COMMUNITY DEVELOPMENT

City of Lancaster Initial Study

1. **Project Title and File Number** — Site Plan Review No. 24-003
General Plan Amendment No. 24-001
Zone Change No. 24-001

2. **Lead Agency Name and Address:** — City of Lancaster
Community Development Department
Planning & Permitting Division
44933 Fern Avenue
Lancaster, California 93534

3. **Contact Person:** — Kendall Brekke, Senior Planner
City of Lancaster
Community Development Department
(661) 723-6109

4. **Project Location:** — 40± gross acres at the northwest corner of Avenue M (Columbia Way) and Division Street (APNs: 3128-013-010 & -011)

5. **Applicant Name and Address:** — Jessica Haughton
Synergy Consulting
410 Patti Ann Woods Drive
Henderson, NV 89002

6. **General Plan Designation:** — Existing: Office Professional (OP)
Proposed: Light Industry (LI)

7. **Zoning:** — Existing: Office Professional (OP)
Proposed: Light Industrial (LI)

8. **Description of Project:** The Project involves a general plan amendment and zone change from Office Professional (OP) to Light Industry/Industrial (LI) associated with the construction of two industrial buildings totaling approximately 807,005 square feet of floor area. The components of the Project are shown in Table 1, *Project Components,* below.

Table 1. Project Components

Project Component	Building 1	Building 2	Total
Gross Site Area (Acres) Net Site Area			**40.40** **36.68**
Building Area (Square Feet (SF) Floor Area Ratio (FAR)			
Warehouse	343,973 SF	347,032 SF	691,005 SF
Manufacturing	46,000 SF	46,000 SF	92,000 SF
Office	12,000 SF	12,000 SF	24,000 SF
Sub-Total	**401,973 SF**	**405,032 SF**	**807,005 SF**
Floor Area Ratio (FAR)	**44%**	**47%**	**46%**
Building Features			
Building Height	50-feet	50-feet	---
Truck Dock Doors	51	51	**112**
Trailer Parking Spaces	74	74	**148**
Auto Parking Spaces	213 (43 EV/Clean Air)	230 (46 EV/Clean Air)	**443**
Landscaping			
Required Landscaping	7%	7%	**7% (111,845 SF)**
Provided Landscaping	15%	15%	**15% (239,671 SF)**

Source: Architectural Master Plan, SKH Architect.

Street Improvements & Access

Access to the Project site is proposed via the following:

- One (1) full-access driveway along Avenue L-12;
- Three (3) full-access driveways along Division Street;
- One (1) full-access driveway along Avenue M; and
- One (1) right-in/right-out driveway along Avenue M.

The Project will also construct and improve Division Street and Avenue L-12 to meet the City of Lancaster requirements for private streets.

Utilities

The Project will connect to the existing utilities such as electricity, natural gas, water, wastewater, telecommunications, etc. These services already exist adjacent to the Project site. Connections would occur on the Project site or within existing roadways or rights-of-way.

Stormwater Facilities

A detention basin is proposed to be located along the Project site's northern property line, between the limits of Building 1 and Avenue L-12. This basin would accommodate stormwater capture and detention before release into the public storm drainage system. In addition, it would serve as the primary water quality feature constructed to comply with Municipal Code Section 8.50.200, *Stormwater Management and Rainwater Retention, Mitigation of Storm and Nuisance Water Runoff*, which is intended to minimize runoff and increase infiltration. The basin will be developed with a maximum slope of 4:1 and a minimum 6-foot view fence along the perimeter.

Landscaping

Once complete, 15 percent or 239,667 square feet of the Project site would be landscaped, more than double the minimum required by the City (7 percent or 111,845 square feet). Landscaping is proposed within the public right-of-way of Division Street and Avenue M along the northern, southern, eastern, and western site boundaries. Additionally, landscaping would be provided within the parking areas.

Outdoor Lighting

Outdoor lighting will be used to secure the buildings and illuminate the parking lots and driveway aisles while minimizing glare onto adjacent properties. The Project will utilize higher lumen/watt efficiency fixtures than the code requires to accomplish this.

Energy Saving Design Features

The Project proposes the following energy-saving design features:

1. Designed to meet LEED Silver Requirements.
2. Insulation of the offices.
3. Conduit for expanded EV charging.

Operational Characteristics

Outdoor Equipment

Equipment for loading and unloading freight from trucks, such as forklifts and terminal tractors (e.g., "yard goats" used to tow trailers around a warehouse or yard), would be used in the loading docks and truck court areas. On-site operational and cargo-handling equipment, including pallet jacks and forklifts, will be electric per the California Air Resources Board's Zero-Emission Forklift Regulation (ZEF), with the necessary charging stations included in the design of the electrical system, buildings, equipment storage, and parking areas.

Outdoor Storage

All activities are proposed to be conducted in the interior of the buildings except for the parking of trucks and trailers.

Hours of Operation

Operations can take place seven days a week 24 hours per day.

Employees

The Project is expected to generate a maximum of 435 employees.

Construction Duration

Construction is expected to take approximately 13 months.

9. Surrounding Land Uses and Environmental Setting

The Project site is situated within the southern portion of the City of Lancaster and encompasses two vacant and undeveloped parcels totaling approximately 40.40 gross acres of land. (See Figure 1, *Aerial View of the Project Site*, and Figure 3*, Street Views of the Project Site*. The site is currently vacant and does not contain any structures. The site is relatively flat, with elevations ranging from approximately 2,513 feet (766 meters) to approximately 2,527 feet (770 meters) above mean sea level. There is a slight decrease in elevation from south to north. Shallow stockpiles of soil and debris are present throughout the site. Surface drainage consists of sheet flow runoff of incident rainfall water derived primarily within the property boundaries and adjacent properties.

Vegetation on the site includes rubber rabbitbrush scrub, creosote bush scrub, and non-native grassland. There are scattered Joshua trees throughout the site. Developed/disturbed areas are associated with unimproved roads along the northern, western, and eastern side boundaries. Also, utility distribution lines and an associated dirt access road run along the site's southern boundary north of Avenue M.

Table 2. General Plan Land Use and Zoning

	General Plan Land Use	General Plan Zoning
Project Site	Office Professional (OP)	Office Professional (OP)
North	Light Industry (LI)	Light Industrial (LI)
East	Office Professional (OP)	Light Industrial (LI)
South (City of Palmdale)	Aerospace Industrial (AI)	Aerospace Industrial (AI)
West	Office Professional (OP)	Office Professional (OP)

Sources: Lancaster Our Community Map, https://opendata-lancasterca.hub.arcgis.com/apps/0dad1680833f41cfb496420fb444a73a/explore; Palmdale City Maps, https://www.cityofpalmdaleca.gov/273/City-Maps

Figure 1. Project Location Map

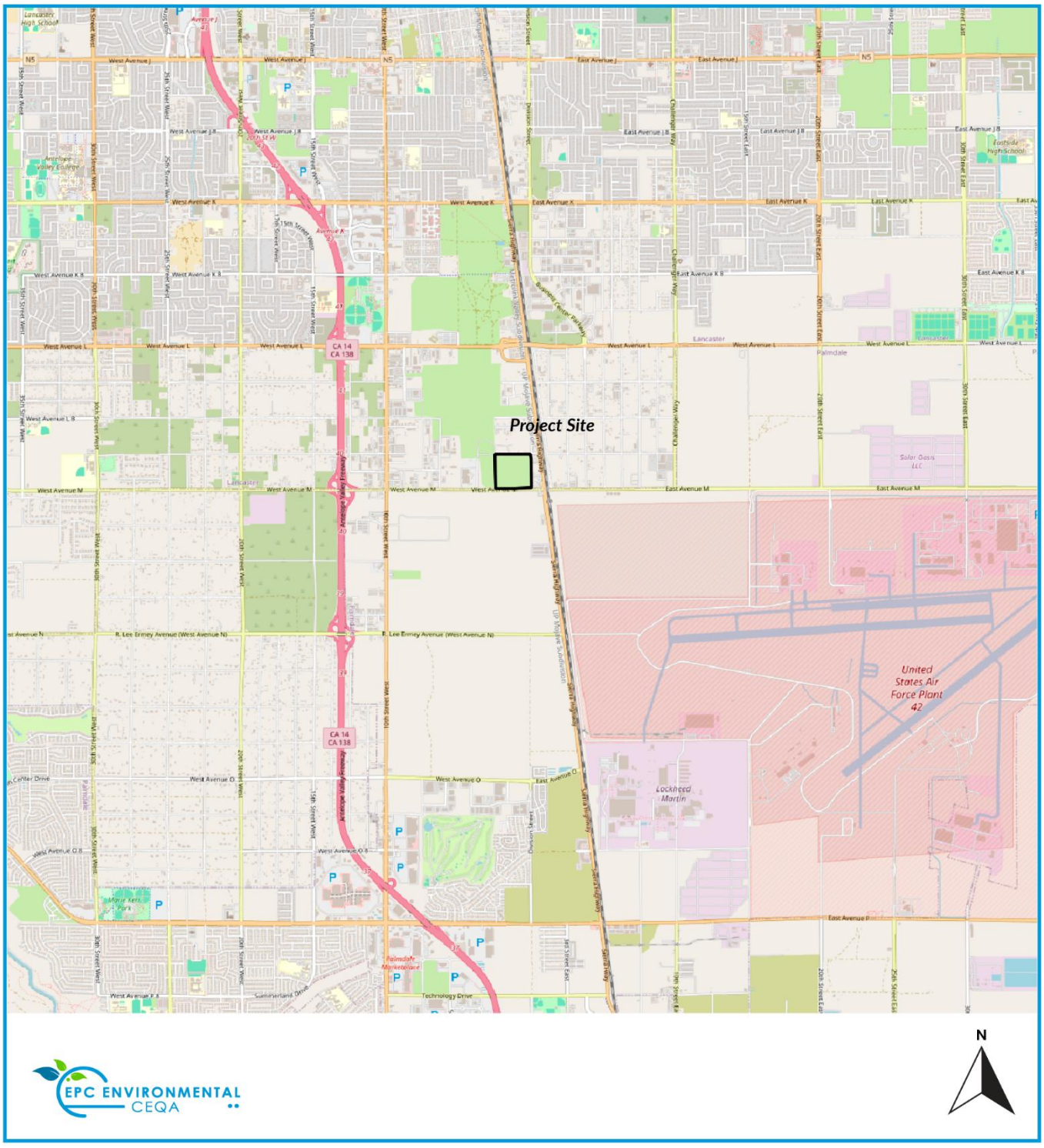

Figure 2. Aerial View of Project Site

Figure 3. Street Views of the Project Site

View of the Project-Looking North from Avenue M.

View of the Project Site-Looking Southeast from the Intersection of Division Street and Avenue L-12.

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Figure 4. Zoning Map

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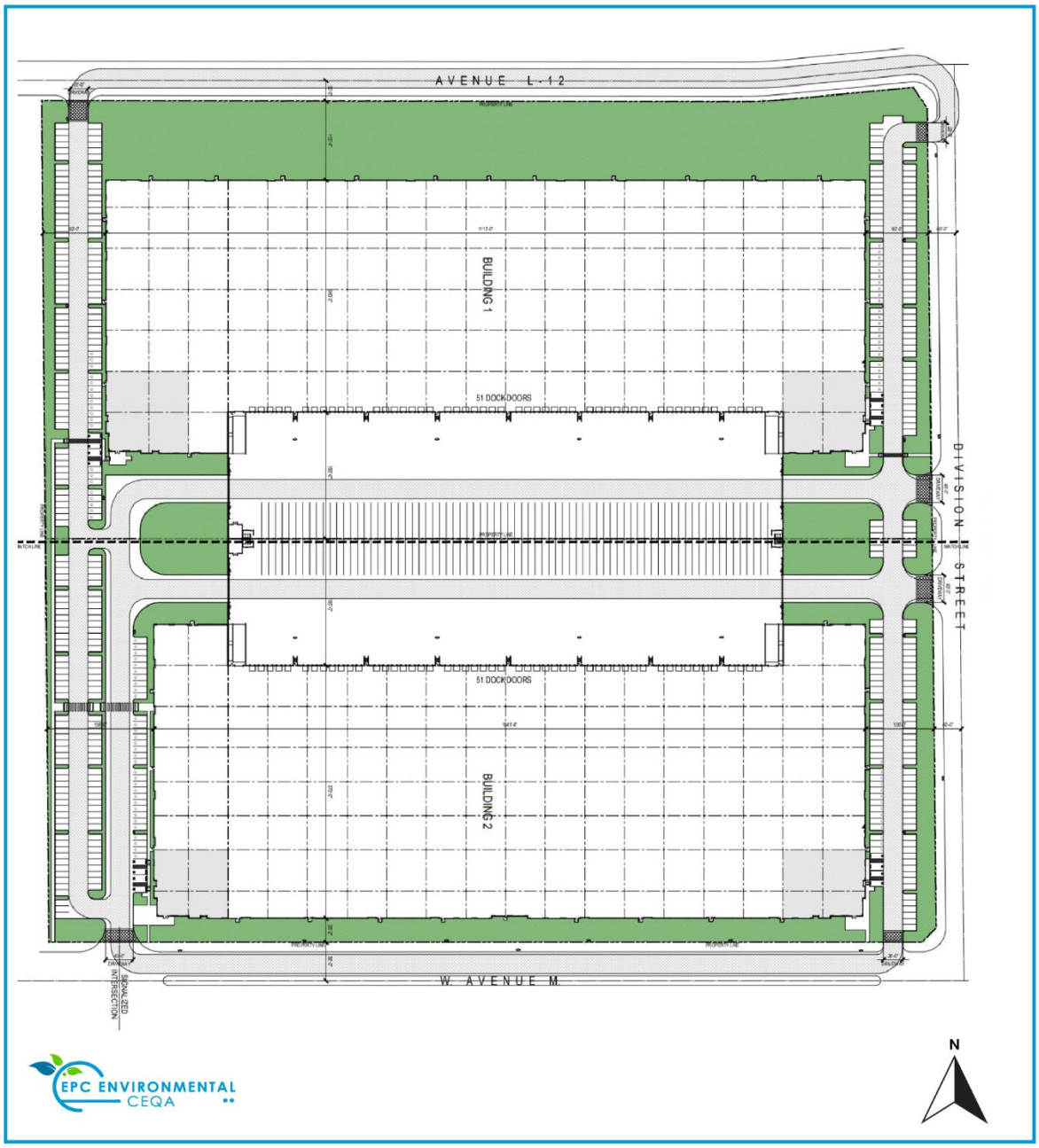
Figure 5. Site Plan



10. **Other public agencies requiring approval (e.g., permits, financing approval, or participation agreement.)**

    Approvals from other public agencies for the proposed Project include, but are not limited to, the following:

    - California Department of Fish and Wildlife
    - Lahontan Regional Water Quality Control Board
    - Antelope Valley Air Quality Management District
    - Southern California Edison
    - Los Angeles County Sanitation District #14
    - Los Angeles County Waterworks District #40
    - Los Angeles County Fire Department

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation under Public Resources Code Section 21080.3.1?** If so, is there a plan for consultation that includes, for example, the determination of the significance of impacts on tribal cultural resources, procedures regarding confidentiality, etc.?

    Per Assembly Bill (AB) 52, and Senate Bill (SB) 18, consultation letters for the proposed Project were sent on May 1, 2024, to the tribes requesting to be notified of projects subject to AB52. These letters were mailed via certified return receipt mail and included copies of the site plan, cultural resources report, and an aerial photograph. Table 18, *Native American Tribes Notification List,* identifies the tribes, the person to whom the letter was directed, and if a response to the AB 52 and SB 18 notice was received.

Environmental Factors Potentially Affected:

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

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

On the basis of this initial evaluation:

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

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

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

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

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

4/15/25

Kendall Brekke, Senior Planner **Date**

EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

    a. Earlier Analysis Use. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less Than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages w3here the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance.

1.1 Aesthetics

Threshold AES 1.1	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			✓	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a state scenic highway?			✓	
c) In non-urbanized areas, substantially degrade the existing visual character or quality or public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?			✓	

Impact Analysis

Threshold AES 1.1a) Would the Development Project have a substantial adverse effect on a scenic vista?

The City of Lancaster General Plan identifies five scenic areas in the City and immediately surrounding area (Figure 4.1.1, *Scenic Resources*). From the Project site, the closest scenic resource is Quartz Hill approximately 4 miles west. The elevation of Quartz Hill is approximately 2,475 feet above mean sea level (AMSL), and the Project site is approximately 2,525 (AMSL). Due to the limited elevation difference, and the significant intervening development including the Los Angeles County Courthouse, the Antelope Valley Freeway, and numerous single-family homes, Quartz Hill is not visible from the Project site. Therefore, the impact would be **less than significant.**

Threshold AES 1.1b) Would the Project Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a state scenic highway?

According to the *California State Scenic Highway System Map*, the Project site is not located in the vicinity of a State Scenic Highway. According to the List of Eligible and Officially Designated State Scenic Highways published by Caltrans, neither Antelope Valley Freeway (State Route [SR]-14) in the vicinity of the Project site or Sierra Highway are designated as

Eligible for State Scenic consideration.[1] The closest designated scenic highway to the Project site is the Angeles Crest Highway (SR-2), located approximately 22 miles southeast of the Project site. However, the Antelope Valley Freeway is designated in the City's Master Environmental Assessment as a local scenic roadway because of the views of the mountain ranges to the north and south of the valley. While the Project site is near the freeway, the construction and operation of the Project would not impact the views to traveling motorists. Therefore, impacts would be **less than significant.**

Threshold AES 1.1c) Would the Project, In non-urbanized areas, substantially degrade the existing visual character or quality or public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

According to the U.S. Census Bureau, the City of Lancaster is located within the Los Angeles Metropolitan, CA Urbanized Area.[2] As described in CEQA Guidelines Section 15387 and defined by the U.S. Census Bureau, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile. Because the City qualifies as an urbanized area, the Project would have a potentially significant impact if it conflicted with applicable zoning and other regulations governing scenic quality.

Although the Project site is located in OP zone, because the Project is proposing a general plan amendment and zone change to Light Industrial (LI), the Project is evaluated for consistency with Municipal Code section 17.16.220 - Design and Performance Standards, and the City of Lancaster Design Guidelines, December 8, 2009 (Updated March 30, 2010), which were adopted to establish standards for all development by implementing quality design.[3]

Additionally, the City of Lancaster has adopted design guidelines that provide the basis to achieve quality design for all development within the City.

As shown in Figure 6: Project Consistency with Site Design Guidelines and Figure 7: Project *Consistency with Building Design Guidelines*, located at the end of this section, the Project's design components are consistent with City's zoning regulations governing scenic quality. Impacts would be **less than significant.**

[1] California State Highway Scenic Map.
[2] *U.S. Census Bureau quickfacts: Lancaster City, California. (n.d.-b).* https://shorturl.at/3VAUF
[3] Lancaster Design Guidelines at: oflancasterca.org/home/showpublisheddocument/11563/635775792210230000.

Threshold AES 1.1 d) Would the Project Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?

The Project would introduce new light sources on the Project site, including pole lighting in the parking areas and wall pack lighting affixed to the building facades. These new light fixtures would comply with all applicable City development standards for lighting, as described in Section 17.16.220 of the City Code.

Glare is caused by light reflections from pavement, vehicles, and building materials such as reflective glass and polished surfaces. During daylight hours, the amount of glare depends on the intensity and direction of sunlight and can create hazards to motorists and nuisances for pedestrians and other viewers. The operation of the proposed Project would not result in any glare-related impacts as the two industrial buildings that would be constructed onsite would consist of concrete tilt-up panels, which are non-reflective. Glass incorporated into the Project design would be tinted, further reducing the potential for glare impacts. Therefore, impacts would be **less than significant**.

