preparation of a Draft EIR was filed on or after July 1, 2015, are required to have lead agencies offer California Native American tribes traditionally and culturally affiliated with the project area consultation on CEQA documents prior to submitting an EIR in order to protect TCRs. PRC Section

21080.3.1(b) defines “consultation” as “the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties’ cultural values and, where feasible, seeking agreement.” Consultation must “be conducted in a way that is mutually respectful of each party’s sovereignty [and] recognize the tribes’ potential needs for confidentiality with respect to places that have traditional tribal cultural significance.” The consultation process is outlined as follows:

1. California Native American tribes traditionally and culturally affiliated with the project area submit written requests to participate in consultations.
2. Lead agencies are required to provide formal notice to the California Native American tribes that requested to participate within 14 days of the lead agency’s determination that an application package is complete or decision to undertake a project.
3. California Native American tribes have 30 days from receipt of notification to request consultation on a project.
4. Lead agencies initiate consultations within 30 days of receiving a California Native American tribe’s request for consultation on a project.
5. Consultations are complete when the lead agencies and participating California Native tribes have agreed on measures to mitigate or avoid a significant impact on a TCR, or after a reasonable effort in good faith has been made and a party concludes that a mutual agreement cannot be reached (PRC §§ 21082.3(a), (b)(1)-(2); 21080.3.1(b)(1)).

AB 52 requires that the CEQA document disclose significant impacts on TCRs and discuss feasible alternatives or mitigation to avoid or lessen an impact.

California Health and Safety Code Section 7050.5

Health & Safety Code Section 7050.5 requires that if human remains are discovered in the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines the remains are not subject to his or her authority and recognizes or has reason to believe the human remains are those of a Native American, he/she shall contact, by telephone within 24 hours, the Native American Heritage Commission (“NAHC”).

California Public Resources Code Sections 5097.9 to 5097.991

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the NAHC. These sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

5.15.2.3 Local and Regional Regulations

City of Palmdale General Plan Conservation Element

The Conservation Element of the City’s General Plan contains the following goal and policies that are applicable to the Project:

- CON-8.4 Preservation in new development.** Require that new development preserve significant historic, paleontological, or archaeological resources.
- CON-8.5 Tribal consultation.** Conduct Native American consultation consistent with the applicable regulations when new development is proposed in potentially culturally sensitive areas.

CON-8.6 **Discovery coordination with Tribal groups.** When human remains suspected to be of Native American origin are discovered, coordinate with the Native American Heritage Commission and any local Native American groups to determine the most appropriate course of action.

CON-8.7 **Cooperation with preservation entities.** Cooperate with private and public entities whose goals are to protect and preserve historic landmarks and important cultural resources.

5.15.3 ENVIRONMENTAL SETTING

Native American Tribes

The Project is within an area considered the Traditional Tribal Land of the Kitanemuk people. As part of the Cultural Resources Assessment (Appendix D) for the Project site, research was conducted using several resources to identify potential TCRs within the Project area. The assessments included a records search at the South Central Coastal Information Center (SCCIC), background and literature research, a search of the Sacred Lands File (SLF) by the NAHC, outreach efforts with Native American tribal representatives, an examination of geological maps, and an intensive pedestrian survey of the Project site. No TCRs were identified as part of the records search and site survey of the Project site.

Site Conditions

As discussed in Section 3, *Project Description*, the Project site is vacant and undeveloped. The Cultural Resources Assessment (Appendix D) identified the Project site elevations as ranging from 2,452 to 2,465 feet above mean sea level (AMSL). The site is not listed in the NAHC SLF.

The Antelope Valley area has supported a long prehistoric Native American population. Evidence of villages, camps, burials, quarries, rock features, and bedrock mortars has been documented at archaeological sites across the desert.

5.15.4 THRESHOLDS OF SIGNIFICANCE

Appendix G of State CEQA Guidelines indicates that a Project could have a significant effect if it were to:

- Tribal-1 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.15.5 METHODOLOGY

The TCR analysis is based on the Cultural Resources Assessment and consultation carried out by the City of Palmdale pursuant to AB 52. The Cultural Resources Assessment included an archaeological and historical

records search, completed at the SCCIC at California State University, Fullerton. This search included the Project site with an additional one-mile buffer. Pedestrian surveys were conducted at the Project site. The NAHC was contacted to perform an SLF search and local Native American tribes were contacted to elicit local knowledge of cultural resource issues related to the Project.

5.15.6 ENVIRONMENTAL IMPACTS

IMPACT TRIBAL-1: THE PROJECT WOULD NOT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE § 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:

(I) LISTED OR ELIGIBLE FOR LISTING IN THE CALIFORNIA REGISTER OF HISTORICAL RESOURCES, OR IN A LOCAL REGISTER OF HISTORICAL RESOURCES AS DEFINED IN PUBLIC RESOURCES CODE SECTION 5020.1(K), OR

(II) A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE § 5024.1. IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCE CODE § 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE.

Less than Significant with Mitigation Incorporated.

AB 52 requires meaningful consultation between lead agencies and California Native American tribes regarding potential impacts on TCRs, which are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (PRC Section 21074). On December 21, 2022, an SLF search and a list of Native American tribes who may have knowledge of cultural resources in the Project area was requested from the NAHC. On February 24, 2022, the NAHC responded with a list of Native American tribes and stated that the SLF search yielded negative results for known TCRs or sacred lands within a one-mile radius of the Project site. The City sent notices on July 27, 2023, regarding the Project to the Native American tribes provided by the NAHC. Responses to the consultation letter were received from the Yuhaaviatam of San Manuel Nation (YSMN) (formerly known as the San Manuel Band of Mission Indians), the Fernandeño Tataviam Band of Mission Indians (FTBMI), and the Morongo Band of Mission Indians (MBMI).

The response letter from the FTBMI states that the proposed Project location is underlain with native soil that is both archaeologically and tribally understudied. Per the response letter from FTBMI, there are known TCRs within 1 mile of the proposed Project location, some indicative of temporary settlement. These circumstances make the proposed Project location subject to inadvertent discovery. The Morongo Band of Mission Indians' response letter (email) dated November 14, 2023, states that the proposed Project is located within the ancestral territory and traditional use area of the Cahuilla and Serrano people of the Morongo Band of Mission Indians, and that projects within this area are potentially sensitive for cultural resources regardless of the presence or absence of remaining surface artifacts and features.

The mitigation measures included below in Section 5.15.10 were drafted in consultation with the consulting tribes. Mitigation Measure TCR-1 states that one Tribal Monitor procured by the consulting tribes shall be

retained to observe all ground-disturbing activities. Mitigation Measure TCR-2 states that one Qualified Archaeologist shall be retained to observe all ground-disturbing activities. Mitigation Measure TCR-3 is included which states that the Qualified Archaeologist and Consulting Tribal Representative shall be present at pre-grade meetings.

In addition, TRC-4 requires preparation of a Cultural Resources Monitoring and Mitigation Plan (CRMMP) in consultation with one representative on behalf of the consulting tribes. Mitigation Measure TCR-5 is included which states that in the event that cultural resources are discovered during Project activities, all work in the immediate vicinity shall be stopped and consulting tribes shall be contacted regarding any pre-contact and/or historic-era cultural resource finds. Mitigation Measure TCR-6 states that, in the event that human remains are encountered during Project activities, work shall stop in the immediate vicinity and the County Coroner shall be contacted.

Lastly, Mitigation Measure TCR-7 states that any and all archaeological/cultural documents created as a part of the Project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to the consulting tribes. Mitigation Measure TCR-8 states that the final report(s) created as a part of the project shall be submitted to the Lead Agency and Consulting Tribe for review and comment before being submitted to the Eastern Information Center and the Consulting Tribes.

Based on literature review (i.e., records check and archival research) and pedestrian surveys, no prehistoric resource sites or isolates, including an historical TCR, as defined by PRC Section 5020.1(k), have been identified within the Project site. Additionally, the potential for encountering archaeological resources including TCRs within the Project site is considered low to moderate due to the historic settlement of the region and based upon the limited visibility on the north side of the Project site as a result of dense vegetation during the pedestrian survey.

Construction of the proposed Project would include earthmoving activities, such as grading, which have the potential to disturb previously unknown TCRs. As a result, Mitigation Measures TCR-2, which requires that a qualified archeologist be retained and present during all grading activities to quickly assess the potential for discoveries of archaeological resources, and TCR-5, which requires preparation of a Monitoring and Treatment Plan if significant pre-contact and/or historic-era cultural resources, as defined by CEQA, are discovered and avoidance cannot be ensured, are included.

The Project would include implementation of PPP TCR-1, which requires that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods, and PPP CUL-1, which provides for compliance with State Health and Safety Code Section 7050.5 which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98.

As discussed previously, no known TCRs were identified within the Project site by the Cultural Resources Assessment (Appendix D). Additionally, as part of the City's AB 52 consultation process, the City reached out to Native American tribes who may have knowledge of TCRs within the Project area. No known TCRs or sensitive sites were identified within the Project site during the AB 52 consultation process.

Project construction would require ground disturbing activities that could result in the excavation of soils up to seven feet in depth and has the potential to disturb unknown TCRs on the Project site. California Health and Safety Code Section 7050.5 and CEQA Guidelines 15064.5(e) requires that if human remains are discovered, disturbance to the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact the NAHC by telephone within 24 hours. Although AB 52 consultation did not yield substantial

evidence that listed or eligible TCRs—pursuant to criteria in Public Resources Code Section 5024.1(c)—within the Project site, PPP TCR-1 and PPP CUL-1, and Mitigation Measures TCR-1 through and TCR-6, would be implemented to ensure that potential impacts related to the inadvertent discovery of TCRs are less than significant.

Furthermore, the Project would be subject to CEQA Guidelines Section 15064.5, PRC Section 21083.2 and 5097.9, and Health and Safety Code Section 7050.5, to properly recover human remains if encountered. Therefore, with implementation of mitigation and applicable regulations, the Project's impacts related to TCRs would be less than significant.

5.15.7 CUMULATIVE IMPACTS

The cumulative study area for TCRs includes the City of Palmdale, which contains the same general tribal historic setting. Other projects throughout the City that would involve ground disturbances could reveal buried TCRs.

Cumulative impacts to TCRs would be reduced by compliance with applicable regulations and the identified mitigation measures. As described above, the Project area is not known to contain TCRs; however, Mitigation Measures TCR-1 through TCR-6 would be implemented to ensure that impacts would not occur in the case of an inadvertent discovery of a potential TCR. These mitigation measures ensure that the Project would not contribute to a cumulative loss of TCRs. Therefore, potential cumulative impacts would be less than significant.

5.15.8 EXISTING REGULATIONS AND PLANS, PROGRAMS, OR POLICIES

- California Government Code Sections 5097.9-5097.99
- California Health and Safety Code Section 7050.5
- California Public Resources Code Sections 21073 et seq. (AB 52)

The following Plans, Programs, or Policies (PPP) related to TCRs are incorporated into the Project and would reduce impacts related to TCRs. These actions will be included in the Project's Mitigation Monitoring and Reporting Program (MMRP):

PPP TCR-1: Native American historical and cultural resources and sacred sites are protected under Pub. Resources Code Sections 5097.9 to 5097.991, which require that descendants be notified when Native American human remains are discovered and provide for treatment and disposition of human remains and associated grave goods.

PPP CUL-1: Human Remains. Should human remains or funerary objects be discovered during Project construction, the Project would be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body (within a 100-foot buffer of the find) until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

5.15.9 LEVEL OF SIGNIFICANCE BEFORE MITIGATION

Without mitigation, Impacts Tribal-1 (I) and Tribal-1 (II) would be **potentially significant**:

Impact Tribal-1 (I) and Tribal-1 (II): Ground disturbance activities associated with Project construction have the potential to impact unknown buried TCRs.

5.15.10 MITIGATION MEASURES

MM TCR-1: On-Site Tribal Monitor. Prior to the issuance of grading permits, the Project Applicant shall notify the consulting tribes (Yuhaaviatam of San Manuel Nation, Fernandeano Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians) and shall enter into a Tribal Monitoring Agreement with at least one of the consulting tribes for a Tribal Monitor. In the case that more than one of the consulting tribes designates a monitor, monitors shall rotate to ensure that only one monitor is present at the site at any given time.

The designated Tribal Monitor(s) shall be on-site during all initial ground-disturbing activities including, but not limited to, clearing, grubbing, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity ("Tribal Monitoring").

Tribal Monitoring services shall continue until confirmation is received from the project applicant, in writing, that all scheduled activities pertaining to Tribal Monitoring are complete. If the Project's scheduled activities require the Tribal Monitor to leave the Project for a period of time and return, confirmation shall be submitted to the Tribal Monitor by project applicant, in writing, upon completion of each set of scheduled activities and 5 days' notice (if possible) shall be submitted to the Tribal Monitor by project applicant, in writing, prior to the start of each set of scheduled activities. If cultural resources are encountered, the Tribal Monitor will have the authority to request that ground-disturbing activities cease within 60 feet of discovery and a qualified archaeologist meeting Secretary of Interior standards retained by the project applicant as well as the Tribal Monitor shall assess the find.

MM TCR-2: Retention of Archaeologist. Prior to any ground-disturbing activities (including, but not limited to, clearing, grubbing, tree and bush removal, grading, trenching, fence post replacement and removal, construction excavation, excavation for all utility and irrigation lines, and landscaping phases of any kind), and prior to the issuance of grading permits, the Applicant shall retain a Qualified Archaeologist who meets the U.S. Secretary of the Interior Standards (SOI). The Archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The Archaeologist will conduct a Cultural Resource Sensitivity Training, in conjunction with the Tribe[s] Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event

MM TCR-3: Pre-Grade Meeting. The retained Qualified Archeologist and Consulting Tribal representative shall attend the pre-grade meeting with the grading contractors to explain and coordinate the requirements of the monitoring plan.

MM TCR-4: Cultural Resources Monitoring and Mitigation Plan. A Cultural Mitigation Resources Monitoring and Mitigation Plan (CRMMP) shall be prepared, in consultation with a single representative on behalf of the consulting tribes (Yuhaaviatam of San Manuel Nation, Fernandeano Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians), prior to the commencement of any and all ground-disturbing activities for the Project,

including any archaeological testing. The CRMMP will provide details regarding the process for in-field treatment of inadvertent discoveries and the disposition of inadvertently discovered non-funerary resources. The CRMMP shall include the following: approved Mitigation Measures (MM)/Conditions of Approval (COA), contact information for all pertinent parties, parties' responsibilities, procedures for each MM or COA, and an overview of the project schedule.

MM TCR-5: Inadvertent Discovery of Cultural Resources. The Lead Agency and/or project applicant shall, in good faith, consult with the Yuhaaviatam of San Manuel Nation (YSMN), Fernandeño Tataviam Band of Mission Indians (FTBMI), and the Morongo Band of Mission Indians (MBMI) on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and so that the Qualified Archaeologist and Tribal Monitor can evaluate the find.

Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the consulting tribes' (Yuhaaviatam of San Manuel Nation, Fernandeño Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians) Cultural Resources Departments shall be contacted, as required by the CRMMP created per TCR-4, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist and tribal monitor make their initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.

A recommendation for the treatment and disposition of the Tribal Cultural Resource shall be made by the Qualified Archaeologist in consultation with the Tribe[s] and the Tribal Monitor[s] and be submitted to the Lead Agency for review and approval. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to the consulting tribes for review and comment, as detailed within TCR-4..

MM TCR-6: Inadvertent Discovery of Human Remains: If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project. No photographs are to be taken except by the coroner, with written approval by the consulting Tribe[s].

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

- b. In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of HSC §7050.5.
- c. The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to PRC §5097.98
- d. The tribe that is named the Most Likely Descendant (MLD) may wish to rebury the human remains and/or cremation and sacred items in their place of discovery with no further disturbance where they will reside in perpetuity. The place(s) of reburial shall not be disclosed by any party and is exempt from the California Public Records Act (California Government Code § 6254[r]). Reburial location of human remains and/or cremations shall be determined by the Tribe's Most Likely Descendant (MLD), the landowner, and the City Planning Department.

MM TCR-7: Archaeological/cultural documents. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to consulting tribes (Yuhaaviatam of San Manuel Nation, Fernandeano Tataviam Band of Mission Indians, and the Morongo Band of Mission Indians). The Lead Agency and/or applicant shall, in good faith, consult with the tribes throughout the life of the construction of the project.

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

5.15.1.1 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Mitigation Measures identified above, along with existing regulatory programs, would reduce potential impacts associated with TCRs for Impacts Tribal-1 (i and ii) to a level that is less than significant. Therefore, no significant and unavoidable adverse impacts related to TCRs would occur.

5.15.1.2 REFERENCES

City of Palmdale. (October 22, 2022). *Envision Palmdale 2045 City of Palmdale General Plan*. Retrieved November 20, 2023, from <https://palmdale2045gp.org/>

City of Palmdale, Rincon Consultants. (2022, August). *City of Palmdale 2045 General Plan Update Final Environmental Impact Report (SCH# 2021060494)*. Retrieved November 20, 2023. https://static1.squarespace.com/static/5c7dc93065a707492aca3e47/t/631fa8d1f119fa360cd7f0ee/1663019242025/Palmdale+2045+GPU+FEIR_reduce.pdf

Brian F. Smith and Associates, Inc. (2024, January 23). *Phase Cultural Resources Assessment, for Avenue M Project. (Appendix D)*

5.16 Utilities and Service Systems

5.16.1 INTRODUCTION

This section of the Draft EIR evaluates the potential effects on utilities and service systems from implementation of the proposed Project by identifying anticipated demand and existing and planned utility availability. This includes infrastructure related to water supply, wastewater, stormwater, solid waste, electric power, natural gas, and telecommunications. Impacts related to energy use are further described in Section 5.5, *Energy*, and impacts related to hydrology and water quality are discussed in Section 5.9, *Hydrology and Water Quality*. Information in this section is based, in part, on the following sources:

- *City of Palmdale General Plan*, October 2022
- *City of Palmdale 2045 General Plan Update Draft Environmental Impact Report*, July 2022
- *City of Palmdale Code of Ordinances*
- *Los Angeles County Waterworks District No. 40 Antelope Valley 2020 Urban Water Management Plan*, October 2021
- *Preliminary Hydrology Report* (Appendix I)
- *Water Supply Assessment* (Appendix K)

Because CEQA focuses on physical environmental effects, this section analyzes whether there would be increases in demand for utility services from implementation of the Project that would result in significant adverse physical environmental effects. For example, an increase in wastewater generation, by itself, would not be considered a physical change in the environment; however, physical changes in the environment resulting from the construction of new facilities or an expansion of existing wastewater facilities as a result from demand induced by the proposed Project could constitute a significant impact under CEQA.

5.16.2 WATER

5.16.2.1 Water Regulatory Setting

Federal Water Regulatory Setting

Clean Water Act

The Clean Water Act (CWA) was enacted by Congress in 1972 and is the primary federal law regulating water quality in the United States. The objective of the CWA is to reduce or eliminate water pollution in the nation's rivers, streams, lakes, and coastal waters. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination System (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint source discharge programs, and wetlands protection. The United States Environmental Protection Agency (USEPA) has delegated the responsibility for administration of CWA portions to State and regional agencies. In California, the State Water Resources Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply. The SDWA authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants that may be found in drinking water. The law was amended in 1986 and 1996 to recognize source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by protecting it from source to tap. The USEPA, states, and water systems then work together to make sure that these standards are met. The SDWA applies to every public water system in the United States.