Figure 6. Project Consistency with Site Design Guidelines

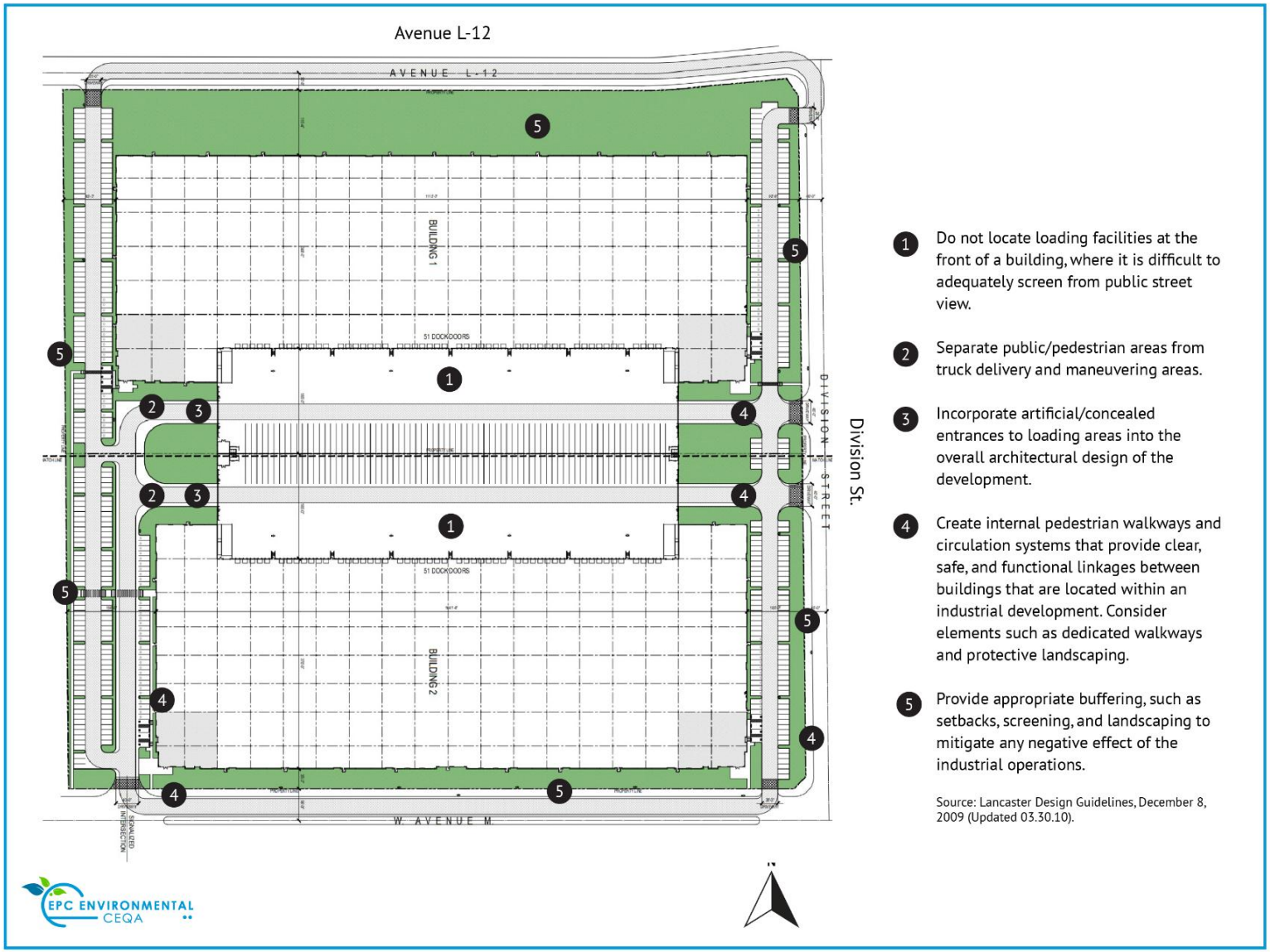


Figure 7: Project Consistency with Building Design Guidelines

NORTH ELEVATION

WEST ELEVATION

1. Design side and rear building facades with attention to the architectural character and detail comparable to the front facades, particularly if rear and side facades are visible to streets or adjacent properties.
2. Provide a variety of roof lines and plane lines, especially whre building heights exceed 20 feet.
3. For all non-residential uses, include parapets to conceal rooftop equipment, chimneys, cooling towers, and solar panels. Encourage use of "equipment wells" on rooftops to screen equipment.
4. Implement glazing and openings into buildings to provide sun control.
5. Portray a quality office appearence of entries, and tie the entry into the overall mass and building composition. Entries should not appear as "add-on" or afterthought.

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1.2 Agriculture and Forestry Resources

Threshold AG 1.2	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.				✓

Impact Analysis

Threshold AG 1.2a): Would the Development 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?

Sections 21095 and 21060.1(a) of the CEQA statute and the *CEQA Guidelines* Appendix G define three Important Farmland categories—Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as agricultural lands for purposes of CEQA analysis and acknowledge that their conversion to non-agricultural uses may be considered a significant impact. The Department of Conservation, Farmland Mapping & Monitoring Program (FMMP) maps for Los Angeles County were reviewed to determine if the Project site is designated as

Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance). The FMMP indicates the Project site is designated as "Other Land".[4] Common examples include low-density rural developments, brush, timber, wetland, and riparian areas unsuitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than forty acres. "Other land" is considered vacant and nonagricultural land surrounded on all sides by urban development and over 40 acres. No Prime Farmland, Farmland of Statewide Importance, or Unique Farmland is located on the Project site; therefore, Project implementation would not convert Important Farmland to non-agricultural uses. As such, there would be **no impact.**

Threshold AG 1.2b): Would the Project conflict with existing zoning for agricultural use or a Williamson Act contract?

According to the Williamson Act Enrollment Finder website, the Project site is not under Williamson Act contract [5]. Additionally, there are no Williamson Act contracts within Los Angeles County. Furthermore, the Project site is zoned Office Professional, which does not allow for agricultural uses, and is surrounded by non-residential and non-agricultural zoning on all sides (refer to Table 1). As such, the Project would not conflict with existing zones for agricultural uses or a Williamson Act contract. As such, there would be **no impact**.

Threshold AG 1.2c-d): Would the Development 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 of forest land to non-forest use?

According to the City of Lancaster's General Plan, there are no forests or timberlands located within the City of Lancaster. Therefore, the proposed Project would not result in the rezoning of forest or timberland and would not cause the loss of forest land or the conversion of forest land to non-forest land. As such, there would be **no impact**.

Threshold AG 1.2e): Would the Development 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?

See responses to Items 1.2a-d.

[4] *California, S. of. (n.d.). Doc maps. Department of Conservation Map Server. https://maps.conservation.ca.gov/*

[5] California Department of Conservation, California Williamson Act Enrollment Finder, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html, accessed February 15, 2025,

1.3 Air Quality

Threshold AQ 1.3	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is attainment under an applicable federal or state ambient air quality standard?		✓		
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

Impact Analysis

The following analysis is based in part on the Air Quality/GHG Assessment prepared by KPC EHS Consultants, LLC, February 19, 2025. (see **Appendix A-1**) and a Health Risk Assessment prepared by Urban Crossroads, March 2025 (see **Appendix A-2**).

Threshold AQ 1.3a): Would the Development Project conflict with or obstruct implementation of the applicable air quality plan?

The Antelope Valley Air Quality Management District (AVAQMD) administers the Air Quality Management Plan (AQMP), which is a comprehensive document outlining an air pollution control program for attaining all California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). The approved AVAQMD AQMP is the AVAQMD Federal 70 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area).

According to the AVAQMD, *California Environmental Quality Act (CEQA), and Federal Conformity Guidelines*,[6] a project is non-conforming with the AQMP if it conflicts with or delays the 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).

[6] Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines, August 2016. https://www.avaqmd.ca.gov/files/818bd8682/AVCEQA2016+Updated+Contact+Info.pdf.

Criterion 1. Consistent with the Land Use Plan Used to Generate the Growth Forecast

As stated in the AVAQMD CEQA Guidelines, conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan used to generate the growth forecast. The current General Plan land use designation is Office Professional (OP). This was the land use plan used to generate the growth forecast. The Project proposes a General Plan Amendment to change the site's General Plan land use designation from Office Professional (OP) to Light Industry (LI). This change is analyzed below using the example in the AVAQMD CEQA Guidelines of a non-conforming project to determine if the Project would increase the gross number of dwelling units, increase the number of vehicle trips, and/or increase the overall VMT.

Increases the Number of Dwelling Units

The Project is for industrial use and does not directly increase the number of dwelling units. Indirectly, the Project could increase the number of dwelling units if there were not enough existing or planned housing to accommodate the local workforce. According to the *California Employment Development Department (EDD). Monthly Labor Force Data for Cities and Census Designated Places (CDP) Annual Average, August 2024*[7] *The City of Lancaster has a labor force of 64,000, with 5,700 unemployed persons (8.9%). The current housing stock has an inventory of 1,895 vacant* units.[8] Given that the Project is forecast to employ 435 people[9], the local labor force is likely to fill many of the jobs.

Increases the Number of Vehicle Trips

According to the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition), the Project is forecast to generate 1,823 daily vehicle trips for general warehouse use. (ITE Land Use Code 150-General Warehouse). If it were developed for general office use, the Project would generate 8,748 daily vehicle trips. (ITE Land Use Code 710-General Office). Thus, the Project's trip generation is 6,925 fewer trips (79% decrease) and would not increase the number of vehicle trips as anticipated in the City's General Plan growth forecast.

Increases the number of Vehicle Miles Traveled

According to the Project's CalEEMod Datasheets (Appendix A-1) the Project is forecast to generate 5,288,747 annual vehicle miles traveled (VMT) for general warehouse use. Using the CalEEMod program to calculate the estimated VMT for professional office projects use for General Office use the Project would generate 28,770,695 VMT per year, and if developed

[7] https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html#CCD. Accessed October 6, 2024.

[8] California Department of Finance, https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed October 8. 2024.

[9] Table 2, Avenue M & Division Street Warehouse Project Vehicle Miles Traveled (VMT) Analysis, RK Engineering Group, December 1, 2023 (Appendix I).

for an Office Park would generate 32,193,522 VMT per year. Thus, the Project would not increase the VMT as anticipated in the City's growth forecast.

Criterion 2. Complies With All Applicable District Rules and Regulations and All Proposed Control Measures

The AVAQMD AQMP was developed to address the attainment of the 2015 8-hour ozone (O_3) NAAQS (70 parts per billion). The AVAQMD AQMP provides actions, strategies, and steps needed to reduce air pollutant emissions and meet the O_3 standard by 2033. The purpose of a consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and if it would interfere with the region's ability to comply with federal and state air quality standards. The proposed Project would comply with all applicable AVAQMD Rules and Regulations including the following and, therefore, would be consistent with the AQMP.

- **Rule 201 Permit to Construct.** A person shall not build, erect, install, alter, or replace any equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce or control the issuance of air contaminants without first obtaining written authorization for such construction from the Air Pollution Control Officer. A permit to construct shall remain in effect until the permit to operate the equipment for which the application was filed is granted or denied, or the application is canceled.

- **Rule 203 Permit to Operate.** A person shall not operate or use any equipment, the use of which may cause the issuance of air contaminants or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit from the Air Pollution Control Office. The equipment shall not be operated contrary to the conditions specified in the permit to operate.

- **Rule 204 Permit Conditions**. To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any permit. Commencing work or operation under such a permit shall be deemed acceptance of all the conditions so specified.

- **Rule 401 Visible Emissions** The purpose of the Rule is to provide limits for the visible emissions from sources within the District.

- **Rule 402 Nuisance.** A person shall not discharge from any source whatsoever such quantities of air contaminants or other materials 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.

- **Rule 403 Fugitive Dust**. The purpose of this rule is to reduce the amount of particulate matter entrained in the ambient air from anthropogenic (manmade) fugitive dust sources within the District by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.

- **Rule 1113 Architectural Coatings.** The purpose of this rule is to limit the quantity of Volatile Organic Compounds (VOC) in architectural coatings.

Therefore, impacts would be **less than significant**.

Threshold AQ 1.3b): Would the Development Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?

The MDAB (Basin) is currently designated nonattainment for the federal and State standards for Ozone (O_3) and nonattainment of State standards for Particulate Matter (PM_{10})(AVAQMD 2017). By its very nature, air pollution is essentially 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 emissions contribute to existing significant adverse air quality impacts if they exceed the threshold of significance for criteria pollutants, and the project's impact on air quality would be considered cumulatively significant. The following analysis assesses the potential cumulative air quality impacts associated with the construction and operation of the proposed Project.

Construction Emissions

The quantification of construction emissions includes emissions generated by on-site construction equipment and emissions resulting from worker and vehicle trips to the site. Detailed construction equipment assumptions used in this analysis and daily emission rates by phase are detailed in the Air Quality/GHG Assessment for the *Avenue M, Lancaster Industrial Development Project* included in Appendix A-1, of this Initial Study.

Construction activities associated with the Project will result in emissions of CO, VOCs, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. Construction-related emissions are expected from the following construction activities:

- Site Preparation.
- Grading.
- Building Construction.
- Paving.
- Architectural Coating.
- Materials Deliveries and Construction Workers Commuting.

Construction emissions were modeled using a 13-month construction schedule as indicated by the Project applicant. The 13-month schedule equates to a 282-day construction schedule in the CalEEMod, with default values for off-road construction equipment and construction schedules. Peak emissions represent the highest values from the summer and winter

modeling. AVAQMD significance thresholds were used to determine the Project's impacts. Emissions have been calculated to combine the on- and off-site emissions and are provided in Table 3: *Summary of Peak Construction Summer Emissions* and Table 4: *Summary of Peak Construction Winter Emissions*. The daily emissions rates shown reflect all combinations of overlapping construction operations.

Table 3. Summary of Peak Construction Summer Emissions

Year	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025	6.75	61.5	62.2	0.11	14.3	7.87
2026	136	7.20	11.3	0.01	0.90	0.34
Maximum Daily Emissions	**136**	**61.5**	**62.2**	**0.11**	**14.3**	**7.87**
AVAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Table 3.3, Air Quality/GHG Assessment. (Appendix A-1).

Table 4. Summary of Peak Construction Winter Emissions

Year	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2025	3.00	16.8	37.2	0.06	6.02	1.80
2026	3.88	23.1	46.5	0.07	6.48	2.06
Maximum Daily Emissions	**3.88**	**23.1**	**37.2**	**0.07**	**6.48**	**2.06**
AVAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Source: Table 3.4, Air Quality/GHG Assessment (Appendix A-1).

As shown in Tables 3 and 4, Project construction emissions are estimated to be below the AVAQMD Regional Thresholds. It should be noted that the VOC emissions (from architectural coatings) are at the limit established for VOC emissions (137 lbs./day). Therefore, implementation of **Mitigation Measure 1** is required to ensure the threshold for architectural coatings VOC is not exceeded.[10]

Valley Fever

The construction of the proposed Project would result in the disturbance of the soil, it is possible individuals could be exposed to Valley Fever. Valley Fever or coccidioidomycosis, is primarily a disease of the lungs caused by the spores of the Coccidioides immitis fungus. The spores are found in soils, become airborne when the soil is disturbed, and are subsequently inhaled into the lungs. After the fungal spores have settled in the lungs, they change into a multicellular structure called a spherule. Fungal growth in the lungs occurs as the spherule grows and bursts, releasing endospores, which then develop into more spherules. Valley Fever is not contagious, and therefore cannot be passed on from person to person. Most of those

[10] Carr, K. P. (2023, December 23). *Avenue "M", Lancaster Industrial Development Project - Air Quality/GHG Assessment. Lancaster*; KPC-EHS Consultants. Technical Memorandum.

who are infected would recover without treatment within six months and would have life-long immunity to the fungal spores. In severe cases, especially in those patients with rapid and extensive primary illness, those who are at risk for dissemination of disease, and those who have disseminated disease, antifungal drug therapy is used. Nearby sensitive receptors as well as workers at the Project site could be exposed to Valley Fever from fugitive dust generated during construction. There is the potential that cocci spores would be stirred up during excavation, grading, and earth-moving activities, exposing construction workers and nearby sensitive receptors to these spores and thereby to the potential of contracting Valley Fever. However, implementation of **Mitigation Measure 18** (refer to Section 1.7 Geology and Soils) which requires the Project operator to implement dust control measures in compliance with Rule 403, and implementation of **Mitigation Measure 2**, below, which would provide personal protective respiratory equipment to construction workers and provide information to all construction personnel and visitors about Valley Fever, the risk of exposure to Valley Fever would be minimized to a less than significant level.

Operational Emissions

Long-term air pollutant emission impacts that would result from the proposed Project are those associated with mobile sources (e.g., vehicle trips, etc.), energy sources (e.g., electricity, etc.), area sources (e.g., architectural coatings, consumer products, and the use of landscape maintenance equipment, etc.), and on-site equipment emissions.

Long-term operational emissions associated with the Proposed Project were calculated using CalEEMod. Table 5. *Summary of Peak Operational Emissions* shows the unmitigated long-term operational emissions for the Proposed Project. This analysis was based on standard construction methods and assumes the buildings would meet the minimum design requirements of California Title 24. As shown in Table 5, operational emissions associated with the Project would be less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Table 5. Summary of Peak Operational Emissions

Operational Activities – Summer	Emissions (pounds per day)					
	VOC	NOX	CO	SOX	PM10	PM2.5
Mobile	10.2	6.88	69.7	0.13	11.7	3.04
Area Source	24.3	0.30	35.1	<0.005	0.06	0.05
Energy Source	0.26	4.80	4.03	0.03	0.36	0.36
Total Maximum Daily Emissions	**34.8**	**12.0**	**109**	**0.16**	**12.2**	**3.46**
AVAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**
Operational Activities – Winter	**Emissions (pounds per day)**					
	VOC	NOX	CO	SOX	PM10	PM2.5
Mobile	9.01	7.48	55.8	0.12	11.7	3.04
Area Source	18.6	-	-	-	-	-
Energy Source	0.26	4.80	4.03	0.03	0.36	6
Total Maximum Daily Emissions	**27.9**	**12.3**	**59.8**	**0.46**	**12.1**	**3.41**
AVAQMD Regional Threshold	137	137	548	137	82	65
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

Mitigation Measures

Mitigation Measure 1. Architectural coatings used for the Project buildings (both interior and exterior coatings), shall contain no more than 50 grams per liter of volatile organic compounds. Paints and architectural coatings containing volatile organic compounds in concentrations exceeding 50 grams per liter shall not be used for the Project. This requirement shall be included in the contractor specifications.

Mitigation Measure 2. Valley Fever Management Plan.

a. Prior to ground disturbance activities, the Project operator shall provide evidence to the Community Development Director that the Project operator and/or construction manager has developed a "Valley Fever Training Handout", training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, handout(s) and schedule shall be submitted to the Community Development Director within 24 hours of the first training session. Multiple training sessions may be conducted if different work crews come to the site for different stages of construction; however, all construction personnel shall be provided training prior to beginning work. The evidence submitted to the Community Development Director regarding the "Valley Fever Training Handout" and Session(s) shall include the following:

    1. A sign-in sheet (to include the printed employee names, signature, and date) for all employees who attended the training session.

2. Distribution of a written flier or brochure that includes educational information regarding the health effects of exposure to criteria pollutant emissions and Valley Fever.

3. Training methods that may help prevent Valley Fever infection.

4. A demonstration to employees on how to use personal protective equipment, such as respiratory equipment (masks), to reduce exposure to pollutants and facilitate recognition of symptoms and earlier treatment of Valley Fever. Where respirators are required, the equipment shall be readily available and shall be provided for employees for use during work. Proof that the demonstration is included in the training shall be submitted to the county. This proof can be via printed training materials/agenda, DVD, digital media files, or photographs.

b. The Project operator also shall consult with the Los Angeles County Public Health to develop a Valley Fever Dust Management Plan that addresses the potential presence of the Coccidioides spore and mitigates for the potential for Coccidioidomycosis (Valley Fever). Prior to issuance of permits, the Project operator shall submit the Plan to the Los Angeles County Public Health for review and comment. The Plan shall include a program to evaluate the potential for exposure to Valley Fever from construction activities and to identify appropriate safety procedures that shall be implemented, as needed, to minimize personnel and public exposure to potential Coccidioides spores. Measures in the Plan shall include the following:

    1. Provide HEP filters for heavy equipment equipped with factory-enclosed cabs capable of accepting the filters. Cause contractors utilizing applicable heavy equipment to furnish proof of worker training on proper use of applicable heavy equipment cabs, such as turning on air conditioning prior to using the equipment.

    2. Provide communication methods, such as two-way radios, for use in enclosed cabs.

    3. Require National Institute for Occupational Safety and Health (NIOSH)-approved half-face respirators equipped with a minimum N-95 protection factor for use during worker collocation with surface disturbance activities, as required per the hazard assessment process.

    4. Cause employees to be medically evaluated, fit-tested, and properly trained on the use of the respirators, and implement a full respiratory protection program in accordance with the applicable Cal/OSHA Respiratory Protection Standard (8 CCR 5144).

    5. Provide separate, clean eating areas with hand-washing facilities.

6. Install equipment inspection stations at each construction equipment access/egress point. Examine construction vehicles and equipment for excess soil material and clean, as necessary, before equipment is moved off-site.

7. Train workers to recognize the symptoms of Valley Fever, and to promptly report suspected symptoms of work-related Valley Fever to a supervisor.

8. Work with a medical professional to develop a protocol to medically evaluate employees who develop symptoms of Valley Fever.

c. Work with a medical professional, in consultation with the Los Angeles County Public Health, to develop an educational handout for on-site workers and surrounding residents within three miles of the Project site, and include the following information on Valley Fever: what are the potential sources/ causes, what are the common symptoms, what are the options or remedies available should someone be experiencing these symptoms, and where testing for exposure is available. Prior to construction permit issuance, this handout shall have been created by the Project operator and reviewed by the Project operator and reviewed by the Community Development Director. No less than 30 days prior to any work commencing, this handout shall be mailed to all existing residences within a specified radius of the Project boundaries as determined by the Community Development Director. The radius shall not exceed three miles and is dependent upon the location of the Project site.

    1. When possible, position workers upwind or crosswind when digging a trench or performing other soil-disturbing tasks.

    2. Prohibit smoking at the worksite outside of designated smoking areas; designated smoking areas will be equipped with handwashing facilities.

    3. Post warnings on-site and consider limiting access to visitors, especially those without adequate training and respiratory protection.

    4. Audit and enforce compliance with relevant Cal OSHA health and safety standards on the job site.

Threshold AQ 1.3c): Would the Development Project expose sensitive receptors to substantial pollutant concentrations?

Construction Impacts

The land use with the greatest potential exposure to Project construction diesel particulate matter (DPM) source emissions is Location R1 which is located approximately 58 feet east of the Project site at the Regal Lodge Motel, located at 42047 Sierra Highway (Appendix A-2). For purposes of this analysis, this receptor was conservatively analyzed as a residential receptor. At the maximally exposed individual receptor (MEIR) the maximum incremental

cancer risk attributable to Project construction DPM source emissions is estimated at 1.89 in one million, which is less than the AVAQMD significance threshold of 10 in one million. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. Because all other modeled receptors are located at a greater distance from the Project site and are exposed to lesser concentrations of DPM than the MEIR as analyzed in Appendix A-2, and toxic air contaminant (TACs) generally dissipate with distance from the source, all other receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than MEIR identified.

Operational Impacts

A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as residences and schools, that may be impacted by a proposed project. This radius is more robust than the 1,000-foot impact radius required in accordance with AB3205 (H&SC Section, 42301.6 through 42301.9) and California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) emissions and modeling analyses, and therefore provides a more health protective scenario for evaluation. The Health Risk Assessment Report in Appendix A-2 studied the impacts for residences and schools within one-quarter mile of the Project Site.

The residential land use with the greatest potential exposure to Project DPM source emissions is Location R2 which is located approximately 70 feet east of the Project site at the Sahara Motel, located at 42137 Sierra Highway. At the MEIR, the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 1.21 in one million, which is less than the AVAQMD significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project operational activity. Because all other modeled residential receptors are located at a greater distance from the Project site and primary truck routes and are exposed to lesser concentrations of DPM than the MEIR analyzed in Appendix A-2, and TACs generally dissipate with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project would not cause a significant human health or cancer risk to nearby receptors.

There are no schools within one-quarter mile of the Project site. The nearest school is Adventureland Preschool, which is located approximately 6,000 feet southwest of the Project site. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than ¼ mile from the air pollution source, there would be no significant impacts that would occur to any schools in the vicinity of the Project.

Therefore, the Development Project would not expose sensitive receptors to substantial pollutant concentrations. The impact would be **less than significant**.

Threshold AQ 1.3d): Would the Development Project create objectionable odors affecting a substantial number of people?

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment, architectural coatings, and paving. Construction of the Project is not anticipated to produce significant objectionable odors as any odors would be short-term in nature and cease upon the completion of construction. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfill
- Dairies
- Fiberglass molding facilities

The Project does not propose or include any of the above-mentioned land uses that would be substantive sources of objectionable odors. Therefore, impacts would be **less than significant**.

1.4 Biological Resources

Threshold BIO 1.4	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			✓	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

Impact Analysis

The following analysis is based in part on the Habitat Assessment and Joshua Tree Census, November 2023, L&L Environmental, Inc. (**Appendix B**).

Threshold BIO 1.4a): 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 the U.S. Fish and Wildlife Service?

The habitat assessment in Appendix B consisted of a literature review and field survey with focus on special status species known to occur in the region in accordance with guidelines from the US Fish and Wildlife Service (USFWS), the California Department of Fish and Wildlife (CDFW) and the California Natural Diversity Database (CNDBB). Species known to occur in the region include desert tortoise, Mohave ground squirrel, burrowing owl, desert kit fox, and various rare plants. Special status species include those that are either a candidate or listed

under the federal Endangered Species Act (ESA) and/or under the California Endangered Species Act (CESA), or as identified by the California Native Plant Society (CNPS) which assigns a ranking of sensitivity (California Rare Plant Rank, CRPR).

Existing Conditions

Vegetation within the Project site consists of rubber rabbitbrush scrub (*Ericameria nauseosa* Shrubland Alliance) and creosote bush scrub (*Larrea tridentata* Shrubland Alliance) along with non-native grassland and developed/disturbed areas. (See Figure 8, *Vegetation Mapping)*. Species observed on the site are identified in Table 6, *Plants and Wildlife Species Observed on the Project Site,* below.

Table 6. Plants and Wildlife Species Observed on the Project Site

Scientific Name	Common Name
Plants	
Ephedra nevadensis	Nevada ephedra, desert tea, Nevada joint fir
Amaranthus albus	Tumbleweed, tumbling pigweed
Ambrosia acanthicarpa	Annual bur-sage, annual sandbur
Baccharis sergiloides	Desert waterweed
(Chrysothamnus nauseosus)	Common rabbitbrush
Amsinckia intermedia (A. menziesii var. intermedia)	Common phacelia
Phacelia distans	Common phacelia
Brassica tournefortii	Sahara mustard, wild turnip
Sisymbrium altissimum	Tumble mustard
Grayia spinosa	Spiny hop-sage
Salsola tragus	Russian thistle
Croton setiger (C. setigerus, Eremocarpus setiger, E. setigerus)	Turkey-mullein, doveweed
Euphorbia species (Chamaesyce species)	Unid. spurge
Erodium cicutarium	Redstem filaree
Birds	
Streptopeliadecaocto	Eurasian collared-dove
Zenaidamacroura	Mourning dove
Corvus corax	Common raven
Haemorhous (Carpodacus) mexicanus	House finch
Euphagus cyanocephalus	Brewer's blackbird
Setophaga coronata	Yellow-rumped warbler
Chondestes grammacus	Lark sparrow
Zonotrichia leucophrys	White-crowned sparrow
Sturnus vulgaris	European starling
Mammals	
Spermophilus beecheyi	California ground squirrel
Invertebrates	
Danaus plexippus	Monarch (fly through), not overwintering population

The Project site was evaluated for impacts on candidate, sensitive, or special-status plant or animal species and is discussed below.

Sensitive Plant Species

Although no special plant species were identified on site, the botanical surveys were not performed during the blooming season. As such, **Mitigation Measure 3,** which requires a botanical survey and **Mitigation Measure 4,** which identifies avoidance and minimization measures, are required to reduce impacts to less than significant.

The biological report identified the following special status plants that occur or may occur on site based on literature review and field surveys.

Crowned muilla – CRPR 4.2

The biological assessment in Appendix B identified that one special status plant species, crowned muilla (*Muilla coronata*), has a moderate potential to occur, as plant surveys were conducted outside of blooming season, and presence could not be verified. The CNPS has ranked this plant as 4.2, which is defined as "Plants of limited distribution; fairly threatened in California." Crowned muilla is a perennial bulbiferous herb in the Themidaceae (Brodiaea) family. This species flowers from March through April or May and is found in Joshua tree woodland, Mojavean desert scrub, pinyon and juniper woodland, and chenopod scrub at elevations from about 2,200 to 6,430 feet (670 to 1,960 meters). Crowned muilla is not tracked in the CNDDB. There are four mapped records of this species within 5 miles of the Project site, with observations in 1991, and 1888 and 1935. Therefore, the biological survey in Appendix B identified that based on the presence of suitable habitat, Crowned muilla has a moderate potential to occur on the site.

Western Joshua Tree – Candidate Species CESA

On September 22, 2020, the western Joshua tree (*Yucca brevifolia*) became a candidate for listing as threatened under CESA, which means it is provided the same protections as a listed species. Western Joshua tree (WJT) is an evergreen tree-like plant in the Agavaceae (Agave) family. It is found on flats and slopes in the Mojave Desert in California and Nevada at elevations from 1,900 to 7,200 feet.

A census of Joshua trees was conducted concurrently with the biological surveys and census methods followed the latest CDFW guidance. As required, the census was conducted on the entire site and a surrounding 50-foot buffer. The survey found a total of 40 live and dead Joshua trees on the site, located in five clumps (Table 7 and Figure 9).

Table 7. Joshua Trees by WJTCA Height Class

Status and Size Class	Number of Joshua Trees Present		
	Site	Buffer	Total
LIVE TREES			
Size Class A	16	0	16
Size Class B	21	0	21
Size Class C	1	0	1
Live Total	**38**	**0**	**38**
DEAD TREES			

Status and Size Class	Number of Joshua Trees Present		
	Site	Buffer	Total
Size Class A	0	0	0
Size Class B	2	0	2
Size Class C	0	0	0
Dead Total	**2**	**0**	**2**
Grand Total	**40**	**0**	**40**

Size Class A = < 1 meter; B = ≥ 1 meter and < 5 meters; C = ≥ 5 meters.

The Western Joshua Tree Conservation Act (WJTCA) was enacted in July 2023 and gives an individual or business the option to pay a standard mitigation fee for impacts to Joshua trees. Mitigation is required for every individual Joshua tree stem arising out of the ground, even if it is a clone. Clones are stems arising from the root system or underground stems (rhizomes) of a Joshua tree.

Therefore, a permit would be required to be obtained from the CDFW prior to removal of the WJT. And while compliance with local, State and federal regulations is not mitigation, **Mitigation Measure 5** which requires the applicant to obtain a western Joshua Tree take permit prior to grading is required to ensure impacts would remain less than significant. With mitigation incorporated, the impacts would be less than significant.

Sensitive Wildlife Species

Burrowing Owl– Candidate CESA
Moderate to High Potential to Occur on Site

The burrowing owl (*Athene cunicularia*) is a small, ground-dwelling owl found in open dry grassland, desert, or shrubland areas and in uncultivated agricultural areas, rangelands, and other open areas with low-growing vegetation.

Burrows are an essential element of burrowing owl habitat. Although the burrowing owl is capable of excavating its own burrows in soft soils, it typically modifies and inhabits abandoned burrows of small burrowing mammals, such as ground squirrels and pocket gophers. Burrowing owl has also been known to use man-made structures such as cement culverts, debris piles, and other artificial burrows.

The literature search recorded several sightings within 5 miles of the site (Appendix B). No burrowing owls or sign of owls was observed on the site during the reconnaissance survey. However, suitable habitat is present and there are mammal burrows on the site that could be suitable for use by burrowing owls. Based on the reconnaissance survey and available information, the biological report in Appendix B indicated that burrowing owl has a moderate potential for occurrence on the site. As such to minimize and avoid potential impacts to burrowing owl **Mitigation Measure 6** to conduct a pre-construction survey and **Mitigation Measure 7** to prepare a relocation plan, are required.

Nesting Birds – Migratory Bird Treaty Act
Moderate to High Potential to Occur on Site

Habitat suitable for nesting birds protected by the Migratory Bird Treaty Act and California Fish and Game Code is present throughout the site and adjacent areas. Birds may nest in trees (including Joshua trees), shrubs, and other vegetation, in tree cavities, in burrows (e.g., burrowing owl), on open ground, or on structures and other surfaces, including utility poles.

No raptor nests were observed during the survey and nesting habitat for raptors is largely absent, however, the utility poles on and adjacent to the site may provide nesting locations for raptors (Appendix B). As such **Mitigation Measure 8** to conduct pre-construction nesting bird surveys is required to reduce impacts to less than significant.

Crotch's Bumble Bee – Candidate CESA
Low Potential to Occur On Site

Crotch's bumble bee occurs in open grassland and scrub habitats and primarily nests underground, often using abandoned rodent burrows, but may also use rock piles, tree cavities, etc. Crotch's bumble bee has a very short tongue, and thus is best suited to forage at open flowers with short corollas. Food plants include *Asclepias, Chaenactis, Lupinus, Medicago, Phacelia, Salvia*, and others.

No bumble bees were observed during the survey, however, the survey was not conducted during its most active season. Based on the survey, there is marginal habitat for Crotch's bumble bee on the site. Potential food plants for Crotch's bumble bee observed on the site are common phacelia and buckwheat. Others may be present but were not observed due to the timing of the survey. There are potential nesting locations on the site, including rock/debris piles, under shrubs, and within grass tufts.

Based on the reconnaissance survey and available information, the biological report in Appendix B identified that the Crotch's bumble bee has a low potential for occurrence on the site. However, to ensure impacts would remain less than significant, **Mitigation Measure 9** that requires a pre-construction survey, is required.

Mohave Ground Squirrel – Threatened CESA
Low Potential to Occur on Site

The Mohave ground squirrel (*Xerospermophilus mohavensis*) range is limited to the western Mojave Desert in San Bernardino, Los Angeles, Kern, and Inyo counties (Best 1995). Within its range it has a patchy distribution but occupies a variety of habitats, including saltbush scrub, creosote bush scrub, Joshua tree woodland, blackbrush (*Coleogyne ramosissima*) scrub, and big sagebrush (*Artemisia tridentata*) scrub. It occurs at elevations up to at least 5,580 feet (1,700 meters) (Appendix B).

This species occupies areas with sandy soils or soils with a mix of sand and gravel, usually on fairly flat terrain with occasional rivulets and with a shrub cover of 10 to 19 percent. It usually avoids steep sloping and rocky terrains (Appendix B). Soil characteristics are critical because Mohave ground squirrel constructs burrows to provide temperature regulation, avoid predators, raise young, and shelter in during the inactive season.

The site includes potentially suitable habitat for Mohave ground squirrel and many small mammal burrows are present, although there is disturbance on the site as well as adjacent development. However, the biological report in Appendix B identified that the Mohave ground squirrel has a low potential for occurrence on the site.

However, to ensure impacts remain less than significant, **Mitigation Measure 10** which requires contractor notification, and **Mitigation Measure 11** which requires a take permit be obtained from CDFW, are required.

Desert Tortoise – Candidate CESA; threatened ESA
Low Potential to Occur on Site

Desert tortoise (*Gopherus agassizii*) occupies a variety of arid habitats from sea level to 7,300 feet elevation, but most commonly occur on gently sloping terrain with sandy-gravel soils where there is sparse cover of low-growing shrubs. Typical habitat for the desert tortoise in the Mojave Desert has been characterized as creosote bush scrub below 5,500 feet elevation, where soils are friable enough for digging of burrows but firm enough so that burrows do not collapse, annual precipitation ranges from 2 to 8 inches, the diversity of perennial plants is relatively high, and production of ephemerals is high.

The entire site, with the exception of developed areas, is potentially suitable habitat for desert tortoise, although there is a high level of disturbance on and adjacent to the site (Appendix B). No desert tortoise and no signs of desert tortoise were incidentally observed during the reconnaissance survey. Items of sign that would be considered evidence of desert tortoise use of the site (other than live animals) include scat, burrows, tracks, carcasses, eggshell fragments, or courtship rings. None of these were observed.

The biological report in Appendix B identified that desert tortoise has a low potential to occur on the site. As such, no mitigation measures are required.

Desert Kit Fox – Title 14 of the California Code of Regulations, Section 460
Moderate to High Potential to Occur on Site

The desert kit fox (*Vulpes macrotis arsipus*) is protected as a fur-bearing mammal under Title 14 of the California Code of Regulations § 460, which states that desert kit fox may not be taken at any time (see Section 2.13). The desert kit fox does not currently have any other protected status.

The desert kit fox is a nocturnal predator of arid lands in the southwestern U.S. In California, it is found in the Mojave and Colorado Deserts, mainly in open desert scrub habitats on flat or gently sloping terrain. The kit fox excavates burrows to provide shelter, cover, and protection for young.

The reproductive period is December to late May and litters are typically born in February through March (Appendix B). Potentially suitable habitat for desert kit fox is present throughout the site and a number of mammal burrows are present that may be utilized by desert kit fox. The site is not within predicted occupied habitat (Appendix B), although predicted occupied habitat is located just to the southwest.

The CNDDB does not track desert kit fox and consequently observation records are not available. The biological assessment in Appendix B stated that the desert kit fox has a moderate potential to occur on the site, based on available information.

As such, to ensure impacts to desert kit fox are less than significant, **Mitigation Measure 12** to conduct pre-construction surveys and contractor notification, is required.

Mountain Lion – Candidate CESA
Low Potential to Occur on Site

Mountain lions (Puma concolor) are primarily solitary, territorial, and occur in low density. They are mainly active at night and at dusk and dawn. Mountain lions have large home ranges that include heterogenous habitats including riparian, chaparral, oak woodlands, coniferous forests, grasslands, and occasionally rocky desert uplands. In California, mountain lions can range from near sea level to the higher mountain slopes and some desert areas. Natal dens may be found in rocky terrain or dense vegetation. There have been recent news reports of mountain lions seen in the Lancaster area (Appendix B). This species could potentially move through or forage within the site, but due to the proximity of ongoing human disturbance and lack of cover, it would not den there. No tracks or other sign of mountain lion were observed during the survey. However, the biological report in Appendix B identified that the mountain lion has a low potential for occurrence on the site. Implementation of Mitigation Measure 12 would ensure that potential impacts to the mountain lion would remain less than significant. While Mitigation Measure 12 focuses primarily on pre-construction surveys for kit fox, the biologist would identify if any dens, tracks, and scat may belong to the mountain lion.

Other Species
Moderate to High Potential to Occur on Site

No special status wildlife species were observed during the reconnaissance survey. However, in addition to the species discussed above, the biological assessment in Appendix B identified several special status wildlife species have a moderate or high potential to occur due to recorded occurrences within 5 miles of the Project site. Implementation of Mitigation Measure 8 which requires pre-construction nesting bird surveys is anticipated to reduce potential impacts to less than significant.

Overall, impacts would be **less than significant with mitigation incorporated.**

Mitigation Measures

Mitigation Measure 3. Botanical Surveys. Prior to Project implementation, and during the appropriate season, a qualified biologist shall conduct botanical field surveys within the Project area following protocols set forth in the California Department of Fish and Wildlife's (CDFW) 2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special-status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field

surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the Project area is identified to the taxonomic level necessary to determine rarity and listing status. If any special-status plants are identified, the Project Applicant shall avoid the plant(s), with an appropriate buffer (i.e., fencing or flagging).

Mitigation Measure 4. Special Status Plants. If complete avoidance of a special status plant is not feasible, the Project Applicant shall mitigate the loss of the plant(s) through off-site compensation including: 1) permanent protection of an existing off-site native population; 2) permanent protection of an off-site introduced population; 3) a combination of 1) and 2); or 4) mitigation banking. The ratio of acquisition to loss must in most cases exceed 1:1 for any species. The ratio should be higher for rarer species, particularly for those that occupy irreplaceable habitats.

Mitigation Measure 5. Western Joshua Tree Individual Take Permit. If any western Joshua trees are to be relocated, removed, or otherwise taken, the Project Proponent shall obtain an Incidental Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) under CDFW under §2081 of the California Endangered Species Act (CESA), or any other appropriate take authorization under CESA or under the Western Joshua Tree Conservation Act (Fish & G. Code, §§ 1927-1927.12), prior to the relocation, removal, or take. (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of western Joshua tree, a Candidate for Threatened CESA-listed species. Taking of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085 and §§ 1927-1927.12). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate Project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection through either the purchase of conservation or mitigation bank credits or the establishment of a conservation easement, the development of a long-term management plan, and securing sufficient funding to implement management plan tasks in perpetuity. These tasks should be completed, or financial security must be provided before starting any Project activities. To execute ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document to have a State Clearing House number, show proof of filing fees, and proof the document has been circulated.

Mitigation Measure 6. Burrowing Owl Take Avoidance Survey. Prior to the initiation of construction activities (i.e., grubbing, clearing, staging, digging), a "take avoidance survey" should be conducted by a qualified Biologist for the Project site and surrounding 500 ft radius utilizing the methodology provided in CDFW's 2012 Staff Report on Burrowing Owl Mitigation. This survey should be conducted no more than 14 days prior to the initiation of ground disturbance activities. If construction is delayed

or suspended for more than 30 days after the survey, the area shall be resurveyed. Should no Burrowing Owls be detected during the initial "take avoidance survey", the survey should be repeated within 24 hours prior to ground disturbance to determine if the Project site contains burrowing owl or sign thereof to avoid any potential impacts to the species. The surveys shall include 100 percent coverage of the Project site. If both surveys reveal no burrowing owls, active burrowing owl burrows or perch sites with active sign (molted feathers, cast pellets, prey remains, eggshell fragments, decoration, or excrement) thereof, no additional actions related to this measure are required and a report shall be prepared by the qualified biologist documenting the results of the survey including all requirement for survey reports (page 30 of the 2012 Staff Report). The report shall be submitted to CDFW for review prior to construction.

Mitigation Measure 7. Burrowing Owl Avoidance/Minimization Plan. If burrowing owl, active burrows or signs thereof are found the qualified biologist shall prepare and implement a plan for avoidance, minimization, and mitigation measures to be review and approved by CDFW for review and approval at least 30 days prior to initiation of ground disturbing activities. The Burrowing Owl Plan shall describe proposed avoidance, minimization, and monitoring actions. The Burrowing Owl Plan shall include the number and location of occupied burrow sites, acres of burrowing owl habitat that will be impacted, details of site monitoring, and details on proposed buffers and other avoidance measures if avoidance is proposed. Project activities shall not occur within 1000 feet of an active burrow until CDFW approves the Burrowing Owl Plan. If the Project cannot ensure burrowing owls and their burrows are fully avoided, consultation with CDFW is warranted to discuss how to implement the Project and avoid take; or if avoidance is not feasible, to potentially acquire an ITP prior to any ground disturbing activities, pursuant Fish and Game Code section 2081 subdivision (b). Full mitigation often involves the permanent conservation of quality habitat benefiting the species through a conservation easement, along with habitat enhancement and ongoing management funded appropriately. Passive relocation, performed according to the Staff Report on Burrowing Owl Mitigation (CDGW, 2012) may be authorized through the incidental take permit as a minimization measure.

Mitigation Measure 8. Nesting Bird Pre-Construction Survey. Project activities shall not result in impacts on birds, or result in the take or removal of nests or eggs in accordance with CDFW and USFWS regulations. Regardless of the time of year, a qualified biologist shall conduct pre-Project nesting bird surveys, implement nest buffers, and conduct monitoring all active nests within the work area and surrounding 300-foot buffer. Nesting bird surveys shall be conducted by a qualified biologist within 300 feet of all work areas, no more than 3 days prior to commencement of Project activities. If active nests containing eggs or young are found, a qualified biologist shall establish an appropriate nest buffer. The buffer shall be delineated to ensure that its location is known by all persons working within the vicinity but shall not be marked in such a manner that it attracts predators. Established buffers shall remain until a qualified biologist determines whether the young have fledged or the nest is no longer

active. If the qualified biologist determines that the Project activities may be causing an adverse reaction, the qualified Biologist shall adjust the buffer accordingly. Active nests shall be monitored until the biologist has determined the young have fledged or the Project is finished.

Mitigation Measure 9. Crotch's Bumble Bee Preconstruction Survey. Prior to the initiation of Project activities, the Project proponent must obtain a qualified biologist to conduct surveys for the candidate bumble bee species. The qualified biologist will conduct habitat mapping no less than 120 days prior to the initiation of Project activities with the submittal of a complete baseline habitat mapping report encompassing Fish and Game Code 1602 resources. Mapping will identify habitat alliances following Sawyer et al. (2009) and the report will identify species composition for each mapped alliance. If habitat mapping identifies the presence of plants (e.g., genera Antirrhinum, Phacelia, Clarkia, Cordylanthus, Dendromecon, Eschscholzia, Eriogonum Hypericum, Lantana, Lupinus, Salvia, Asclepias, Cirsium, Monardella, Keckiella, Acmispon, Euthamia, Ehrendorferia, Vicia, and/or Trichostema) or other suitable habitats, then a qualified biologist approved by CDFW shall prepare a draft survey plan and conduct surveys for Crotch's bumble bee. The survey plan will identify the timing, number, and duration of survey efforts and procedures to follow if Crotch's bumble bee is detected within the Project area. The survey methodology shall generally follow the U.S. Fish and Wildlife Service protocol for the Rusty Patched bumble bee (USFWS 2019). CDFW also recommends completing multiple surveys, coinciding with the peak bloom periods of the plants listed above. Following the completion of surveys, and no less than 30 days prior to initiation of Project activities, survey results shall be submitted to CDFW for review and comment. If Crotch's bumble bee is detected during surveys, Project activities shall not occur in any occupied habitat areas and the qualified biologist shall immediately notify CDFW.