State Water Regulatory Setting

California Urban Water Management Planning Act

Section 10610 of the California Water Code established the California Urban Water Management Planning Act (CUWMPA), requires urban water suppliers to initiate planning strategies to ensure an appropriate level of reliability in its water service. The CUWMPA states that every urban water supplier that provides water to 3,000 or more customers, or that annually provides more than 3,000 acre-feet (AF) of water service, should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The CUWMPA describes the contents of UWMPs as well as methods for urban water suppliers to adopt and implement the plans.

Senate Bill 610

Senate Bill (SB) 610 requires public urban water suppliers with 3,000 or more service connections to identify existing and planned sources of water for planned developments of a certain size. It further requires the public water system to prepare a water supply assessment (WSA) for projects that meet the following criteria:

- a) A proposed residential development of more than 500 dwelling units;
- b) A proposed shopping center employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- c) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- d) A hotel or motel, or both, with more than 500 rooms;
- e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 sf of floor area; or
- f) A mixed-use project that includes one or more of the projects above.

The components of a WSA include existing water demand, future water demand by the project, and must ensure that water is available for the project during normal years, a single dry year, and multiple dry years during a 20-year future projection period. The WSA must also describe whether the project's water demand is accounted for in the water supplier's UWMP. Supplies of water for future water supply must be documented in the WSA.

CALGreen Building Code

California Code of Regulations Title 24, Part 11, establishes the California Green Building Code or CALGreen. The CALGreen Code is updated every three years. It was recently updated in 2022 and became effective January 1, 2023. CALGreen sets forth water efficiency standards (i.e., maximum flow rates) for all new plumbing and irrigation fittings and fixtures

Local Water Regulatory Setting

Palmdale General Plan

The Palmdale General Plan includes the following goals, policies, and programs that are applicable to the Project:

Land Use and Community Design Element

Goal LUD-3 A City with high-quality services and facilities in all neighborhoods.

LUD-3.5 Infrastructure Capacity and Service. Ensure that there will be adequate water and wastewater system capacity to meet projected demand by continuing to oversee the development of adequate and dependable public services and facilities to support both existing and future development.

LUD-3.6 Infrastructure Funding and Programs. Continue to implement comprehensive water and wastewater management programs and ensure that future developments pay their fair share for any infrastructure improvements demand necessary.

Conservation Element

Goal CON-5 Protect the quality and quantity of local water resources.

CON-5.1 Ground water recharge. Ensure that ground water supplies are recharged and protect natural recharge areas such as the Little Rock and Big Rock Washes, and Amargosa and Anaverde Creeks from pollutants or other materials, which might degrade groundwater supplies.

CON-5.3 Regional monitoring cooperation. Cooperate with Los Angeles County Health Department and the Regional Water Quality Control Board in monitoring industrial and commercial uses utilizing hazardous or potentially polluting materials and fluids, to prevent their discharge into the groundwater aquifer.

Goal CON-6 Minimize the impacts of urban development on groundwater supplies.

CON-6.1 Encourage natural recharge. Restrict building coverage and total impervious area in the vicinity of natural recharge areas.

CON-6.2 Reduce landscaping irrigation needs. Require the use of water conserving native or drought resistant plants and drip irrigation systems where feasible.

CON-6.4 New construction water conservation. Require water conserving appliances and plumbing fixtures in all new construction.

CON-6.5 Monitoring and coordination. Coordinate with local water agencies to monitor ground water levels, State water allocations and development approvals, to assure that development does not outpace long-term water availability.

Goal CON-7 Maintain and further the City's commitment to long-term water management within the Antelope Valley by planning for the conservation and managed use of water resources, including groundwater, imported water, and reclaimed water.

CON-7.5 Implementation. Promote implementation of water reduction and recycling systems that are feasible and appropriate to the Planning Area.

- CON-7.6** **Water recycling.** Encourage residents and businesses to recycle water where feasible, and where water recycling does not result in health and safety concerns.

Public Facilities, Services, and Infrastructure Element

- Goal PFSI-3** **Ensure that all development in Palmdale is served by adequate water distribution and sewage facilities.**

- PFSI-3.12** **Water and Wastewater BMPs.** Utilize best management practices (BMPs) in the purveyance of water resources and management of wastewater.

- PFSI-3.14** **Water and Wastewater Provision.** Ensure the provisions of adequate water and wastewater services to all new development.

- PFSI-3.18** **Water Conservation.** Support and promote water conservation across all facets of City water infrastructure.

- Goal PFSI-5** **Ensure that adequate public utilities are available to support development in an efficient and orderly manner.**

- PFSI-5.1** **Development Priorities.** Prioritize development in areas that have existing horizontal infrastructure (roads, sewer, water, drainage, etc.).

- PFSI-5.3** **Off-Site Fair Share Contribution.** Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.

- PFSI-5.7** **Adjacent Development Integration.** Require that individual development projects integrate with adjacent development with respect to backbone infrastructure (streets, sewer, water, and drainage). If adjacent property is undeveloped, a conceptual plan should be prepared to show that the pending development will allow for future integration and development of adjacent properties in a manner which is reasonable from a design, construction, and cost standpoint.

- Goal PFSI-6** **Coordinate with utility providers to support adequate provision of critical utilities.**

- PFSI-6.4** **Utility Construction Cost Minimization.** Coordinate installation of utility line placement with street construction to minimize cost, where possible.

- PFSI-6.6** **Prioritize Connections.** Work with providers to prioritize connections near existing development in the core of the city.

- PFSI-6.7** **Utility Safety.** When feasible, require new utility lines to be constructed away from fault lines, flood zones, fire zones, and other vulnerable areas.

5.16.2.2 Water Environmental Setting

The Project site is located outside of the water service area of the Los Angeles County Waterworks District No. 40 Antelope Valley (LACWD40). LACWD40 encompasses approximately 232 square miles providing water service to the cities of Lancaster and Palmdale, as well as unincorporated communities of Pearblossom, Littlerock, Sun Village, Rock Creek, Northeast Los Angeles County, and Lake Los Angeles.

The LACWD40 2020 Urban Water Management Plan (UWMP) provides a summary of anticipated water supplies and demands for the next 20 years. LACWD40 operates a network of approximately 1,057 miles of water (potable and recycled) lines and 71 potable water tank reservoirs to deliver water to its customers.

There are no existing water lines on or adjacent to the Project site. The past water source for the Project site was from existing onsite wells that are no longer in use. The closest water line is the 30-inch water main that is located approximately 17,400 linear feet (approximately 3.3 miles) west of the Project site within the East Avenue M/Columbia Way right-of-way at 4th Street W.

Water Supply and Demand

LACWD40 has three water supply sources: purchased water from the Antelope Valley-East Kern Water Agency (AVEK), groundwater from the Antelope Valley Groundwater Basin, and recycled water purchased from the City of Lancaster and City of Palmdale Recycled Water Authority.

The Antelope Valley Groundwater Basin that LACWD40 extracts groundwater from covers approximately 1,580 square miles and has an estimated capacity of nearly 68 million acre-feet (MAF). The Antelope Valley Groundwater Basin is divided into 12 sub-basins and is composed of two primary aquifers: the upper (principal) aquifer and the lower (deep) aquifer.

LACWD40 purchases imported water from AVEK for potable uses. AVEK is a wholesale water supplier that sources water from both the State Water Project (SWP) and the Antelope Valley Groundwater Basin to then allocate to municipalities, ranchers, and other agricultural users. Approximately 70 percent of the water provided by AVEK goes to LACWD.

Table 5.16-1 summarizes LACWD40's current retail water supplies. As shown in Table 5.16-1, in 2020, the LACWD40 obtained the majority of its water supply from AVEK.

Table 5.16-1: LACWD40 Water Supply 2020

Water Supply	Source	Actual Volume (acre-feet [AF])	Water Quality
Purchased or Imported Water	AVEK	31,552	Drinking Water
Groundwater	Antelope Valley Groundwater Basin	14,266	Drinking Water
Recycled Water	Refill lake at Apollo Park and City of Lancaster Reuse	361	Recycled Non-Potable Water
Total Volume of Potable Water in AF		45,818	-
Total Volume of Non-Potable Water in AF		361	-
Total		46,179	-

Source: Los Angeles County Waterworks, 2021.

Table 5.16-2 summarizes LACWD40's projected overall water supplies. As shown in Table 5.16-2, the 2020 UWMP estimates that water supplies in the future are anticipated to be obtained through a similar mix of purchased or imported water, groundwater, and recycled water.

Table 5.16-2: LACWD40 Projected Water Supply (AF)

Water Supply	Source	2025	2030	2035	2040	2045
Purchased or Imported Water	-	57,300	55,800	54,200	52,700	52,700
Groundwater	-	23,298	23,298	23,298	23,298	23,298

Water Supply	Source	2025	2030	2035	2040	2045
Purchased or Imported Water	New Supply from AVEK	1,733	1,733	1,733	1,733	1,733
Recycled Water	-	764	902	1,102	1,302	1,302
Total Volume of Potable Water in AF		82,331	79,429	79,231	77,731	77,731
Total Volume of Non-Potable Water in AF		764	902	1,102	1,302	1,302
Total		83,095	80,831	80,333	79,033	79,033

Source: Los Angeles County Waterworks, 2021.

The 2045 projections anticipate that approximately 69 percent of supply would be from purchased or imported water, approximately 30 percent would be from groundwater, and less than one percent from recycled water.

Table 5.16-3: LACWD40 Projected Water Demand (AF)

Water Supply	2025	2030	2035	2040	2045
Potable Water, Raw, Other	54,400	57,100	60,000	63,100	66,300
Recycled Water	764	902	1,102	1,302	1,302
Total Water Demand	55,164	58,002	61,102	64,402	67,602

Source: Los Angeles County Waterworks, 2021.

Projected demands for LACWD40 water supplies in the UWMP were based on Southern California Association of Governments (SCAG) projections. As shown in Table 5.16-4, LACWD40 would meet the projected water needs and have between 27,922 AF and 11,422 AF additional supply annually through 2045.

Table 5.16-4: LACWD40 Projected Water Demand and Supply in Normal Years (AF)

Water Source	2025	2030	2035	2040	2045
Supply Totals	83,086	81,724	80,324	79,024	79,024
Demand Totals	55,164	58,002	61,102	64,402	67,602
Remaining Water Supply	27,922	23,722	19,222	14,622	11,422

Source: Los Angeles County Waterworks, 2021.

In addition, the LACWD40 2020 UWMP details that it can meet water supply demand in multiple dry year conditions through five consecutive years with projected increases in water demand (Los Angeles County Waterworks, 2021). The LACWD40 UWMP includes a five-year drought risk assessment, which as detailed in Table 5.16-5, shows that that surplus water supplies of at least 17,001 AF would be available.

Table 5.16-5: LACWD40 UWMP Five-Year Drought Risk Assessment (AF)

	2021	2022	2023	2024	2025
Total Water Use	47,977	49,774	51,570	53,367	55,164
Total Supplies	70,457	70,884	70,884	71,738	72,165
Surplus	22,480	21,110	19,314	18,371	17,001

Source: Los Angeles County Waterworks, 2021 (2020 UWMP, Table 7-5)

The LACWD40 UWMP describes that there are planned water projects that will increase supplies and that it can purchase additional imported water from AVEK, banking it in the local groundwater water basin to prepare for multiple dry years to ensure supply. The 2020 AVEK UWMP details that the wholesale supply would exceed demands through 2045 by a minimum of 46,640 AF, as shown on Table 5.16-6.

Table 5.16-6: AVEK 2020 UWMP Projected Water Demand and Supply in Normal Years (AF)

	2025	2030	2035	2040	2045
Supply Totals	91,080	93,790	94,030	94,430	97,010
Demand Totals	44,440	44,440	44,440	44,440	44,440
Surplus	46,640	49,350	49,590	49,990	52,570

Source: AVEK, 2021 (2020 UWMP, Table 7-2W)

In addition, the AVEK 2020 UWMP details that it could meet water supply demand through five-year consecutive dry year conditions. AVEK has developed several groundwater banks and is planning for future banks including the Westside Water Bank, Antelope Valley Water Bank (AVWB), and the Water Supply Stabilization Project 2 to maximize its supplies. LACWD40 has also purchased excess imported water from AVEK, banking it in the local groundwater water basin to prepare for scenarios during dry years.

Additional water supplies can also be accessed via the MOU agreement that LACWD40 has executed with AVEK. As detailed in the AVEK 2020 UWMP, when LACWD is required to acquire new supplemental water supplies for new growth, the MOU agreement requires AVEK to acquire the supplies on behalf of LACWD, and AVEK will deliver the water to LACWD along with AVEK's existing supplies.

5.16.2.3 Water Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Utilities-1 Require or result in the construction of new water facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects; or

Utilities-2 Not have sufficient water supplies available to serve the project and reasonably foreseeable development during normal, dry, and multiple dry years.

5.16.2.4 Water Service Methodology

The evaluation methodology identifies whether construction of water system improvements proposed by the Project would have significant environmental effects other than the physical environmental effects analyzed for proposed development throughout this EIR. The evaluation of water supply quantifies the amount of water that would be required to support operation of the proposed Project and compares the demand to the available water supply to identify if sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years.

5.16.2.5 Water Environmental Impacts

IMPACT UTILITIES-1: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW WATER FACILITIES, OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. As discussed above, there are no existing water lines on or adjacent to the Project site. The past water source for the Project site was from onsite wells that are no longer in use. The Project site is near the water service area of the LACWD40. The proposed Project includes annexation of the Project site into the LACWD40 service area. The Project would install offsite 16-inch water lines along the perimeter of the Project site that would connect to a proposed 24-inch offsite water main at East Avenue M/Columbia Way and 30th Street E. The proposed offsite 24-inch water line would extend approximately 17,400 linear feet west within the East Avenue M/Columbia Way right-of-way to 4th Street W and connect

to the existing 30-inch water line in East Avenue M/Columbia Way (as shown in Figure 3-13a, *Utility Improvements (Water)*, in Section 3, *Project Description*). The new offsite water line installations would be within existing roadway rights-of-way or within roadway rights-of-way that are being developed as part of the Project. Additionally, the proposed water infrastructure would be installed as part of new roadway construction and roadway improvement activities that are part of the proposed Project.

The construction activities related to new water infrastructure needed to serve the Project's proposed light industrial warehouse facilities would not result in any physical environmental effects beyond those identified in the other sections of this Draft EIR. For example, construction emissions for excavation and installation of the water infrastructure and related mitigation measures are included in Sections 5.3, *Air Quality*, and 5.7, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed water infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified within this EIR, such as agricultural resource impacts, operational VMT impacts, architectural coating and operational vehicle emissions impacts, and operational greenhouse gas impacts, are not related to the construction of the proposed water infrastructure. Thus, with construction related mitigation as detailed under other resource topic areas, impacts related to the proposed expansion and construction of new water facilities would be less than significant. No additional mitigation measures would be required.

IMPACT UTILITIES-2: THE PROJECT WOULD HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT AND REASONABLY FORESEEABLE DEVELOPMENT DURING NORMAL, DRY, AND MULTIPLE DRY YEARS.

Less than Significant Impact. The Project site would be developed with approximately 3,001,712 square feet (SF) of industrial uses. A Water Supply Assessment (WSA) prepared for the Project (Appendix K), pursuant to SB 610. The WSA estimated the water demand of the project through utilization of estimates provided by LACWD for office and warehouse buildings and landscape water demand for the proposed landscaping. Demand estimates provided by LACWD assume a water demand of 64 gallons per day (gpd) per 1000 SF for office space and 25 gpd per 1000 SF for industrial warehouse. Although office space within industrial warehousing buildings is incidental and part of the proposed warehousing use, the WSA conservatively assumed the office space as a separate use with a higher demand for water supplies. As shown on Table 5.16-7, the proposed Project is estimated to have a demand of 110.93 acre-feet per year (AFY).

Table 5.16-7: WSA Project Water Demand Estimates

Use	Square Feet	Water Generation Rate (GPD/1,000 SF)	Water Demand (GPD)	Water Demand (AFY)
Office	40,000	0.064	2,560	2.87
Warehouse	2,961,712	0.025	74,043	82.94
Landscaping	880,912	-	-	25.12
Total				110.93

Source: Dudek (2023). Appendix K.

As the Project site is not currently within the LACWD40 service area, it is conservatively assumed that buildout of the site was not included in the UWMP growth projections. However, LACWD40 has anticipated an increased demand for water from the industrial sector, as detailed in the WSA that was prepared for the Project (Appendix K). The LACWD40's 2020 UWMP provides a comparison of projected water supply and demand in normal years, which shows that a surplus of supply would exist. Further, as detailed in Table 5.16-

8, the water demand of the proposed Project would equate to between 0.4 to 1.0 percent of the LACWD surplus of water supplies through 2045.

Table 5.16-8: LACWD40 Projected Water Supply & Demand in Normal Years without Project (AF)

	2025	2030	2035	2040	2045
Supply Totals	83,086	81,724	80,324	79,024	79,024
Demand Totals	55,164	58,002	61,102	64,402	67,602
Difference	27,922	23,656	23,722	14,662	11,422
Project Demand Percentage of Difference	0.4%	0.5%	0.5%	0.8%	1.0%

Source: Los Angeles County Waterworks, 2021

As detailed previously in Table 5.16-5, LACWD40 UWMP Five-Year Drought Risk Assessment (AF), surplus water supplies of up to approximately 17,001 AF are anticipated to be available from LACWD40 in five consecutive dry year conditions, which would accommodate the additional 110.93 AFY from the proposed Project, which would be 0.7 percent of the surplus. As described previously, the LACWD40 2020 UWMP details that it can meet water supply demand through its banked water supply. LACWD40 typically uses less water than its allotment to meet water demands during average water years and excess water from AVEK is “banked” for additional supply needed during dry years (Appendix K).

Also, additional water supply is available from AVEK, if necessary. As described previously, an existing MOU between the two agencies requires AVEK to acquire additional water supplies, if needed, on behalf of LACWD, to be delivered along with the existing supplies. The 2020 AVEK UWMP determined that the AVEK wholesale supply would exceed demands through 2045 by a minimum of 46,640 AFY (shown previously in Table 5.16-6, AVEK 2020 UWMP Projected Water Demand and Supply in Normal Years (AF)), and would also be able to meet demands through five consecutive dry year conditions. Therefore, AVEK would have the additional supply to provide to LACWD40 as needed to meet the MOU requirements. Thus, there is sufficient water supplies available to serve the Project and reasonably foreseeable development during normal, dry, and multiple dry years. Impacts related to water supplies would be less than significant.

5.16.2.6 Water Existing Regulations and Plans, Programs, or Policies

The following standard regulations would reduce potential impacts related to water supplies:

California Code of Regulations Title 24, Part 11; the California Green Building Code

5.16.2.7 Water Project Design Features

None.

5.16.2.8 Water Level of Significance Before Mitigation

Impacts Utilities-1 and Utilities-2 would be less than significant.

5.16.2.9 Water Mitigation Measures

No mitigation measures are required.

5.16.2.10 Water Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to water supplies or water infrastructure would occur.

5.16.3 WASTEWATER

5.16.3.1 Wastewater Regulatory Setting

Local Wastewater Regulatory Setting

Palmdale General Plan

The Palmdale General Plan includes the following goals, policies, and programs related to wastewater utilities that are applicable to the Project:

Land Use and Community Design Element

Goal LUD-3 A City with high-quality services and facilities in all neighborhoods.

LUD-3.5 Infrastructure Capacity and Service. Ensure that there will be adequate water and wastewater system capacity to meet projected demand by continuing to oversee the development of adequate and dependable public services and facilities to support both existing and future development.

LUD-3.6 Infrastructure Funding and Programs. Continue to implement comprehensive water and wastewater management programs and ensure that future developments pay their fair share for any infrastructure improvements demand necessary.

Public Facilities, Services, and Infrastructure Element

Goal PSFI-3 Ensure that all development in Palmdale is served by adequate water distribution and sewage facilities.

PFSI-3.12 Water and Wastewater BMPs. Utilize best management practices (BMPs) in the purveyance of water resources and management of wastewater.

PFSI-3.14 Water and Wastewater Provision. Ensure the provisions of adequate water and wastewater services to all new development.

Goal PSFI-5 Ensure that adequate public utilities are available to support development in an efficient and orderly manner.

PFSI-5.1 Development Priorities. Prioritize development in areas that have existing horizontal infrastructure (roads, sewer, water, drainage, etc.).

PFSI-5.3 Off-Site Fair Share Contribution. Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.

PFSI-5.7 Adjacent Development Integration. Require that individual development projects integrate with adjacent development with respect to backbone infrastructure (streets, sewer, water, and drainage). If adjacent property is undeveloped, a conceptual plan should be prepared to show that the pending development will allow for future integration and development of adjacent properties in a manner which is reasonable from a design, construction, and cost standpoint.

Goal PSFI-6 **Coordinate with utility providers to support adequate provision of critical utilities.**

PFSI-6.4 **Utility Construction Cost Minimization.** Coordinate installation of utility line placement with street construction to minimize cost, where possible.

PFSI-6.7 **Utility Safety.** When feasible, require new utility lines to be constructed away from fault lines, flood zones, fire zones, and other vulnerable areas.

5.16.3.2 Wastewater Environmental Setting

The Los Angeles County Sanitation District (LACSD) provides wastewater treatment and recycled water services within LACSD's service area. LACSD is a public agency consisting of 24 independent special districts serving approximately 5.5 million people in Los Angeles County. The service area covers approximately 850 square miles which encompasses 78 cities and unincorporated areas throughout the County treating about 400 million gallons per day. LACSD have a wastewater system that consists of 11 wastewater treatment facilities, 49 pump stations, over 1,400 miles of sewer lines, and two composting facilities.

The Project site is adjacent to the Antelope Valley Service Area of the Los Angeles County Sanitation District No. 14 (LACSD14), which services the Cities of Palmdale and Lancaster as well as surrounding unincorporated areas and operates the Lancaster Water Reclamation Plant (LWRP). The closest sewer main to the Project site operated by LACSD14 is located adjacent to the Project site, within 30th Street, as shown in Figure 3-13b, *Utility Improvements (Sewer)* in Section 3, *Project Description*. The LWRP serves approximately 160,000 people providing primary, secondary, and tertiary treatment with a design capacity of 18 million gallons of wastewater per day. The recycled water is then used for landscape irrigation and other municipal and industrial purposes in the City of Lancaster and surrounding areas.

In 2020, the LWRP collected and treated approximately 16,416 AFY of wastewater from the City of Lancaster, City of Palmdale, and Los Angeles County Public Works (Los Angeles County Waterworks, 2021). Thus, on average, LWRP treats approximately 14,656,775 million gallons per day or 44.98 AF per day while having a capacity to treat 18 million gallons per day.

5.16.3.3 Wastewater Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Utilities-3 Require or result in the construction of new wastewater facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects; or

Utilities-4 Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

5.16.3.4 Wastewater Service Methodology

The evaluation of wastewater infrastructure quantifies the amount of wastewater that would be generated from operation of the proposed Project and compares the demand to the existing and planned sewer infrastructure and wastewater treatment plants. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.16.3.5 Wastewater Environmental Impacts

IMPACT UTILITIES-3: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW WASTEWATER FACILITIES, OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. The proposed Project would construct two industrial warehouses of 1,500,856 SF each that would generate wastewater. The proposed Project does not currently have any sewer infrastructure onsite and is adjacent to the LACSD14 service area boundary. The Project would therefore include annexation into LACSD14 which maintains an existing 15-inch diameter sewer line in 30th Street East, adjacent to the Project site. The proposed Project would install 6-inch sewer laterals on the northerly side of each building and would connect to the proposed 10-inch sewer lines onsite that would then connect to the existing 15-inch diameter sewer line within 30th Street.

The construction activities related to the new onsite sewer system and connection to the existing 15-inch sewer main is included as part of the proposed Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, construction emissions for excavation and installation of the sewer infrastructure is included in Section 5.3, *Air Quality* and 5.7, *Greenhouse Gas Emissions*. Therefore, the proposed Project would not result in the construction of new sewer facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed sewer infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified within this EIR, such as agricultural resource impacts, operational VMT impacts, architectural coating and operational vehicle emissions impacts, and operational greenhouse gas impacts, are not related to the construction of the proposed sewer infrastructure. Thus, with construction related mitigation as detailed under other resource topic areas, impacts related to the proposed expansion and construction of new water facilities would be less than significant. No mitigation measures would be required.

IMPACT UTILITIES-4: THE PROJECT WOULD NOT RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER THAT WOULD SERVE THE PROJECT, THAT IT HAS INADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDERS EXISTING COMMITMENTS.

Less than Significant Impact. The LWRP provides wastewater treatment to the Project area via LACSD14. In 2020, the LWRP collected and treated approximately 16,416 AF of wastewater from the City of Lancaster, City of Palmdale, and Los Angeles County Public Works (Los Angeles County Waterworks, 2021). Thus, on average, LWRP treats approximately 14,656,775 gallons per day (44.98 AF per day) while having a capacity to treat 18 million gallons per day.

According to LACSD's wastewater generation rates, warehouse uses over 300,000 SF generate approximately 25 gpd per 1,000 SF and office uses generate approximately 200 gpd per 1,000 SF. Thus, the proposed Project would conservatively generate approximately 82,043 gallons of wastewater per day ($2,961,712 \text{ SF}/1,000 \text{ SF} \times 25 \text{ gpd} = 74,043 \text{ gpd} + 40,000 \text{ SF}/1,000 \text{ SF} \times 200 \text{ gpd} = 8,000 \text{ gpd}$) or 92 AFY.

Under existing conditions, the LWRP has an excess treatment capacity of approximately 3.3 million gallons per day. As such, implementation of the Project would utilize approximately 2.49 percent of LWRP's daily excess treatment capacity. Thus, the wastewater treatment plant has ample capacity, and the Project would not create the need for any new or expanded wastewater facility (such as conveyance lines, treatment

facilities, or lift stations) to serve the proposed Project. Therefore, impacts related to wastewater treatment capacity would be less than significant.

5.16.3.6 Wastewater Existing Regulations and Plans, Programs, or Policies

The following existing regulations would reduce potential impacts related to wastewater:

California Code of Regulations Title 24, Part 11; the California Green Building Code

5.16.3.7 Wastewater Project Design Features

None.

5.16.3.8 Wastewater Level of Significance Before Mitigation

Impacts Utilities-3 and Utilities-4 would be less than significant.

5.16.3.9 Wastewater Mitigation Measures

No mitigation measures are required.

5.16.3.10 Wastewater Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to wastewater infrastructure would occur.

5.16.4 STORMWATER DRAINAGE

5.16.4.1 Stormwater Drainage Regulatory Setting

Local Stormwater Drainage Regulatory Setting

Palmdale General Plan

The Palmdale General Plan includes the following goals, policies, and programs that are applicable to the Project:

Public Facilities, Services, and Infrastructure Element

Goal PSFI-3	Ensure that all development in Palmdale is served by adequate water distribution and sewage facilities.
PFSI-3.2	Local Drainage Detection Basins. Make use of interim local drainage detention basins to slow stormwater runoff until such time as permanent drainage facilities are constructed.
PFSI-3.3	Retention Facilities. Where feasible, plan for detention or retention facilities in areas where groundwater recharge can be accomplished.
PFSI-3.13	Low Impact Development. Require new development to minimize storm water runoff and pollutant exposure by incorporating low impact development (LID) measures and appropriate best management practices (BMPs) consistent with the National Pollution Discharge Elimination System (NPDES).

- PFSI-3.17 Adequate Systems.** Identify and correct issues within the City's sewer and storm drain systems to prevent system failures.
- Goal PSFI-5 Ensure that adequate public utilities are available to support development in an efficient and orderly manner.**
- PFSI-5.1 Development Priorities.** Prioritize development in areas that have existing horizontal infrastructure (roads, sewer, water, drainage, etc.).
- PFSI-5.2 On-site Infrastructure.** Require all new development, including major modifications to existing development, to construct required on-site infrastructure improvements pursuant to City standards.
- PFSI-5.3 Off-Site Fair Share Contribution.** Require all new development, including major modifications to existing development, to construct or provide a fair share contribution toward construction of required off-site improvements needed to support the project. This includes a fair share contribution toward development of regional master facility plans for roads, sewer, water, drainage, schools, libraries, parks, fire, and other community facilities, prior to granting approval of development applications.
- PFSI-5.5 Improvements Prior to Occupancy.** Require that on- and off-site improvements are constructed prior to occupancy of a new development project, or phase thereof, unless otherwise approved by the City.
- PFSI-5.7 Adjacent Development Integration.** Require that individual development projects integrate with adjacent development with respect to backbone infrastructure (streets, sewer, water, and drainage). If adjacent property is undeveloped, a conceptual plan should be prepared to show that the pending development will allow for future integration and development of adjacent properties in a manner which is reasonable from a design, construction, and cost standpoint.
- PFSI-6.4 Utility Construction Cost Minimization.** Coordinate installation of utility line placement with street construction to minimize cost, where possible.
- PFSI-6.7 Utility Safety.** When feasible, require new utility lines to be constructed away from fault lines, flood zones, fire zones, and other vulnerable areas.
- PFSI-6.8 Utility Easements.** Through the development review process, protect existing utility easements and require dedication of additional easements where needed.

5.16.4.2 Stormwater Drainage Environmental Setting

Topographically, the Project site is relatively flat with an elevation of 2,452 to 2,465 feet above mean sea-level. The existing site is undeveloped and currently a vacant lot with some vegetation. There are currently no nearby storm drain improvements. As described in the Preliminary Hydrology Report prepared for the Project site (Appendix I), a majority of the Project site is part of the Anaverde Watershed and is tabled to two unconstructed master plan storm drains, one of which is near the center of the Project site area, and the other one in 30th Street East along the Project frontage. Both unconstructed master plan lines would drain northerly to an existing drainage channel north of Avenue L and east of 30th Street East, in the City of Lancaster.

5.16.4.3 Stormwater Drainage Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Utilities-5 Require or result in the construction of new stormwater drainage facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects.

5.16.4.4 Stormwater Drainage Methodology

The evaluation of stormwater drainage infrastructure quantifies the amount of impervious surfaces and stormwater runoff that would be generated from the proposed Project and identifies if runoff from the Project would be accommodated by the existing stormwater drainage infrastructure. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.16.4.5 Stormwater Drainage Environmental Impacts

IMPACT UTILITIES-5: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF NEW DRAINAGE FACILITIES, OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. The Project would install new onsite storm drain lines throughout the site. Stormwater would be collected using a system of catch basins and storm drains that route flows to a detention basin adjacent to the Project's easterly or westerly property line. All stormwater runoff would then be conveyed to the proposed retention basin of approximately 11 acres at the north end of the Project site, which would be designed to meet the regional LID structural treatment control best management practices (BMPs). There is an absence of any nearby storm drain improvements thus the proposed basin would retain the entire storm runoff volume. As such, no offsite storm drain improvements are proposed for this Project. Curbs and gutters would also be installed around the perimeter of the Project site.

Impacts associated with the Project's proposed onsite stormwater drainage infrastructure are included as part of the construction of the Project and would not result in any physical environmental effects beyond those identified throughout this EIR. As such, there are no environmental impacts that would occur specifically related to the Project's proposed stormwater drainage infrastructure. Therefore, Project impacts due to stormwater drainage infrastructure would be less than significant.

5.16.4.6 Stormwater Existing Regulations and Plans, Programs, or Policies

None.

5.16.4.7 Stormwater Project Design Features

None.

5.16.4.8 Stormwater Level of Significance Before Mitigation

Impact Utilities-5 would be less than significant.

5.16.4.9 Stormwater Drainage Mitigation Measures

No mitigation measures are required.

5.16.4.10 Stormwater Drainage Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to drainage would occur.

5.16.5 SOLID WASTE

5.16.5.1 Solid Waste Regulatory Setting

State Solid Waste Regulatory Setting

California Assembly Bill 341

AB 341 established a State policy goal that no less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020, and requiring CalRecycle to provide a report to the Legislature that recommends strategies to achieve the policy goal.

California Green Building Standards

Section 5.408.1 Construction waste diversion. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste.

Section 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals, or meet a lawfully enacted local recycling ordinance, if more restrictive.

5.16.5.2 Solid Waste Environmental Setting

Solid waste generated by the Project would be disposed of at either the Antelope Valley Public Landfill or the Lancaster Landfill and Recycling Center. However, the Lancaster Landfill and Recycling Center is the closest landfill to the Project site, located approximately 9.9 roadway miles from the site in Lancaster. The Lancaster Landfill and Recycling Center has a current remaining capacity of 14,514,648 tons. The Lancaster Landfill and Recycling Center is permitted to accept 5,100 tons per day of solid waste and is permitted to operate through April 2044. In 2022, the average tonnage received was 405 tons per day (CalRecycle, 2022b).

5.16.5.3 Solid Waste Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

- | | |
|-------------|--|
| Utilities-6 | 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. |
| Utilities-7 | Comply with federal, state, and local management and reduction statutes and regulations related to solid waste. |

5.16.5.4 Solid Waste Methodology

Solid waste generation from construction and operation of the Project was estimated using a construction and operation waste generation factor from the Environmental Protection Agency (EPA) and CalEEMod version 2022.1.1, respectively. Solid waste volumes were then compared with recent estimates of remaining disposal capacity of the landfill serving the City. In addition, potential impacts related to compliance with

solid waste regulations were evaluated by identifying how the proposed Project would implement the relevant requirements.

5.16.5.5 Solid Waste Environmental Impacts

IMPACT UTILITIES-6: THE PROJECT WOULD NOT 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.

Less than Significant Impact.

The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the City are subject to the requirements set forth in the 2022 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the City's development Project permitting process.

As discussed above, solid waste generated by the Project would be disposed of at Lancaster Landfill and Recycling Center which is permitted to accept 5,100 tons per day of solid waste. In 2022, the average tonnage received was 405 tons per day (CalRecycle, 2022b). Thus, the facility has a remaining capacity of 4,695 tons per day.

Construction

The proposed Project does not involve demolition of existing structures; however, Project construction would generate solid waste from construction packing and discarded materials. Utilizing a construction waste factor of 3.89 pounds per square foot (EPA, 1998), construction of the proposed Project would generate approximately 6,081 tons of waste. The 2022 California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, construction activities would generate approximately 2,128 tons of solid waste to be disposed of at the landfill.

As described in Section 3, *Project Description*, construction activities would occur over an 11-month period. This equates to approximately 7.55 tons of debris per day (excluding landfill closure days). As discussed previously, solid waste generated by the Project would be disposed of at the Lancaster Landfill and Recycling Center which is permitted to accept 5,100 tons per day of solid waste. In 2022, the average tonnage received was 405 tons per day (CalRecycle, 2022b). Thus, the facility had a remaining capacity of 4,695 tons per day. Therefore, the Lancaster Landfill and Recycling Center would be able to accommodate the addition of 7.55 tons of debris per day during construction. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's additional tonnage of waste per day during construction. Impacts related to landfill capacity from construction would be less than significant.

Operation

The Project would include operation of approximately 3,001,712 SF of warehousing, inclusive of 40,000 SF of office uses. The *Air Quality, Health Risk, Greenhouse Gas and Energy Impact Report* prepared for the Project uses a default CalEEMod operational solid waste generation factor of 0.94 tons per 1,000 SF per year for industrial uses and 0.93 tons per 1,000 SF per year for general office uses (Appendix B). For a conservative analysis, the highest generation factor of 0.94 per 1,000 SF is assumed; thus, operation of the Project would generate approximately 2,822 tons of solid waste per year, at least 75 percent of which is

required by California law to be recycled, which would reduce the volume of landfilled solid waste to approximately 705 tons per year, or 13.6 tons per week.

As described above, the Lancaster Landfill and Recycling Center has a maximum daily throughput of 5,100 tons per day. As of 2022, the Lancaster Landfill had an average disposal of 405 tons per day and an average remaining capacity of 4,695 tons (CalRecycle, 2022b). The Project's estimated solid waste (705 tons per year, or approximately 13.6 tons per week), would represent approximately 15 percent of Lancaster Landfill and Recycling Center's daily remaining capacity. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would not impair the attainment of solid waste reduction goals. Impacts related to landfill capacity from operation would be less than significant.

IMPACT UTILITIES-7: THE PROJECT WOULD NOT COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE.

No Impact. The proposed Project would result in new development that would generate solid waste. All solid waste-generating activities within the County are subject to the requirements set forth in the California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of the proposed Project would be consistent with all State regulations, as ensured through the County's development permitting process. Therefore, the proposed Project would comply with all solid waste statute and regulations; and impacts would not occur.

5.16.5.6 Solid Waste Existing Regulations and Plans, Programs, or Policies

The following existing regulations would reduce potential impacts related to solid waste:

- Assembly Bill 347 (Chapter 476, Statutes of 2011)
- California Green Building Standards Code

5.16.5.7 Solid Waste Project Design Features

None.

5.16.5.8 Solid Waste Level of Significance Before Mitigation

Impacts Utilities-6 and Utilities-7 would be less than significant.

5.16.5.9 Solid Waste Mitigation Measures

No mitigation measures are required.

5.16.5.10 Solid Waste Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to solid waste would occur.

5.16.6 ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS

5.16.6.1 Electric Power, Natural Gas, and Telecommunications Regulatory Setting

Electric Power, Natural Gas, and Telecommunications State Regulatory Setting

Title 24 Energy Efficiency Standards and California Green Building Standards

California Code of Regulations (CCR) Title 24 Part 6: The California Energy Code (CALGreen) is updated every three years. The most recent update is the 2022 California Green Building Code Standards that became effective January 1, 2023. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards, among other requirements. The 2022 CALGreen standards that are applicable to the proposed Project include, but are not limited to, the following:

EV charging stations. New construction shall facilitate the future installation of EV supply equipment. The compliance requires empty raceways for future conduit and documentation that the electrical system has adequate capacity for the future load. The number of spaces to be provided is contained in Table 5.106.5.3.3 (5.106.5.3). Additionally, Table 5.106.5.4.1 specifies requirements for the installation of raceway conduit and panel power requirements for medium- and heavy-duty electric vehicle supply equipment for warehouses, grocery stores, and retail stores.

Electric Power, Natural Gas, and Telecommunications Local Regulatory Setting

Palmdale General Plan

The Palmdale General Plan includes the following goals, policies, and programs that are applicable to the Project:

Sustainability, Climate Action, and Resilience Element

Goal SCR-3 Green and decarbonized buildings for new construction and major renovations.

SCR-3.1 Energy Efficient New Construction. Integrate CALGreen Tier 1 and Tier 2 green building and energy efficiency standards into new construction and major remodels.

SCR-3.3 Solar and Storage. Require installation of photovoltaic panels and battery storage on all residential new construction and nonresidential new construction over 5,000 sq. ft.

5.16.6.2 Electric Power, Natural Gas, and Telecommunications Environmental Setting

Electricity

Electricity is provided to the Project area by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons within its 50,000 square mile service area. According to SCE's 2021 Power Content Label Mix, SCE derives electricity from varied energy resources including: fossil fuels, hydroelectric generators, nuclear power plants, geothermal power plants, solar power generation, and wind farms. SCE maintains power poles along 30th Street East and East Avenue M/Columbia Way, both of which are adjacent to the Project site.

Natural Gas

Natural gas is provided to the Project area by the Southern California Gas Company (SoCal Gas). The closest gas line is located in East Avenue M/Columbia Way, adjacent to the Project site.