Mitigation Measure 10. Mohave Ground Squirrel Avoidance/Minimization Measures. Prior to the issuance of a grading permit, the following text shall be included as a note on the grading plan:

"If Mohave ground squirrel is observed, the following avoidance and minimization measures shall be implemented during construction activities.

- Prior to the initiation of construction activities, the Project Applicant shall retain a qualified Biologist to oversee compliance with the protection measures for Mohave ground squirrel, and any other special status species. The Biologist shall monitor vegetation clearance and ground disturbance activities. Once ground disturbance is completed, monitoring shall be conducted at the frequency determined by the Biologist or as specified in the ITP. The Biologist shall have the authority to halt activities that violate measures designated to protect the Mohave ground squirrel or other special status species. Work shall proceed only after hazards to Mohave ground squirrel, and/or other special status species are removed, and the species are no longer at risk. The Biologist

shall have in his/her possession a copy of all the compliance measures and permits while work is being conducted on-site.

- Prior to the initiation of construction activities, and for the duration of construction activities, all new construction workers for the Project shall attend a Worker Environmental Awareness Program (WEAP) training developed and presented by a qualified Biologist. The training shall address Mohave ground squirrel as well as other special status biological resources that may be encountered during construction activities; their legal protections; the definition of "take" under the Endangered Species Act; specific measures that each worker shall employ to avoid taking of the Mohave ground squirrel, and other special status species; reporting requirements; and penalties for violation of the Federal and State Endangered Species Acts. All workers who attend the WEAP training shall sign a training log, which will also be signed by the qualified Biologist conducting the training.
- At the end of each workday, a qualified Biologist shall survey all trenches, bores, and other excavations to ensure no wildlife is trapped; any wildlife observed shall be relocated to a safe area. Only an Authorized Biologist shall handle Mohave ground squirrel (i.e., one approved by CDFW to handle Mohave ground squirrel). Following this final inspection, the Biologist shall ensure that the construction contractor has backfilled or adequately covered all trenches, bores, and other excavations to prevent wildlife from falling into them. If backfilling or covering the trenches, bores, and/or excavations is not feasible, then wildlife escape ramps shall be provided at least every 50 feet. Additionally, any pipes, culverts, or similar structures shall be inspected before the material is moved, buried, or installed.
- The Project Applicant or its designee shall ensure that no pets are allowed at the construction site.
- Wildlife shall not be intentionally killed or injured during construction.
- Use of anticoagulant rodenticides (e.g., difenacoum, brodifacoum, bromadiolone difethialone, warfarin, chlorophaninone, and diphacinone) shall be prohibited from being used on the Project site. If rodent control must be conducted, zinc phosphide should be used.
- For the duration of construction activities, the Biologist shall complete monitoring forms that shall be summarized into monthly monitoring reports, which shall be provided to the CDFW. The monthly monitoring reports shall document compliance with the mitigation measures and shall include WEAP training logs, and CNDDB forms for any special status species observations. Additionally, the biologist shall prepare a final report summarizing compliance throughout the Project's construction.

Mitigation Measure 11. Mohave Ground Squirrel Incidental Take Permit. If a Mohave ground squirrel is observed on the Project site, the Project Applicant shall provide a Section 2081 Incidental Take Permit (ITP) from the CDFW for the Mohave ground squirrel prior to the issuance of a grading permit. The Project Applicant or its designee shall provide compensatory mitigation for permanently impacting approximately 39 acres of habitat for Mohave ground squirrels. The goal of this mitigation is to ensure no net loss of habitat following the implementation of the Project. Mitigation ratios (i.e., the amount of mitigation acreage compared to the amount of impacted habitat) shall be negotiated with CDFW but shall be no less than 1:1, replacing each acre of habitat lost with an acre of equivalent or higher quality habitat. This mitigation may be in the form of habitat preservation, restoration, enhancement, and/or establishment (i.e., creation). The Project Applicant shall implement one or a combination of these options, as approved by CDFW.

- Compensatory mitigation may be in the form of permittee-responsible mitigation, in which the permittee maintains liability for the construction incorporating mitigation measures and long-term success of the mitigation site or through mitigation banking/in-lieu fee program, where liability for Project success is transferred to a third party (i.e., a mitigation bank/in-lieu fee sponsor). If the Project Applicant elects to provide mitigation through a mitigation banking/in-lieu fee program, the mitigation bank/program shall be selected by the Project Applicant and approved by CDFW, and payment shall be made prior to the issuance of a grading permit.

- For permittee-responsible mitigation involving establishment, restoration, or enhancement of habitat, the Project Applicant shall retain a qualified Biologist to prepare a Habitat Mitigation Monitoring Plan (HMMP) to mitigate for loss of Mohave ground squirrel habitat. The HMMP shall be reviewed/approved by the CDFW prior to the issuance of a grading permit. The detailed HMMP shall contain the following items: (1) responsibilities and qualifications of the personnel to implement and supervise the plan, (2) mitigation site selection criteria, (3) site preparation and planting implementation, (4) implementation schedule, (5) maintenance plan/guidelines, (6) monitoring plan, and (7) long-term preservation. The Project Applicant shall implement the Plan as approved.

Mitigation Measure 12. Desert Kit Fox. Prior to the issuance of a grading permit, the following text shall be included as a note on the grading plan:

> "Pre-Grading Survey. No more than fourteen (14) days and no less than three (3) days prior to the beginning of surface disturbance, the Designated Biologist shall conduct a pre-Project 10-meter transect survey (or reduced based on topography and vegetation), to attain 100% visual coverage within the Project area and a minimum 200-meter buffer to determine the presence or absence of Desert Kit Fox individuals, dens, and sign. The

permittee shall provide the results of the survey to CDFW prior to the start of Project activities."

If potential dens are located, they shall be monitored by the Designated Biologist. Trail cameras may be used to assist with observation but shall not be the sole basis upon which the status is determined. The permittee shall provide a determination if active dens can be avoided and buffered from Project activities to prevent take and disturbance with the survey results.

Should active dens be present within the Project area that cannot be avoided with an adequate buffer, the Permittee shall reschedule Project activities or submit a monitoring and relocation plan for CDFW's review and approval. No disturbance or relocation of active dens may take place when juveniles are present and dependent on parental care. The permittee shall block off inactive dens within the buffer zone with rocks and sticks to discourage use during Project activities and remove them when construction is complete. The Designated Biologist shall periodically check that the inactive burrows remain blocked and are not reoccupied.

Threshold BIO 1.4.b): Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

Riparian habitat consists of land located along watercourses and bodies of water, such as floodplains and stream banks. Riparian habitat is characterized by unique soil and/or vegetation that is influenced by the presence of water. The Project site is devoid of any riparian habitat. In addition, Project construction would be confined to the designated Project site and thus, would not impact any riparian habitat. As a result, there would be **no impact**.

Threshold BIO-1.4c): Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

There are no State or federally protected wetlands on the Project site as defined by Section 404 of the Clean Water Act. Therefore, there would **be no impact**.

Threshold BIO-1.4d): 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?

There is existing development to the north and east of the Project site. West Avenue M runs along the southern site boundary but there is vacant undeveloped land beyond. There is also vacant undeveloped land to the west and northwest of the site, but this is hemmed in by existing development. None of this vacant land is conserved open space. The Angeles and San Bernardino National Forests are located about seven miles or more south and southwest

of the site. A patchwork of federal lands administered by the U.S. Bureau of Land Management (BLM) is located 32 miles or more to the north, northeast, and east of the site. Terrestrial connectivity to all of these habitat blocks is largely or completely restricted by existing development including highways and freeways, the California Aqueduct, federal and military facilities, and residential and commercial developments. The Project site is within an area mapped as "Limited Connectivity Opportunity" by CDFW's Areas of Conservation Emphasis–Terrestrial Connectivity (CDFW2023e). Limited Connectivity Opportunity is defined as "areas where land use may limit options for providing connectivity (e.g., agriculture, urban) or no connectivity importance has been identified in models.

The site provides native habitat and local movement opportunities for species that live within the site and immediately adjacent undeveloped lands. The Project site provides a generally limited contribution to wildlife movement in the area, but it has little or no terrestrial connectivity to conserved habitat blocks and is not within a wildlife corridor. Therefore, impacts would be **less than significant**.

Threshold BIO-1.4.e): Would the Development Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The proposed Project would not conflict with any local policies or ordinances, such as a tree preservation policy, protecting biological resources. The proposed Project would be subject to the requirements of Ordinance No. 848, Biological Impact Fee, which requires the payment of $770/acre to offset the cumulative loss of biological resources in the Antelope Valley as a result of development. This fee is required for all projects occurring on previously underdeveloped land regardless of the biological resources present and is utilized to enhance biological resources through education programs and the acquisition of property for conservation. Therefore, there would be **no impact**.

Threshold BHIO 1.4.f): Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans which are applicable to the Project site. The West Mojave Coordinated Habitat Conservation Plan only applies to federal land, specifically land owned by the Bureau of Land Management. In conjunction with the Coordinated Management Plan, a Habitat Conservation Plan (HCP) was proposed which would have applied to all private properties within the Plan Area. However, this HCP was never approved by the California Department of Fish and Wildlife nor was it adopted by the local agencies (counties and cities) within the Plan Area. As such, there is no HCP that is applicable to the Project site, therefore, there would be **no impact**.

Figure 8: Vegetation Mapping

Figure 9: Joshua Tree Locations

1.5 Cultural Resources

Threshold CUL 1.5	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?		✓		
b) Cause a substantial adverse change in the significance of archaeological resources pursuant to §15064.5?		✓		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			✓	

Impact Analysis

This section was informed in part by the *Phase I Archaeological Record Search and Survey Report*, L&L Environmental Inc., January 25, 2023 (see **Appendix C**). The purpose of this technical report is to provide the City of Lancaster with information necessary to determine whether the Project would cause an adverse change to historical resources, as defined in PRC §5020.1(j), and therefore result in a significant impact to the environment under CEQA. To accomplish this objective, L&L completed a cultural resource records search and historical and geoarchaeological background research in addition to a pedestrian survey.

Threshold CUL 1.5a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Records Search

The cultural resources records search of the Project area was conducted at the South-Central Coastal Information Center (SCCIC) by SCCIC staff and emailed to L&L, on September 12, 2023 (ST-6987) (Confidential Appendix D). The records search included a review of SCCIC maps, previously documented cultural resource records, and historical resource studies on or within a one-mile radius of the Project area. Previously identified cultural resources may include properties designated as California Historical Landmarks, Points of Historical Interest, or Los Angeles County Landmarks, as well as those listed in the National Register of Historic Places, the California Register of Historical Resources, or the California Historical Resources Inventory.

Historical background research for this study was conducted by L&L archaeologist, Julia Fox, including published literature in local and regional history, the Built Environment Resources Directory (BERD), historic topographic maps of the Lancaster area, and historic aerial/satellite photographs of the Project vicinity. Among the maps consulted for this study were the U.S.

General Land Office's (GLO) land survey plat maps dated 1856 and the U.S. Geological Survey's (USGS) topographic maps dated 1930-1974, which are available at the websites of the U.S. Bureau of Land Management and the USGS. The aerial and satellite photographs, taken in 1948- 2020, are available on the Nationwide Environmental Title Research (NETR) online website and through Google Earth software. In addition, parcel records and maps available through the Los Angeles County Assessors Website were also reviewed.

Pedestrian Survey

An intensive pedestrian survey was conducted on the Project area by William R. Gillean on November 18, 2023. The Project area is located on 38.78± acre square shaped, relatively flat parcel. Project survey boundaries were readily identifiable in the field as the Project area is bounded by pea sized gravel roads to the north and west, an unimproved road to the east and West Avenue M to the south (see Appendix B). The survey was conducted using north/south trending transects at 15-meter intervals and the entire Project area (100%) was surveyed. Digital photographs were taken to document current field conditions and weather, ground surface visibility, vegetation, soils, exposure/slope, topography, natural depositional environments, and identified cultural resources.

The records search results identified one (1) prehistoric resource, two (2) prehistoric isolates, thirteen (13) historical-archaeological site and two (2) historic isolates previously recorded within a one-mile radius of the Project area. Of these, one historic resource was reported within the Project area (19-003709, detailed below), none were identified within 0.25 mile of the Project area and only one (19-004792, historic trash scatter) was identified within 0.5 mile of the Project area (see Table 3 of Appendix C). The remaining 16 previously recorded archaeological resources were identified between 0.50 and 1.0 mile of the Project area.

Site 19-003709

Site 19-003709 was originally recorded in 2007 by Jones & Stokes as, "…an historic pump and concrete cylinder" (Jones & Stokes 2007). The report documented a pump approximately 3 feet tall and a large concrete cylinder measuring approximately 5 feet high with an 8–10-foot diameter located approximately 10 feet to the east of the pump. Three metal loops were observed in the ground surrounding the concrete cylinder. Age was not known.

Generally, a resource is considered significant under CEQA if it possesses sufficient integrity and demonstrates eligibility under at least one (1) of the following criteria (PRC 5024.1 and California Code of Regulations 15064.5):

> 1. Is associated with events that have made a significant contribution to the broad\ patterns of California's history and cultural heritage;
>
> 2. Is associated with the lives of persons important in our past;
>
> 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Four historic resources consisting of two sites (19-003709, EPCE-01H) and two isolates (EPCE-Iso-01H and -02H) were identified and recorded within the Project Area. No prehistoric sites or isolates were encountered during the pedestrian survey. The resources consisted of a crushed can likely printed with "Central City Chemical Co."; A galvanized steel pipe extending 5.5 inches above the ground with a 2.5-inch diameter. The pipe is filled with cement with a brass tag placed in the top, reading "L.A. CO. ENG'R."; a historic pump and concrete cylinder. Artifacts found sparsely scattered 30 to 120 feet, from the pump and cylinder include one (1) vent hole can, two (2) church-key beverage cans, one (1) cone top beverage can, two (2) key wind tins, two (2) glass bottle shards; and a partially exposed poured concrete slab associated with the Antelope Valley Airstrip identified in the Project area on the 1947 -1952 Los Angeles Aeronautical Sectional Charts (USCGS).

An analysis of these resources found that they did not meet any of the four criteria identified above to be eligible for listing on the California Register of Historic Resources. As such, they do not qualify as a historical resource under CEQA.

Though the Project will impact no known resources eligible for CRHR, based on the presence of historical resources on the site and within one mile of the site, the presence of Holocene-age alluvial deposits that may contain anthropogenic soils and subsurface archaeological assemblages mitigation monitoring is recommended during Project related ground-disturbing activities including geotechnical investigations, vegetation removals, grading, trenching, etc.

Historic Tribal Cultural Resources

Under prior law, Tribal Cultural Resources were typically addressed under the umbrella of "cultural resources." AB 52 formally added the category of "Tribal Cultural Resources" to CEQA. It required a Lead Agency under CEQA to consider traditional Indigenous knowledge to help identify traditional cultural resources that are considered "significant" under AB 52 of CEQA that are not necessarily archaeological resources and therefore addressed in Section 1.18, *Tribal Cultural Resources* of this document. Because a Tribal Cultural Resource may also be a historic resource under CEQA, **Mitigation Measure 13** to ensure coordination between the Project Archaeologist and the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department is required to reduce impacts to less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Mitigation Measure

Mitigation Measure 13. Cultural Resources Monitoring Plan. A Monitoring and Treatment Plan that is reflective of the Project mitigation ("Cultural Resources" and "Tribal Cultural Resources") shall be completed by the archaeologist and submitted to the Lead Agency for dissemination to the Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN, also known as San Manuel Band of Mission Indians). Once all parties review and approve the plan, it shall be adopted

by the Lead Agency – the plan must be adopted prior to permitting for the Project. Any and all findings will be subject to the protocol detailed within the Monitoring and Treatment Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the Project, should YSMN elect to place a monitor on-site.

Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. The, impacts would be **less than significant with mitigation incorporated**.

Threshold CUL 1.5b): Would the Project cause a substantial adverse change in the significance of an archaeological resources pursuant to §15064.5?

As the Project would involve significant grading and ground disturbing activities during construction, unanticipated resources may be identified. As the Project area has been identified as potentially sensitive for archaeological resources, **Mitigation Measure 14** which calls for an qualified Archaeologist to monitor during large areas of earth-moving activities is required.

During the City's AB52 consultation, no tribal archaeological resources were identified, however, sensitivity to discovery of unanticipated resources was identified as a potential impact. To ensure no significant impacts would result, implementation of **Mitigation Measure 15** which requires the preparation of a monitoring and treatment plan for Native American resources a, is required. Implementation of Mitigation Measures 14 and 15 would reduce the potential for the destruction of any significant archaeological resources less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Mitigation Measures

Mitigation Measure 14. Archaeological Monitor. Due to the heightened cultural sensitivity of the proposed Project area, an archaeological monitor with at least 3 years of regional experience in archaeology shall be present for all ground-disturbing activities that occur within the proposed Project area (which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work). A sufficient number of archaeological monitors shall be present each workday to ensure that simultaneously occurring ground disturbing activities receive thorough levels of monitoring coverage.

Mitigation Measure 15. Treatment of Cultural Resources During Project Implementation. If a pre-contact cultural resource is discovered during Project implementation, ground-disturbing activities shall be suspended 60 feet around the resource(s), and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed.

The Project Archaeologist shall develop a research design that shall include a plan to evaluate the resource for significance under CEQA criteria. Representatives from YSMN, the Archaeologist, and the Lead Agency shall confer regarding the research design, as well as any testing efforts needed to delineate the resource boundary. Following the completion of evaluation efforts, all parties shall confer regarding the resource's archaeological significance, its potential as a Tribal Cultural Resource (TCR), and avoidance (or other appropriate treatment) of the discovered resource. Removal of any cultural resource(s) shall be conducted with the presence of a Tribal monitor representing the Tribe, unless otherwise decided by YSMN. All plans for analysis shall be reviewed and approved by the applicant and YSMN prior to implementation, and all removed material shall be temporarily curated on-site.

It is the preference of YSMN that removed cultural material be reburied as close to the original find location as possible. However, should reburial within/near the original find location during Project implementation not be feasible, then a reburial location for future reburial shall be decided upon by YSMN, the landowner, and the Lead Agency, and all finds shall be reburied within this location. Additionally, in this case, reburial shall not occur until all ground-disturbing activities associated with the Project have been completed, all monitoring has ceased, all cataloguing and basic recordation of cultural resources have been completed, and a final monitoring report has been issued to Lead Agency, CHRIS, and YSMN. All reburials are subject to a reburial agreement that shall be developed between the landowner and YSMN outlining the determined reburial process/location, and shall include measures and provisions to protect the reburial area from any future impacts.

Should it occur that avoidance, preservation in place, and on-site reburial are not an option for treatment, the landowner shall relinquish all ownership and rights to this material and confer with YSMN to identify an American Association of Museums (AAM)-accredited facility within the County that can accession the materials into their permanent collections and provide for the proper care of these objects in accordance with the 1993 CA Curation Guidelines. A curation agreement with an appropriate qualified repository shall be developed between the landowner and museum that legally and physically transfers the collections and associated records to the facility. This agreement shall stipulate the payment of fees necessary for permanent curation of the collections and associated records and the obligation of the Project developer/applicant to pay for those fees.

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

Threshold 1.5c): Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

There is no indication that human remains are present within the Project site or were part of past site land uses. However, construction activities may unearth previously undiscovered human remains. As such implementation of **Mitigation Measure 16** would ensure that the Project would not disturb human remains outside of those in dedicated cemeteries. **Mitigation Measure 17** which includes the provision of funerary objects and potential tribal human remains is also required, as requested during the City's AB52 tribal consultation, to reduce impacts to less than significant. Therefore, impacts would be **less than significant with mitigation incorporated**.

Mitigation Measures

Mitigation Measure 16. In compliance with State and federal regulations, if human remains are encountered during excavation activities, all work shall halt at the site and or any nearby areas reasonably suspected to overlie adjacent remains, and the County Coroner shall be notified. The Coroner shall determine whether the remains are of forensic interest within two working days of receiving notification. If the Coroner, with the aid of the qualified archaeologist, determines that the remains are prehistoric, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours of the determination. The NAHC shall be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the California Public Resources Code.

Mitigation Measure 17. Inadvertent Discoveries 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.

1.6 Energy

Threshold ENG 1.6	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficient?			✓	

Impact Analysis

This section is informed in part by a technical energy memorandum dated February 19, 2025, prepared by KPC EHS Consultants, LLC. This energy memorandum documents the proposed Project's estimated energy use as it relates to the potential environmental impacts associated with its construction and operation. This document can be found in **Appendix D.**

Threshold ENG 1.6a): Would the Development Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction Energy Consumption Analysis

For construction, the consumption of energy would be temporary in nature and would not represent a significant demand for available supplies. There are no unusual characteristics that would necessitate the use of fuel or electricity that would be less energy efficient than at comparable construction sites in the region or State. In 2014, the California Air Resources Board (CARB) adopted the nation's first regulation to clean off-road construction equipment such as bulldozers, graders, and backhoes. These requirements ensure fleets gradually turn the oldest and dirtiest equipment into newer, cleaner models and prevent fleets from adding older, dirtier equipment. As such, the equipment used for Project construction would conform to CARB regulations and California emissions standards as fuel efficiencies gradually rise. It should also be noted that there are no unusual Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in the construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel. In addition, as required by State law, idling times of construction vehicles is limited to no more than five minutes, thereby minimizing, or eliminating unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Equipment employed in the construction of the Project would therefore not result in inefficient, wasteful, or unnecessary consumption of fuel.