Telecommunications

Telecommunications in the City of Palmdale and surrounding area are offered by a variety of companies. Further, the City of Palmdale has formed an agreement with WiFi Networks, a fiberoptic cable internet provider, to install an underground fiberoptic network within public and private streets of Palmdale. The applicant reached out to both Frontier Communications and AT&T. In response, Frontier Communications provided a will-serve letter confirming they have facilities to service the Project. Frontier Communications maintains aerial lines on East Avenue M/Columbia Way.

5.16.6.3 Electric Power, Natural Gas, and Telecommunications Thresholds of Significance

Appendix G of State CEQA Guidelines indicates that a project could have a significant effect if it were to:

Utilities-8 Require or result in the relocation or construction of a new or expanded electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects.

5.16.6.4 Electric Power, Natural Gas, and Telecommunications Methodology

The evaluation of utilities identifies if utility demand from the Project would be accommodated via existing utility infrastructure available to the proposed Project. The evaluation identifies if expansions would be required to serve the proposed development, and if those expansions have the potential to result in an environmental impact.

5.16.6.5 Electric Power, Natural Gas, and Telecommunications Environmental Impacts

IMPACT UTILITIES-8: THE PROJECT WOULD NOT REQUIRE OR RESULT IN THE RELOCATION OR CONSTRUCTION OF A NEW OR EXPANDED ELECTRIC POWER, NATURAL GAS, OR TELECOMMUNICATIONS FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS.

Less than Significant Impact. Implementation of the proposed Project would generate demand for electricity, communication systems, street lighting, and maintenance of public facilities.

Electricity would be provided to the Project by Southern California Edison (SCE). Adequate commercial electricity supplies are presently available to meet the incremental increase in demand attributed to the Project. Provision of electricity to the Project site is not anticipated to require or result in the construction of new facilities or the expansion of existing facilities, the construction or relocation of which would cause significant environmental impacts to electricity. Impacts would be less than significant. Pursuant to the existing California Green Energy Code requirements, the Project would include installation of solar panels based on square footage of air-conditioned space and the roof would be 15 percent solar ready.

The Project would connect to the existing 6-inch natural gas line in East Avenue M/Columbia Way and natural gas would be provided by Southern California Gas. As such, the proposed Project is not anticipated

to require or result in the construction of new gas facilities or the expansion of existing facilities. Impacts would be less than significant.

Communication systems for the Project would be provided by Frontier Communications. Frontier Communications is a private company that provides connection to the communication system on an as-needed basis. As such, the proposed Project is not anticipated to require or result in the construction of new communications facilities or the expansion of existing facilities. Impacts would be less than significant.

The Project Applicant would be responsible for coordinating with each utility company to ensure utility improvements occur according to standard construction and operation procedures administered by the California Public Utilities Commission. Each of the dry utility systems is available along East Avenue M/Columbia Way, and excavation would be required to underground these lines and interconnect to the Project site, which would be done as part of roadway, driveway, and sidewalk improvements that are included in the proposed Project. Impacts associated with installation of utility infrastructure and connection to existing infrastructure have been addressed throughout this Draft EIR as part of evaluation of construction of the proposed Project and have been mitigated to a less-than-significant level, as similarly detailed in the Impact Utilities-1 discussion, previously. Therefore, potential impacts associated with utilities, including electricity, natural gas and communication systems would be less than significant.

5.16.6.6 Electric Power, Natural Gas, and Telecommunications Existing Regulations and Plans, Programs, or Policies

Existing Regulations

California Code of Regulations Title 24, Part 11; the California Green Building Code

Plans, Programs, or Policies (PPPs)

None.

5.16.6.7 Electric Power, Natural Gas, and Telecommunications Project Design Features

None.

5.16.6.8 Electric Power, Natural Gas, and Telecommunications Level of Significance Before Mitigation

Impact Utilities-8 would be less than significant.

5.16.6.9 Electric Power, Natural Gas, and Telecommunications Mitigation Measures

No mitigation measures are required.

5.16.6.10 Electric Power, Natural Gas, and Telecommunications Level of Significance After Mitigation

No significant and unavoidable adverse impacts related to electric power, natural gas, or telecommunications would occur.

5.16.7 CUMULATIVE IMPACTS

Water

Cumulative water supply impacts are considered on a water purveyor basis and are associated with the capacity of the infrastructure system and the adequacy of the water purveyor's infrastructure and primary sources of water that include groundwater, surface water, and purchased or imported water. Potential impacts related to water supply and infrastructure are based on the projections contained within LACWD40's 2020 UWMP.

As discussed above, the Project would result in an increase in water demand of 110.93 AFY. It is anticipated that existing and future water entitlements from groundwater, surface water, and purchased or imported water sources, plus recycling and conservation, would be sufficient to meet the Project's demand, in addition to forecast demand for LACWD40's entire service area. As a result, the Project would not result in a cumulatively considerable increase in water supply demands that would require increased need for water supplies that could be cumulatively considerable. Thus, impacts related to water demand and supply would be less than cumulatively significant.

The construction activities related to the new water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, analysis of construction emissions for excavation and installation of the water infrastructure and related mitigation measures are included in Sections 5.3, *Air Quality* and 5.7, *Greenhouse Gas Emissions*. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed water infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified within this EIR, such as agricultural resource impacts, operational VMT impacts, architectural coating and operational vehicle emissions impacts, and operational greenhouse gas impacts, are not related to the construction of the proposed water infrastructure. Thus, potential cumulative impacts from offsite water system expansions would be less than significant.

Wastewater

Cumulative wastewater infrastructure impacts are considered on a systemwide basis and are associated with the overall capacity of existing and planned infrastructure and based on County growth projections that are utilized by LACSD for facilities planning. The cumulative system evaluated includes the sewer system that serves the Project site and conveys wastewater to the LWRP.

As described previously, with the proposed Project, the sewer system and wastewater treatment plant would have sufficient capacity to handle the increased flows resulting from implementation of the proposed Project. The continued regular assessment and maintenance of the existing sewer system by LACSD14 would reduce the potential of cumulative development projects to result in a cumulatively substantial increase in wastewater such that new or expanded facilities would be required. Thus, increases in wastewater in the sewer system would result in a less than significant cumulative impact.

Stormwater

The geographic scope for cumulative impacts related to stormwater drainage includes the geographic area served by the existing stormwater infrastructure for the Project area, from capture of runoff through final discharge points. As described above the proposed Project includes installation of a new onsite storm drain system that would capture and retain stormwater from the site. There are no nearby storm drains and stormwater from the site would not discharge offsite that could become cumulatively considerable.

Additionally, no offsite storm drain improvements are proposed for this Project that could be cumulatively significant.

The existing State and regional regulations require development projects to maintain pre-project hydrology, thus no net increase of offsite stormwater flows would occur. RWQCB permit conditions require a hydrology/drainage study to demonstrate that all runoff would be appropriately conveyed and not leave the project sites at rates exceeding pre-project conditions, prior to receipt of necessary permits. As a result, increases of runoff from cumulative projects that could cumulatively combine to impact stormwater drainage capacity would not occur, and cumulative impacts related to drainage infrastructure would be less than significant.

Solid Waste

The geographic scope of cumulative analysis for landfill capacity is the service area for the Lancaster Landfill and Recycling Center which serves the Project area. The projections of future landfill capacity based on the entire projected waste stream going to these landfills is used for cumulative impact analysis. The Lancaster Landfill and Recycling Center has a maximum permitted capacity of 5,100 tons per day and as of 2022 had an average disposal of 405 tons per day (CalRecycle, 2022b). Thus, the facility had an additional capacity of 4,695 tons per day. The 13.6 tons of solid waste per week from operation of the Project would represent approximately 15 percent of Lancaster Landfill and Recycling Center's daily remaining capacity. Therefore, the landfill would have sufficient capacity to serve the Project and the increase in solid waste from full buildout of the Project. Cumulative impacts would be less than significant.

Electric Power, Natural Gas, and Telecommunications

Cumulative dry utilities assessment considers development of the Project in combination with the other development projects within the vicinity of the Project area, as listed in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR. Cumulative impacts related to the provision of facilities for electricity, natural gas, and communications systems have been evaluated throughout this Draft EIR, primarily associated with the emissions resulting from construction. In addition, existing dry utility lines are present along East Avenue M/Columbia Way, and the Project would connect to existing infrastructure and cumulative impacts related to needs for new utilities that could result in an environmental impact would be less than significant.

5.16.8 REFERENCES

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6. Other CEQA Considerations

6.1 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(c) requires an EIR to describe “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.” As described in detail in Section 5.0, *Environmental Impact Analysis*, of this Draft EIR, implementation of the Project would result in environmental impacts that cannot be reduced to a level below significance after implementation of Project design features; regulatory requirements; plans, programs, policies; and feasible mitigation measures. The significant impacts that cannot be mitigated to a level below significance are summarized below.

6.1.1 Agriculture and Forest Resources

Impact Agriculture-1: Conversion of prime farmland, unique farmland, or farmland of statewide importance.

The Project site contains approximately 162.5 acres of Prime Farmland. The entirety of the Project site, except for offsite roadways, was previously utilized for farming and consists of Prime Farmland as designated by the FMMP. Although the Project is consistent with the General Plan land use and zoning designations, the Project would convert the 162.5 acres of designated Prime Farmland to light industrial warehouse uses with roadway improvements and result in reduction of the overall acreage of Prime Farmland within the City. There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland and loss of farmland. As such, Impact Agriculture-1 would be significant and unavoidable.

Impact Agriculture-5: Changes to the environment that could result in the conversion of farmland to non-agricultural use.

As described previously, the Project site was historically used as farmland and consists of Prime Farmland. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural uses. There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland and loss of farmland. As such, Impact Agriculture-5 would be significant and unavoidable.

6.1.2 Air Quality

Impact Air Quality-2: Cumulatively considerable net increase to any criteria pollutant.

As detailed in Section 5.3, *Air Quality*, the maximum daily construction emissions for VOC would exceed the significance criteria. However, with implementation of Mitigation Measure AQ-1, which requires the use of super compliant low VOC paints, VOC emissions from Project construction would be below the AVAQMD significance thresholds.

The daily operational emissions of CO, NO_x, and PM₁₀ and annual emissions of NO_x and PM₁₀ would exceed the significance criteria and mitigation would be required. A majority of the Project's operational emissions are derived from vehicle and truck trips. The Project would implement Mitigation Measures AQ-2 through AQ-12 to reduce the operational emissions; however, these measures would not be sufficient enough to reduce the NO_x, CO, and PM₁₀ emissions below the daily thresholds or NO_x and PM₁₀ below the annual thresholds. Neither the Project applicant nor the City have regulatory authority to control tailpipe emissions. Thus, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-

significant. Therefore, operation of the Project would result in NO_x, CO, and PM₁₀ emissions that would be significant and unavoidable and also cumulatively considerable.

6.1.3 Greenhouse Gas Emissions

Impact Greenhouse Gas Emissions-1: Generation of greenhouse gas emissions.

The proposed Project's total unmitigated increase in GHG emissions would be 36,997 MTCO_{2e} annually, which exceeds the 3,000 MTCO_{2e} screening threshold. Implementation of Mitigation Measures AQ-4, AQ-7, AQ-10, AQ-11, and GHG-1 through GHG-3 would reduce GHG emissions to approximately 36,395 MTCO_{2e}. The majority of the proposed Project's GHG emissions are generated by mobile emissions. Further mitigation to reduce the proposed Project's mobile GHG emissions is not feasible due to the limited ability of the Project Applicant and City of Palmdale to reduce emissions from mobile sources. Neither the Project Applicant nor the Lead Agency (City of Palmdale) can substantively or materially affect reductions in proposed Project mobile-source emissions. Therefore, GHG emissions from the proposed Project would be significant and unavoidable and also cumulatively considerable.

6.1.4 Transportation

Impact Transportation-2: Conflict or inconsistency with CEQA Guidelines § 15064.3, Subdivision (B).

The proposed Project would have a significant impact on employment VMT per employee when compared to both the baseline and cumulative thresholds. The projected VMT per employee for the Project would be 18.2 in 2023 and 18.4 in 2045, which is 15.19 percent above the baseline threshold and 16.46 percent above the cumulative threshold. Therefore, the Project would result in a significant project level and cumulative impact to VMT. With compliance with existing rules and implementation of CAPCOA measures T-7 and T-8 that are included as Mitigation Measures T-1 and T-2, the Project VMT would be reduced by 7.84 percent. Despite this reduction, the Project VMT would continue to exceed both the baseline and cumulative thresholds. Therefore, the Project VMT impact would be significant and unavoidable.

6.2 GROWTH INDUCEMENT

State CEQA Guidelines Section 15126.2(e), *Growth Inducing Impact of the Proposed Project*, requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." The CEQA Guidelines also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment. In general terms, a project may foster spatial, economic, or population growth in a geographic area, if it meets any one of the following criteria:

1. Directly or indirectly foster economic or population growth, or the construction of additional housing, in the surrounding environment;
2. Remove obstacles to population growth;
3. Require the construction of new or expanded facilities that could cause significant environmental effects; or
4. Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

1. Does the Project directly or indirectly foster economic or population growth or the construction of additional housing?

Growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in master plans, land use plans, or in projections made by regional

planning agencies, such as SCAG. The Project would contribute to the economic growth and could contribute to population growth in the City of Palmdale and the surrounding areas through the generation of jobs. As described in Section 5.12, *Population and Housing*, the proposed Project does not involve construction of any new residential uses and would not contribute to a direct increase in the City's population. However, the proposed Project may indirectly contribute to population growth within the City by creating jobs both during construction and operation. The Project would require the need for approximately 1,977 employees, according to employment generation rates from the Southern California Association of Governments (SCAG) which estimate operation of industrial warehouse uses require one employee for every 1,518 SF of warehouse space.

According to regional population projections included in SCAG's 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the City of Palmdale is projected to increase its employment in the City by 25 percent between 2016 and 2045 and the County of Los Angeles is anticipated to increase employment in the County by 20 percent. SCAG regional growth forecasts are based upon, among other things, land uses designated in land use plans. As such, a project that is consistent with the land use designated in a General or Specific Plan would be consistent with SCAG's growth projections. The proposed Project is consistent with the site's existing land use and zoning designations therefore the projected increases in employment resulting from the Project are within SCAG's 2020 RTP/SCS projected increases. Thus, Project-related growth would not be unexpected or constitute substantial unplanned growth.

The proposed Project may cause an indirect economic growth as it would generate revenue to the City through taxes generated by the development. Additionally, employees (short-term construction and long-term operational employees) from the Project site would purchase goods and services in the region, but any secondary increase in employment growth associated with meeting these incremental demands would be marginal, as these goods and services could be accommodated by existing providers. The Project is highly unlikely to result in any new or additional physical impacts to the environment based on the amount of existing and planned future commercial and retail services, which can serve Project employees, available in areas near the Project site.

In addition, the proposed Project would create jobs, a majority of which would likely be filled by residents of Palmdale, Lancaster, and the surrounding Los Angeles County areas. Employees would live in housing either already built or are planned for development in Palmdale, Lancaster, and the surrounding Los Angeles County areas. Because it is anticipated that most of the future employees from implementation of the Project would already be living in the region, the Project's introduction of employment opportunities would not induce substantial growth in the area and cause the need for additional housing.

However, should the proposed Project require employees to relocate to the area for work, there is sufficient vacant housing available within the region. Within the City of Palmdale, there are 50,094 housing units, 2.7 percent of which are vacant (California Department of Finance, 2023). Thus, the Project would not result in the influx of new labor to serve the increased economic activities that would result from implementation of the Project.

2. Does the Project remove obstacles to population growth?

The elimination of a physical obstacle to growth is considered to be a growth inducing impact. A physical obstacle to growth typically involves the lack of public service infrastructure. The Project would induce growth if it would provide public services or infrastructure with excess capacity to serve lands that would otherwise not be developable.

As described in Section 3, *Project Description*, the Project would include approximately 17.65 acres of roadway improvements. The Project would construct two new roadways adjacent to the Project site: 35th Street East, which would be adjacent to the eastern boundary of the Project site, and Avenue L-8, which

would be adjacent to northern boundary of the Project site. The Project would also make improvements to turn lanes and traffic signals, as discussed in Section 3, *Project Description*. The proposed roadway improvements would accommodate the safe passage and turning movements of the vehicles that would access the Project site. The Project does not propose roadway extensions into new undeveloped areas that would allow for additional growth and development.

In addition, the Project would install a 24-inch water line for approximately 13,400 linear feet west of the Project site within the East Avenue M/Columbia Way right-of-way to accommodate the demands of the Project. The water line would connect to the existing water main in East Avenue M/Columbia Way at 5th Street East. The proposed 24-inch watermain extension would then continue from 4th Street West to 4th Street East for an additional 4,000 linear feet. In total, the water line extension would be approximately 17,400 linear feet in length. The proposed water lines are shown in Figure 3-13a, *Utility Improvements (Water)*.

The proposed water line has been sized to accommodate demands of the proposed Project and would not expand water services into unplanned areas. The proposed infrastructure improvements have been designed to serve only the demands of the Project. Therefore, the Project would not result in significant growth inducing impacts.

3. Does the proposed Project require the construction of new or expanded facilities that could cause significant environmental effects?

Growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services that requires the construction of new public service facilities, or if it can be demonstrated that the potential growth significantly affects the environment in some other way. The proposed Project would slightly increase the demand for fire protection and emergency response and police protection. However, as described in Section 5.13, *Public Services*, the proposed Project would not require development of additional facilities or expansion of existing facilities to maintain existing levels of service for public services. Based on service ratios and build out projections, the proposed Project would not create a demand for services beyond the capacity of existing facilities.

The Project would include the extension of the proposed offsite 24-inch water line 17,400 linear feet west within the East Avenue M/Columbia Way right-of-way, however, as described in Section 5.16, *Utilities*, LACWD40's existing and future water supply would be sufficient to meet the proposed Project's demand of 110.93 AFY. Additionally, the construction activities related to the new water infrastructure that would be needed to serve the proposed Project is included as part of the Project and would not result in any physical environmental effects beyond those identified throughout this Draft EIR. For example, analysis of construction emissions for excavation and installation of the water infrastructure and related mitigation measures are included in Sections 5.3, *Air Quality*, and 5.7, *Greenhouse Gas Emissions*. As the Project would be required to implement mitigation measures related to construction activities, including those required for installation of the proposed water infrastructure, impacts would be less than significant. Further, the significant and unavoidable impacts that are identified within this EIR, such as agricultural resource impacts, operational VMT impacts, architectural coating and operational vehicle emissions impacts, and operational greenhouse gas impacts, are not related to the construction of the proposed water infrastructure.

Therefore, an indirect growth inducing impact as a result of expanded or new public facilities that could support other development in addition to the proposed Project would not occur. The proposed Project would not have significant growth inducing consequences that would require the need to expand public services to maintain desired levels of service.

4. Does the Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

The City of Palmdale is in the process of transitioning from its historical use of agricultural uses to more dense industrial uses and other urbanized uses as planned in the City of Palmdale General Plan and through the construction of multiple industrial and commercial developments, residential developments and other types of development. Development of the Project site may place further development pressure on areas within the vicinity of the Project site which are currently undeveloped. However, the site has been planned for urban uses by the General Plan. Also, areas directly south of the Project site consist of airport-related uses. Areas to the west include a solar farm. Areas to the east are predominantly undeveloped. Areas to the north of the site are also undeveloped but will include a future vehicle storage facility. Areas surrounding the Project site are planned for growth by the City of Palmdale General Plan and are designated as HI. Further, the proposed infrastructure is only sized to serve the Project and would not have capacity to serve additional development projects in the area. The Project would not individually or cumulatively encourage or facilitate substantial growth.

Based on the foregoing analysis, the Project would not directly or indirectly result in substantial, adverse growth-inducing impacts.

6.3 SIGNIFICANT IRREVERSIBLE EFFECTS

State CEQA Guidelines require the EIR to consider whether “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.... Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.” (CEQA Guidelines Section 15126.2(d)). “Nonrenewable resource” refers to the physical features of the natural environment, such as land, waterways, mineral resources, etc. These irreversible environmental changes may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed irretrievable commitments of nonrenewable resources is not justified (e.g., the project involves the wasteful use of energy).

The Project would result in or contribute to the following irreversible environmental changes:

- Lands in the Project site would be committed to warehousing and industrial uses once the proposed buildings are constructed. Secondary effects associated with this irreversible commitment of land resources include:
 - Changes in views associated with construction of the new buildings and associated development (see Section 5.1, *Aesthetics*)
 - Increased traffic on area roadways (see Section 5.14, *Transportation*).
 - Emissions of air pollutants and greenhouse gas emissions associated with Project construction and operation (see Section 5.3, *Air Quality*, and Section 5.7, *Greenhouse Gas Emissions*).

- Consumption of non-renewable energy associated with construction and operation of the proposed Project due to the use of automobiles, trucks, lighting, heating, and cooling systems, appliances, etc. (see Section 5.5, *Energy*).
- Increased ambient noise associated with an increase in activities and traffic from the Project (see Section 5.11, *Noise*).
- Construction of the proposed Project as described in Section 3, *Project Description*, would require the use of energy produced from non-renewable resources and construction materials.

In regard to energy usage from the proposed Project, as demonstrated in the analysis contained in Section 5.5, *Energy*, the proposed Project would not involve wasteful or unjustifiable use of non-renewable resources, and conservation efforts would be enforced during construction and operation of proposed development. The proposed development would incorporate energy-generating and conserving Project design features, including those required by the California Building Code, California Energy Code Title 24, which specify green building standards for new developments. In addition, as listed in Section 5.7, *Greenhouse Gas Emissions*, the proposed Project would include sustainability features in line with Title 24 requirements that result in additional energy-efficiency. Project specific information related to energy consumption is provided in Section 5.5, *Energy*, of this EIR.

6.4 REFERENCES

- California Department of Finance. (2023). *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2021-2023, with 2020 Benchmark*.
<https://dof.ca.gov/forecasting/demographics/estimates/>
- SCAG (Southern California Association of Governments). (2001, October 31). *Employment Density Study Summary Report*.
<https://www.mwcog.org/file.aspx?A=QTTITR24POOOUIw5mPNzK8F4d8djdJe4LF9Exj6IXOU%3D>
- SCAG (Southern California Association of Governments). (2019). *2019 Local Profile for Palmdale*.
Accessed: <https://scag.ca.gov/data-tools-local-profiles>
- SCAG (Southern California Association of Governments). (2020). *2020-2045 Regional Transportation Plan/ Sustainable Communities Strategy*. <https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx>

7. Effects Found Not Significant

CEQA Guidelines Section 15126.2(a) states that “[a]n EIR shall identify and focus on the significant effects on the environment.” During the preparation of this EIR, the Project was determined to have no potential to result in significant impacts under thresholds for the 10 environmental issue areas described below (Appendix A). Therefore, these topics were not required to be analyzed in detail in Section 5, *Environmental Impact Analysis*, of this Draft EIR.

CEQA Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. As allowed by CEQA Guidelines Section 15128, statements related to each topic area are presented below.

7.1 AESTHETICS

Scenic Highway

According to the California Department of Transportation (Caltrans) Scenic Highway Map, the Project site is not located within a state scenic highway corridor. The closest scenic highway is Route 2, located approximately 40 miles away (California Department of Transportation, 2023). Thus, there are no officially designated State scenic highways adjacent to the Project site. Therefore, the Project would not result in any impacts to scenic resource within a state scenic highway.

7.2 AGRICULTURE AND FOREST RESOURCES

Williamson Act Contract

The Project site is currently zoned as Heavy Industrial (HI), which allows for agricultural support, sales, services, and storage and horticultural production. However, the HI zone also allows for light manufacturing and processing, heavy manufacturing and processing, and warehousing and distribution. The Project site is not currently under a Williamson Act contract thus development of the Project would not conflict with a Williamson Act contract. As a result, the Project would not impact existing zoning for agricultural use or a Williamson Act contract.

Forest Land/Timberland and Forest Land Zoning

The Project site is currently vacant and undeveloped. There are no forest lands or resources in proximity to the Project site. Additionally, the Project site is designated Industrial (IND) and zoned as Heavy Industrial (HI) in the City of Palmdale General Plan and is therefore not zoned to support forest land, timberland, or Timberland Production Zone (TPZ). Therefore, the proposed Project would not result in impacts to forest land, timberland, or timberland production zones and would not impact the conversion of forest land to non-forest use.

7.3 BIOLOGICAL RESOURCES

Riparian Habitat

As described in the Biological Resources Assessment, included as Appendix C, the Project site does not contain or support any streams, drainages or riparian habitats (Appendix C). Thus, no impacts related to riparian

habitat or other sensitive natural communities identified in local or regional plans would result from Project implementation.

Wetlands

As described in the General Biological Resources Assessment, the Project site does not contain or is adjacent to natural wetlands (Appendix C). Therefore, the Project would not result in impacts to wetlands.

Conflict with Biological Resource Policies

The Project would be required to comply with the Joshua Tree and Native Desert Vegetation Preservation Standards and Mitigation Fees as listed in Section 14.04 of the City Municipal Code. However, as described in the General Biological Assessment, included as Appendix C of this DEIR, the Project site is densely vegetated with weedy and non-native plant species; therefore, the Project would not be subject to the City of Palmdale's tree preservation policy. Implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources therefore the Project would have no impact on local tree policies.

Conservation Plan

The Project is located within the California Desert Conservation Area Plan planning area, which includes the West Mojave Plan and is administered by the Bureau of Land Management (BLM) (City of Palmdale, 2022). The West Mojave Plan spans 9.4 million acres, including most of Palmdale, and is dedicated to conserving numerous plants, animals, and natural communities across the Mojave. The Project would not conflict with the conservation criteria associated with the California Desert Conservation Area Plan because the plan is applicable to the management of public lands. As the project site is privately owned, the plan would not apply. As such, the Project would result in no impact on an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

7.4 CULTURAL RESOURCES

Historical Resources

The Project site is currently vacant and undeveloped. The Phase I Cultural Resources Assessment completed for the Project, included as Appendix D, determined that no historic structures or homesteads have ever existed within the Project boundaries. Therefore, the Project site would result in no impact to historical resources.

Archaeological Resources

The Project site is currently undeveloped and vacant. Project construction would require excavation at depths of approximately seven feet. As part of the Phase I Cultural Resources Assessment, an archaeological records search for the Project site and surrounding area was conducted through the South Central Coastal Informational Center at California State University Fullerton on December 21, 2021. The records search indicated that 21 previous studies have been conducted within a mile of the Project site and 32 resources have been identified within one mile of the Project site; however, no resources have been recorded within the boundaries of the Project site or immediately adjacent. Additionally, a field survey of the Project site was conducted on December 22 and 23, 2021, in which no cultural resources were identified within the Project site (Appendix D). Based upon the results of the cultural resources study and field survey, the potential to encounter unknown archeological resources was determined to be minimal. Therefore, the Project would result in less than significant impacts to archaeological resources.

Human Remains

The Project site has not been previously disturbed and has not been previously used as a cemetery. It is not anticipated that implementation of the proposed Project would result in the disturbance of human remains. Existing regulation under the California Health and Safety Code, included as PPP CUL-1, outlines the procedures to undertake if human remains are found on the Project site. In the event of inadvertent discovery of human remains during Project construction, the State Health and Safety Code Section 7050.5 states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. Compliance with existing regulations would ensure impacts related to potential disturbance of human remains would be less than significant.

Plans, Policies, and Programs

PPP CUL-1: Human Remains. Should human remains be discovered during Project construction, the Project will be required to comply with State Health and Safety Code Section 7050.5, which states that no further disturbance may occur in the vicinity of the body until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine the identity of and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD must complete the inspection within 48 hours of notification by the NAHC.

7.5 GEOLOGY AND SOILS

Fault Rupture

A preliminary Geotechnical Investigation was conducted by Southern California Geotechnical (SCG) in January 2022 for the Project site, included in Appendix A. As described in the Geotechnical Investigation, the Project site is within a seismically active zone (Southern California Geotechnical, 2022). Because the Project site is in a seismically active region of Southern California, occasional seismic ground shaking is likely to occur within the lifetime of the proposed Project. However, according to the California Department of Conservation, the California Geologic Survey, the Project site is not within an Alquist-Priolo Earthquake Fault Zone. The closest active fault zone is the Little Rock Fault in the San Andreas Fault Zone, which is located approximately 6.5 miles southwest of the site. Therefore, the Project would result in less than significant impacts on exposure of people or structures to risk of loss, injury, or death involving rupture of an earthquake fault on a state-designated Alquist-Priolo Earthquake Fault Zone.

Ground Shaking

As mentioned previously, the Project site is located within a seismically active region of Southern California. The closest active fault is the Little Rock Fault located approximately 6.5 miles southwest of the site. Thus, strong seismic ground shaking has a high likelihood of occurring at the site. Greater movement can be expected at sites located closer to an earthquake epicenter, which consist of poorly consolidated material such as alluvium, and in response to an earthquake of great magnitude. Structures built in the city are required to be built in compliance with California Code of Regulations, Title 24, Part 2, California Building Code (CBC), included in the PMC Chapter 8.04.201. Compliance with the CBC would ensure earthquake safety based on factors including occupancy type, the types of soils onsite, and the probable strength of the ground motion. Therefore, with CBC compliance, the proposed Project would not expose people or structures

to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking more than other developments in Southern California and impacts would be less than significant.

Liquefaction

The Geotechnical Investigation for the Project site, included in Appendix A, determined that groundwater underlying the site is at a depth of greater than 300 feet (Southern California Geotechnical, 2022). Furthermore, according to the City of Palmdale General Plan Safety Element Figure 13.2, *Palmdale Liquefaction Risk*, the Project site is not located in an area mapped as a seismic hazard liquefaction zone. Therefore, the soils underlying the Project site would not be considered at risk for liquefaction. Additionally, all structures built in the City are required to be developed in compliance with the CBC (California Code of Regulations, Title 24, Part 2) adopted under PMC Chapter 8.04.201. The Project will defer to the most recent building code, the 2022 CBC, (effective January 1, 2023) to comply with State law. Compliance with the CBC is included as a condition of approval and verified by the City's review process which would ensure that impacts related to liquefaction would be less than significant.

Landslides

Landslides are the downhill movement of masses of earth and rock and are often associated with earthquakes; but other factors, such as the slope, moisture content of the soil, composition of the subsurface geology, heavy rains, and improper grading can influence the occurrence of landslides. The elevation of the Project site ranges between 2,452 feet above mean sea-level to 2,465 feet above mean sea-level (Appendix D). The Project site and the adjacent parcels are flat and do not contain any hills or steep slopes, and no landslides on or adjacent to the Project site would occur. Therefore, the Project would have no impact on landslides.

Soil Erosion

The Project would involve earthmoving activities that would disturb soil and leave exposed soil on the ground surface. As such, the Project would be required to comply with the City's grading standards and erosion control measures, included in PMC Section 8.04.265. To comply, all graded areas must be protected from erosion through slope stabilization methods such as erosion-control blankets, soil stabilizers or other means as approved by the City.

The proposed Project would also be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including implementation of a Stormwater Pollution Prevention Plan (SWPPP) and associated Best Management Practices (BMPs) which would be implemented by PPP HYD-1. BMPs may include a combination of mitigative construction methods to reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Additionally, the Construction General Permit issued by the State Water Resources Control Board (SWRCB), regulates construction activities to minimize water pollution, including sediment.

Additionally, the Project includes installation of landscaping adjacent to the warehouse buildings and throughout the proposed parking areas. With the proposed landscaping, areas of loose topsoil that could erode by wind or water would not exist upon operation of the proposed Project. In addition, implementation of PPP HYD-2 requiring demonstration of compliance with the Drainage Management Plan of the City of Palmdale would ensure that RWQCB requirements and appropriate operational BMPs would be implemented to minimize or eliminate the potential for soil erosion or loss of topsoil to occur. With compliance of City Municipal Code stormwater management requirements, Regional Water Quality Control Board

(RWQCB) SWPPP requirements, and installation of BMPs ensured by PPP HYD-1 and PPP HYD-2, construction impacts related to substantial erosion and loss of topsoil would be less than significant.

Result in On- or Offsite Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse

As described above, landslides would not occur from implementation of the Project. Therefore, impacts related to landslides or rock falls would not occur from implementation of the Project.

As described previously, the Project site is relatively flat and constrained laterally, earthquake-induced lateral spreading and liquefaction would likely not occur on the site.

As described previously, the depth of groundwater underlying the site was found to be at a depth of greater than 300 feet (Southern California Geotechnical, 2022). The Project would not pump water from the Project area; however, slight subsidence is anticipated as a result of soil excavation and compaction. As described previously, the proposed Project would be required to comply with the City's grading standards and erosion control measures, included in Municipal Code Section 8.04.265. Thus, impacts related to subsidence would be less than significant.

Additionally, compliance with the requirements of the CBC and related recommendations in the Geotechnical Investigation related to compaction of soils and development of foundations is required as part of the building plan check and development permitting process, and would reduce potential impacts related to lateral spreading, liquefaction, subsidence, and ground collapse to a less than significant level.

Expansive Soils

The Geotechnical Investigation, included in Appendix A, found that the near-surface soils of the Project site consist of silty sands, sandy silts and fine sands with occasional thin layers of clayey sands, sandy clays and clayey silts. Based on preliminary field investigation and laboratory testing, onsite soils possess a "very low" to "low" expansion potential (expansion index of 5 and 35) (Southern California Geotechnical, 2022). In addition, as described previously, compliance with the CBC would require specific engineering design recommendations be incorporated into grading plans and building specifications as a condition of construction permit approval to ensure that Project structures would withstand the effects of related to ground movement, including expansive soils. Therefore, impacts would be less than significant.

Alternative Waste Disposal Systems

The proposed Project would develop new onsite sewer infrastructure that would connect to existing sewer infrastructure and would not use septic tanks or alternative methods for disposal of wastewater into subsurface soils. Therefore, impacts related to septic tanks or alternative wastewater disposal methods would not occur.

Plans, Policies, and Programs

PPP HYD-1: NPDES/SWPPP. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the NPDES (National Pollutant Discharge Elimination System) requirement to obtain a construction permit from the State Water Resource Control Board (SWRCB). The permit requirement applies to grading and construction sites of one acre or larger. The Project applicant/proponent shall comply by submitting a Notice of Intent (NOI) and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) and a monitoring program and reporting plan for the construction site.

PPP HYD-2: Phase II Small MS4 General Permit. Prior to issuance of any grading permits, the applicant shall provide the City Building and Safety Department evidence of compliance with the Drainage Management Plan (DMP) of the City of Palmdale which establishes the hydrologic and hydraulic requirements for development within the City limits in accordance with revised procedures developed by the County of Los Angeles Department of Public Works and adopted by the City of Palmdale. It is the policy of the City of Palmdale that each development consisting of five acres or greater in size shall attenuate on-site storm runoff as required by drainage law and shall prepare hydrology and hydraulic studies in accordance with the DMP. Each development is required by City Ordinance to attenuate post-developed flows to 85 percent of pre-developed flows through the installation of an onsite storm drain system to remove particulate pollutants and to reduce maximum runoff values associated with development.

7.6 LAND USE AND PLANNING

Physically Divide Established Community

The Project would not divide an established community. The project site is within the Industrial (IND) General Plan land use designation and Heavy Industrial (HI) zone and is currently undeveloped. The surrounding land uses of the Project site include vacant, undeveloped land to the north, south, east and a solar farm to the west. Therefore, the Project would not have an impact on an established community.

7.7 MINERAL RESOURCES

According to the Palmdale General Plan Land Use and Community Design Element, the City of Palmdale has limited the extraction and processing of mineral resources such as sand, gravel and decomposed granite to Mineral Resource Zone 2 areas designated by the State Division of Mines and Geology. The Project site is not located in a designated Mineral Resource Extraction area (Mineral Resource Zone 2). As a result, no impacts to mineral resources would occur.

7.8 POPULATION AND HOUSING

Displacement of People or Housing

The Project site is currently vacant and undeveloped and no habitable structures exist on the Project site nor are they currently planned for future development of residential uses. Therefore, no impacts would occur.

7.9 RECREATION

The closest recreational facility to the Project site is Lancaster National Soccer Center approximately 0.8 miles north of the Project site located in the City of Lancaster. The closest park within the City of Palmdale is William J. McAdam Park, located approximately 8.8 miles south of the Project site. However, because the Project is industrial in nature, the Project would not generate an increase in the use of parks. Although new employees may occasionally use existing local parks, neighborhood and regional parks, employees' limited use would not result in deterioration of facilities such that the construction or expansion of recreational facilities would be necessary. As such, impacts related to the physical deterioration of facilities such that the construction or expansion of existing recreation parks or facilities would be necessary would be less than significant.

7.10 WILDFIRE

Emergency Response/Evacuation Plan

According to the CalFire Fire Hazard Severity Zone Map for Los Angeles County and Figure 13.4 in the City's Safety Element, the Project site is not within a State Responsibility Area (SRA) or a Very High Fire Hazard Severity Zone (CAL FIRE, 2022). The Project would provide adequate emergency access to the site via eight driveways from the existing road, 30th Street East, and from the proposed new road, 35th Street East, that would be constructed along the east side of the Project. In the event Project construction requires temporary roadway closures or obstructions, the Applicant would be required to prepare and implement a temporary traffic control plan consistent with the 2012 California Manual on Uniform Traffic Control Devices per City requirements. Access to and from the Project site for emergency vehicles would be reviewed and approved by the City as part of the Project approval process to ensure the proposed Project is compliant with all applicable codes and ordinances for emergency vehicle access. Since the Project is required to comply with all applicable codes, as verified by the City, any potential impacts related to an emergency response or evacuation would be less than significant.

Wildfire Risk

As described in the previous response, the Project site is not within a High or Very High Fire Hazard Severity Zone. The areas considered to be within very high fire hazard severity zones in Palmdale consist primarily of open space that is largely vegetated with chaparral, trees, and grassland groundcover, which can provide fuel for wildfires. The Project site and adjacent areas are sparsely vegetated and do not contain trees or other major factors that could exacerbate wildfire risks. Thus, no impacts would occur.

Fire Risk from Infrastructure

As described in the previous responses, the Project site is not within a Very High Fire Hazard Severity Zone, and the Project does not include infrastructure that could exacerbate fire risks. Additionally, the Project would connect to existing utilities and would not result in the installation or maintenance of infrastructure that could increase fire risk to the Project site or surrounding area.

Risk from Flooding or Landslides

As described in the previous responses, the Project site is not within a Very High Fire Hazard Severity Zone. In addition, the Project site is located in a flat area that does not contain or is adjacent to large slopes, and the Project would not generate large slopes. Thus, the Project would not result in risks related to wildfires or significant risks related to downslope or downstream flooding or landslides after wildfires.

7.11 REFERENCES

BFSA. (2024). *Phase I Cultural Resource Assessment for the Avenue M Project*. (**Appendix D**)

CAL FIRE. (2022). *Fire Hazard Severity Zones in State Responsibility Area*. Retrieved from <https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=4466cf1d2b9947bea1d4269997e86553>

California Department of Transportation. (2023). *State Scenic Highway Map*. Retrieved from California Department of Transportation: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-communitylivability/>

City of Palmdale. (2022). *City of Palmdale General Plan 2030*. Retrieved from City of Palmdale.