Operational Energy Consumption Analysis

During operations, the Project would generate demand for electricity, natural gas, and fuels (gasoline and diesel) for motor vehicle trips. Operational energy use includes heating, ventilation, air conditioning, lighting, water heating, electrical systems, and plug-in appliances within buildings and parking lots. These uses of energy are typical for urban development, and no operational activities or land uses would occur that would result in extraordinary energy consumption. The proposed Project would be required to meet the CCR Title 24 energy efficiency standards effect during the permitting of the Project. Energy-saving and sustainable design features and operational programs would be incorporated into the Project as per CalGreen. Prior to the issuance of the building permit, the Project's facility energy efficiency would be documented as part of the City's development review process. The City, as part of the Project review, will assess the design components and energy conservation measures during the permitting process, which ensures that all requirements are met and that the Project will be in compliance with the general plan energy efficiency requirements. Additionally, regulatory measures, standards, and policies directed at reducing air pollutant emissions and GHG emissions would also act to promote energy conservation and reduce Project energy consumption, such as the limits imposed by CCR Title 13, Section 2449(d)(3) on idling. Also, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. Based on the preceding the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be **less than significant**.

Threshold ENG 1.6b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the Project. Energy-saving and sustainable design features and operational programs would be incorporated into the Project as per CalGreen (Part 11 of Title 24), with compliance confirmed by the City prior to the issuance of a building permit. The City, as part of the Project review, would assess the design components and energy conservation measures during the permitting process, which ensures that all requirements are met, and the Project will be in compliance with the City's General Plan energy efficiency requirements.

Additionally, regulatory measures, standards, and policies directed at reducing air pollutant emissions and GHG emissions would also act to promote energy conservation and reduce Project energy consumption such as the limits imposed by CCR Title 13, Section 2449(d)(3) on idling. Also, the Project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy, as the Project would provide dedicated space for future solar panels. Based on the preceding discussion, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and potential impacts would be **less than significant**.

1.7 Geology and Soils

Threshold GEO 1.7	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?			✓	
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?		✓		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			✓	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			✓	

Impact Analysis

This section was informed in part by the Geotechnical Investigation prepared for the Project (**Appendix E-1**). Additionally, this section relies on a paleontological records search that was conducted (**Appendix E-2**).

Threshold GEO 1.7a) (i): Would the Development Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of known fault? (Refer to Division of Mines and Geology Special Publication 42.)

In 1972, the Alquist-Priolo Earthquake Zoning Act was passed in response to the damage sustained in the 1971 San Fernando Earthquake. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. As shown in mapping by the California Department of Conservation, *Seismic Hazards Program: Alquist-Priolo Fault Hazard Zones*, the Project site is not located in an Alquist-Priolo Earthquake Fault Zone and is not subject to setback requirements from a fault zone. Therefore, there would be **no impact**.

Threshold GEO 1.7a) (ii): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?

There are no faults on the Project site. The closest active fault is the San Andreas Fault, located 5.2 miles southwest and has greatest potential for causing earthquake damage related to ground shaking at this site (Appendix E-1)

State and local jurisdictions regulate development in California through various tools that reduce hazards from earthquakes and other geologic hazards. The CBC (adopted and incorporated into the City's Municipal Code) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. In addition, the CBC includes provisions for earthquake safety based on factors such as occupancy type, the types of soil and rock on site, and the strength of ground motion with a specified probability of occurring at the Project site. The design and construction of the proposed uses would be in adherence to the provisions of the CBC and other Codes. Compliance with the California building codes and City of Lancaster development standards would reduce hazards from strong seismic ground shaking. There would be a **less than significant impact.**

Threshold GEO 1.7a) (iii): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving Seismic-related ground failure, including liquefaction?

The geotechnical investigation in Appendix E-1 identified that groundwater is anticipated to be deeper than 50 feet below ground surface, therefore the impact from liquefaction would be low. The Project must comply with the California Building Codes and other applicable

codes and the recommendations in the geological and geotechnical assessment prepared for the proposed Project. As such, the impact would be **less than significant.**

Threshold GEO 1.7a) (iv): Would the Development Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?

The Project site and vicinity are relatively flat. As shown in 10, *Geologic Hazard Zones*, at the end of this section, the Site is not located within a landslide hazard zone. Therefore, there would be **no impact.**

Threshold GEO 1.7b): Result in substantial soil erosion or the loss of topsoil?

The Project will not result in substantial soil erosion or the loss of topsoil, because the site will be paved and landscaped after it is developed. To control soil erosion during construction, the Project proponent is required to comply with the State Water Resources Control Board requirements to prepare a Storm Water Pollution Plan (SWPPP) for all construction where grading exceeds 1 acre. The SWPPP will identify potential sources of erosion and sedimentation loss of topsoil during construction and identify erosion control measures to reduce or eliminate the erosion and loss of topsoil, such as the use of silt fencing, fiber rolls, or gravel bags, stabilized construction entrance/exit, and hydroseeding.

However, there remains a potential for water and wind erosion during construction. The proposed Project would be required, under the provisions of the Lancaster Municipal Code (LMC) Chapter 8.16, to adequately wet or seal the soil to prevent wind erosion. Additionally, implementation of **Mitigation Measure 18** to prepare a dust control plan, is required to reduce impacts to less than significant.

Post-construction, much of the site will be covered with paving, structures, and landscaping, which will reduce soil erosion. In addition, a Water Quality Management Plan (WQMP) is required to be prepared and approved by the City that addresses stormwater control for the site which also serves to reduce erosion. Preparation and implementation of these plans is a mandatory requirement. Therefore, the impact would be **less than significant with mitigation incorporated.**

Mitigation Measure

> **Mitigation Measure 18. Dust Control Plan.** The applicant shall submit the required Construction Excavation Fee to the Antelope Valley Air Quality Management District (AVAQMD) prior to the issuance of any grading and/or construction permits. This includes compliance with all prerequisites outlined in District Rule 403, Fugitive Dust, including submission and approval of a Dust Control Plan, installation of signage and the completion of a successful onsite compliance inspection by an AVAQMD field inspector. Proof of compliance shall be submitted to the City.

Threshold GEO 1.7c): 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?

The geotechnical report in Appendix E-1 identified that the Project Site is not located in a special zone that is subject to off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Subsidence is the sinking of the soil caused by the extraction of water, petroleum, etc. Subsidence can result in geologic hazards known as fissures. Fissures are typically associated with faults or groundwater withdrawal, which result in the cracking of the ground surface. According to Figure 2-3 of the City of Lancaster's Master Environmental Assessment, the closest sinkholes and fissures to the Project site are located in the vicinity of 20th Street West and Lancaster Boulevard. However, the Project site is not known to be within an area of subject to sinkholes, subsidence (LMEA Figure 2-3) or any other form of soil instability. The proposed Project would be required to have a geotechnical study prepared and all recommendations followed as part of the building permit process. These recommendations would ensure that any impacts associated with forms of soil instability would be less than significant.

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking or other events. This phenomenon occurs in saturated soils that undergo intense seismic shaking typically associated with an earthquake. There are three specific conditions that need to be in place for liquefaction to occur: loose granular soils, shallow groundwater (usually less than 50 feet below ground surface) and intense seismic shaking. The City of Lancaster General Plan Safety Element, Figure 4-3, identifies that the Project Site is not located in a liquefaction zone.

Therefore, based on these maps, the impact would be **less than significant**.

Threshold GEO 1.7d): Would the Development Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Expansive soils are soils that experience volumetric changes in response to increases or decreases in moisture content. As encountered in the exploratory excavations, these materials generally consist of medium dense to very dense, silty sands and poorly to well-graded sand. In the event that, following the completion of grading, it is determined that near-surface soils within building pad areas exhibit an elevated expansion potential, the potential impact of those expansive soils would be addressed through design of structural foundations and floor slabs in compliance with applicable requirements in the CBC, as adopted by the City of Lancaster in its Municipal Code. Nevertheless, based on visual observations, the expansion potential for the on-site soils is considered to be low. Any imported material or doubtful material exposed during grading should be evaluated for its expansive properties. In any event, the subgrade soils should be tested for their expansion potential or during the final stages of grading. Since the potential for expansive soils is low

and any potential expansion would be addressed through compliance with applicable State and local Code requirements, the proposed Project would not create substantial potential risks to life or property, and there would be a **less than significant** impact.

Threshold 1.7e:) 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?

The Project would be tied into the sanitary sewer system upon annexation to the Los Angeles County Sanitation District No. 14. No septic or alternative means of wastewater disposal are part of the proposed Project. Therefore, **no impacts** would occur.

Threshold GEO 1.7f:) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Phase I Paleontological Resources Inventory dated January 29, 2024 (Appendix E-2) concludes that the Project site has no potential for paleontological sensitivity within the artificial fill and disturbed areas and a low potential for paleontological sensitivity within the modern alluvial portions of the Project site.

Notwithstanding, sediments mapped as Quaternary younger alluvial fan sediments (Qaf and Qa) in the Antelope Valley are assigned a Low paleontological sensitivity. Due to the presence of fossil remains found near Lake Los Angeles, within similar Holocene deposits at the surface and subsurface, periodic inspection of the Project site during earthmoving is recommended.[11] **Mitigation Measure 19** requires paleontological monitoring during mass grading and excavation activities in undisturbed Quaternary older alluvial fan sediments to mitigate any adverse impacts (loss or destruction) to potential nonrenewable paleontological resources. For the excavation of young alluvial fan and alluvial valley deposits at the Development Site, periodic "spot check" monitoring would be required, consisting of approximately one to three scheduled Development Site visits per week by a paleontological monitor during construction ground disturbance. If fossils are discovered, work in the immediate area of the discovery would be halted, and a qualified paleontologist would assess the discovery. These procedures would mitigate potential impacts to scientifically significant, nonrenewable paleontological resources to a less than significant impact**.**

[11] *Irish, L., Wagner, H. M., & Ball, J. (2024, January 29). A Phase I Paleontological Resources Inventory for Northwest Corner of West Avenue M and Division Street, City of Lancaster, Los Angeles County, California. Redlands; L&L Environmental, Inc. Survey Area: ±38.78 acres (AINs) 3128-013-010 and 3128-013-011 Township 7 North, Range 12 West, Section 34. USGS Lancaster West 7.5' Topographic Quadrangle*

Mitigation Measure

Mitigation Measure 19. Paleontological Resources. All mass grading, excavation, drilling, and trenching activities within the old alluvial fan deposits ("Qaf"), which underlie the majority of the Development Site, starting at the surface, shall be monitored full-time by a qualified paleontological monitor for paleontological resources. Prior to initiation of any grading, drilling, and/or excavation activities, a pre-construction meeting shall be held and attended by the paleontologist of record, the grading contractor and subcontractors, the Development Site applicant, and a representative of the lead agency. The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following the discovery of any fossiliferous materials.

For earthmoving within young alluvial fan deposits ("Qa") mapped at the Development Site, periodic "spot check" monitoring shall be conducted, consisting of approximately one to three scheduled site visits per week by a qualified paleontological monitor during construction ground disturbance. If fossils are discovered, full-time monitoring for paleontological resources shall be warranted. In the field, the primary monitor or the monitors under the direction and supervision of the site-specific paleontologist shall be the responsible persons onsite with the assigned authority and responsibility to control all grading operations that might adversely affect any salvage efforts.

Isolated fossils will be collected by hand, wrapped in paper, and placed in temporary collecting flats or five-gallon buckets. Notes will be taken on the map location and stratigraphy of the site, which will be photographed before it is vacated, and the fossils are removed to a safe place.

All paleontological monitors shall immediately notify all parties concerned (client and lead agency [i.e., the City of Lancaster]) at the time of any discovery. The City of Lancaster shall ensure that the recommendations from the qualified, professional paleontologist shall be followed by the Applicant/Developer.

Within 90 days of final paleontological monitoring, a final monitoring and mitigation report of findings and significance will be prepared, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location(s). The report, when submitted to and accepted by the appropriate lead agency, will signify satisfactory completion of the Project program to mitigate impacts to any potential nonrenewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Figure 10: Geologic Hazard Zones

Source: California Geologic Society, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

1.8 Greenhouse Gas Emissions

Threshold GHG 1.8	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Impact Analysis

An Air Quality/Greenhouse Gas Assessment (Appendix A-1) was prepared by KPC EHS Consultants on February 19, 2025, to document the impacts of GHG emissions as it relates to the potential environmental impacts associated with the construction and operation of the proposed industrial development.

Threshold GHG 1.8a): Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

According to CEQA Guidelines Section15064.4, when making a determination of the significance of greenhouse gas emissions, the "lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use." Moreover, CEQA Guidelines §15064.7(c) provides that "a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts" on the condition that "the decision of the lead agency to adopt such thresholds is supported by substantial evidence."

The Antelope Valley Air Quality Management District (AVAQMD) has developed regional significance thresholds for regulated pollutants. The MDAQMD's *CEQA and Federal Conformity Guidelines* indicate that any project with daily regional emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant greenhouse gas emissions impact. The AVAQMD has identified thresholds of 100,000 tons per year (90,718 $MTCO_2e$/year) or 548,000 pounds per day of CO_2e emissions for individual projects.

The GHG emissions for the Project were quantified using the California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential GHG associated with both construction and operations emissions (refer to Appendix A-1).

As indicated in Table 8, *Project Greenhouse Gas Emissions*, the Project's GHG emissions are estimated to be below the AVAQMD threshold of 548,000 CO2e pounds per day and 100,000 TCO2e/year.

Table 8. Project Greenhouse Gas Emissions

Source		GHG Emissions MT/yr		
	N_2O	CO_2	CH_4	CO_2e
Mobile Sources	010	1,864	0.10	1,898
Area	<0.005	11.8	<0.005	11.8
Energy	0.01	1,689	0.15	1,696
Water/Wastewater	0.15	229	6.05	424
Solid Waste	0.00	70.1	7.01	246
Refrigerant	-	-	-	3.97
30-year Amortized Construction GHG				32.2
TOTAL			*Tons / Metric Tons*	***4,753 / 4,312***
AVAQMD Threshold			*Tons / Metric Tons*	**100,000/90,718**
Exceed Threshold?				**NO**

Source: CalEEMod 2022.1.1.29 Datasheets.

Based on the preceding, the Project would not generate GHG emissions either directly or indirectly that may have a significant impact on the environment and impacts would be less than significant.

Threshold GEO 1.8b): Would the Development Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?

Under the CEQA Guidelines, the IS/MNMD must discuss "any inconsistencies between the proposed Project and applicable general plans, specific plans, and regional plans." (Cal Code Regs §15125(d). Plans adopted for the purpose of reducing GHG emissions include the California Air Resources Board (CARB) Scoping Plan, the Southern California Association of Government (SCAG) *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS,) and the City of Lancaster Climate Action Plan (CAP). This rule does not require that consistency be evaluated, only that any inconsistencies with the plan be discussed. A proposed project should be considered consistent with a plan if it furthers one or more policies and does not obstruct other policies. [12] Generally, a project should be compatible with the plan's overall goals and objectives but need not be in perfect conformity with every planning policy (Appendix A-1). Therefore, impacts would be **less than significant**.

[12] 67 Ops Cal Attorney General 75 (1984); Office of Planning and Research (OPR), State of California General Plan Guidelines (2003).

CARB AB32 Scoping Plan

On December 15, 2022, under AB 32 requirements, the California Air Resources Board (CARB) updated the *Climate Change Scoping Plan* (Scoping Plan) which provides a range of GHG actions. CARB's 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 following AB 1279. The transportation, electricity, and industrial sectors are the State's largest GHG contributors.

The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions would be achieved through decarbonizing the electricity and industrial sectors. Statewide strategies to reduce GHG emissions in the latest 2022 Scoping Plan include implementing SB 100, which would achieve 100 percent clean electricity by 2045; achieving 100 percent zero-emission vehicle sales in 2035 through Advanced Clean Cars II; and implementing the Advanced Clean Fleets regulation to deploy zero-emission electric vehicle buses and trucks.

Additional transportation policies include the Off-Road Zero Emission Targeted Manufacturer Rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Fueled Fleets Regulation, and Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation. The 2022 Scoping Plan would continue to implement SB 375.

While these measures are not directly applicable to the Project, any activity associated with the Project would be required to comply with these measures as adopted. As shown in Table 9. *Consistency with Lancaster CAP* and Table 10. *Consistency With ConnectSoCal*, the Project would implement measures consistent with the overall goal of reducing GHG emissions. Therefore, the Project would not conflict with applicable Statewide action measures contained in the 2022 Scoping Plan and would not conflict with a plan, policy, or regulation that has been adopted for the purpose of GHG emissions reductions, and as such, impacts would be less than significant.

Lancaster Climate Action Plan

The City's Climate Action Plan (CAP) includes a total of 61 projects across eight sectors that would enhance the community, improve government operations, and ultimately reduce GHG emissions. The eight sectors are transportation, energy, municipal operations, water, waste, built environment, community, and land use (City of Lancaster 2017). The Project would be consistent with the following measures identified in the CAP.

Table 9. Consistency with Lancaster CAP

CAP Measure	Consistent Determination
Transportation-Measure 4.1.2c: Pedestrian Amenities.	**Consistent.** The Project would improve sidewalk facilities along Avenue M, Division Street, and Avenue L-12.
Energy-Measure 4.2.1a: Renewable Energy Purchase Plan.	**Consistent.** All development receives its power from Lancaster Choice Energy unless the entity chooses to opt out. In addition, the Project would generate renewable solar energy to offset electricity use within the building envelope.
Water-Measure 4.4.2a: Sensor Technology.	**Consistent.** Water-saving irrigation, such as sensor technology, would be installed with landscaping on the Project site. The Project would include a water conservation
Measure 4.7.4c: Conservation Habitat Acquisition.	**Consistent.** All development projects, including the proposed Project, are required to pay a Biological Impact Fee pursuant to the City's Municipal Code to offset the overall loss of biological resources within Antelope Valley. This fee is utilized to fund the acquisition of habitat, which is placed under a conservation easement.
Measure 4.7.3a: Xeriscaping.	**Consistent.** All landscaping within the development would be designed to be water-efficient in accordance with the City's Municipal Code. This includes the incorporation of the water conservation strategy to reduce indoor and outdoor water use by at least 20%.
Waste-Measure 4.5.1b: Recycling Incentives.	**Consistent.** Bins for trash, recycling, and organics enclosures would be provided on the Project site. The Project would require at least 50% diversion of solid waste from landfills.

Southern California Area of Governments Regional Transportation Plan/Sustainable Communities Strategy/Connect SoCal

The Southern California Association of Governments (SCAG) is required by federal law (23 U.S.C. Section 134 et seq.) to prepare and update a long-range Regional Transportation Plan (RTP) every four years. The Plan must provide for the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area. Additionally, SCAG is required by State law to prepare and adopt a Sustainable Communities Strategy (SCS) that sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures and policies, will reduce greenhouse gas (GHG) emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the California Air Resources Board (Govt. Code Section 65080(b)(2)(B)).

SCAG's RTP/SCS, known as Connect SoCal, most recently adopted in April 2024 builds upon strategies identified in the Connect SoCal 2020 in that it that identifies projects, investments, policies and strategies to help the region achieve its vision for a better future through 2050. .

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Table 10. *Consistency with Connect SoCal2024* identifies the goals and subgoals of Connect SoCal 2024 and how the Project is consistent with the goals and subgoals

Table 10: Consistency with Connect SoCal 2024

Goal and Subgoal	Project Consistency
Mobility: Build and maintain an integrated multimodal transportation network • Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions • Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities • Support planning for people of all ages, abilities and backgrounds	**Consistent.** As the Project is to construct a warehouse, the Project would not conflict SCAG or the City's ability to build and maintain an integrated multimodal transportation network.
Communities: Develop, connect and sustain livable and thriving communities • Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances • Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households	**Consistent.** The Project does not include housing but would not conflict with the Plan's policy in this regard as it would locate new jobs near existing housing reducing VMT. The Proposed Project is expected to add approximately 435 employees which is consistent with the socio-economic data (SED) growth projections for the Project's traffic analysis zone. And while new these employees are anticipated to come from the Lancaster area, the VMT analysis in Appendix I identified that the Project exceeds 15 percent below the Los Angeles County Antelope Valley Planning Area (AVPA) Baseline VMT for home-based work VMT per employee, which presents a significant impact for VMT. The City allows developers to pay a VMT mitigation fee to mitigate VMT impacts. The Project would be subject to this fee, therefore, the Project is consistent with this goal.
Environment: Create a healthy region for the people of today and tomorrow • Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change • Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water • Conserve the region's resources	**Consistent.** A Project-level GHG study was prepared (Appendix A) that identifies the Project would not contribute to climate change. A Project-level water usage study was also prepared (Appendix J) that identifies that the Project's water usage would not exceed what is available for the area.

Goal and Subgoal	Project Consistency
Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all people in the region • Improve access to jobs and educational resources • Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities	**Consistent**. The Project would create new jobs for the region. The Project is also a warehouse which would serve to support resilient and efficient goods movement.

Overall, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs. The impact would be **less than significant**.

1.9 Hazards and Hazardous Materials

Threshold HAZ 1.9	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in safety hazard or excessive noise for people residing or working in the project area?			✓	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			✓	

Impact Analysis

A Phase I dated November 29, 2023, was prepared for the Project by RSB Environmental. The conclusions made in the Phase I have been incorporated into this section. **(Appendix F).**

Threshold HAZ 1.9a): Would the Development 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?

Development of the proposed Project has the potential to transport, use, or dispose of hazardous materials during construction and operational activities.

Construction of the proposed Project would require the temporary transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and Project construction would be required to comply with applicable State and federal regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. In addition, Regulatory Compliance Measures (RCMs) WQ-1, WQ-2, and WQ-3 provided in Section1.9, *Hydrology and Water Quality*, of this Initial Study would require compliance with the waste discharge permit requirements to avoid potential impacts to water quality due to spills or runoff from hazardous materials used during construction. Therefore, with adherence to the regulatory standards included in RCMs WQ-1, WQ-2, and WQ-3, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

Commercial and industrial uses operated on the Development Site may require the use and disposal of hazardous waste and limited use of pesticides and herbicides for landscape maintenance. Vehicles accessing the Project would contain oil and gasoline, potentially resulting in minor releases of such substances through drops or leaks in parking areas. Operational truck traffic travelling to and from the Development Site, may also contribute to minor releases of oil and gasoline in loading dock areas and the parking areas.

Development of the proposed Project is not anticipated to generate or use hazardous materials and would not create unusually high quantities of hazardous waste. In addition, if a future tenant would include a business that would handle or use significant amounts of hazardous materials, the business would be conditioned to comply with all federal, State, and local regulations related to hazardous materials.

Although the specific businesses that would occupy the Development Site are not yet known, the types of business activities that would occur at the Development Site are outlined in the City's Municipal Code. Business owners on the Development Site would be required to prepare Material Safety Data Sheets (MSDSs) as part of the Hazardous Materials Business Plan (HMBP) for any hazardous substance that will be handled, manufactured, or used in the business (pursuant to the Hazardous Substances Information and Training Act [Section 6360, Chapter 2.5, Part 1 of Division 5 of the California Labor Code]). The Los Angeles County Fire Department serving the City of Lancaster will provide the MSDSs for each of the individual businesses that will occupy the Project to ensure the hazardous material types on site are known, and the Los Angeles County Fire Department can provide adequate emergency service in the event of a hazardous substance release. Chapter 8.04 of the City of Lancaster Municipal Code requires business owners on the site to submit a completed disclosure form annually that identifies the hazardous substances that will be utilized.

The Hazardous Materials Division of the Los Angeles County Fire Department (County Fire-Haz) identifies types and amounts of waste generated in the County and establishes programs for managing waste. The program requires businesses to submit a Hazardous Material Management Plan, which ensures that adequate treatment and disposal capacity is

available to manage the hazardous waste generated within the County and address issues related to the disposal, handling, processing, storage, and treatment of local hazardous materials and waste products.

Construction of the proposed Project would require transporting and disposing of hazardous materials on and off-site, including gasoline, diesel, lubricants, and various petroleum-based products used to operate construction equipment. These materials' transportation, application, and handling would be temporary during the Project's construction. Per construction specifications and Project-specific BMPs, contractors would be responsible for accident prevention and containment, including properly managing hazardous materials and wastes. Contractors would be subject to applicable regulations regarding hazardous materials and waste management and disposal.

The DEH would review the uses operating on the Development Site for hazardous material use, safe handling, and storing materials. Before the issuance of grading permits, the DEH would apply conditions of approval to the Project in order to reduce hazardous material impacts and ensure that any hazardous waste generated at the Development Site would be safely stored and transported to an appropriate disposal facility by a licensed hauler in accordance with State and federal law.

Therefore, due to the type and nature of the uses that would operate on the Development Site and compliance with the conditions of approval identified below, the implementation of the proposed Project would result in less than significant impacts related to the routine transport, use, or disposal of hazardous materials; and no mitigation is required. Therefore, impacts would be **less than significant**.

Threshold HAZ 1.9b): Would the Development 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?

Development of the proposed Project has the potential for accidental releases of hazardous materials during construction and operational activities, as discussed below. Overhead utility lines are present along the Site's Columbia Way boundary. Due to the lack of subsurface and underground utilities and conveyance systems, compliance with California Government Code (CGC) Section 4216 is not applicable, given the available information. Because the nature, location, extent, and/or severity of accidental release cannot be known at this time, it is reasonable that the reporting, control, repair, and/or remediation of any such release would conform to applicable local, State, and federal requirements, thereby ensuring the appropriate protection of persons and property in the Project site.

The industrial uses that would be built and operating onsite may involve the use of hazardous materials. Nevertheless, the use, storage, transport, and disposal of hazardous materials in the Project's operations would not cause significant hazards to the public or the environment through accidental releases of hazardous materials with compliance with all applicant State, federal, and local requirements. Impacts would be **less than significant**.

Threshold HAZ 1.9c): 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?

The Project site is not located within one-quarter mile of an existing or proposed school. Therefore, there would be **no impact**.

Threshold HAZ 1.9d): Would the Development Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Phase 1 Environmental Site Assessment in Appendix F performed a database search of a variety of public databases, including the sites compiled pursuant to Government Code Section 65962.65, as well as conducted a site inspection. The database search was performed for hazardous waste sites within 0.5 mile of the Project site. Based on the database search and literature review, the Project site is not included on any hazardous materials websites, nor were there any field conditions that constituted Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs) and Historical Recognized Environmental Conditions (HRECs) and de minimis conditions as defined by ASTM E1527-13 and E1527-21. There were some underground storage tank sites located within 0.5 mile downgradient, which would not impact the Project construction or operations.

Therefore, Project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, and would not create a significant hazard to the public or the environment. Therefore, there would be **no impact**.

Threshold HAZ 1.9e): 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 for people residing or working in the project area?

The Project site is located within 1 mile of the US Air Force Plant 42, a classified aircraft manufacturing plant owned by the United States Air Force. Nevertheless, the two industrial buildings that would be constructed as part of the Project would have a height of less than 50 feet. Therefore, the Project would not introduce development that could interfere with the approach or take-off of aircraft utilizing the aforementioned airport and the proposed Project would not result in a safety hazard for future employees. As a result, impacts would be **less than significant**.

Threshold HAZ 1.9f): Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City's General Plan Safety Element identifies major roadways within the city to utilize as evacuation routes. Division Street, along the Project's east boundary, is identified as an evacuation route, with the main route identified as SR-14 (Sierra Highway). Development of the proposed Project would include widening roadways adjacent to the Development Site and funding additional roadway improvements, which could aid in the evacuation. Site

preparation, grading, and construction would not block roadways providing access to surrounding properties or surrounding neighborhoods. Columbia Way provides primary access to State Highway 14. Therefore, implementing the proposed Project would not interfere with the adopted emergency response and/or evacuation plans; therefore, impacts would **be less than significant**.

Threshold HAZ 1.9g): Would the Development Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The property surrounding the Project site is undeveloped and could be subject to vegetation fires. However, the Project site is located within the boundaries of Fire Station No. 129, located at 42110 6th Street, located approximately 1.5 mile to the west. This fire station would serve the Project site in the event of a fire with additional support available from other fire stations. Therefore, impacts from wildland fires would be **less than significant**.

1.10 Hydrology and Water Quality

Threshold HYD 1.10	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site			✓	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site			✓	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff			✓	
iv) Impede or redirect flood flows			✓	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✓
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

Impact Analysis

This section was informed in part by the *Preliminary Hydraulic Calculations* prepared by Thienes Engineering. (Appendix G).

Threshold HYD 1.10a): Would the Development Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction Impacts

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and the installation of landscaping, which would result in the generation of potential water quality pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have

the potential to occur during construction activities in the absence of any protective or avoidance measures.

As required by the National Pollution Discharge Elimination System (NPDES), the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) is required to identify construction Best Management Practices (BMPs) that will be implemented to prevent soil erosion and the discharge of sediment into the local storm drains during the Project's construction phase. Typical BMPs include, but are not limited to, preserving natural vegetation, stabilizing exposed soils, use of sandbags, and installation of temporary silt fencing. Compliance with regulatory requirements would ensure that impacts related to violation of any water quality standards or waste discharge requirements and degradation of surface or groundwater quality during construction would be less than significant. Therefore, impacts would be **less than significant**.

Operational Impacts

Stormwater pollutants commonly associated with industrial land uses include sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides. The Project requires the preparation of a Water Quality Management Plan (WQMP) for managing the quality of stormwater or urban runoff that flows from a developed site after construction is completed. The Project is designed so that water collected from the site would be directed via gutters and parking lot drains into an underground chamber that would allow the water to percolate into the ground.

The Project will comply with the City of Lancaster's and the Phase II Small MS4 General Permit for the Mojave River Watershed. Therefore, because the Project would comply with all regulations to maintain water quality during construction and operation, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The impacts would be **less than significant**.

Threshold HYD 1.10b): Would the Development Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

The proposed Project would not include any groundwater wells or pumping activities. All water supplied to the proposed Project would be obtained from Los Angeles County Waterworks, District 40. Therefore, impacts would be **less than significant**.

Threshold HYD 1.10c): Would the Development 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 substantial erosion or siltation on or off site; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage

systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?

There is no drainage that is readily discernable on the Project Site. Therefore, the Project would not alter a drainage pattern; alternatively, if it is found to be a drainage course, the application would be required to comply with all state and federal regulations with regard to filling/altering the drainage.

Ultimate development of the Proposed Project would increase the amount of surface runoff as a result of impervious surfaces associated the paving of the parking areas and the construction of the buildings. The Proposed Project would be designed, on the basis of a hydrology study, to construct appropriately sized system to accept current flows entering the property and to handle the additional incremental runoff from the developed site.

The Project site is designated as Flood Zone X per the Flood Insurance Rate Map (FIRM) (06037C0420F). Flood Zone X is located outside of both the 100-year flood zone and the 500-year flood zone. Therefore, there would be no impacts relating to impeding or redirecting flood flows.

Therefore, development of the Project would not substantially alter the existing drainage pattern of the Site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) Result in substantial erosion or siltation on or off site; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows. The impacts would be **less than significant**.

Threshold HYD 1.10d): Would the Development Project result in a flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

The Project site is approximately 48 miles northeast of the Pacific Ocean and is not located in an area subject to tsunamis. In addition, the Project site would not be at risk from seiche because there is no enclosed water body in close proximity to the Project site capable of producing as seiche. Lake Palmdale is located approximately 7 miles southeast of the Development Site. According to California Dam Breach Inundation Map, the distance between Lake Palmdale and the Project site would preclude the Development Site from being inundated if a seiche were to occur on this water. Therefore, there would be **no impact**.

Threshold HYD 1.10e): Would the Development Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The Project site is within the jurisdiction of the Lahontan RWQCB. The Lahontan RWQCB adopted a Basin Plan that designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. As noted above, the Project would comply with existing Antelope

Valley Watershed MS4 requirements and would implement construction and operational BMPs to reduce pollutants of concern in stormwater runoff Compliance with these regulatory requirements would ensure that the Development Project would not degrade or alter water quality in a manner that would cause the receiving waters to exceed the water quality objectives or impair the beneficial use of receiving waters.

As such, the Development Project would not result in water quality impacts that would conflict with the Lahontan RWQCB Water Quality Control Plan for the Antelope Valley Basin Region (Basin Plan).

As previously discussed, the additional impervious surface areas that would result from Development Project construction would not substantially decrease infiltration compared to existing conditions due to the incorporation of landscaped slopes, parking medians, open spaces, and infiltration basins. For these reasons, the Development Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Therefore, construction and operational impacts related to conflict with, or obstructing water quality control plans or sustainable groundwater management plans would be less than significant, and no mitigation is required. Therefore, impacts would be **less than significant**.

1.11 Land Use and Planning

Threshold 1 LUP .11	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community			✓	
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✓	

Impact Analysis

Threshold LUP 1.11a): Would the Development Project physically divide an established community?

Avenue M (Columbia Way) is a primary roadway that provides access to the Project site with SR-14, located approximately one mile to the west. Division Street is currently a two-lane unpaved roadway between Avenue L-12 and Columbia Way along the eastern boundary of the Project site.

The issue is specifically concerned with the expansion of an inconsistent land use into an established community assuming that an "established community" refers to a residential neighborhood, such as a cohesive subdivision. One of the primary factors in considering division of an established community is whether the project would create any physical barriers that change the connectivity between areas of a community.

The Project would construct a pair of warehouses on vacant land. There are no linear features that would physically divide any established community. Therefore, the impact would be less than significant.

Threshold LUP 1.11b): Would the Development Project cause a significant environmental impact due to a conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The City of Lancaster General Plan land use designation for the Project site is Office Professional (OP), and it is zoned OP.

While the Development Project does not include the variety of professional office land uses identified in the General Plan Land Use Map, the proposed industrial land use does not conflict with adjacent industrial areas and complies with the City's stated goal of

encouraging industrial growth in the City to accommodate demand in the High Desert.[13] Table 11, *General Plan Policy Consistency Analysis* provides a consistency analysis of all applicable goals and policies within the City of Lancaster General Plan and the Development Project.

With approval of the General Plan Amendment and Zone Change, the Project would be consistent with the General Plan and Lancaster Municipal Code.

Table 11. General Plan Policy Consistency Analysis

General Plan Policies	Consistency Analysis
Policy 3.1.1: Ensure that development does not adversely affect the groundwater supply.	No groundwater pumping will occur as part of the Development Project. All water supplied to the development will be provided by Los Angeles County Waterworks District #40 in accordance with existing regulations and agreements. A water supply assessment was prepared by SB 610, indicating that sufficient water was available to supply the Project in normal, single-dry, and multiple-dry years.[14]
Policy 3.2.1: Promote the use of water conservation measures in the landscape plans of new developments.	The landscaping proposed as part of the Proposed Project would aesthetically pleasing and native/drought tolerant in accordance with the City of Lancaster's Municipal Code, Section 8.50.
Policy 3.2.5: Promote the use of water conservation measures in the design of new developments.	The Proposed Project will be designed and constructed in compliance with the Uniform Building Code and the California Green Building Code which include water conservation requirements.
Policy 3.3.1: Minimize the amount of vehicular mile traveled.	The Proposed Project will provide another source of jobs for the local economy. It will allow residents to work in the Antelope Valley instead of commuting to the Los Angeles basin, reducing the amount of VMT generated for work-based trips. A VMT Analysis was prepared by RK Engineering, indicating that the Development Project cannot be screened from a VMT analysis based on its size, location, or accessibility to transit. Based upon this review, the Development Project does not satisfy the VMT screening requirements, and additional VMT analysis was prepared, and is included in Appendix I. The VMT analysis determined that VMT is exceeded, and payment of a mitigation fee for the exceedance is required to reduce impacts to less than significant. The applicant will be required to pay this fee, and as such, the Development Project is consistent with this policy.

[13] City of Lancaster. (2009, July 14). City of Lancaster General Plan. City of Lancaster.
[14] *Maher, A. S. (2024, July). Wate Supply Assessment. Santa Ana, CA; Michael Baker International. Prepared for: Lancaster M Avenue, LLC (need to site the latest, approved version)*

General Plan Policies	Consistency Analysis
Policy 3.3.2: Facilitate the development and use of public transportation and travel modes such as bicycle riding and walking.	The Proposed Project would install bicycle parking for employees and visitors. Additionally, site improvements along Avenue L-12, Division Street, and Avenue M/Columbia Way, would help make the area more pedestrian-friendly.
Policy 3.3.3: Minimize air pollutant emissions by new and existing development.	The Proposed Project does not exceed the pollutant criteria thresholds established by the AVAQMD identified in Federal Conformity Guidelines (2016), Therefore, all emissions associated with the construction and operation of the Project would be less than significant.
Policy 3.4.2: Preserve significant desert wash areas to protect sensitive species that utilize these habitat areas.	As discussed in Section 1.4 Biological Resources section of this document, the Project site would not impact desert wash areas as identified by the report or impact any protected sensitive species that utilize these habitat areas because there are no known desert washes that cross through the Project site. This Initial Study for the proposed Project contains mitigation measures to comply with local, State and federal regulations with respect to sensitive species that could occur on site. Compliance with regulations is not mitigation, however, compliance with regulations would allow the project to be consistent with this policy. Impacts would be less than significant.
Policy 3.4.4: Ensure that development proposals, including City-sponsored projects, are analyzed for short- and long-term impacts on biological resources and that appropriate mitigation measures are implemented.	As discussed in Section IV, Biological Resources, the proposed Project site discusses biological resources and identifies mitigation measures to ensure impacts to these resources would be less than significant.
Policy 3.5.1: Minimize erosion problems resulting from development activities.	The proposed Project will comply with all dust control and erosion control measures. These include best management practices as identified in NPDES and the air quality regulations pertaining to dust control.
Policy 3.5.2: Since certain soils in the Lancaster study area have exhibited shrink- swell behavior and a potential for fissuring, and subsidence may exist in other areas, minimize the potential for damage resulting from the occurrence of soils movements.	A geotechnical study is required to be prepared by a registered professional engineer and submitted to the City as part of the grading and building plans. All recommendations within the study are required to be followed.
Policy 3.6.1: Reduce energy consumption by establishing land use patterns which would decrease automobile travel and increase the use of energy efficient modes of transportation.	The proposed Project would be built in an area that has been designated for industrial type uses. It would provide additional job opportunities for local residents which would reduce the amount of energy consumed on transportation.
Policy 3.6.2: Encourage innovative building, site design, and orientation techniques which minimize energy use.	The proposed Project would be constructed in accordance with the Uniform Building Code and the California Green Building Code. To the extent feasible solar and battery storage would be incorporated onto the building.

General Plan Policies	Consistency Analysis
Policy 3.6.3: Encourage the incorporation of energy conservation measures in existing and new structures.	The proposed Project would be constructed in accordance with the Uniform Building Code and the California Green Building Code. To the extent feasible solar and battery storage would be incorporated onto the building.
Policy 3.6.6: Consider and promote the use of alternative energy such as wind energy and solar energy.	The proposed Project would obtain its energy from Lancaster Choice Energy, which provides energy from a variety of sources including wind and solar. Additionally, the Development Project would install solar panels and battery storage on the building to the extent feasible.
Policy 3.8.1: Preserve views of surrounding ridgelines, slope areas and hilltops, as well as other scenic vistas.	The proposed Project would not block the views of any scenic resources available from the Development Site. Additionally, landscaping would be installed around the perimeter of the site to help screen the loading docks from a public view.
Policy 4.3.1: Ensure that noise-sensitive land uses, and noise generators are located and designed in such a manner that City noise objectives will be achieved.	As detailed in Section 1.9, *Noise,* the proposed Project would not expose the future residents of the supportive housing units to the east of the site to noise in excess of the City's standards, Additionally, although compliant with the City's standards, Mitigation Measure 20 is required to further reduce construction noise impacts.
Policy 4.5.1: Ensure that activities within the City of Lancaster transport, use, store, and dispose of hazardous materials in a responsible manner which protects the public health and safety.	The proposed Project would utilize common hazardous materials during its construction and operations including oils/lubricants, pesticides, cleaning agents, etc. All use would be in accordance with applicable rules and regulations. Additionally, no fueling operations would take place on the project site.
Policy 4.7.2: Ensure that the design of new development minimizes the potential for fire.	The proposed Project is designed in accordance with all applicable fire code regulations. The City Fire Department and Building Department would review all plans for compliance with all applicable codes.
Policy 14.1.4: Encourage the design of roads and traffic controls to optimize the safe traffic flow by minimizing turning movements, curb parking, uncontrolled access, and frequent. stops.	The proposed Project would improve Division Street, Avenue L-12, and Avenue M, along the project frontage to meet the requirements established by the City.
Policy 14.2.2: Manage the City's roadway network so that it is aesthetically pleasing through the development and maintenance of streetscapes.	The proposed Project would install enhanced landscaping along Avenue M in accordance with the requirements of the City of Lancaster Municipal Code. Additionally, Avenue M would be improved with a sidewalk along the Project frontage.
Policy 14.5.1: Provide adequate roadways and a support system to accommodate both automobile and truck traffic.	The proposed Project site is located at the northeast corner of Avenue M and 30th Street West. These roadways would be able to handle the traffic generated by the Development Project.

General Plan Policies	Consistency Analysis
Policy 15.1.2: Cooperate with local water agencies to provide an adequate water supply system to meet the standards for domestic and emergency needs.	The proposed Project would obtain its water from Los Angeles County Waterworks District # 40 upon annexation in accordance with existing regulations and requirements.
Policy 15.3.1: Direct growth to areas with adequate existing facilities and services, areas that have adequate facilities and services committed, or areas where public services and facilities can be economically extended.	The necessary utilities and services to support the proposed Project are located within the vicinity of the site or can be easily extended to serve the Proposed Project site.
Policy 16.3.1: Promote development patterns which will minimize the costs of infrastructure development, public facilities development and municipal service delivery.	The proposed Project site is located within an area that is designated for industrial uses and has the appropriate infrastructure to support those uses.
Policy 17.1.4: Provide office and industrial based employment-generating lands which are highly accessible and compatible with other uses in the community.	The proposed Project site is located within an area that is designated for industrial uses and has the appropriate infrastructure to support those uses. Additionally, the close proximity to State Highway 14 makes the Proposed Project site easily accessible.
Policy 18.2.2: Encourage appropriate development to locate so that municipal services can be efficiently provided.	The proposed Project site zoning is designated as Office Professional but proposed to be changed to Light Industrial and has the appropriate existing infrastructure to support those uses or the infrastructure can be provided.

Southern California Area of Governments Regional Transportation Plan/Sustainable Communities Strategy/Connect SoCal

As discussed in Section 1.8, Connect SoCal sets forth a forecasted regional development pattern which, when integrated with the transportation network, measures and policies, will reduce GHG emissions from automobiles and light-duty trucks and achieve the GHG emissions reduction target for the region set by the California Air Resources Board. Table 10 identifies how the Project is consistent with the goals of Connect SoCal 2024 relative to greenhouse gas emissions.

The Connect SoCal plan is based on modeling of a variety of factors including local jurisdiction's zoning and land use, growth forecasts in population, housing and employment.

The Proposed Project is not a residential project, and therefore, would not generate new residents. The Project includes a zone change from Office Professional to Light Industrial, which is anticipated to generate similar employment opportunities. The City of Lancaster identified 60,100 employed persons for 2019, and 65,400 for planning years 2035 and 2050. As both Office Professional and Light Industrial land uses generate employment opportunities, and Connect SoCal is updated every four years, the Project's impact on Connect SoCal achieving its plan due to the zone change is **less than significant**.