ELMT. (2024). *Biological Resources Assessment for the Proposed Project Located at 3347 East Avenue M*.
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8. Alternatives

8.1 INTRODUCTION

The identification and analysis of alternatives to a project is a fundamental part of the environmental review process pursuant to CEQA. Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is to identify alternatives to the project."

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR must describe a reasonable range of alternatives to the proposed project or to the project's location that would feasibly avoid or lessen its significant environmental impacts while attaining most of the proposed project's objectives. CEQA Guidelines Section 15126.6(b) emphasizes that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project. In addition, CEQA Guidelines Section 15126.6(e)(2) requires the identification and evaluation of an "Environmentally Superior Alternative."

Pursuant to CEQA Guidelines Section 15126.6(d), discussion of each alternative presented in this EIR Section is intended "to allow meaningful evaluation, analysis, and comparison with the proposed project." As permitted by CEQA, the significant effects of each alternative are discussed in less detail than those of the proposed Project, but in enough detail to provide perspective and allow for a reasoned choice among alternatives to the proposed Project.

In addition, the "range of alternatives" to be evaluated is governed by the "rule of reason" and feasibility, which requires the EIR to set forth only those alternatives that are feasible and necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6(f)). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors and other considerations (CEQA Guidelines Sections 15091(a)(3), 15364).

Based on the CEQA requirements described above, the alternatives addressed in this EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative could avoid or substantially lessen any of the identified significant environmental effects of the proposed Project;
- The extent to which the alternative could accomplish the objectives of the proposed Project;
- The potential feasibility of the alternative;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives that would allow an informed comparison of relative advantages and disadvantages of the proposed Project and potential alternatives to it; and
- The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (CEQA Guidelines Section 15126.6(e)).

Neither the CEQA statute, the CEQA Guidelines, nor recent court cases specify a specific number of alternatives to be evaluated in an EIR. Rather, "the range of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice" (CEQA Guidelines 15126(f)).

8.2 SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA requires the alternatives selected for comparison in an EIR to avoid or substantially lessen one or more significant effects of the Project being evaluated. This analysis evaluates both the potential to avoid or reduce a significant and unavoidable impact, and to avoid the need for mitigation to obtain less than significance levels.

The analysis in Section 5 of this Draft EIR determined that significant and unavoidable Project-specific and cumulative impacts would occur to agricultural resources, air quality, greenhouse gases (GHG), and transportation and that potentially significant impacts of the Project related to biological resources, paleontological, and tribal cultural resources can be mitigated to a less than significant level.

8.2.1 Significant and Unavoidable Impact

Impact Agriculture-1: Conversion of prime farmland, unique farmland, or farmland of statewide importance.

The Project site contains approximately 162.5 acres of Prime Farmland, inclusive of offsite roadway improvements. The entirety of the Project site, except for offsite roadways, was previously utilized for farming and consists of Prime Farmland as designated by the FMMP. Although the Project is consistent with the General Plan land use and zoning designations, the Project would convert the 162.5 acres of designated Prime Farmland to light industrial warehouse uses and result in reduction of the overall acreage of Prime Farmland within the City. There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland and loss of farmland. As such, Impact AG-1 would be significant and unavoidable.

Impact Agriculture-5: Changes to the environment that could result in the conversion of farmland to non-agricultural use.

As described previously, the Project site was historically used as farmland and consists of Prime Farmland. Project implementation would result in the conversion of farmland onsite to nonagricultural use and would facilitate the conversion of farmland within the vicinity to nonagricultural uses. There are no feasible mitigation measures that would substantially reduce impacts related to the conversion of Prime Farmland and loss of farmland. As such, Impact AG-5 would be significant and unavoidable.

Impact Air Quality-2: Cumulatively considerable net increase to any criteria pollutant.

As detailed in Section 5.3, *Air Quality*, the maximum daily construction emissions for VOC would exceed the significance criteria. However, with implementation of Mitigation Measure AQ-1, which requires the use of super compliant low VOC paints, VOC emissions from Project construction would be below the AVAQM significance thresholds.

The daily operational emissions of CO, NO_x, and PM₁₀ and annual emissions of NO_x and PM₁₀ would exceed the significance criteria and mitigation would be required. A majority of the Project's operational emissions are derived from vehicle and truck trips. The Project would implement Mitigation Measures AQ-2 through AQ-12 to reduce the operational emissions; however, these measures would not be sufficient enough to reduce operational emissions of NO_x, CO, and PM₁₀ below AVAQM's thresholds. Neither the Project applicant nor the City have regulatory authority to control tailpipe emissions. Thus, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant. Therefore, operation of the Project would result in NO_x emissions that would be significant and unavoidable and also cumulatively considerable.

Impact Greenhouse Gas Emissions-1: Generation of greenhouse gas emissions.

The proposed Project's total unmitigated increase in GHG emissions would be 36,997 MTCO₂e annually, which exceeds the 3,000 MTCO₂e screening threshold. Implementation of Mitigation Measures AQ-4, AQ-7, AQ-10, AQ-11, and GHG-1 through GHG-3 would reduce GHG emissions to approximately 36,395 MTCO₂e. The majority of the proposed Project's GHG emissions are generated by mobile emissions. Further mitigation to reduce the proposed Project's mobile GHG emissions is not feasible due to the limited ability of the Project Applicant and City of Palmdale to reduce emissions from mobile sources. Neither the Project Applicant nor the Lead Agency (City of Palmdale) can substantively or materially affect reductions in proposed Project mobile-source emissions. Therefore, GHG emissions from the proposed Project would be significant and unavoidable and also cumulatively considerable.

Impact Transportation-2: Conflict, or inconsistency with CEQA Guidelines § 15064.3, Subdivision (B).

The proposed Project would have a significant impact on employment VMT per employee when compared to both the baseline and cumulative thresholds. The projected VMT per employee for the Project would be 18.2 in 2023 and 18.4 in 2045, which is 15.19 percent above the baseline threshold and 16.46 percent above the cumulative threshold. Therefore, the Project would result in a significant project level and cumulative impact to VMT. With compliance with existing rules and implementation of CAPCOA measures T-7 and T-8 that are included as Mitigation Measures T-1 and T-2, the Project VMT would be reduced by 7.84 percent. Despite this reduction, the Project VMT would continue to exceed both the baseline and cumulative thresholds. Therefore, the Project VMT impact would be significant and unavoidable.

8.2.2 Impacts Mitigated to Less than Significant

Impact Biological-1: Effects on species of special concern.

One listed special-status wildlife species, the loggerhead shrike, was observed during the biological field investigation adjacent to the Project site. The Project site provides suitable foraging habitat with minimal nesting habitat. To avoid potential impacts to nesting loggerhead shrike, construction activities, including grading and vegetation removal, would be conducted outside the general bird nesting season (February 1 to August 31). If construction activities cannot occur outside the bird nesting season, a pre-construction nesting bird survey by a qualified biologist is required prior to construction in accordance with Mitigation Measure BIO-1. Additionally, although the Project site was determined to have low potential to support burrowing owl, Mitigation Measure BIO-2 was included out of abundance of caution to require pre-construction burrowing owl surveys. Implementation of Mitigation Measures BIO-1 and BIO-2, potential impacts to species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS, would be less than significant.

Impact Biological-4: Migratory Bird Treaty Act.

Project site contains shrubs that can support nesting birds or raptors that are protected under the Federal MBTA and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code during the nesting season. Therefore, grading activities or vegetation removal between the February 1 and August 31 general bird nesting season might result in potential impacts to nesting birds. However, compliance with the MBTA and Mitigation Measure BIO-1, which includes preconstruction nesting bird surveys during the nesting bird season, would ensure that potential impacts to nesting birds would be less than significant.

Impact Paleontological-1: Unique paleontological resources.

No previously discovered fossils have been found on the site. However, significant fossils have been found within similar sediments in the region. Therefore, although unique paleontological resources are not anticipated to be found onsite, Mitigation Measure PAL-1 is included to require preparation and

implementation of a Paleontological Resources Impact Mitigation Plan (PRIMP) and that ground disturbing activities be monitored starting at ground surface by a qualified paleontologist.

Impact Tribal-1: Substantial adverse change in the significance of a tribal cultural resource.

No known tribal cultural resources (TCRs) were identified within the Project site by the Cultural Resources Assessment (Appendix D). Additionally, as part of the City's AB 52 consultation process, the City reached out to Native American tribes who may have knowledge of tribal cultural resources within the Project area. No known tribal cultural resources or sensitive sites were identified within the Project site during the AB 52 consultation process. Construction of the proposed Project would include earthmoving activities, such as grading, which have the potential to disturb previously unknown TCR on the Project site. Although AB 52 consultation did not yield substantial evidence that listed or eligible tribal cultural resources—pursuant to criteria in Pub. Resources Code Section 5024.1(c)—within the Project site, PPP TCR-1 and PPP CUL-1, and Mitigation Measures CUL-1, CUL-2, TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5, would be implemented to ensure that potential impacts related to the inadvertent discovery of TCRs are less than significant.

8.3 PROJECT OBJECTIVES

The proposed Project has been designed to meet a series of Project-specific objectives that have been carefully crafted in order to aid decision makers in their review of the Project and its associated environmental impacts. The primary purpose and goal of the Project is to develop an underutilized property with an industrial use to provide an employment-generating business to help grow the economy in the City of Palmdale. The Project would achieve this goal through the following objectives:

1. To make efficient use of the property in the City of Palmdale by adding to its potential for employment-generating uses.
2. To attract new business and employment to the City of Palmdale and thereby promote economic growth.
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.
4. To develop an underutilized property with an industrial warehouse building near State Route 14, to help meet demand for logistics business in the City and surrounding region.
5. To build an industrial warehouse project in the City of Palmdale that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Palmdale.
6. Develop a project that does not contribute to surface and groundwater quality degradation by treating surface and stormwater flows.

8.4 ALTERNATIVES CONSIDERED BUT REJECTED

Pursuant to State CEQA Guidelines Section 15126.6(c), an EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are potentially feasible and, therefore, merit in-depth consideration, and which are infeasible and need not be considered further. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines Section 15126.6(f), (f)(3)). This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the Draft EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects.

Alternate Site Alternative. An alternate site for the Project was eliminated from further consideration. Based on a review of available sites for sale and the City of Palmdale General Plan land use map, there are no other available, suitable sites within the control of the Project Applicant. However, in the event land could

be purchased of suitable size, the Project could have the same potential impacts to agricultural resources, air quality, biological resources, greenhouse gas emissions, transportation, and tribal cultural resources. Moreover, other possible sites may not be located in proximity to SR-14, established transportation routes, and with access to available infrastructure, including roads and utilities thereby possibly resulting in further potential impacts. Therefore, analysis of an alternative site for the proposed Project is neither meaningful nor necessary, because the impacts and need for mitigation resulting from the proposed Project would not be avoided or substantially lessened by its implementation. Given these reasons, it would be infeasible to develop and operate the Project on an alternate site with fewer environmental impacts while meeting Project objectives. Therefore, the Alternative Site Alternative was rejected from further consideration.

8.5 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Three alternatives to the Project have been identified for further analysis as representing a reasonable range of alternatives that attain most of the Project Objectives, may avoid or substantially lessen the Project's significant impact, avoid the need for mitigation, or are feasible from a development perspective. The following alternatives have been developed based on the criteria identified in Section 8.1:

Alternative 1: No Project/No Development Alternative. Consistent with the requirements of CEQA Guidelines Section 15126.6(e), this alternative consists of the Project not being approved, and the Project site remaining in the condition that existed at the time the Notice of Preparation was published (September 21, 2023).

Alternative 2: 30 Percent Reduced Project Alternative. This Reduced Project Alternative (RPA) consists of development of the Project site in a manner similar to the Project, but with a 30 percent reduction in square footage and operational intensity. Specifically, the 30 Percent RPA would result in development of two warehouse buildings. Building 1 would total 1,050,599 SF on the 2,987,292 SF (68.58-acre) Parcel 1, resulting in a FAR of 0.35; Building 2 would total 1,050,599 SF on the 3,059,048-SF (70.23-acre) Parcel 2, resulting in a FAR of 0.34. The third parcel would be dedicated to the construction of a stormwater detention basin. Development under the 30 Percent RPA would reduce Project square footage by approximately 30 percent, or by 900,513.6 on the 150.63-acre Project site. Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. The buildings would operate as two speculative industrial warehouses with no cold storage, 90 percent would be used for warehouse uses and 10 percent for manufacturing uses.

Alternative 3: Manufacturing Use/50 Percent Reduced Warehouse with Storage. This alternative consists of developing the Project site in a manner that is consistent with the existing zoning designation, but with manufacturing uses and a 50 percent reduction in square footage compared to the proposed Project. The Heavy Industrial (HI) zone is intended to allow a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing distribution, and the like. This zone implements the Industrial (IND) General Plan land use designation, which permits a variety of industrial uses, including manufacturing. This alternative assumes that the 150.63-acre site would be developed with two manufacturing buildings and two storage yards; each building would be 750,000 SF and have a FAR of 0.25. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. The third parcel would be dedicated to the construction of a stormwater detention basin. Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. The two buildings would operate 100 percent for manufacturing uses.

8.6 ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

Pursuant to State CEQA Guidelines Section 15126.6(e), this Draft EIR is required to “discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services [...] In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

The No Project/No Development Alternative (NDA) allows decision-makers to compare the environmental impacts of approving the proposed Project to the environmental impacts that would occur if the property were to be left in its existing conditions for the foreseeable future. Under the existing conditions, the Project site continues to be vacant and undeveloped. See Section 4, *Environmental Setting*, for additional details regarding the existing conditions at the Project site.

8.6.1 Environmental Impacts

Aesthetics

Under the NDA, no new development would occur within the Project site, and the visual character and quality of the site would be maintained in its existing condition, which includes undeveloped and mostly disturbed conditions. No structures or landscaping would be introduced on the site. No additional lighting or sources of glare would be installed. No views across the Project site would change. Thus, implementation of the NDA would not result in contrast or aesthetic incompatibilities with the existing environment. However, the visual improvements that would be introduced throughout the Project site if the proposed Project is approved include new and improved landscaping, providing a building of contemporary design, and improvements to the public realm by streetscaping would not be implemented by the NDA. Overall, there would be no aesthetic impacts from this alternative would be less than significant and would be reduced in comparison to the Project.

Agricultural and Forestry Resources

The Project site contains approximately 162.5 acres of Prime Farmland, inclusive of offsite roadway improvements. The entirety of the Project site, except for offsite roadways, was previously utilized for farming and consists of Prime Farmland as designated by the FMMP. Under this alternative no new development would occur, and no new agricultural uses would be introduced to the Project site. The site would continue to be vacant Prime Farmland that was previously used for agricultural activities. This alternative would not convert Prime Farmland to nonagricultural use. Therefore, this alternative would avoid the significant and unavoidable impacts related to the loss of Prime Farmland and agricultural land that would occur from implementation of the proposed Project.

Air Quality

Under this alternative no new development would occur in the Project site, and as such, no new stationary sources of air pollution would be introduced. This alternative would avoid the Project’s less than significant impacts related to conflict with the 2022 AQMP as emissions would not occur with no construction or operational trips introduced to the Project site. In addition, this alternative would also avoid the Project’s significant and unavoidable impacts related to cumulatively considerable net increase of criteria pollutants, as this alternative would result in no increase in emissions of criteria pollutants. Lastly, this alternative would also avoid the Project’s less than significant impact related to the exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the No Project/No Development alternative would avoid the

significant and unavoidable air quality impacts of the proposed Project and no mitigation measures would be required.

Biological Resources

The Project site contains shrubs that can support nesting birds and raptors protected under the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code during the nesting season. Under this alternative, vegetation removal would not occur. As such, this alternative would not result in potential impacts to nesting birds, including Loggerhead Shrike (a special status species observed on an adjacent parcel during field investigations) or burrowing owl, due to tree or shrub removal during the nesting bird season (February 1 through August 31). Although Mitigation Measures that would be imposed on the Project would reduce biological resource impacts to less than significant levels, this alternative would generate less impacts to biological resources as compared with the Project and would not require mitigation. Therefore, the NDA would result in less impacts than the proposed Project.

Energy

Under the NDA, there would be no new development on the site, and there would be no increase in demand from the Project site for energy resources. As such, the NDA would completely avoid the Project's less than significant impacts associated with the consumption of energy resources during construction and long-term operation. Neither the Project nor the NDA would conflict with a State or local plan for renewable energy or energy efficiency, although impacts would be reduced under the NDA in comparison to the Project because the NDA would not result in an increase in the use of energy resources.

Geology and Soils

Under this alternative, no construction activities would occur at the Project site or offsite areas. As such, 100 percent less building area would be developed within the Project site. As such, the NDA would avoid the Project's less than significant impacts due to earthquake faults, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides, lateral spreading, subsidence, collapse, and expansive soils. Because no ground-disturbing activities would occur under the NDA, the NDA would avoid the Project's significant but mitigable impacts to paleontological resources that may be buried beneath the surface of the Project site.

Greenhouse Gas Emissions

No new construction activities would occur at the Project site or operation of new structures that would generate GHGs under this alternative. Under this alternative, no vehicle trips would be introduced to the Project site, which is the source of most of the greenhouse gas emissions from the proposed Project as discussed in Section 5.7, *Greenhouse Gas Emissions*. This alternative would be consistent with all applicable air quality plans and would avoid the Project's significant and unavoidable impact to the generation of greenhouse gas emissions and to the Project's conflict with an applicable plan or policy. Therefore, the NDA would avoid the significant and unavoidable impacts that would occur from implementation of the proposed Project.

Hazards and Hazardous Materials

No new construction activities would occur at the Project site or operational uses that could generate, use, and result in transport of, hazardous materials. The NDA would not include major construction activities that would use typical construction-related hazardous materials. Thus, potential impacts related to use, disposal, and transport of hazardous materials would be avoided by this alternative. While this Draft EIR determined

that the Project's impacts related to hazards and hazardous materials would be less than significant, this alternative would result in less impacts since no construction or operation of new uses would occur. Therefore, the NDA alternative would result in less impact than the proposed Project.

Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain "as is" under this alternative as no new development would occur. This alternative would not introduce new sources of water pollutants from either the construction or operation phases of development to the Project site, because no new development would occur. This alternative would not require the storm drain facility improvements that would be necessary with the Project. Additionally, this alternative would not introduce new impervious areas. Therefore, the NDA would result in less impacts than the proposed Project.

Land Use

This alternative would not result in new development, and as such, there would be no potential for land uses to be introduced that would indirectly result in environmental impacts due to a conflict with an existing land use plan. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, this alternative would result in no impacts to land use and planning, and therefore, would be less than the Project's less than significant impacts.

Noise

Under this alternative, no development would occur onsite, and no new sources of noise would be introduced to the Project site or surrounding areas. Since no new development would occur and no traffic trips would be generated, this alternative would not contribute to an incremental increase in area-wide traffic noise levels. In addition, this alternative would not result in construction onsite and no construction noise or vibration would occur. Therefore, this alternative would avoid the Project's less than significant impact related to noise.

Population and Housing

This alternative would not result in new development, and as such, would not result in induced growth or displacement affecting population and housing. As such, the No Project alternative would result in no impact to population and housing. Therefore, while the Project's impacts would be less than significant, this alternative would result in less impacts as compared to the Project. However, this alternative would also not result in the benefit of adding new employment opportunities, which would help result in a more balanced jobs-housing ratio.

Public Services

This alternative would not result in new development, and as such, would not result in increased demand for public services such as fire and sheriff services, school services, library services, or health services that requires the new construction of public facilities. As such, the NDA would result in no impact to public services. Therefore, while the Project's impacts would be less than significant through compliance with regulatory programs, this alternative would result in less impacts than the Project. However, this alternative would also not result in the payment of the City's development impact fees.

Transportation

This alternative would not result in new development, and as such, would not result in any trips, traffic, or VMT related to operation of the Project site. This alternative would not impact existing transit service and

alternative transportation facilities within the Project site. As the Project site would not be developed and trips would not be generated, the NDA avoids the Project's significant and unavoidable impacts.

Tribal Cultural Resources

Under this alternative, existing conditions would remain, and no new development would occur. No grading would occur and there would be no potential impacts to tribal cultural resources that may be buried below ground. Although the Project would result in less than significant impacts on tribal cultural resources with implementation of mitigation measures, this alternative would avoid all potential impacts to tribal cultural resources. Therefore, the NDA would result in less impacts than the proposed Project.

Utilities and Service Systems

Under this alternative, existing conditions would remain, and no new development would occur. No additional configurations or connections to existing domestic water, wastewater, stormwater drainage, electric power, natural gas, or telecommunication facilities would be needed under this alternative, and there would be no change in the demand for domestic water or wastewater treatment services. This alternative would also not result in increased demand for solid waste collection and disposal. Selection of this alternative would result in no impact to utilities and service system providers and would avoid the project's less than significant impacts.

8.6.2 Conclusion

Ability to Reduce Impacts

The NDA would result in maintaining the vacant and undeveloped Project site, and the proposed development would not occur. As a result, this alternative would avoid the need for mitigation measures that are identified in Section 5 of this Draft EIR, which include measures related to air quality, biological resources, greenhouse gases, transportation, and tribal cultural resources. This alternative would also avoid the significant and unavoidable impacts to agricultural resources, air quality, greenhouse gas emissions, and transportation. This alternative would result in lessened impacts to 16 of the 16 environmental topics analyzed in this Draft EIR (see Table 8-6).

However, the environmental benefits of the proposed Project would also not be realized, including, but not limited to, provision of local jobs reducing the need for members of the local workforce to commute outside the Project vicinity to work, and storm water capture and treatment improvements.

Ability to Achieve Project Objectives

As shown in Table 8-7, below, the NDA would not meet any of the Project objectives. This alternative would not make efficient use of the site for employment uses, would not attract new businesses, would not reduce workforce commuting, and would not support logistics near SR 14. Thus, the Project objectives would not be achieved from implementation of the NDA.

8.7 ALTERNATIVE 2: 30 PERCENT REDUCED PROJECT ALTERNATIVE

This 30 Percent Reduced Project Alternative (RPA) consists of development of the Project site in a manner similar to the Project, but with a 30 percent reduction in square footage. Specifically, the 30 Percent RPA would result in development of two warehouse buildings. Building 1 would total 1,050,599 SF on the 2,987,292 SF (68.58-acre) Parcel 1, resulting in a FAR of 0.35; Building 2 would total 1,050,599 SF on the 3,059,048-SF (70.23-acre) Parcel 2, resulting in a FAR of 0.34. The third parcel would be dedicated to the

construction of a stormwater detention basin. Development under the 30 Percent RPA would reduce Project square footage by approximately 30 percent, or by 900,513.6 SF on the 150.63-acre Project site.

Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. The buildings would operate as two speculative industrial warehouses with no cold storage, 90 percent would be used for warehouse uses and 10 percent for manufacturing uses. Development of the 30 Percent RPA would result in approximately 3,646 daily trips, 294 AM trips and 344 PM trips.

8.7.1 Environmental Impacts

Aesthetics

The 30 Percent RPA would develop 30 percent smaller buildings with less loading docks and parking and would be visually less dense than the proposed Project. The 30 Percent RPA would result in two buildings with smaller footprints, but of the same height and the same architectural character as the Project. Areas of offsite improvements would be the same as the Project. Thus, the visual character and quality of the developed portion of the site would be the similar to the Project. The visual improvements that would be introduced throughout the Project site that include new and improved landscaping, providing a building of contemporary design, and improvements to the public realm by streetscaping would be implemented similar to the proposed Project. Overall, implementation of the 30 Percent RPA would result in impacts consistent with the Project and would be less than significant.

Agricultural and Forestry Resources

Under this alternative, the Project site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. The entirety of the Project site, with the exception of offsite roadways, was previously utilized for farming and consists of Prime Farmland as designated by the FMMP. Under this alternative, areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. No undeveloped Prime Farmland or areas that could be used for farmland would exist with implementation of the 30 Percent RPA. As such, this alternative would result in Prime Farmland areas converted to non-agricultural uses. Consistent with the Project, impacts would be significant and unavoidable.

Air Quality

Under this alternative, approximately 30 percent less built area, or 900,513.6 fewer square feet would be developed, which would result in fewer vehicle and truck trips. Table 8-1 shows the construction air quality emissions without mitigation from this alternative and Table 8-2 shows construction air quality emissions with mitigation for this alternative. Although construction emissions are reduced under this alternative as compared to construction emissions from the Project, consistent with the Project, mitigation would be required to reduce VOC emissions to a less than significant level.

Table 8-1: Alternative 2 Construction Emissions Without Mitigation

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NOx	CO	SOx	PM10	PM2.5
Maximum Pounds Per Day						
Maximum (lbs/day)	181.5	20.4	124.4	0.1	17.0	4.3

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NOx	CO	SOx	PM10	PM2.5
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Exceeds Threshold?	Yes	No	No	No	No	No

Tons Per Year						
Maximum (tons/year)	7.2	1.0	4.9	<0.1	0.8	0.2
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	120
Exceeds Threshold?	No	No	No	No	No	No

Note: Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.

CO = carbon monoxide

lbs/day = pounds per day

NOx = nitrogen oxides

SOx = sulfur oxides;

AVAQMD = Antelope Valley Air Quality Management District

PM2.5 = particulate matter less than 2.5 microns in size

PM10 = particulate matter less than 10 microns in size

VOCs = volatile organic compounds

Table 8-2: Alternative 2 Construction Emissions With Mitigation

Project Construction	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NOx	CO	SOx	PM10	PM2.5
Maximum Pounds Per Day						
Maximum (lbs/day)	41.6	20.4	124.4	0.1	17.0	4.3
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Exceeds Threshold?	No	No	No	No	No	No

Tons Per Year						
Maximum (tons/year)	1.7	1.0	4.9	<0.1	0.8	0.2
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	120
Exceeds Threshold?	No	No	No	No	No	No

Note: Some values may not appear to add correctly due to rounding. Maximum emissions of VOCs occurred during the overlapping building construction and architectural coating phases.

CO = carbon monoxide

lbs/day = pounds per day

NOx = nitrogen oxides

SOx = sulfur oxides

AVAQMD = Antelope Valley Air Quality Management District

PM2.5 = particulate matter less than 2.5 microns in size

PM10 = particulate matter less than 10 microns in size

VOCs = volatile organic compounds

The proposed Project is calculated to generate 5,208 daily trips including 420 AM peak hour trips, and 494 PM peak hour trips. The 30 Percent RPA would result in 1,562 fewer daily trips, 126 fewer AM trips and 150 fewer PM trips compared to the proposed Project. Under this alternative, operational air quality impacts would be less than those under the proposed Project due to reduced emissions resulting from the decrease in square footage and decreased number of trips/mobile emissions. Operational emissions under this alternative would be below AVAQMD thresholds, as shown in Table 8-3. Therefore, the 30 Percent RPA would avoid the significant and unavoidable operational air quality impacts that would occur from the proposed Project, and mitigation measures would not be required.

Table 8-3: Alternative 2 Operational Emissions Without Mitigation

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NOx	CO	SOx	PM10	PM2.5
Pounds Per Day						

Emission Type	Pollutant Emissions (lbs/day)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mobile Sources – Vehicles and Light Duty Trucks	18.5	34.5	309.3	0.7	57.9	15.0
Mobile Sources – Heavy Duty Trucks	1.0	55.0	11.1	0.5	16.0	4.9
Area Sources	63.4	0.8	91.4	<0.1	0.2	0.1
Energy Sources	1.0	17.4	14.6	0.1	1.3	1.3
Stationary Sources	0.6	2.8	1.6	<0.1	0.1	0.1
Total Project Emissions	84.5	110.5	428.0	1.3	75.5	21.4
AVAQMD Thresholds	137.0	137.0	548.0	137.0	82.0	65.0
Significant?	No	No	No	No	No	No
Tons Per Year						
Mobile Sources – Vehicles and Light Duty Trucks	3.2	6.5	45.7	0.1	10.5	2.7
Mobile Sources – Heavy Duty Trucks	0.2	10.1	2.0	0.1	2.9	0.9
Area Sources	10.2	0.1	8.2	<0.1	<0.1	<0.1
Energy Sources	0.2	3.2	2.7	<0.1	0.2	0.2
Stationary Sources	0.1	0.5	0.3	<0.1	<0.1	<0.1
Total trip Project Emissions	13.9	20.4	58.9	0.2	13.6	3.8
AVAQMD Thresholds	25.0	25.0	100.0	25.0	15.0	12.0
Significant?	No	No	No	No	No	No

Note = Some values may not appear to add correctly due to rounding.

CO = carbon monoxide

lbs/day = pounds per day

NO_x = nitrogen oxides

SO_x = sulfur oxides

AVAQMD = Antelope Valley Air Quality Management District

PM_{2.5} = particulate matter less than 2.5 microns in size

PM₁₀ = particulate matter less than 10 microns in size

VOCs = volatile organic compounds

Biological Resources

Under this alternative, although 30 percent smaller buildings would be developed, this alternative would still require removal of existing vegetation, including shrubs, which provide nesting habitat for Migratory Bird species. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. As such, the impacts to biological resources at the Project site would be similar to the Project and require Mitigation Measures BIO-1 and BIO-2 to reduce potential project impacts to nesting birds and burrowing owl. These mitigation measures would reduce potential impacts from this alternative to a less than significant level. Thus, this alternative would result in less than significant impacts to biological resources with implementation of mitigation, which is consistent with the impacts and required mitigation for the proposed Project.

Energy

Under the 30 Percent RPA, approximately 30 percent less building area, or 900,513.6 fewer SF, would be developed on the Project site. This would result in an approximately 30 percent decrease in the demand for energy in comparison to the proposed Project, which was determined to be less than significant. This alternative would also be required to be in compliance with Title 24 requirements. Like the Project, this alternative would be required to meet 2022 California Energy Code that require installation of solar

photovoltaic systems for warehouses based on square footage of air-conditioned spaces. The alternative would also require the use of diesel fuel for trucking operations; however, operations would be reduced by 30 percent capacity as a result of reduction in facility size. Therefore, impacts to energy from the 30 Percent RPA would be less than those associated with the proposed Project, but would also be less than significant. Therefore, while Project impacts to energy would be reduced compared to the proposed Project; impacts would continue to be less than significant, consistent with the proposed Project.

Geology and Soils

Under this alternative, approximately 30 percent less building area would be developed within the Project site. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation measure regarding paleontological resources would be required for this alternative. This alternative would result in less than significant impacts to geology and soils, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the RPA, approximately 30 percent less building area would be developed within the Project site. Therefore, a reduced volume of construction activities and related production of GHG emissions would occur. In addition, the reduced amount of development by this alternative would result in less stationary source emissions from onsite equipment, and less traffic associated GHG emissions than the proposed Project. Therefore, the overall volume of GHG emissions would be reduced in comparison to the proposed Project. The proposed Project would result in 39,803 MTCO₂e/yr. with implementation of mitigation measures. This alternative would implement the same greenhouse gas emission reduction measures discussed in Section 5.7, *Greenhouse Gas Emissions*. It is expected that mitigated GHG emissions from this alternative would be less as compared to the Project but would continue to exceed the screening threshold of 3,000 MTCO₂e/yr. As such, consistent with the proposed Project, the 30 Percent RPA would result in a significant and unavoidable impact on greenhouse gas emissions.

Hazards and Hazardous Materials

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials such as fuel, paints, and solvents. In addition, this alternative would likely require the same utilization of hazardous materials during operation, including small quantities of household cleaners, lubricants, batteries, etc. as the proposed Project (albeit to a lesser degree). Overall, this alternative would result in less than significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Due to the decrease in square footage developed, development of this alternative would result in a decrease in impermeable surfaces compared to those required for development of the Project. Construction of the alternative would construct the identified stormwater drainage system as the Project but would likely require a smaller sized detention basin due to the smaller area of impervious surfaces. In addition, preparation of a SWPPP would be required for development of this alternative.

Overall, consistent with the proposed Project, this alternative would result in less than significant impacts related to hydrology and water quality.

Land Use

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Like the proposed Project, the 30 Percent RPA would be consistent with the General Plan land use designation of Industrial (IND), and the zoning designation of Heavy Industrial (HI). Therefore, potential impacts due to land use compatibility under both the Project and this alternative would be less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the 30 Percent RPA would be less than significant; and therefore, would be consistent with the Project's impacts.

Noise

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. The operation of this alternative would result in approximately 1,562 fewer daily trips, including 126 fewer AM trips and 150 fewer PM, in comparison to the proposed Project. Therefore, this alternative would result in a decrease in roadway noise when compared to the proposed Project and would reduce noise-related impacts. Short-term noise and vibration impacts would occur during construction similar to the Project. Like the Project, long-term operational noise would not expose nearby sensitive receivers to noise levels over the City's daytime noise standards. Overall, this alternative would result in fewer operational noise-related impacts than those associated with the Project, but consistent with the Project, impacts would be less than significant.

Population and Housing

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Based on the SCAG *Employment Density Study Summary Report* generation factor for Los Angeles County of 1,518 SF of warehouse space per employee, this alternative has the potential to result in the need for approximately 1,384 employees in comparison to the Project's 1,977 estimated employees, which is a reduction of 593 employees (30 percent). Consistent with the proposed Project, the resulting employment increase from this alternative would also be within the SCAG growth projections. Thus, this alternative would also not result in unplanned growth inducing impacts or displacement of population and housing. Therefore, consistent with the proposed Project, the 30 Percent RPA would result in less than significant impacts related to population and housing. However, the employment benefit of the Project would be less than that would be provided by the proposed Project.

Public Services

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Construction of this alternative would result in a slightly decreased demand for public services based on the decreased amount of employment generated. The same fire and sheriff's stations would serve the alternative, and the decrease in square footage developed would likely decrease the amount of service calls received by these public services compared to the proposed Project. In addition, this alternative would also require the payment of development impact fees imposed by the City of Palmdale, although the amount of fees would likely be reduced. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less than significant impacts as the proposed Project.

Transportation

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Table 8-4, *30 Percent Reduced Project Alternative Trip Generation*, identifies the number of trips that would be generated by this alternative. The trip rates for High-Cube Transload and Short-Term Storage Warehouse (Land Use Code 154) and Manufacturing (Land Use Code 140) were used to evaluate this alternative, consistent with the rates used to evaluate the proposed Project in Section 5.14, *Transportation*. Development of the 30 Percent RPA would result in approximately 3,646 daily trips, as shown in Table 8-4.

Table 8-4: 30 Percent Reduced Project Alternative Trip Generation

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Warehouse Cars	2,643	161	52	213	76	174	250
Trucks	1003	61	20	81	29	65	94
Total	3,646	222	72	294	105	239	344

This is 1,562 fewer daily trips, 126 fewer AM trips and 150 fewer PM trips compared to the proposed Project. With respect to VMT, the reduced number of trips and employees from this alternative results in the same VMT per service population, resulting in the same impact. Therefore, consistent with the proposed Project, the 30 Percent RPA would result in a significant and unavoidable impact related to VMT.

Tribal Cultural Resources

Under this alternative, 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. However, the areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. As a result, potential tribal cultural resource impacts would be similar to the Project due to grading and excavation required for development of the warehouse and require the same mitigation measures. Therefore, impacts from the 30 Percent RPA would be similar to those of the proposed Project.

Utilities and Service Systems

The level of development onsite would be decreased under this alternative as compared to the proposed Project. Both the Project and this alternative would require installation of underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded along East Avenue M/Columbia Way. Additionally, both the Project and this alternative would connect to the existing 6-inch natural gas line in East Avenue M/Columbia Way. Impacts associated with the provision of such facilities would be similar and would be less than significant upon compliance with existing regulatory requirements. Although impacts would be decreased under this alternative due to the decrease in building size/capacity and associated demand for water resources, impacts to water supply would continue to be less than significant. This alternative would also require offsite extension of a water line for approximately 13,400 linear and connection of a sewer line to existing sewer main line along 30th street, consistent with the Project. Similarly, LACWD40 would have adequate capacity to treat wastewater generated under both the Project and this alternative; however, this alternative would generate less wastewater than the proposed Project. This alternative would result in a decrease in building square footage and would generate less solid waste than the proposed Project. Overall, this alternative would also result in less than significant impacts

related to utilities and service systems but would result in a decrease in impacts in comparison to the proposed Project.

8.7.2 Conclusion

Ability to Reduce Impacts

Under this alternative, the 150.63-acre site would be developed with two 1,050,599 SF speculative industrial warehouse buildings. Development under the 30 Percent RPA would reduce Project square footage by approximately 30 percent. The reduced square footage would allow for increased setbacks, passenger vehicle parking, and truck parking. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. Mitigation measures for agricultural resources, Biological resources, paleontological resources, GHG, transportation, and tribal cultural resources would still be applicable to this alternative. Although, the 30 Percent RPA would generally result in a reduction of impacts due to the 30 percent reduction in building space, this alternative would only reduce the impact level of a portion of 1 of the 16 environmental topics analyzed in this Draft EIR, operational air quality impacts, from significant and unavoidable with mitigation to less than significant with mitigation (see Table 8-6). Furthermore, impacts to agricultural resources, GHG, and transportation would continue to be significant and unavoidable (although GHG and transportation impacts would be slightly less).

Ability to Achieve Project Objectives

As shown in Table 8-7, below, the 30 Percent RPA would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. This alternative would develop a property in the City of Palmdale with industrial uses, adding to its potential employment-generating uses and would attract new businesses and employment. Furthermore, the 30 Percent RPA would reduce the need for the local workforce to commute outside of the Project vicinity. This alternative would develop a speculative warehouse building within close proximity to SR-14 that is compatible with other industrial buildings that were recently built or recently approved by the City. Lastly, this alternative would treat surface and stormwater flows as to not contribute to surface and groundwater quality degradation. However, this alternative would not meet the main Project objectives to the same extent as the proposed Project would, since the proposed Project would accomplish the same goals, but generally to a greater degree.

8.8 ALTERNATIVE 3: MANUFACTURING USE/50 PERCENT REDUCED WAREHOUSE WITH STORAGE

This Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative consists of development of the Project site in a manner that is consistent with the existing General Plan land use and zoning designation, but with manufacturing uses and a 50 percent reduction in square footage compared to the proposed Project. Specifically, the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative would result in development of two manufacturing buildings and two storage yards; each building would be 750,000 SF and have a FAR of approximately 0.25. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. The third parcel would be dedicated to the construction of a stormwater detention basin. Consistent with the proposed Project, improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. The buildings would operate as 100 percent for manufacturing uses.

This Alternative would result in approximately 1,501,721 SF, or 50 percent reduced building area compared to the proposed Project. Development of the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative would result in approximately 7,125 daily trips, 1,021 AM trips and 1,110 PM trips, as shown in Table 8-4. The trip rates for Manufacturing (Land Use Code 140) were used to evaluate this alternative.

8.8.1 Environmental Impacts

Aesthetics

Under the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative, the 150.63-acre site would be developed with two industrial buildings, each totaling 750,000 SF and associated storage yards for each building. This would be 50 percent of the size of the buildings proposed by the Project. The third parcel would be developed with a water detention basin, consistent with the Project. The Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative would be visually less dense than the proposed Project due to the reduction in building size and associated reduction in parking areas. This Alternative would include construction of two buildings with 50 percent smaller footprint, but of the same height and the same architectural character as the Project. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. Thus, the visual character and quality of the developed portion of the site would be similar to the Project. The visual improvements that would be introduced throughout the Project site that include new and improved landscaping, providing a building of contemporary design, and improvements to the public realm by streetscaping would be implemented similar to the proposed Project. Overall, implementation of the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative would result in impacts that are consistent with the Project, and that would also be less than significant.

Agricultural and Forestry Resources

Under this alternative, the Project site would be developed with two industrial buildings, each totaling 750,000 SF and associated storage yards for each building. The entirety of the Project site, except for offsite roadways, was previously utilized for farming and consists of Prime Farmland as designated by the FMMP. Although the buildings would be 50 percent smaller than those developed by the proposed Project, the areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. No remaining areas that could be used for Prime Farmland type agricultural uses would exist. As such, this alternative would result in Prime Farmland conversion to non-agricultural uses, consistent with the Project, and impacts would continue to be significant and unavoidable.

Air Quality

Under this alternative, two manufacturing buildings and two storage yards; each building would be 750,000 SF for a total of 1,500,000 SF building area, approximately 1,501,721 SF, or 50 percent, reduced building area as compared to the Project. The proposed Project is calculated to generate 5,208 daily trips including 420 AM peak hour trips, and 494 PM peak hour trips. This alternative would result in 1,917 (26.9 percent) more daily trips, 601 more AM trips and 616 more PM trips compared to the proposed Project. Under this alternative, air quality impacts would be much greater than those under the proposed Project due to increased emissions resulting from the increase in number of trips/mobile emissions. As with the proposed Project, the No Project/Buildout of Existing Zoning Alternative would also result in emissions above AVAQM thresholds. However, additional thresholds for criteria pollutants are likely to be exceeded. Therefore, the No Project/Buildout of Existing Zoning Alternative would result in greater overall air quality impacts compared to the Project, and impacts would be significant and unavoidable.

Biological Resources

Under this alternative, the Project site would be developed with two 750,000 SF manufacturing buildings and associated storage yards on the 150.63-acre site. Although the buildings would be 50 percent smaller than those developed by the proposed Project, this alternative would require removal of existing vegetation, including shrubs, which provide nesting habitat for Migratory Bird species. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. As such, the impacts to biological resources at the Project site would be similar to the Project and require mitigation to reduce potential project impacts to nesting birds and burrowing owl. These mitigation measures would reduce potential impacts from this alternative to a less than significant level. Overall, this alternative would result in less than significant impacts to biological resources, and therefore, impacts would be the same as the proposed Project.

Energy

Under the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative, the Project site would be developed with two 750,000 SF manufacturing buildings and associated storage yards on the 150.63-acre site. This would result in an increase in energy demand associated with manufacturing activities in comparison to the Project. Like the Project, this alternative would be required to meet 2022 California Energy Code that require installation of solar photovoltaic systems for warehouses based on square footage of air-conditioned spaces. In addition, this alternative would have an increase in fuel usage as compared to the proposed Project resulting from the 26.9 percent additional trips. Thus, with implementation of existing regulations and policies, this alternative would not obstruct use of renewable energy or energy efficiency. Although more energy would be used by this alternative, it would not be used in a wasteful, inefficient, or unnecessary manner because it would comply with Title 24, Part 6 (Energy Efficiency Standards) and implement typical Title 24 measures, consistent with the proposed Project. Therefore, impacts to energy from the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative would be less than significant, which is consistent with the proposed Project.

Geology and Soils

Under this alternative, approximately 50 percent less building area would be developed within the Project site. The remaining portion of the site would be developed with two storage yards (one on each parcel), additional truck and vehicle parking, landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Potential impacts related to the potential for additional workers, building, and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Project site would be similar to the Project. Soil erosion impacts would also be less than significant due to compliance with water quality standards, and new development would be required to comply with regulatory requirements regarding geologic considerations such as seismic hazards from ground shaking. The same mitigation measures regarding paleontological resources would be required for this alternative. This alternative would result in less than significant impacts with implementation of mitigation measures, and therefore, would be consistent with the Project's impact.

Greenhouse Gas Emissions

Under the No Project/Buildout of Existing Zoning Alternative, approximately 50 percent less building area would be developed within the Project site. However, as discussed in Section 5.7, *Greenhouse Gas Emissions*, a majority of the Projects GHG emissions are from mobile sources such as emission from vehicles and trucks. Development of the Manufacturing Use/50 Percent Reduced Warehouse with Storage Alternative would result in approximately 1,917 (26.9percent) more daily trips, 601 more AM trips and 616 more PM trips

compared to the proposed Project. The additional trips are a result of the 100 percent manufacturing use that would be implemented by this alternative.

As the number of trips would increase by 26.9 percent, the overall volume of GHG emissions would be much greater in comparison to the proposed Project. The proposed Project's mitigated operational GHG emissions are 39,911, which is above the threshold of 3,000 MTCO₂e/yr. The GHG mitigation measures required for the Project would be applicable to the No Project/Buildout of Existing Zoning Alternative. GHG emissions under this alternative would be farther above the screening threshold of 3,000 MTCO₂e/yr than the proposed Project because of the increased number of trips. Therefore, this alternative would also result in impacts that would be significant and unavoidable and impacts would be greater than the proposed Project.

Hazards and Hazardous Materials

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. Like the proposed Project, construction of this alternative would be required to comply with existing regulations regarding the transport, use, and disposal of hazardous materials such as fuel, paints and solvents. In addition, this alternative would likely require utilization of hazardous materials during operation, including small quantities of household cleaners, lubricants, batteries, etc. as the proposed Project. However, this alternative could have potential to utilize a higher number of hazardous materials due to the manufacturing use, depending on the user. Overall, this alternative would result in less than significant impacts to hazards and hazardous materials, and therefore, would be consistent with the Project's impact.

Hydrology and Water Quality

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. Construction of the alternative would include installation of a stormwater drainage system, and preparation of a SWPPP would be required for development of this alternative. As the No Project/Buildout of Existing Zoning Alternative would be required to adhere to the same hydrology and water quality requirements as the proposed Project, this alternative would result in less than significant impacts like the proposed Project.

Land Use

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. The Project site has a General Plan land use designation of Industrial (IND) and a zoning designation of Heavy Industrial (HI), as stated in Section 3, *Project Description*. The IND land use designation is intended to allow a variety of industrial uses including manufacturing, warehousing distribution, and similar uses up to a maximum floor area ratio (FAR) of 0.5. The Heavy Industrial zone provides for a range of medium to high intensity industrial uses such as manufacturing, assembly, warehousing, and distribution. Like the proposed Project, the No Project/Buildout of Existing Zoning Alternative would be consistent with the land use designation of (IND) and zoning designation of HI.

Potential impacts due to land use compatibility under both the Project and this alternative would be less than significant. This alternative would also not physically disrupt or divide the arrangement of an established community. Overall, impacts related to land use and planning from the No Project/Buildout of Existing Zoning Alternative would be less than significant; and therefore, would be consistent with the Project's impacts.

Noise

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. The operation of this alternative would result in approximately 1,917 (26.9 percent) more daily trips, 601 more AM trips and 616 more PM trips, in comparison to the proposed Project. Therefore, this alternative would result in a substantial increase in roadway noise when compared to the proposed Project and would increase noise-related impacts. As detailed in Section 5.11, Noise, in Table 5.11-7, *Traffic Noise Levels Without and With Proposed Project*, the proposed Project-related traffic noise increase would be 1.9 dBA at 30th Street north of Columbia Way. A substantial increase of 26.9 percent in traffic at this location compared to the proposed Project from the No Project/Buildout of Existing Zoning Alternative would likely result in this alternative being close to or exceeding the 3.0 dBA traffic noise level increase threshold. Therefore, traffic noise impacts from the No Project/Buildout of Existing Zoning Alternative to sensitive receptors have the potential to be significant and unavoidable, mitigation measures would be required.

Short-term noise and vibration that would occur during construction of the No Project/Buildout of Existing Zoning Alternative would be similar to the Project. Like the Project, long-term onsite operational noise would not expose nearby sensitive receivers to noise levels over the City's daytime noise standards. The proposed Project has less than significant noise impacts without mitigation. Overall, this alternative would result in greater operational noise-related impacts than those associated with the Project and impacts would require mitigation and may be significant and unavoidable.

Population and Housing

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. Based on the SCAG *Employment Density Study Summary Report* generation factor for Los Angeles County of 1,214 SF of per employee for light manufacturing use (the table does not include data for heavy manufacturing), this alternative has the potential to result in the need for approximately 1,235 employees in comparison to the Project's 1,977 estimated employee generation, which is a reduction of 742 employees (37.5 percent reduction). This employment number would be within the SCAG growth projections from 2016 to 2045. Thus, this alternative would not result in unplanned growth inducing impacts or displacement of population and housing. Therefore, this alternative would be less than significant, which is consistent with the proposed Project. However, the employment benefit of the Project would be reduced by 58 percent.

Public Services

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. This alternative would result in a decreased demand for public services based on the decreased employment generated. The same fire and sheriff's stations would serve the alternative, and the decrease in square footage developed and employment generated would likely decrease the amount of service calls received by these public services compared to the Project. In addition, this alternative would also require the payment of development impact fees imposed by the City of Palmdale. Through implementation of regulatory requirements, impacts would be less than significant. Therefore, this alternative would result in similar less than significant impacts as the Project.

Transportation

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. Development of the No Project/Buildout of Existing Zoning alternative would result in approximately 7,125 daily trips, as shown in Table 8-5.

Table 8-5: No Project/Buildout of Existing Zoning Alternative Trip Generation

	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Warehouse Cars	6,448	706	217	923	312	692	1005
Trucks	677	74	24	98	32	72	105
Total	7,125	780	241	1,021	344	764	1,110

This alternative would result in 1,917 (26.9 percent) more daily trips, 601 more AM trips and 616 more PM trips compared to the proposed Project. With respect to VMT, the increased number of trips and fewer employees results in greater VMT per service population, resulting in more impact as compared to the Project. Therefore, this alternative would result in significant and unavoidable impacts related to VMT and impacts would be greater than the proposed Project.

Tribal Cultural Resources

Under this alternative, the 150.63-acre site would be developed with two 750,000 SF manufacturing buildings. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. Additional improvements onsite would include landscaping, sidewalks, utility connections, implementation of stormwater facilities, and pavement of parking areas and driveways. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. Therefore, potential tribal cultural resource impacts would be the same as the Project and would require the same mitigation measures. Therefore, impacts from the No Project/Buildout of Existing Zoning Alternative would be the same as the Project.

Utilities and Service Systems

This alternative would be approximately 1,501,721 SF, or 50 percent reduced building area as compared to the Project. Both the Project and this alternative would require installation of underground electric and communication lines that would connect to existing infrastructure which would also be undergrounded along East Avenue M/Columbia Way. Additionally, both the Project and this alternative would connect to the existing 6-inch natural gas line in East Avenue M/Columbia Way. Impacts associated with the provision of such facilities would be similar and would be less than significant upon compliance with existing regulatory requirements. Although impacts would be decreased under this alternative due to the decrease in building demand and associated demand for water resources, impacts to water supply would still be less than significant. This alternative would require extension of the water line for approximately 13,400 linear feet west within the East Avenue M/Columbia Way right-of-way to 5th Street E and connection to existing sewer main line along 30th Street East. Similarly, LACWD40 would have adequate capacity to treat wastewater generated under both the Project and this alternative; however, this alternative would generate less wastewater than the proposed Project. This alternative would result in a decrease in building square footage and would generate less solid waste than the proposed Project. Overall, this alternative would also result in less than significant impacts related to utilities and service systems but would result in a decrease in impacts in comparison to the proposed Project.

8.8.2 Conclusion

Ability to Reduce Impacts

This alternative assumes that the 150.63-acre site would be developed with two manufacturing buildings and two storage yards; each building would be 750,000 SF and have a FAR of 0.25. This Alternative would be approximately 1,501,721 SF, or 50 percent reduced building area as compared to the Project; however, it would result in a 26.9 percent increase in trips. The reduced building square footage would allow for additional truck and vehicle parking and for the development of a storage yard at each building site. The third parcel would be dedicated to the construction of a stormwater detention basin. Areas planned for physical impact on and offsite would be identical to those required for development of the proposed Project. All of the mitigation measures would still be applicable to this alternative and additional mitigation measures related to traffic noise would be required, and may still result in a significant and unavoidable impact. This alternative would not reduce the potential of any impacts and would result in greater impacts to 1 environmental topic that would require mitigation and may be significant and unavoidable (see Table 8-6). Furthermore, impacts to agricultural resources, air quality, GHG, and transportation would be more than the Project and would continue to be significant and unavoidable.

Ability to Achieve Project Objectives

As shown in Table 8-7, below, the No Project/Buildout of Existing Zoning Alternative would partially meet the majority of Project objectives, but not to the same extent as the proposed Project. This alternative would develop a property in the City of Palmdale with industrial uses, adding to its potential employment-generating uses (although at a reduced level) and would attract new businesses. Furthermore, the No Project/No Development Alternative would reduce the need for the local workforce to commute outside of the Project vicinity. This alternative would develop two manufacturing buildings within close proximity to SR-14 that is compatible with other industrial buildings that were recently built or recently approved by the City. Lastly, this alternative would treat surface and stormwater flows as to not contribute to surface and groundwater quality degradation. However, this alternative would generate 50 percent less employment as compared to the Project, and would provide fewer resident opportunities to reduce commute times.

8.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” when significant environmental impacts result from a proposed Project.

Additionally, State CEQA Guidelines Section 15126.6(3)(1) states:

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Therefore, pursuant to CEQA, because the No Project/No Development Alternative has been identified as the Environmentally Superior Alternative, the next best Environmentally Superior Alternative would be Alternative 2: Reduced Project Alternative, which would involve developing the Project two speculative warehouse buildings at a reduced scale. Building 1 would total 1,050,599 SF on the 2,987,292 SF (68.58-acre) Parcel 1, resulting in a FAR of 0.35; Building 2 would total 1,050,599 SF on the 3,059,048-SF (70.23-

acre) Parcel 2, resulting in a FAR of 0.34. This alternative would result in lessened impacts in a part of 1 of the 16 environmental topics analyzed in this EIR by avoiding operational air quality impacts. However, this alternative would be required to implement the same applicable mitigation measures regarding construction air quality emissions, biological resources, paleontological resources, GHG, transportation, and tribal cultural resources, similar to the Project. Impacts to agricultural resources, GHG, and transportation would continue to be significant and unavoidable under this alternative. Moreover, the Reduced Project Alternative would not meet the Project objectives to the same extent as the proposed Project. Alternative 2 would have a reduction of 593 employees (30 percent) as compared to the proposed Project.

CEQA does not require the Lead Agency (the City of Palmdale) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed Project, and make findings that the benefits of those considerations outweigh the harm. Table 8-6 provides, in summary format, a comparison between the level of impacts for each alternative and the proposed Project. In addition, Table 8-7 provides a comparison of the ability of each of the alternatives to meet the objectives of the proposed Project.

Table 8-6: Impact Comparison of the Proposed Project and Alternatives

	Proposed Project	Alternative 1: No Project	Alternative 2: 30% Reduced Project	Alternative 3: Manufacturing Use/ 50% Reduced Warehouse
Aesthetics	Less than significant	Less than Project	Same as Project	Same as Project
Agricultural and Forestry Resources	Significant and Unavoidable	Less than Project, reduced to no impact	Same as Project, Significant and Unavoidable	Same as Project, Significant and Unavoidable
Air Quality	Significant and Unavoidable	Less than Project, reduced to no impact	Less than Project, operational impacts are less than significant with mitigation	Greater than Project, Significant and Unavoidable
Biological Resources	Less than significant with Mitigation	Less than Project	Same as Project	Same as Project
Energy	Less than significant	Less than Project	Less than Project, but still less than significant	Greater than Project, but less than significant
Geology and Soils	Less than significant with Mitigation	Less than Project	Same as Project	Same as Project
Greenhouse Gases	Significant and unavoidable	Less than Project, reduced to no impact	Less than Project, but remains Significant and Unavoidable	Greater than Project, Significant and Unavoidable
Hazards and Hazardous Materials	Less than significant	Less than Project	Same as Project	Same as Project
Hydrology and Water Quality	Less than significant	Less than Project	Same as Project	Same as Project
Land Use and Planning	Less than significant	Less than Project	Same as Project	Same as Project
Noise	Less than significant	Less than Project	Less than Project, but less than significant	Greater than Project may be significant and unavoidable
Population and Housing	Less than significant	Less than Project	Same as Project	Same as Project
Public Services	Less than significant	Less than Project	Same as Project	Same as Project
Transportation	Significant and Unavoidable	Less than Project, reduced to no impact	Same as Project, Significant and Unavoidable	Same as Project, Significant and Unavoidable
Tribal Cultural Resources	Less than significant with Mitigation	Less than Project	Same as Project	Same as Project
Utilities and Service Systems	Less than significant	Less than Project	Less than Project, but less than significant	Less than Project
Reduce Impacts of the Proposed Project?		Yes	Yes	No
Areas of Reduced Impact Levels Compared to the Proposed Project		16 (All)	1 (Air Quality)	0

Table 8-7: Comparison of the Proposed Project and Alternatives' Ability to Meet Objectives

	Project	Alternative 1: No Project	Alternative 2: 30% Reduced Project	Alternative 3: Manufacturing Use/ 50% Reduced Warehouse
1. To make efficient use of the property in the City of Palmdale by adding to its potential for employment-generating uses.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
2. To attract new business and employment to the City of Palmdale and thereby promote economic growth.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
3. To reduce the need for members of the local workforce to commute outside the Project vicinity to work.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
4. To develop an underutilized property with an industrial warehouse building near State Route 14, to help meet demand for logistics business in the City and surrounding region.	Yes	No	Yes, but to a lesser extent	Yes, but to a lesser extent
5. To build an industrial warehouse project in the City of Palmdale that is similar to and compatible with other industrial buildings that were recently built or recently approved for construction in the City of Palmdale.	Yes	No	Yes, but to a lesser extent	Yes
6. Develop a project that does not contribute to surface and groundwater quality degradation by treating surface and stormwater flows.	Yes	No	Yes, but to a lesser extent	Yes

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9. EIR Preparers and Persons Contacted

EIR PREPARERS

City of Palmdale

Brenda Magana, Planning Manager
Sarah Stachnik, Assistant Planner

EPD Solutions, Inc.

Jeremy Krout, AICP
Konnée Dobrevá, JD
Tatiana Torres
Jazmin Rodriguez
Tiffany Dang
Brady Connolly
Sam Kelley

Subconsultants

LSA, Air Quality Impact, Health Risk, Greenhouse Gas and Energy Impact Analysis

Cara Cunningham

LSA, Noise and Vibration Impact Analysis

JT Stephens

ELMT Consulting, Biological Resources Assessment

Travis McGill

Brian F. Smith and Associates, Inc., Cultural Resources Assessment

Brian F. Smith, M.A.
Elena C. Goralogia

Brian F. Smith and Associates, Inc., Paleontological Assessment

Todd A. Wirths, M.S.

EPD Solutions, Inc., Vehicle Miles Traveled (VMT) Analysis

Daji Yuan, Ph.D
Alex J. Garber

Thienes Engineering, Preliminary Hydrology Report

Reinhard Stenzel

Thienes Engineering, Sewer Study Area

Reinhard Stenzel

Dudek, Water Supply Assessment

Matt Norcott

PERSONS CONTACTED

None.