1.12 Mineral Resources

Threshold MIN 1.12	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓

Impact Analysis

Threshold MIN 1.12a): Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Threshold 4.12.b): Would the Development Project Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The Project site does not contain any current mining or recovery operations for mineral resources and no such activities have occurred on the Project site in the past. According to the LMEA (Figure 2-4 and page 2-8), the Project site is designated as Mineral Reserve Zone 3 (contains potential but presently unproven resources). However, the Lancaster area is unlikely to have large valuable mineral and aggregate deposits. Therefore, there would be **no impact.**

1.13 Noise

Threshold NOI 1.13	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies?		✓		
b) Generation of excessive ground-borne vibration or ground-borne noise levels?			✓	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✓	

Impact Analysis

The following analysis is based in part on the Noise Impact Technical Memorandum, February 19, 2025 by KPC Consultants. (**Appendix H**).

Threshold NOI 1.13.a): Would the Development Project generate 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?

The Project site is located approximately 2.89 miles northwest of the Palmdale Regional Airport and United States Air Force Plant 42 and 1.5 miles northwest of the nearest end of a facility runway. Although the airport is not currently operating commercial flights, the City of Palmdale is in negotiations with the United States Air Force, and as such, airport noise is included in the noise assessment in Appendix H. The primary sources of ambient noise in the Project site are traffic, commercial and industrial uses, an external loudspeaker from the Lancaster DMV Office which is located approximately 0.25 miles to the northwest, and United States Air Force Plant 42/Palmdale Regional Airport, located approximately 2.89 miles northwest. Traffic-generated noise is from 8th Street West, 10th Street West, and Highway 14, which is approximately 0.44 miles to the west.

Existing Ambient Noise Level Measurements: An existing ambient noise survey was conducted from August 9 through August 10, 2023, to establish existing conditions. The ambient noise monitoring survey consisted of three short-term noise measurements (15 minutes) and two long-term noise measurements (24 hours). Short-term and long-term noise measurements were conducted using Soft dB, Piccolo Class 2 sound level meters (SLMs), which meet the American National Standards Institute for Type 2 instrumentation. The SLMs were set to "slow" response and "A" weighting (dBA). The SLMs were calibrated before and after the noise monitoring survey with a high-precision Larson Davis CAL 200 calibrator. All SLMs were at least 5 feet above ground and 5 feet from any other reflective surfaces and equipped with a windscreen. Meteorological conditions were favorable during the noise monitoring survey, with average wind speeds of 7 miles per hour (mph) and 89 degrees Fahrenheit (°F).

Table 12. *Ambient Noise Level Measurements* summarize the noise monitoring survey results and briefly describe each measurement location. **Error! Reference source not found.**11. *Noise Monitoring Locations,* located at the end of this section, show the approximate Noise Monitoring Locations.

Table 12. Ambient Noise Level Measurements

Location	Description	CNEL dBA	Daytime Average Noise Level dBA (Leq)	Nighttime Average Noise Level dBA (Leq)	Average Noise Level dBA (Leq)
Long-Term Measurements					
LT-1	Eastern Project property line/Division St between Sahara and Regal Motel	64	60	56	
LT-2	Southern Project property line along Ave M	80	75	73	
Short-Term Measurements					
ST-1	Northern Project property line adjacent to Paradise Landscape				55.6
ST-2	Eastern Project property line/Division Street next to Sahara Motel				57.5
ST-3	Southern Project property line along Avenue M				70.4
ST-4	Western Project property next to vacant lot				54.0

Construction Noise

Construction activities that would create noise include site preparation, grading, building construction, paving, and architectural coating. Noise levels associated with the construction will vary depending on the type of construction equipment used, the duration of the activity, and the distance from the source. Construction noise will temporarily or periodically increase in the ambient noise level above the existing levels within the Project vicinity. The nearest sensitive receptors to the Project site are the Sahara Motel and Regal Lodge (which are being converted into permanent, supportive housing) located approximately 60 feet east of the property's eastern boundary and 800 feet from the site's center.

Noise levels will be loudest during the site preparation and grading phases. Table 4-3 of the Noise Report prepared by KPC EHS Consultants identifies the construction equipment noise levels at the nearest sensitive receptors, and Table 4-4 of the Noise Report identifies the construction equipment noise levels at 500 feet representing the approximate center of the site and the average noise conditions as equipment will be moving throughout the site during the site preparation and grading phases of construction. The properties immediately adjacent to and surrounding the Project site include office professional, industrial uses, vacant undeveloped parcels (zoned Light Industrial), and commercial uses, with the nearest sensitive receptors located at the Sahara Motel and Regal Lodge (60 feet to the east). The Project would be compatible with surrounding land uses and would not adversely impact sensitive receptors, as construction noise levels are expected to be lower than 80 dBA. Nevertheless, in order to ensure that construction noise levels are adequately suppressed, **Mitigation Measure 20** has been provided to further reduce construction noise impacts.

Operational Noise

According to the Federal Highway Administration*, Highway Traffic Noise Analysis and Abatement Policy and Guidance,* the level of roadway traffic noise depends on three things: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of the traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater numbers of trucks. These factors are discussed below.

- *The Volume of Traffic*

  As there are currently no known tenants of future development the number of truck trips for the Project was calculated using the South Coast AQMDs Warehouse Truck Trip Study with an overall trip rate of 1.78 per 1,000 SF and a truck trip rate of 0.53 per 1,000 SF. The average daily trips total is estimated to be 1,733 trips per day with 467 truck trips per day (Appendix H)

  The current average daily vehicle trips (ADT) along West Avenue M west of Sierra Highway are 24,900 ADT, and along East Avenue M east of 4th Street is 20,950 ADT.[15]

  According to Caltrans, the human ear is able to begin to detect sound level increases of 3 decibels (dB) in typical noisy environments.[16] A doubling of sound energy (e.g., doubling the volume of traffic on a highway) that would result in a 3-dBA increase in sound, would generally be barely detectable. Implementation of the Project will increase traffic volumes in the area occurring along W Avenue M but not to the extent that traffic volumes will be doubled creating a +3dBA noise increase or result in a perceivable noise increase. Therefore, operational noise impacts would be less than significant.

[15] City of Lancaster 2019 Average Daily Traffic Map. https://www.cityoflancasterca.org/home/showpublisheddocument/41344/637141754835800000 Accessed December 21, 2023.
[16] Caltrans, Traffic Noise Analysis Protocol, April 2020, p.7-1.

- *The Speed of Traffic*

  W Avenue M is a 4-lane road and has a posted speed limit of 55 mph, as indicated in volume of traffic above, the anticipated increase in noise levels would be less than 3 dBA and less than significant on W Avenue M.

- *The Number of Trucks in the Flow of Traffic*

  The Project is a warehouse development in an industrial area and although it will generate noise from large trucks, the site is located in an industrial area with similar truck and traffic uses. The total number of daily trips from both passenger cars and trucks is calculated to be 1,733 ADT, of which 467 (27 %) will be from trucks. The morning and afternoon peak hour truck traffic is calculated to be 17 AM peak hour truck traffic and 17 PM peak hour truck traffic. Truck traffic will also be required to use any State or City designated truck routes. The use of the truck routes will also decrease the impacts on sensitive receptors such as residential uses.

Facility Operations (Stationary Noise)

At the time the noise analysis in Appendix H was prepared, the future tenants of the proposed Project are unknown. The on-site Project-related noise sources are expected to include roof-top heating ventilation and air conditioning units (HVAC), refrigeration units, idling trucks, truck activities, backup alarms, as well as loading and unloading of dry goods, and parking lot vehicle movements. The noise analysis in Appendix H is intended to describe noise level impacts associated with the expected typical operational (stationary source) activities at the Project site. Table 13. *Stationary Reference Noise Level Measurements*, is provided model potential noise from stationary equipment.

Table 13. Stationary Reference Noise Level Measurements

Noise Source	Reference Distance (feet)	Reference Noise Level (dBA)	Distance to Receptor (feet)	Noise Level (dBA)
Rooftop HVAC [1]	1	88	525	54.4
Truck Loading Dock Activity [2]	50	63.6	525	43.2
Truck Backup Alarm [2]	50	75.0	525	54.6
Parking Lot Activity [2]	25	54.4	525	28.0

[1] Reference Level Lennox 10-ton air handler unit (AHU) manufacturer specifications.

[2] Reference Level collected at Amazon Fulfillment Center ONT-6 (24208 San Michele Rd., Moreno Valley)

Trucks at the Project site would utilize backup alarms during the loading/unloading activities, which according to ECCO17, the first manufacturer of backup alarms, depending on the model, typically produce a noise level of 87 to 112 dBA at one foot and at 60 feet with no sound barriers (walls or buildings) the noise level would be between 51.4 to 76.4 dBA. Reference noise level measurements taken at 50 feet during truck movement and backup alarm operation were measured at 75 dBAmax which would result in a 68.2 dBA noise level at 60 feet with no perimeter walls or buildings as shielding.

Parking lot areas for passenger vehicles and trailer parking were estimated to be located on the west and east sides of the proposed structure. Traffic associated with parking lots is typically not at a sufficient level to exceed the community noise standards. The total parking spaces estimated for the Project is approximately 482 stalls, the reference noise levels were taken at a parking lot that can accommodate approximately 1,000 stalls. The Project's parking lots are substantially smaller, and no significant noise impacts offsite from the parking lot use would be anticipated.

The USEPA identifies noise levels affecting health and welfare as exposure levels over 70 dBA over a 24-hour period. Noise levels for various levels are identified according to the use of the area. Levels of 45 dBA are associated with indoor residential areas, hospitals, and schools, whereas 55 dBA is identified for outdoor areas where typical residential human activity takes place. According to the USEPA levels of 55 dBA outdoors and 45 dBA indoors are identified as levels of noise considered to permit spoken conversation and other activities such as sleeping, working, and recreation, which are part of the daily human condition18. Levels exceeding 55 dBA in a residential setting are normally short in duration and not significant in affecting the health and welfare of residents. As the Project site is located in an industrialized and commercial area that is zoned and planned for future industrial and commercial development, the nearest exiting receptor is approximately 60 feet away to the east and no significant noise impacts are expected at that distance.

Therefore, based on the analysis in Appendix H, the Project would not generate a substantial 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 during the operational phase. However, during the construction phase, the Project may generate temporary noise in excess of standards, and mitigation is required to reduce the temporary impacts. Therefore, the overall impact of this criterion would be **less than significant with mitigation incorporated**.

[17] ECCO Backup alarm manufacturer resources: https://www.eccoesg.com/us/en/SearchResults?searchText=backup+alarm+noise+levels accessed December 21, 2023.
18 USEPA "EPA Identifies Noise Levels Affecting Health and Welfare" https://archive.epa.gov/epa/aboutepa/epa-identifies-noise- levels-affecting-health-and-welfare.html accessed December 22, 2023.

Mitigation Measure

Mitigation Measure 20. Construction Noise Reduction. Before issuance of grading and/or building permits, a note shall be provided on grading and building plans indicating that, during grading and construction, the property owner/developer shall be responsible for requiring contractors to implement the following measures to limit construction-related noise:

- The construction contractor shall ensure that all internal combustion engine-driven equipment is equipped with mufflers that are in good condition and appropriate for the equipment.
- When sensitive receptors adjoin or are near a construction Project area, the construction contractor shall locate stationary noise-generating equipment as far as possible from them. In addition, the Project contractor shall place such stationary construction equipment so that emitted noise is directed away from sensitive receptors near the Project site.
- The construction contractor shall prohibit unnecessary idling (no more than 5 minutes) of internal combustion engines.
- Equipment shall not be operated along the site's eastern boundary for more than 30 minutes per hour during construction.
- The construction contractor shall, to the maximum extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the Project site during all Project construction.
- The construction contractor shall designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., a bad muffler) and require measures to be implemented to correct the problem.
- These measures may only be granted an exception if an application for construction-related exception is made to and considered by the City's Building Official.

Threshold 1.13.b): Would the Development Project generate excessive ground-borne vibration or ground-borne noise levels?

During construction, the operation and movement of heavy equipment create seismic waves that radiate along the ground surface in all directions. These waves are felt as ground vibrations. Vibrations from construction can result in effects ranging from annoyance to people to structure damage. Vibration levels are impacted by geology, distance, and frequencies. According to the Federal Transit Administration, *Transit Noise and Vibration*

Impact Assessment Manual, September 2018, while ground vibrations from construction activities do not often reach the levels that can damage structures, construction vibration may result in building damage or prolonged annoyance from activities such as blasting, piledriving, vibratory compaction, demolition, and drilling or excavation near sensitive structures.

Table 14. *Vibration Source Levels for Construction Equipment* identifies the FTA's typical peak particle velocity (PPV) for various pieces of typical construction equipment that could be utilized on site.

Table 14. Vibration Source Levels for Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.

The Project does not require construction methods such as pile driving, vibratory compaction and drilling that would cause excessive ground borne vibration.

Vibration amplitude and impact decrease with distance, and perceptible ground-borne vibration is generally limited to areas within 100 to 200 feet of the construction activity.

The City of Lancaster does not establish quantified thresholds for temporary construction noise and vibration damage. Therefore, to evaluate potential construction noise and vibration impacts the following California Department of Transportation (Caltrans) thresholds for vibration are used in this analysis.

- **Vibration Damage Potential (Old Structures):** 0.3 inches/second (in/sec) peak particle velocity (PPV) for continuous/Frequent Intermittent Sources at the facade of an older residential structures.
- **Vibration Damage Potential (New Structures):** 0.50 in/sec PPV at the façade for continuous/Frequent Intermittent Sources at the facade of a new residential structures.
- **Vibration Annoyance Criteria (Receptor Perception):** 0.24 in/sec PPV is classified by Caltrans as distinctly perceptible.

The closest receptor to the Project property line is approximately 60 feet from the property line. The estimated construction vibration level from a large bulldozer (worst case scenario) measured at 15 feet would create a vibration level of 0.191 in/sec which does not exceed

the 0.3 PPV in/sec or 0.5 PPV in/sec thresholds for structural damage or the 0.24 PPV in/sec for human annoyance threshold. Therefore, the vibrations at the nearest receptor and structures will remain below the strongly perceptible annoyance criteria and potential vibration damage criteria threshold. This threshold requires that no vibration greater than 0.24 PPV be felt at or beyond the lot line. The proposed Project therefore is not considered to result in exposure of people to excessive ground vibration.

Therefore, impacts would be **less than significant**.

Threshold 1.13c). 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 2 miles of a public airport or public use airport, would the Development Project expose people residing or working in the project area to excessive noise levels?

The Project site is located approximately 2.89 miles northwest of United States Air Force Plant 42 and 1.5 miles northwest of the nearest end of a facility runway. Although the airport is not currently operating commercial flights the City of Palmdale is in such negotiations with the United States Air Force and as such airport noise is included in the noise assessment in Appendix H. As shown in Appendix H, Exhibit 4-C *Palmdale Regional Airport Influence Area and Noise Contour Map*, the Project site is within the airport influence area and 65 CNEL noise contour. As the Project is an industrial use such uses are acceptable within the 65 CNEL noise contour and impacts would be **less than significant**.

Figure 11. Noise Monitoring Locations

1.14 Population and Housing

Threshold PH 1.14	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.				✓

Impact Analysis

Threshold PH 1.14.a): Would the Development 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)?

The Project would not generate substantial population growth as the Project is an industrial development and does not include residential uses. It is anticipated that the Project will generate 435 new permanent jobs. It is possible that individuals could relocate to the Antelope Valley to work at the proposed distribution facility. However, it is much more likely that individuals living in Antelope Valley will be hired to work at the distribution facility. Therefore, impacts would be **less than significant.**

Threshold PH 1.14.b): Would the Development Project Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project site is currently vacant. No housing or people would be displaced, necessitating the construction of replacement housing elsewhere. Therefore, there would be **no impact.**

1.15 Public Services

Threshold PS 1.15	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project result in substantial adverse physical impacts associated with the provision of new physically altered government 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:			✓	
Fire Protection?			✓	
Police Protection?			✓	
Schools?			✓	
Park?			✓	
Other Public Facilities?			✓	

Impact Analysis

Threshold PS 1.15.a): Would the project result in substantial adverse physical impacts associated with the provision of new physically altered government 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:

Fire Protection: The Los Angeles County Fire Department provides fire protection services to the Project area. The Project would be primarily served by Station #129, approximately 0.5 roadway miles west of the Project site at 42110 6th Street, located west of the Project. Though the Project may require additional fire services, the Project is an industrial project that does not induce substantial population growth that typically determines service levels. The Additionally, all development projects are required to comply with the requirements of the fire code and to pay the applicable development impacts fees.

Sheriff Protection: The Los Angeles County Sheriff's Department provides community policing to the City and is headquartered at 501 West Lancaster Boulevard. And though the Project may require additional fire services, the Project is an industrial project that does not generate residents that typically determine service levels. Though the Project may require additional fire services, the Project is an industrial project that does not induce substantial population growth that typically determines service levels.

Schools: Construction of the proposed Project may result in an incremental increase in population and may increase the number of students in the Lancaster School District and Antelope Valley Union High School District. Proposition IA, which governs the way in which school funding is carried out, predetermines by statute that payment of developer fees is adequate mitigation for school impacts. Therefore, impacts would be less than significant.

Parks: The nearest public park to the Project site is Sgt. Steve Owen Memorial Park approximately 1.2 miles to the northwest. The Project does not propose residential development, so it would not directly increase population within the City and therefore would not significantly increase the demand for parkland or other recreational facilities.

Other Public Facilities: As noted above, development of the Project would not directly result in an increase in the population. Thus, it is not anticipated the Project would increase the demand for public services, including public health services and library services to the degree that the construction of new or expanded public facilities would be required based on this small increase in population.

Therefore, this Project would not result in substantial adverse physical impacts associated with the provision of new physically altered government 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. Impacts would be **less than significant**.

1.16 Recreation

Threshold REC 1.16	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			✓	

Impact Analysis

Threshold REC 1.16.a): Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Threshold REC.16.b): Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The Project would not include the development of residential units. As a result, the construction of the proposed Project would not directly add to the City's existing population and would not generate new residential park demand. Buildout of the Development Project is anticipated to increase employment in the City by approximately 435 jobs, most of which are expected to be filled by City or County residents. The proposed Project does not involve the construction of any parks or recreational facilities. However, the applicant would be required to pay applicable park fees which would offset any impacts to existing parks. Therefore, impacts would be less than significant.

1.17 Transportation

Threshold TRAN 1.17	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			✓	
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?		✓		
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
d) Result in inadequate emergency access?				✓

Impact Analysis

This section was informed, in part, by the Vehicle Miles Traveled (VMT) Analysis prepared for the Project by RK Engineering, dated February 14, 2025. (**Appendix I**).

Threshold TRANS 1.17a): Would the Development Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The proposed Project would not conflict with any programs, plans, ordinances, and policies with respect to transportation systems including bicycle and pedestrian facilities. The Project site is located at the northwest corner of two major roadways, Avenue M and Division Street, and in close proximity to the Antelope Valley Freeway (State Route 14). The proposed Project would be required to install roadway improvements including sidewalks and bicycle lanes as appropriate and would also be required to provide bicycle facilities in accordance with the California Green Building Code. Therefore, impacts would be **less than significant**.

Threshold TRANS 1.17b): Would the Development Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

In July 2020, the City of Lancaster adopted standards and thresholds for analyzing projects with respect to vehicle miles traveled (VMT). A series of screening criteria were adopted and if a project meets one of these criteria, a VMT analysis is not required. These criteria include: 1) project site – generates fewer than 110 trips per day; 2) locally serving retail – commercial developments of 50,000 square feet or smaller; 3) project located in a low VMT area – 15% below baseline; 4) transit proximity; 5) affordable housing; and 6) transportation facilities. Based on these criteria, the project does not screen out of a VMT Analysis.

As indicated previously, a VMT analysis was conducted for the proposed Project by RK Engineering Group, Inc. The VMT analysis was conducted pursuant to the City of Lancaster Department of Public Works, Local Transportation Assessment Guidelines dated January 5, 2021 ("VMT Guidelines"). Per the City of Lancaster VMT Guidelines, the threshold for determining a significant VMT impact for an Employment (Commercial or Industrial) Project would occur if the project exceeds 15 percent below the Los Angeles County Antelope Valley Planning Area (AVPA) Baseline VMT for home-based work VMT per employee.

The City of Lancaster City Council adopted the Vehicle Miles Traveled Impact Fee Mitigation Program in January 2023 and certified the accompanying Final Program Environmental Impact Report, Findings, and Statement of Overriding Considerations. The VMT mitigation program allows developers to pay $150 per VMT to mitigate their VMT impacts and tier off of the Program EIR.

VMT Impact Analysis Results

The VMT analysis in Appendix I utilized VMT data from the SCAG VMT model for the 2012 base year and 2040 future year conditions. To estimate 2024 baseline year conditions, the 2012 base year and 2024 future year VMT data were interpolated. The Proposed Project is expected to add approximately 435 employees, which is consistent with the socio-economic data (SED) growth projections for the Project's traffic analysis zone, and it would not modify the existing roadway circulation plan for the area. Hence, no land use or network changes have been made to the SCAG model.

Based on the results of this VMT analysis, which are identified in Table 15. *SCAG VMT Analysis*, the Project-generated VMT per employee has the potential to exceed the City of Lancaster VMT Threshold of Significance under 2024 Baseline Year conditions and 2040 Future Year conditions. The Project Proposes to mitigate its VMT exceedances by contributing to the City's VMT impact fee program based on the 2024 baseline year and allowable fee structure . With payment of the fee, as identified in **Mitigation Measure 21**, the Proposed Project's VMT impacts would be **less than significant with mitigation incorporated**.

Table 15. SCAG VMT Analysis

Zone ID	Tier 2 TAZ	VMT Metric	2012 Base Year	2040 Future Year	2024 Baseline Year
VMT Analysis Results for Project TAZ					
105	20315300	Employees	1,256	2,067	1,604[3]
		Home Based Work VMT	16,217	17,933	16,952[3]
		Home Based Work VMT per Employee [a]	12.91	8.68	10.57
Threshold of Significance					
		AVPA Home Based Work VMT per Employee	10.97	7.05	9.29[3]
		VMT Threshold of Significance [b] (15% below AVPA Home Based Work VMT per employee)	9.32	5.99	7.90
Project Mitigation Calculation					
		VMT/Employee Above Threshold [a] - [b]	3.59	2.69	2.67
		Estimated Number of Project Employees[1]		435	
		Total VMT Above Threshold	1,561.65	1,170.15	1,161.45
VMT Impact Fee Requirement ($1S0NMT Above Threshold)					**$174,218**

1. SCAG base model SEO and VMT statistics provided by City of Lancaster. Refer to Appendix I.

2. The number of Project employees is estimated based on current trends in warehouse employment density; which shows a rise in warehouse automation that has led to a reduction in the number of warehouse employees per square foot. The ratio of employees per square foot is consistent with the employment density rate used for the *8th Street Warehouse Project Vehicle Miles Traveled (VMT) Analysis, City of Lancaster, July 25, 2023, prepared by RK Engineering Group, Inc.*
   - Project employees = (Project Building Area, in thousand square feet) x (Employment density ratio)
   - 435 employees= (807.968 TSF) x (50 employees/ 92.932 TSF)

3. Interpolated based on 2012 base year and 2040 future year VMT data.

Mitigation Measure

Mitigation Measure 21. Vehicle Miles Traveled Mitigation Fee. In accordance with the City of Lancaster's Vehicle Miles Traveled Impact Fee Mitigation Program, the applicant shall pay $174,218 to reduce VMT impacts prior to the issuance of construction-related permits.

Threshold TRANS 1.16.c): Would the Development Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Access to the Project is proposed via the following:

- One (1) full-access driveway along Avenue L-12;
- Three (3) full-access driveway along Division Street;
- One (1) full-access driveway along Avenue M; and
- One (1) right-in/right-out driveway along Avenue M.

The Project will construct and improve Division Street from Avenue L-12 to Avenue M to meet the City of Lancaster requirements. Additionally, the Project will construct and improve Avenue L-12 from the western Project site boundary to Division Street, to meet the City of Lancaster requirements. The Project will coordinate with the properties north of the Project site to obtain adequate right-of-way for the alignment of Avenue L-12 at Sierra Highway.

These improvements would not increase hazards in the vicinity of the Project nor create dangerous design situations or incompatible uses. Therefore, no impacts would occur.

Threshold TRANS 1.16d): Would the Development Project result in inadequate emergency access?

The Project is not anticipated to result in any significant emergency access impacts during construction. In the event of an accident or emergency during construction, emergency service providers would still be able to access the site from Avenue M and Division Street. Access throughout the site would be maintained by ensuring that vehicles would not be parked or placed in a manner that would impede access for emergency response vehicles. The proposed Project would include improvements to the existing roadway network and the development of an internal roadway network consistent with City design standards. Therefore, no impacts would occur.

1.18 Tribal Cultural Resources

Threshold TCR 1.17	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or 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 for in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			✓	

Impact Analysis

Section 21074 of the Public Resources Code describes Tribal Cultural Resources as follows: (a) "Tribal cultural resources" are either of the following: (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following: (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources. (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1. (2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

A Sacred Lands File request was sent by BCR Consulting to the State of California Native American Heritage Commission (NAHC) for a records search. The NAHC is the State of California's trustee agency for the protection of "tribal cultural resources," as defined by California Public Resources Code §21074 and is tasked with identifying and cataloging properties of Native American cultural value, including places of special religious, spiritual, or social significance and known graves and cemeteries throughout the state. The Sacred Lands File yielded negative results for Native American cultural resources in the vicinity of the Project area.

Assembly Bill (AB) 52 The Legislature added requirements regarding tribal cultural resources for CEQA in Assembly Bill 52 (AB 52) that took effect July 1, 2015. AB 52 requires consultation with California Native American tribes and consideration of tribal cultural resources in the CEQA process. By including tribal cultural resources early in the CEQA process, the legislature intended to ensure that local and Tribal governments, public agencies, and project proponents would have information available, early in the project planning process, to identify and address potential adverse impacts to tribal cultural resources. By taking this proactive approach, the legislature also intended to reduce the potential for delay and conflicts in the environmental review process. To help determine whether a project may have such an effect, the Public Resources Code requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. Because the Project site is located within the ancestorial territory of Yuhaaviatam of San Manuel Nation (YSMN), the possibility exists that Native American Tribal Cultural Resources may be discovered during ground-disturbing activities.

As required by AB 52, the City notified the tribes of the Project to determine if consultation was required in an effort to understand if tribal resources may be present. Table 16. *Native American Tribes AB 52 Notices and Responses,* below , identifies the City's process.

Table 16. Native American Tribes AB52 Notices and Responses

Tribe	Person/Title	Date Received
Yuhaaviatam of San Manuel Nation (YSMN)	Alexandra McCleary, Cultural Resources Management Department	May 4, 2024
Fernandeño Tataviam Band of Mission Indians	Sarah Brunzell, CRM Manager	May 3, 2024
Gabrieleno Band of Mission Indians – Kizh Nation	Andrew Salas, Chairman	May 3, 2024
Morongo Band of Mission Indians	Ann Brierty, THPO	May 3, 2024
Morongo Band of Mission Indians	Robert Martin, Chairperson	May 6, 2024
Quechan Tribe of the Fort Yuma Reservation	Jill McCormick, Historic Preservation Officer	May 9, 2024
Quechan Tribe of the Fort Yuma Reservation	Jordan Joaquin, Quechan Tribal Council	

Tribe	Person/Title	Date Received
Quechan Tribe of the Fort Yuma Reservation	Manfred Scott, Acting Chairman – Kw'ts'an Cultural Committee	
San Fernando Band of Mission Indians	Donna Yocum, Chairperson	May 3, 2024
Serrano Nation of Mission Indians	Mark Cochrane, Co-Chairperson	May 3, 2024
Serrano Nation of Mission Indians	Wayne Walker, Co-Chairperson	May 3, 2024

Threshold TCR 1.18a): Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically restricted in terms of the size and scope of the landscape, sacred place, or object with artistic value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Threshold TCR 1.18.b): Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically restricted in terms of the size and scope of the landscape, sacred place, or object with artistic value to a California Native American tribe, and that is A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for in subdivision (c) of Public Resources Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

A historical resource or archaeological resource may also be a tribal cultural resource if it conforms with the criteria described in Public Resources Code §21074(a) above. As discussed in Section 1.5 Cultural Resources, based on a records search and a pedestrian field survey, no historical or archaeological resources eligible for listing on the California Register of Historical Resources or a local register were encountered on the surface of the Project site. The City conducted tribal consultation in accordance with AB52, and resources were not identified on or near the Project site. Therefore, because there are no known tribal resources that are 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) significant pursuant to criteria set for in subdivision (c) of Public Resources Section 5024.1, there would be no impact.

However, grading, utility trenching, and the construction of the water quality basin have the potential to reveal buried deposits below the surface. Therefore, Mitigation Measures 15 and 17 under Section 1.5, Cultural Resources would reduce impacts to less than significant.

Therefore, with the incorporation of mitigation measures identified as part of cultural resources, the impacts would be **less than significant.**

1.19 Utilities and Service Systems

Threshold UTL 1.18	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction or new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			✓	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Impact Analysis

The following analysis is based in part on the Water Supply Assessment, October 2024, prepared by Michael Baker International. (**Appendix J**).

Threshold UTL 1.1.a): Would the Development Project require or result in the relocation or construction or new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The proposed Project would be required to connect to the existing utilities such as electricity, natural gas, water, wastewater, telecommunications, etc. These services already exist adjacent to the Project site. Connections would occur on the Project site or within existing roadways or rights-of-way. Connections to these utilities are assumed as part of the proposed Project, and the impacts on environmental resources are discussed throughout the document. As such, impacts would be less than significant.

Threshold UTL 1.19.2: Would the Development Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

A Water Supply Assessment (WSA) was prepared for the Development Project by Michael Baker International, dated October 2024 and included as Appendix K. The WSA assessed water supplies available during normal, single-dry, and multiple-dry water years to see if they can meet the projected water demand of the proposed Project, in addition to the water supplier's existing and planned future uses. As stated in the WSA, the estimated water demand for the Project is 31 AFY, including demands from the warehouse space and landscape irrigation.

The Project is located in an area that is currently serviced by Los Angeles County District 40's water system, specifically District 40 Region 4. District 40's water supply is sourced from a combination of purchased imported water and groundwater. District 40 purchases its imported water from the Antelope Valley-East Kern Water Agency (AVEK) and is AVEK's largest municipal customer. AVEK is a regional water wholesaler that supplies surface water to portions of Los Angeles, Kern, and Ventura County. The majority of AVEK's water is received as imported water from the State Water Project (SWP).

The projected water demand associated with the Project follows the forecasting methodology described in District 40's 2020 UWMP and the Forecasting Memorandum. Multiplying percentages for each year were derived from the data presented in Table 4-2 of District 40's UWMP and multiplied by the Project current water demand to achieve the projected water demand. The calculated projected water demand associated with the Project is summarized in *Table 17: Project Future Water Demand (AFY)*.

Table 17. Project Future Water Demand (AFY)

Structure	Land Use Type	Use Area (ft^2)	Water Duty Factor (gpd/kft^2)	Total Demand (gpd)	Total Water Demand (AFY)
Building 1	Warehouse	356,480	25	8,912	10.0
	MFR	29,200	25	730	0.8
	Office	10,000	64	640	0.7
Building 2	Warehouse	335,925	25	8,398	9.4
	MFR	51,600	25	1,290	1.4
	Office	10,000	64	640	0.7
Landscape Area	Irrigation	237,837	30.8	7,325	8.2
			Total	**27,936**	**31**

Source: Table 7,Water Supply Assessment, Appendix J.

Table 18. Normal Year Water Supply and Demand Comparison presents District 40's normal water year scenario, showing a comparison of current and projected water supply for the current and projected demand. The proposed Project demands would be met with increased water conservation reduction actions through the District's Water Shortage Contingency Plan (WSCP) in the event of a severe drought scenario. District 40 has indicated that the Project demands are low, and they do not anticipate an issue meeting water demands for the Project with conservation actions alone.

Table 18. Normal Year Water Supply and Demand Comparison

Source	2025	2030	2035	2040	2045
Supply Totals[a]	83,086	81,724	80,324	79,024	79,024
AVEK SWP[b]	57,300	55,800	54,200	52,700	52,700
District's Groundwater Production Rights[b]	6,789	6,789	6,789	6,789	6,789
District's Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
District's Imported Water Return Flows	10,400	10,4000	10,4000	10,4000	10,4000
District/AVEK Lease	2,600	2,600	2,600	2,600	2,600
New supply from AVEK[c]	1,733	1,733	1,733	1,733	1,733
Recycled Water[b,d]	764	902	1,102	1,302	1,302
Demand Totals[e]	55,164	58,002	61,002	64,402	67,602
Difference (Supply Minus Demand)	**27,922**	**23,722**	**19,222**	**14,622**	**11,422**

Source: Table 10, water Supply Assessment , Appendix K

Table 19. Single Dry Year Supply and Demand Comparison (AFY) presents District 40's single-dry water year scenario, showing a comparison of single-dry year water supply for the projected demand. The single-dry year scenario is based on the driest year on record for AVEK, 1977. District 40 and AVEK determined that water demand in the single-dry year will remain the same as a normal year. In the single-dry year scenario, AVEK can meet District 40's demand by pumping groundwater from its banked supplies. No supply deficit is anticipated.

Table 19. Single Dry Year Supply and Demand Comparison (AFY)

Source	2025	2030	2035	2040	2045
Supply Totals	55,164	58,002	61,102	64,402	67,602
AVEK SWP	5,000	5,000	5,000	5,000	5,000
AVEK Groundwater from Banked Supplies	24,378	27,078	29,978	33,078	36,278
District 40's Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
District 40's Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
District 40's Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
New supply from AVEK[a]	1,733	1,733	1,733	1,733	1,733
Recycled Water [b]	764	902	1,102	1,302	1,302
Demand Totals	55,164	58,002	61,102	64,402	67,602
Difference (Supply Minus Demand)	**0**	**0**	**0**	**0**	**0**

Source. Table 11, Water Supply Assessment, Appendix K.

Error! Reference source not found.12 in Appendix K presents District 40's multiple-dry water year scenario. District 40 and AVEK determined that water demand in a multiple-dry year scenario will remain the same as a normal year. In the multiple-dry year scenario, AVEK can meet District 40's demand by pumping groundwater from its banked supplies. No supply deficit is anticipated.

As stated above, District 40 has sufficient supply to meet the current and projected supply during normal, single-dry, and multiple-dry years. In single-dry and multiple-dry years, AVEK, the primary supply of District 40, can meet District 40's demand together with the Project's demand by pumping groundwater from its banked supplies.

It should be noted that though District 40's UWMP concludes there are supplies to meet demand, District 40's water supply is very near what the region can accommodate. The District relies heavily on its WSCP conservation actions to make up the difference in multi- year drought periods. The Project will add stress to an already stressed supply. With new extreme drought scenarios, it is growing more uncertain whether the region will be able to meet the demands of this and other large development projects.

Upon completion of this WSA, the Los Angeles County Waterworks District 40, the likely water supplier for the Project, will provide a Notice of Determination if adequate water supplies are available. This will be included in the Project's environmental documentation.

Consistent with the provisions of SB 610, neither this WSA nor its approval shall be construed to create a right or entitlement to water service or any specific level of water service and shall not impose, expand, or limit any duty concerning the obligation of District 40 to provide certain service to its existing customers or any future potential customers.

This WSA does not constitute a will-serve, plan of service, or agreement to provide water service to the Project and does not entitle the Project, Project Applicant, or any other person or entity to any right, priority, or allocation in any supply, capacity, or facility. To receive water service, the Project will be subject to an agreement with District 40, together with any and all applicable fees, charges, plans and specifications, conditions, and any and all other applicable District 40 requirements in place and as amended from time to time. Nor does anything in the WSA prevent or otherwise interfere with District 40's discretionary authority to declare a water shortage emergency in accordance with the CWC. Therefore, impacts would be less than significant.

Threshold UTL 1.19c): 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?

The Project site is located outside of the jurisdictional boundaries of Los Angeles County Sanitation District (LACSD) District No. 14. All wastewater created by the Project would be treated at the Lancaster Water Reclamation Plant which has a design capacity of 18 million gallons per day (mgd) and currently produces an average recycled water flow of 14.5 mgd. The proposed Project would discharge a local sewer line for conveyance to the Districts' Amargosa Creek Trunk Sewer, located in Division Street at Avenue L-12. This trunk sewer has a capacity of 3.9 mgd and conveyed a peak flow of 0.1 mgd when last measured in 2021. The proposed Project would generate 20,192 gallons of wastewater per day. The proposed Project would not require the expansion of existing facilities or the construction of new facilities. Therefore, the impacts would be less significant.

Threshold UTL1.19d): Would the Development Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impact the attainment of solid waste reduction goals?

Threshold UTL 1.1.e): Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Solid waste generated within the City is typically disposed of at Lancaster Landfill located at 600 East Avenue F. This landfill is a Class III landfill which accepts agricultural, nonfriable asbestos construction/demolition waste, contaminated soil, green materials, industrial, inert, mixed municipal, sludge, and waste tires. This landfill does not accept hazardous materials. The current capacity of this landfill is 27.7 million cubic yards, with a remaining capacity of 13,017,160 cubic yards as of September 2023, according to CalRecycle. The landfill is permitted to accept up to 5,100 tons per day. The proposed Project would generate solid waste during construction and operation Assembly Bill (AB) 939 was adopted in 1989 and required a 25% diversion of solid waste from landfills by 1995 and a 50% diversion by 2005. In 2011, AB 341 was passed which required the State to achieve a 75% reduction in solid waste by 2030. The City of Lancaster also requires all developments to have trash collection services in accordance with City contracts with waste haulers over the life of the proposed project.

These collection services would also collect recyclable materials and organics. The trash haulers are required to be in compliance with applicable regulations on solid waste transport and disposal, including waste stream reduction mandated under AB 341.Additionally, the proposed Project would comply with all State and local regulations regulating solid waste disposal. Therefore, the **impacts would be less significant.**

1.20 Wildfire

Threshold WF 1.20	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impact an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

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Threshold WF1.20a): Substantially impact an adopted emergency response plan or emergency evacuation plan?

Threshold WF1.20b): Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Threshold WF1.20c): Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Threshold WF1.20d): Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The Project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones (https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones.). The Project site is located within the service boundaries of Fire Station No. 129, located at 42110 6th Street West, which would provide service in the event of a fire. Additionally, the proposed Project would be constructed in accordance with all existing and applicable building and fire codes. Therefore, there would be **no impact**.

1.21 Mandatory Findings of Significance

Threshold MANFS 1.21	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)		✓		
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

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Threshold MFS 1.21a): Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As indicated in this Initial Study, biological resources, cultural resources, geology (paleontological), and tribal cultural resources may be adversely impacted by Project development. Mitigation measures are incorporated in these resource areas to reduce impacts to less than significant. Therefore, the Project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the

major periods of California history or prehistory. The impacts would be **less than significant with mitigation incorporated**.

Threshold MFS 1.21b): Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

The Proposed Project consists of the construction and operation of an industrial/warehouse facility in the Light Industrial zone. Other projects have been approved and/or submitted within approximately one mile of the Project site and are identified in Table 20. *Related Projects List*.

Table 20. Related Projects List

Case No.	Location	Land Use	Quantity	Status
CUP 18-27	742-752 W Avenue L 3128-009-006, 3128-009-083, 3128-009-084, 3128-009-100	Cannabis cultivation, manufacturing, and distribution facility	9.69	Approved
CUP 21-01 GPA 21-01 ZC 21-01	SEC of 15th Street W & Avenue L3109-026-040, 3109-026-042, 3109-026-032, 109-026-044	Mixed-use development with hotel, apartments, conference center, restaurants and retail	10.11	Under Review
SPR 22-08	NEC of 12th Street W & Avenue L-8 3109-025-049	Light industrial development	2.25	Under Review
SPR 21-01	SEC of 10th Street W & Avenue L-8 3128-010-010	Automotive repair	0.43	Under Review
SPR 22-07	6th Street W, south of Avenue L-8 3128-020-015	Industrial buildings	1.23	Approved
SPR 22-11	South of Forbes Street and Market Street 3128-008-009	Industrial buildings	11.62	Approved
SPR 22-14	W Avenue L-4, West of Wall Street 3128-007-015, 3128-007-024	Industrial building	10.78	Approved
SPR 22-02	SEC of W Avenue L and Sierra Highway 3128-007-034, 3128-007-039	Warehouse	1.81	Approved
SPR 22-03	SWC of W Avenue L and Sierra Highway 3128-007-030, 3128-007-038	Self-storage facility	4.47	Approved

Case No.	Location	Land Use	Quantity	Status
CUP23-018	SWC of Avenue L and 15th Street W 3109-019-041	Convenience store with fueling station	2.3	Under Review
CUP23-020	SWC of Avenue L & 10th Street W 3109-026-047, 3109-026-049, 3109-026-048	Commercial center with a drive-through restaurant and a car wash	3.7	Approved
SPR24-003	Avenue M & Division Street3128-013-010	Industrial development	38.97	Under Review
CUP24-004	Sierra Highway & Avenue L 3128-007-021	Commercial cannabis facility	3.88	Approved

These projects are also required to comply with the city's zoning code and General Plan. Cumulative impacts are 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 projects. The proposed Project would not create any impacts with respect to: Agriculture and Forestry Resources, Energy, Land Use and Planning, Mineral Resources, Tribal Cultural Resources, and Wildfire. The Project would create impacts to other resource areas and mitigation measures have been identified for Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Noise, and Transportation. Many of the impacts generated by projects are site specific and generally do not influence the impacts on another site. All projects undergo environmental review and have required mitigation measures to reduce impacts when warranted. These mitigation measures reduce environmental impacts to less than significant levels whenever possible. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable.

Threshold MFS 1.21c):–Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

As indicated by this Initial Study, the Project would have a less than significant impact on human beings except for Air Quality (Valley Fever), Geology (Dust Control), and Noise (Construction). Potential impacts are reduced to a less than significant level by the implementation of the mitigation measures outlined in this analysis. Therefore, the Project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. Impacts would be **less than significant with mitigation incorporated**.

Acronyms And Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AQMP	Air Quality Management Plan
AVAQMD	Antelope Valley Air Quality Management District
AVTA	Antelope Valley Transit Authority
bgs	below ground surface
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
City	City of Lancaster
CNEL	community noise equivalent level
CO	carbon monoxide
County	County of Los Angeles
CRHR	California Register of Historic Resources
dBA	A-weighted decibel
EIR	environmental impact report
EV	electric vehicle
GHG	greenhouse gas
HBW	home-based work
HMBP	hazardous materials business plan
HVAC	heating, ventilation, and air conditioning
ips	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
LACFD	Los Angeles County Fire Department
LACWD	Los Angeles County Waterworks District
Leq	equivalent noise level over a given period
LHMP	City of Lancaster Local Hazard Mitigation Plan
MDAB	Mojave Desert Air Basin
MS4	Municipal Separate Storm Sewer System
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NOx	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
O_3	ozone
PM_{10}	particulate matter with an aerodynamic diameter equal to or less than 10 microns
$PM_{2.5}$	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
PRC	California Public Resources Code
RCNM	Roadway Construction Noise Model
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SLF	Sacred Lands File
SR	State Route

Acronym/Abbreviation	Definition
SWPPP	stormwater pollution prevention plan
TCR	tribal cultural resource
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled