DRAFT INITIAL STUDY - MITIGATED NEGATIVE DECLARATION

Soyeon Choi MAY 2, 2025

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning

Project Title: 230th Street Solar Project/Project No. PRJ2023-002405 (CUP No. RPPL2023005137, Environmental Plan No. RPPL2023005138)

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Soyeon Choi, Senior Planner, North County Development Services, (213) 974-6443

Project sponsor's name: RPCA Solar 12, LLC

Project location: Generally located at 49560 230th St W, Lancaster, CA 93536. See **Figure 1: Regional Vicinity Map** and **Figure 2: Local Vicinity Map.**
APN: 3278-025-001 *USGS Quad*: Neenach School

Gross Acreage: 31 acres

General Plan designation: N/A

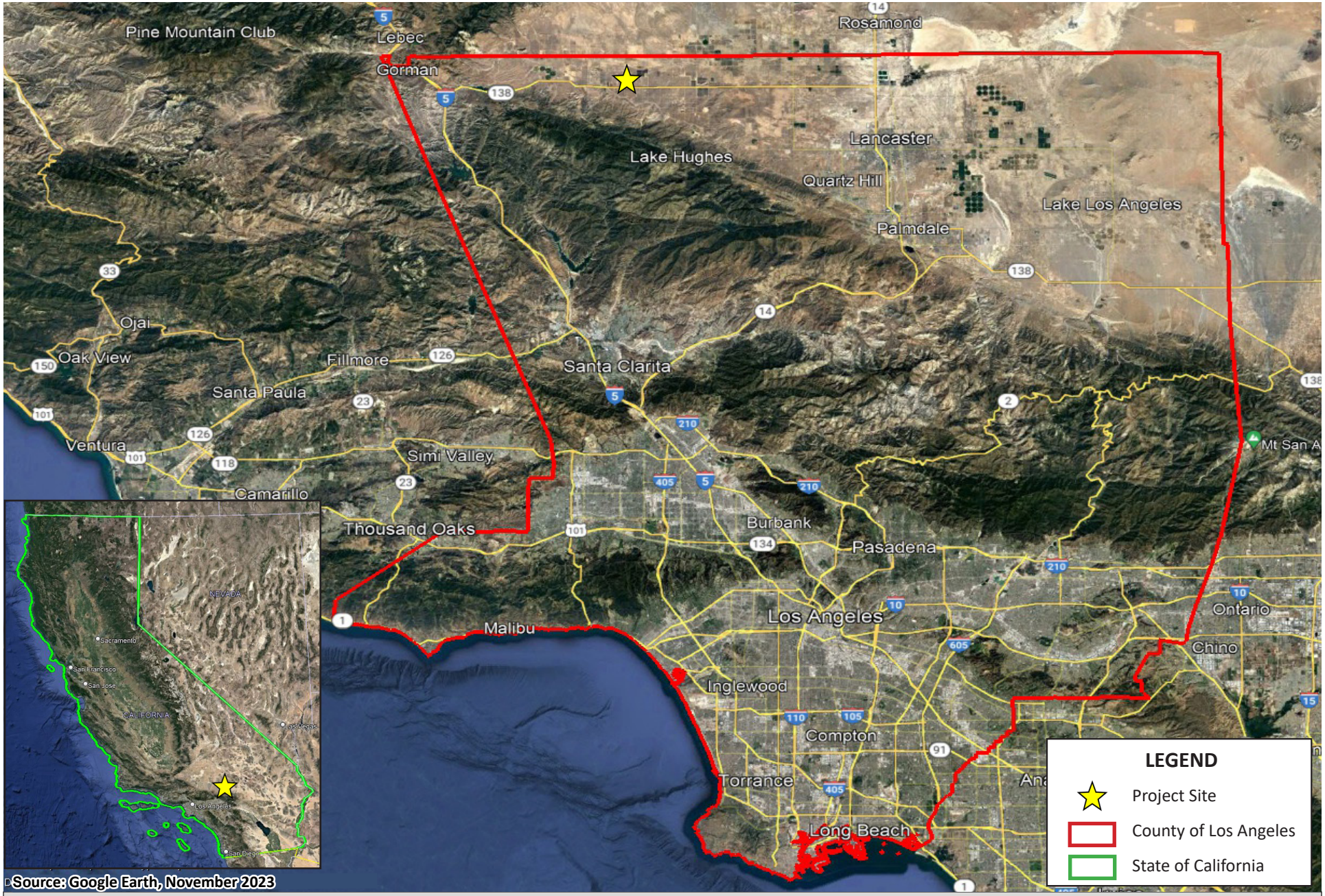
Community-/Area-wide Plan designation: Antelope Valley Area Plan, Rural Land 10 (RL10)

Zoning: A-2-2 (Heavy Agricultural Zone)

Project Description: RPCA Solar 12, LLC (Applicant) proposes to construct and operate the 230th Street Solar Facility (Project) that consists of a single-axis tracker ground-mounted photovoltaic (PV) community solar panels and battery energy storage system (BESS) facility that would generate up to a total of up to 4.99 megawatts (MW) of alternating current (AC) in capacity. The U.S. Department of Energy defines "community solar" as any solar project or purchasing program, within a geographic area, in which the benefits flow to multiple customers such as individual businesses, nonprofits, and other groups. Community solar customers typically subscribe to—or in some cases own—a portion of the energy generated by a solar array, and receive an electric bill credit for electricity generated by their share of the community solar system.[1]

The Project would occupy approximately 31 acres (Project Site) of a 39-acre parcel (Los Angeles County Assessor Parcel Number [APN] 3278-025-001) generally located at 49560 230th Street W near the community of Lancaster. The Applicant is requesting Conditional Use Permit (CUP) approval from the County. The Project would consist of the following components: solar modules, BESS, underground electrical conductors, Balance of System Equipment, access roads, and fencing. The Project would be interconnected to an existing electrical distribution system owned by Southern California Edison (SCE) located southwest of and adjacent to the Project Site along 230th Street W.

[1] U.S. Department of Energy, Community Solar Basics, https://www.energy.gov/eere/solar/community-solar-basics. Accessed July 25, 2024.



Source: Google Earth, November 2023

Figure 1: REGIONAL VICINITY MAP

230th Street Solar Project

Initial Study/Mitigated Negative Declaration

NOT TO SCALE

Kimley»Horn

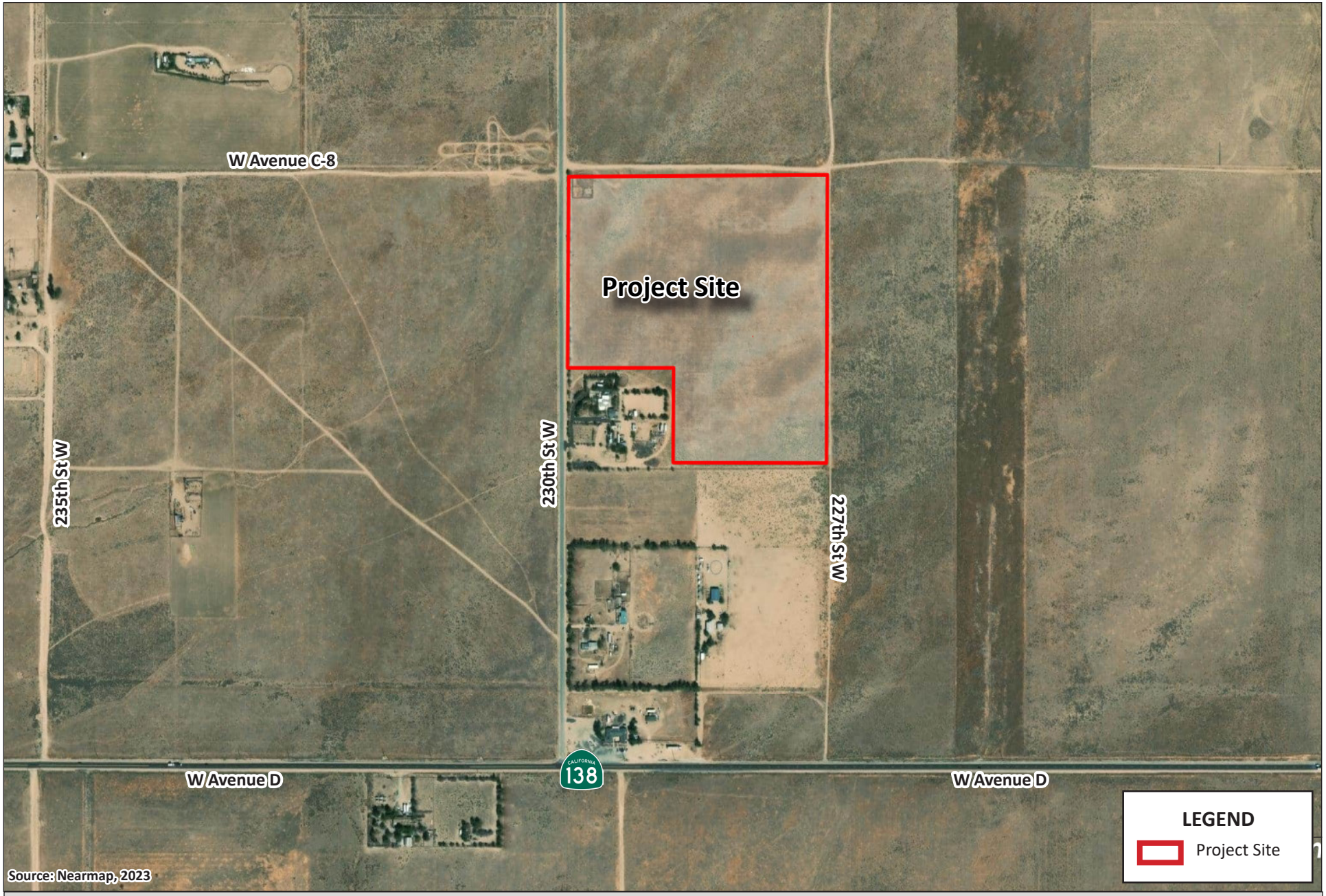


Figure 2: LOCAL VICINITY MAP
230th Street Solar Project
Initial Study/Mitigated Negative Declaration

NOT TO SCALE

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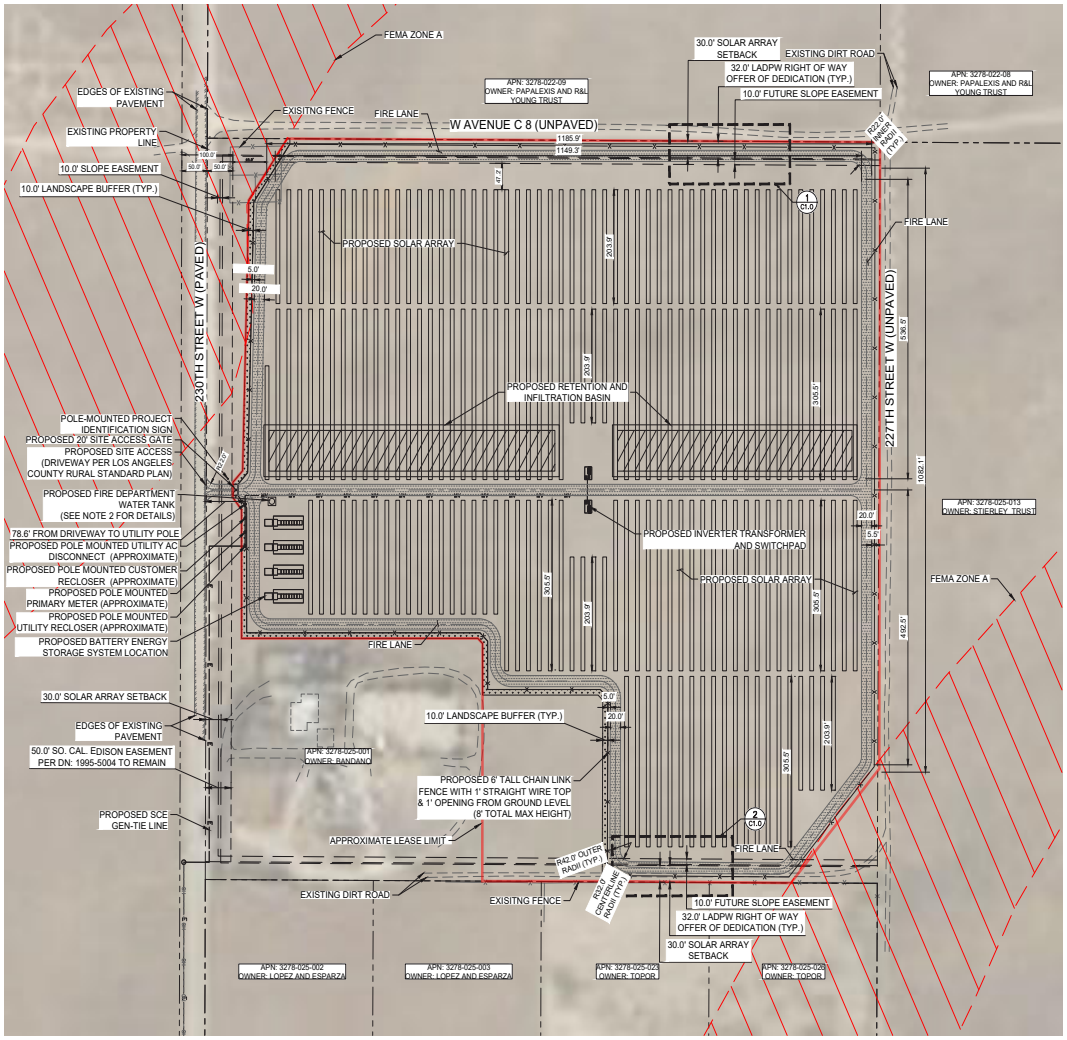
As depicted in **Figure 3: Conceptual Site Plan,** the Project would utilize approximately 14,000 solar modules and 40 string inverters. The modules would be manufactured off-site and delivered by truck in wooden crates or cardboard boxes. The single-axis tracking technology would allow the modules to efficiently track the sun throughout the day to maximize the efficiency of solar collection. The modules would be stored vertically at the end of the day. The modules would be mounted on a steel racking system, which would be anchored into the ground using driven steel piers to a maximum depth of 8 to 12 feet below ground surface. The foundations securing the solar modules would be designed to withstand high winds and snow loads. The overall height of the array would be no more than the maximum permitted height of 25 feet for solar arrays, pursuant to Section 22.140.510.E.3.c.iii of the County's Renewable Energy Ordinance. The Project is designed to comply with the development standards of the Los Angeles County's Renewable Energy Ordinance.

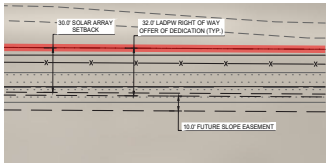
Pursuant to Section 22.140.510.E.3.c.v of the County's Renewable Energy Ordinance, setbacks from the property line shall be a minimum of 30 feet in Agricultural Zones. The Project would include a 30-foot setback from the from the solar array along W Avenue C 8 to the north, 230th Street W to the west, and the southern boundary of the Project Site. As such, the proposed fencing would comply with Section 22.140.510.E.3.c.ii of the County's Renewable Energy Ordinance.

The BESS would store electrical energy produced by the Project during the day and flexibly dispatch energy to the grid when it is most needed, typically in the evening. The BESS would be comprised of approximately four battery banks located in the southwest corner of the PV array. Each battery bank would be approximately the size of a standard shipping container. The BESS would include redundant safety measures, such as hydrogen detection, active ventilation, fire detection and remote shutdown, fireproof insulation, and internal fire suppression technology. The BESS will be designed to comply with all applicable codes in Chapter 12 of the County of Los Angeles Fire Code as well as Energy Storage Standard UL 9540 and UL 9540a. Underground electrical conductors would be installed in trenches at a depth of up to 3 feet below surface in compliance with the National Electric Code. The conductors would be buried in either a polyvinylchloride (PVC) conduit or equivalent.

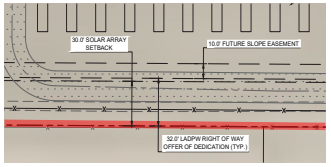
The Balance of System Equipment, including, but not limited to, inverters, AC combiner boxes, transformers, and/or medium voltage switchgear may be installed near the solar array within the Project's fence line. The Balance of System Equipment would be installed on H-Frames and concrete pads and in compliance with equipment manufacturer instructions. Low voltage conductors connecting the solar modules to the Balance of System Equipment would be run underground in conduit. The medium voltage conductors would mostly run underground in a similar fashion to low voltage wiring.

Site access would be provided via a new driveway constructed from 230th Street W and new on-site access roads. The driveway entrance would be upgraded using gravel, and would transition to native compacted soil. The proposed access roads would encircle the whole solar array and bisect the Project Site in a west-east orientation from 230th Street W to the eastern Project Site boundary. The access roads would provide an access path directly to the BESS. The roads would be wide enough to accommodate emergency vehicles and would be designed in compliance with County building and fire department standards. A minimum of 11.5 feet of space would be maintained between each row of solar modules for operations and maintenance access. The access roads would be placed such that no panel is more than 175 feet from a fire road and would connect directly to the BESS.





NORTH ENLARGED PROPERTY BOUNDARY (1)
SCALE: 1"=30'



SOUTH ENLARGED PROPERTY BOUNDARY (2)
SCALE: 1"=30'

ZONING INFORMATION			
ZONE A2-2: HEAVY AGRICULTURAL			
REQUIREMENTS	STANDARD (FT)	PROPOSED (FT)	MEETS REQ. (Y/N)
SOLAR ARRAY SETBACK	30	30	Y
LANDSCAPE BUFFER	10	10	Y
MAXIMUM TRACKER HEIGHT	25	10	Y
MINIMUM ROAD WIDTH	20	20	Y
ACCESS GATE SETBACK	50	60+	Y

TRACKER QTY.	
DC SYSTEM SIZE	6,633.90 kW
# OF 81 MODULE TRACKER ROWS	95
# OF 54 MODULE TRACKER ROWS	85

LEGEND

- 81 MODULE SAT ROW
- 54 MODULE SAT ROW
- INVERTER TRANSFORMER AND SWITCHPAD
- BATTERY ENERGY STORAGE SYSTEM
- EXISTING PROPERTY LINE
- EXISTING RIGHT-OF-WAY LINE
- EXISTING EDGE OF PAVEMENT PER PLAN
- PROPOSED PROPERTY LINE
- APPROXIMATE LEASE LIMIT
- PROPOSED 6' TALL CHAIN LINK FENCE WITH 1' STRAIGHT WIRE TOP & 1' OPENING FROM GROUND LEVEL (8' TOTAL HEIGHT)
- EXISTING OVERHEAD LINE
- PROPOSED SCE GEN-TIE LINE
- PROPOSED 20' ALL WEATHER ACCESS ROAD/ FIRE LANE
- PROPERTY LINE SETBACK
- PROPOSED 20' SITE ACCESS GATE
- PROPOSED MV LINE
- LANDSCAPE BUFFER
- EASEMENT
- MATCHLINE
- PROPOSED RETENTION AND INFILTRATION BASIN

SITE INFORMATION

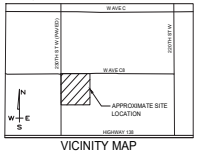
PROJECT ADDRESS:	49560 230TH STREET W, LANCASTER, CA 93536
APN:	3278-025-001
PARCEL SIZE:	39 AC
PROPOSED SITE DISTURBANCE:	31 AC
FLOOD NOTE:	PROPERTY FALLS PARTIALLY WITHIN ZONE "A" SPECIAL FLOOD HAZARD AREA SUBJECT TO INUNDATION BY THE 1% ANNUAL CHANCE FLOOD AND PARTIALLY WITHIN ZONE "X" AREA DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN. FEMA FLOOD INSURANCE RATE MAP 06043 PANEL 0100 F, EFFECTIVE DATE 09/26/2008

SURVEY NOTE

DATE:	OCTOBER 2023
TITLE REPORT INFORMATION:	THE INFORMATION SHOWN HEREON IS PER A PRELIMINARY TITLE REPORT PREPARED BY STEWART TITLE GUARANTY COMPANY, DATED MAY 31, 2022. ISSUING OFFICE: 7676 HAZARD CENTER DRIVE, STE 1400, SAN DIEGO, CALIFORNIA 92108. ISSUING AGENT: FRANK GREEN. TITLE ORDER NUMBER: 2200033980. THE ESTATE OR INTEREST IN THE LAND HEREINAFTER DESCRIBED OR REFERRED TO COVERED BY THIS REPORT IS: A FEE. TITLE TO SAID ESTATE OR INTEREST AT THE DATE HEREOF IS VESTED IN: AMILCAR R. BADANO AND DEBBIE BADANO, HUSBAND AND WIFE AS JOINT TENANTS.
BASIS OF BEARINGS:	CALIFORNIA COORDINATE SYSTEM, ZONE 5, GRID NORTH BASED ON GPS OBSERVATIONS BETWEEN SET CONTROL POINTS POST PROCESSED USING OPUS (ONLINE POSITIONING USER SERVICE
LEGAL DESCRIPTION:	THE LAND REFERRED TO HEREIN IS SITUATED IN THE STATE OF CALIFORNIA, COUNTY OF LOS ANGELES IS DESCRIBED AS FOLLOWS: THE NORTHWEST QUARTER OF THE SOUTHWEST QUARTER OF THE SECTION 13, TOWNSHIP 8 NORTH, RANGE 16 WEST, SAN BERNARDINO BASE MERIDIAN, IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, ACCORDING TO THE OFFICIAL PLAT OF SAID LAND.
BENCHMARK:	ELEVATIONS SHOWN HEREON ARE BASED UPON THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD 88). BENCHMARK CONTROL POINT #5000 SET 60D NAIL CONTROL POINT. ELEVATION = 2823.09' NAVD 88

GENERAL NOTES

1. THIS SITE PLAN IS PRELIMINARY IN NATURE AND THEREFORE DOES NOT GUARANTEE THAT REQUIREMENTS FOR STORM DRAINAGE, GRADING, UTILITY EASEMENTS, AND OTHER SIMILAR CRITERIA ARE PROPERLY ADDRESSED AT THIS TIME. THE ABOVE REQUIREMENTS CAN AFFECT THE LAYOUT OF THIS SITE.
2. A 10,000 GALLON WATER TANK TO BE CLEARLY IDENTIFIED FOR "FIRE DEPARTMENT USE ONLY" AND SHALL BE IN COMPLIANCE WITH FIRE DEPARTMENT STANDARDS.
3. THE CONTRACTOR IS SPECIFICALLY CAUTIONED THAT THE LOCATION AND/OR ELEVATION OF EXISTING UTILITIES AS SHOWN ON THESE PLANS IS BASED ON RECORDS OF THE VARIOUS UTILITY COMPANIES AND, WHERE POSSIBLE, MEASUREMENTS TAKEN IN THE FIELD. THE INFORMATION IS NOT TO BE RELIED ON AS BEING EXACT OR COMPLETE. THE CONTRACTOR MUST CALL THE LOCAL UTILITY LOCATION CENTER AT LEAST 48 HOURS BEFORE ANY EXCAVATION TO REQUEST EXACT FIELD LOCATIONS OF THE UTILITIES. IT SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR TO RELOCATE ALL EXISTING UTILITIES WHICH CONFLICT WITH THE PROPOSED IMPROVEMENTS ON THE PLANS.
4. PROPOSED TRACKER HEIGHT IS 10 FEET, BUT WILL NOT EXCEED LA COUNTY'S HEIGHT MAXIMUM (25 FEET).
5. PHOTOVOLTAIC PANELS, INVERTERS AND INTERCONNECTION EQUIPMENT, LOCATIONS SHOWN FOR REFERENCE ONLY. DESIGN AND FINAL LAYOUT PER DRAWINGS BY THE CONTRACTED ELECTRICAL DESIGN CONSULTANT.
6. TO PROTECT EQUIPMENT FROM POTENTIAL PONDING OR OVERLOAD STORMWATER FLOW, ALL EQUIPMENT SKIDS/PADS (FOR INVERTERS, INTERCONNECTION EQUIPMENT, ETC.) SHALL BE ELEVATED A MINIMUM O 12" ABOVE 100 YEAR FLOOD ELEVATION.
7. THE NEW ONSITE ROAD SURFACE CLOSELY MATCHES THE EXISTING SURFACE GRADES. THE INTENT IS TO MAINTAIN EXISTING SURFACE FLOWS ACROSS THE SITE AND ELIMINATE AREAS OF PONDING.
8. FOR ONSITE AND OFFSITE DRAINAGE ANALYSIS, REFER TO "ONSITE AND OFFSITE DRAINAGE REPORT" FOR 230TH STREET SOLAR, PREPARED BY KIMLEY-HORN, DATED MONTH, YEAR.
9. DRAINAGE IMPROVEMENTS ARE NOT TO BE MAINTAINED BY THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT.
10. IN ADDITION TO THE REQUIREMENTS OF CHAPTER 22.80 (RURAL OUTDOOR LIGHTING DISTRICT), ANY OUTDOOR LIGHTING REQUIRED FOR SAFETY AND SECURITY PURPOSES SHALL BE SHIELDED AND DIRECTED DOWNWARD TO AVOID LIGHT TRESPASS AND SHALL INCLUDE:
    - 10.1. MOTION SENSORS FOR ENTRY-LIGHTING TO THE ON-SITE EQUIPMENT, STRUCTURES, AND BUILDINGS; AND
    - 10.2. LIGHT-SENSOR OR MOTION-SENSOR LIGHTING FOR THE MAIN FACILITY ACCESS GATE, OPERATIONS AND MAINTENANCE BUILDING DOORWAYS, AND ANY PARKING AREAS OF FACILITIES WITH OPERATION AND MAINTENANCE BUILDINGS.
11. NO PRIVATE EASEMENTS EXIST ON SITE.



VICINITY MAP
NTS

GRAPHIC SCALE IN FEET
0 40 80 160

Source: Kimley-Horn and Associates, Inc., April 9, 2025

Figure 3: CONCEPTUAL SITE PLAN

230th Street Solar Project

Initial Study/Mitigated Negative Declaration

Kimley»Horn

Pursuant to Section 22.140.510.E.3.c.viii of the County's Renewable Energy Ordinance, a landscaped area at least 10 feet in depth shall be maintained between perimeter fencing and any public right-of-way or adjacent property with an existing residential or agricultural use. The Project proposes a 10-foot landscape buffer between the fence and the access road along the western and southern boundaries of the Project Site. See **Figure 4: Conceptual Landscape Plan** for more details. As such, the proposed landscape buffer would be designed in compliance with the pertinent development standards regarding landscape buffers in the County's Renewable Energy Ordinance. The landscape buffer includes various shrubs like the big sagebrush (*Artemisia Tridentata*), brittlebush (*Encelia Farinosa*), California buckwheat (*Eriogonum Fasciculatum*), California matchweed (*Gutierezzia Californica*), Tecate cypress (*Hesperocyparis forbesii*), and California cudweed (*Pseudognaphalium Californicum*).

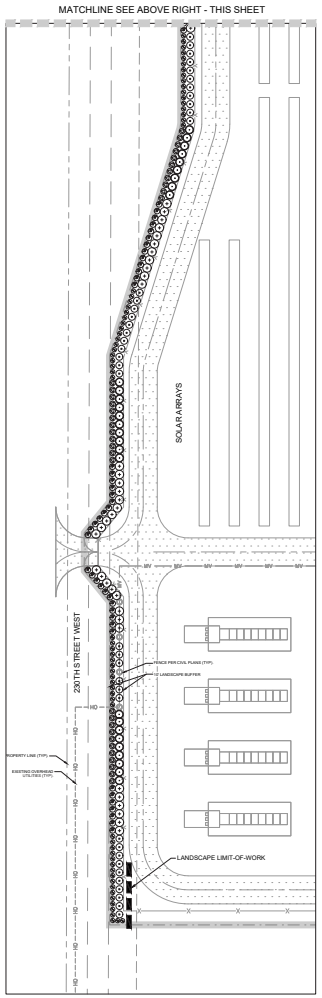
Pursuant to Section 22.140.510.E.3.c.ii of the County's Renewable Energy Ordinance, fencing shall be required around the perimeter of ground-mounted utility-scale solar energy facilities with a maximum height of eight feet. The Project would be enclosed in a six-foot-tall chain link fence with one foot of straight wire on top and one foot of wildlife pass on the bottom (for a total fence height of eight feet). As such, the proposed fencing would comply with Section 22.140.510.E.3.c.ii of the County's Renewable Energy Ordinance. The fence would have at least one vehicle access gate at the boundary of the array. The vehicle access gate would remain locked, except during operations and maintenance activities. A Knox box would be installed at the entrance gate to provide 24-hour access for emergency responders.

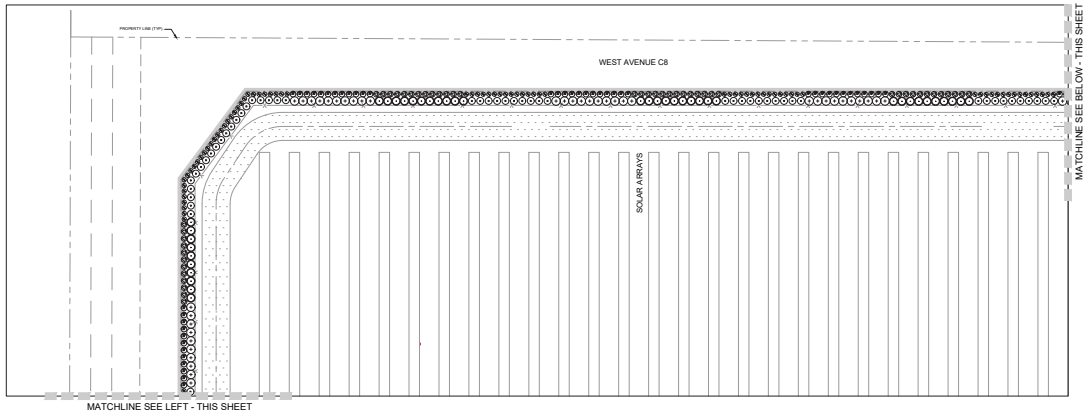
A 10,000-gallon water tank would be installed adjacent to the BESS and access gate on the southern side of the Project Site for fire department use only. The water tank would include a low-level water local alarm. The water tank would be designed and located in compliance with Los Angeles County Fire Department (LACFD) standards. The water tank would have a LACFD supply outlet of 2.5 inches in diameter with National Standard threads. The supply outlet is to be located 14 to 24 inches above the finished grade and is required to be protected by approved barricades. To mitigate a potential increase in runoff flows, in compliance with the Los Angeles County Department of Public Works (LACDPW) Low Impact Development (LID) Standards Manual, the Project would construct an infiltration retention basin across the central width of the Project Site with an approximate volume of 42,336 cubic feet.

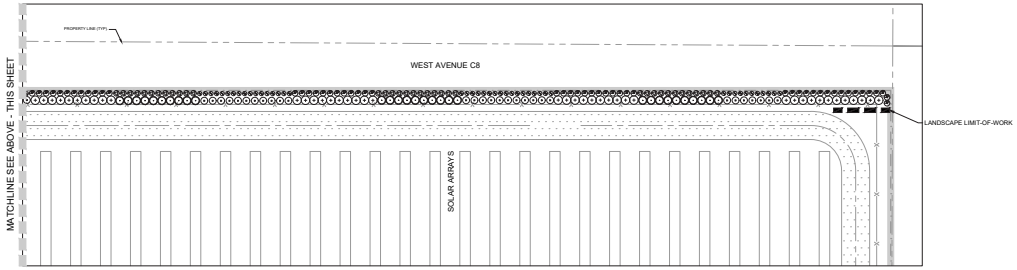
Construction

Project construction is anticipated to be completed over a period of approximately seven months beginning as early as December 2025 and ending as early as June 2026.[2] Project construction activities generally fall into six main categories: (1) demolition, (2) site preparation (vegetation clearing), (3) grading, (4) paving, (5) system installation, and (6) testing, commissioning, and cleanup. The on-site construction workforce is expected to peak at approximately 50 individuals during the construction period, but approximately 15 to 20 workers may be expected during non-peak activities. Construction personnel will be divided between civil and electrical services.

[2] The technical analyses prepared for this IS/MND assessed Project impacts with a construction timeline of seven months beginning as early as January 2025 and ending as early as July 2025. Since the analyses were prepared, the Project construction timeline has since been updated to begin as early as December 2025 and end as early as June 2026. As construction vehicles and regulations are anticipated to be cleaner with less emissions in the future, and because the construction duration has not changed, the technical analyses provided herein are considered to be conservative.







LEGEND

- 81 MODULE SAT ROW
- 54 MODULE SAT ROW
- INVERTER TRANSFORMER AND SWITCHPAD
- BATTERY ENERGY STORAGE SYSTEM
- EXISTING PROPERTY LINE
- APPROXIMATE LEASE LIMITS
- ROAD CENTERLINE
- PROPOSED 8' TALL CHAIN LINK FENCE WITH 1' STRAIGHT WIRE TOP & 1' OPENING FROM GROUND LEVEL (8' TOTAL HEIGHT)
- (7' TOTAL HEIGHT)
- EXISTING GEN TIE LINE
- PROPOSED GEN TIE LINE
- PROPOSED 20' ALL WEATHER ACCESS ROAD
- PROPERTY LINE SETBACK
- PROPOSED 20' SITE ACCESS GATE
- PROPOSED MV LINE
- LANDSCAPE BUFFER
- EASEMENT
- LANDSCAPE LIMIT-OF-WORK

PLANT SCHEDULE

SHRUBS	QTY	BOTANICAL / COMMON NAME	CONT.	SPACING	WUCOLS
	118	ARTEMISIA TRIDENTATA / BIG SAGEBRUSH	5 GAL.	72" O.C.	LOW
	189	ENCELIA FARINOSA / BRITTLEBUSH	5 GAL.	48" O.C.	VERY LOW
	99	ERIOGONUM FASCICULATUM / CALIFORNIA BUCKWHEAT	5 GAL.	72" O.C.	VERY LOW
	117	GUTIEREZZIA CALIFORNICA / CALIFORNIA MATCHWEED	1 GAL.	72" O.C.	VERY LOW
	120	HESPEROCYPARIS FORBESII / TECATE CYPRESS	1 GAL.	60" O.C.	VERY LOW
	144	PSEUDOGNAPHALIUM CALIFORNICUM / CALIFORNIA CUDWEED	1 GAL.	60" O.C.	VERY LOW

LANDSCAPE NOTE:

THE SELECTION OF PLANT MATERIAL IS BASED ON CLIMATIC, AESTHETIC, AND MAINTENANCE CONSIDERATIONS. ALL PLANTING AREAS SHALL BE PREPARED WITH APPROPRIATE SOIL AMENDMENTS, FERTILIZERS AND APPROPRIATE SUPPLEMENTS BASED UPON A SOILS REPORT FROM AN AGRICULTURAL SUITABILITY SOIL SAMPLE TAKEN FROM THE SITE. ALL SHRUB BEDS SHALL BE MULCHED TO A 3" DEPTH TO HELP CONSERVE WATER, LOWER SOIL TEMPERATURE, AND REDUCE WEED GROWTH. THE SHRUBS SHALL BE ALLOWED TO GROW IN THEIR NATURAL FORMS. ALL LANDSCAPE IMPROVEMENTS SHALL FOLLOW THE GUIDELINES SET FORTH BY LOS ANGELES COUNTY MUNICIPAL CODE.

IRRIGATION NOTE:

ALL PROPOSED LANDSCAPE AREAS SHALL BE WATERED BY HAND AND TRUCK OR A TEMPORARY IRRIGATION SYSTEM FOR A PERIOD OF 1 (ONE) YEAR UNTIL ESTABLISHMENT. ANY PLANT MATERIAL THAT DIES DURING THIS PERIOD SHALL BE REPLACED AT THE COST TO THE CONTRACTOR.

Source: Kimley-Horn and Associates, Inc., October 26, 2023

Figure 4: CONCEPTUAL LANDSCAPE PLAN

230th Street Solar Project

Initial Study/Mitigated Negative Declaration

NOT TO SCALE

Kimley»Horn

The eight-foot perimeter fence would be installed at the onset of construction to establish the outer boundaries of the Project Site. Site preparation would consist of clearing the existing vegetation in those areas on the Project Site where construction would be undertaken, grading, and establishing temporary staging area (including stockpile and laydown areas) as necessary. Selected vegetation would be removed to accommodate the construction of the array and its appurtenances, as well as to prevent shading on the array during operation. Any vegetation taller than six inches or expected to exceed six inches in height would be removed. Grass and groundcover may remain between rows and under the solar modules. All cleared vegetation would be chipped or spread on-site or disposed of responsibly.

A temporary staging area would be used as laydown area for construction equipment and materials. The staging area would also include a location for sanitary facilities and a construction trailer. The area containing the equipment and materials would be closed within a temporary construction fence with a lockable gate. Construction equipment such as tractors, backhoes, loaders, dozers, and graders may be needed to clear vegetation from the Project Site, and to grade roads and areas where structures will stand. All soils would be balanced on-site, and no import or export is expected.

Erosion and sediment control best management practices (BMPs) would be installed on the Project Site to prevent stormwater runoff. These BMPs would remain in place until construction is complete and until the Project Site is reseeded and stabilized in accordance with applicable code requirements. The construction contractor would be required to incorporate BMPs consistent with the County's ordinance and with guidelines provided in the California Stormwater Quality Association's Construction Best Management Practice Handbook, including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and a Soil Erosion and Sedimentation Control Plan to reduce potential impacts related to construction of the Project.

Erection of the solar arrays would include support structures and associated electrical equipment and cabling. During this work, there would be multiple crews working on the Project Site with various equipment and vehicles, including special vehicles for transporting the modules and other equipment. As the solar arrays are installed, the electrical collection and communication systems would be installed.

During Project construction, approximately 13 acre-feet (AF) of non-potable water would be required for common construction-related purposes, including but not limited to dust suppression, soil compaction, and grading. No new permanent water infrastructure would be proposed during Project construction. Temporary sanitary facilities would be placed on-site during construction and removed upon operation.

Operations

The Project would have a useful life of approximately 35 years and would operate year-round. The Project would be unmanned, and no employees would report to the Project Site daily. Typical operations and maintenance (O&M) activities during Project operations include, but are not limited to, facility monitoring; administration and reporting; remote operations of inverters, BESS system, and other equipment; repair and maintenance of solar facilities; and periodic panel and inverter washing. It is estimated that the Project would require 6 maintenance-related visits per year and 4 solar panel and inverter washing visits per year, resulting in a total of approximately 10 operational roundtrips per year (20 one-way trips).

All scheduled maintenance of the Project would occur from 8 a.m. to 5 p.m. Unscheduled maintenance visits would generally occur only if an emergency situation develops at the Project Site or its immediate surroundings that could endanger the functional capacity of the Project and/or endanger the general public health, safety, and welfare of the Project Site and its surroundings. In the event of a major disruption to the Project Site, a corrective maintenance visit would be scheduled as soon as possible with all reasonable effort to schedule any such maintenance activities between 8 a.m. and 5 p.m.

During Project O&M, it is anticipated that minimal water would be required for solar panel and inverter washing. Water consumption for washing panels and inverters is expected to be approximately 0.2 AF of water per year, and all water would be trucked in from an off-site source. Water washing is by deluge, or inundation of water, and no chemicals or other materials are used. Per the LACFD request, a 10,000 gallon water storage tank will be kept on-site during the Project's operation.

Decommissioning

At the end of the Project's operational term, the Applicant may determine that the Project should be decommissioned and deconstructed. The Applicant will work with the County to ensure decommissioning of the Project after its productive lifetime complies with all applicable local, State, and federal requirements and BMPs and in a manner consistent with the requirements of the Project Decommissioning Plan. The Project would include BMPs to ensure the collection and recycling of modules and to avoid the potential for modules to be disposed of as municipal waste with a preference for recycling.

Equipment would be de-energized prior to removal, salvaged (where possible), placed in appropriate shipping containers, and secured in a truck transport trailer for shipment off-site to be recycled or disposed of at an appropriately licensed disposal facility. Site infrastructure would be removed, including fences and concrete pads that may support the inverters and related equipment. The exterior fencing would be removed, and materials would be recycled to the extent feasible. Project internal and access roads would be restored to their pre-construction condition to the extent feasible unless the landowner elects to retain the improved roads for access throughout the property. A collection, reuse, and recycling program would be utilized to promote reuse and recycling of Project components and minimize disposal in landfills.

Surrounding land uses and setting: The Project Site is in the Antelope Valley West Zoned District in northwest Los Angeles County and is approximately two miles east of the community of Neenach. The Project would occupy approximately 31 acres of a 39-acre parcel. The Project Site is comprised of fallow/ruderal land that was previously used for agricultural purposes and is devoid of structures except for a corral fence on the northwest corner. A rural residence/single-family home is located outside of the Project Site on the southwest corner fronting 230th Street W. Several large-scale solar projects are located further north, east, and south of the Project Site.

As shown in **Figure 2: Local Vicinity Map**, the Project Site is bordered by W Avenue C 8 to the north, 227th Street W to the east, undeveloped open space and a residence to the south, and 230th Street W to the west. 230th Street W is a public right-of-way, whereas W Avenue C 8 and 227th Street W are private streets. The nearest residence is located southwest of the Project Site. Regional access to the Project Site is provided via State Route 138 (SR 138), approximately 0.25-mile to the south. Local access to the Project Site would be accessed via W Avenue C 8 and 230th Street W.

Land Use Designations and Zoning

The Project Site has a Land Use Designation of Rural Land 10 (RL10), as designated in the Antelope Valley Area Plan (AVAP). Intended uses on RL10 include single-family residences, equestrian and animal uses, and agricultural and related activities. The Project Site is also designated as Rural Preserve Area in the AVAP and Agricultural Resource Area in the County General Plan.

The Project Site is zoned Heavy Agricultural, Two Acres Minimum Required Lot Area (A-2-2). Surrounding parcels are also zoned A-2-2 and consist primarily of agricultural, rural residential, and undeveloped open

space uses. Pursuant to Los Angeles County Code of Ordinances Table 22.16.030-B, the use of utility-scale solar energy facilities is a permitted use with an approved CUP in the A-2 zone.[3]

Table 1: Project Site and Surrounding Uses within a 500-Foot Radius summarizes the on-site and surrounding land uses within 500 feet of the Project Site.

Table 1: Project Site and Surrounding Uses within 500-Foot Radius

Description	Existing Land Use	AVAP Land Use	Zoning
Project Site	Fallow land	Rural Land 10 (RL10)	Heavy Agriculture Zone (A-2-2)
North	Vacant land	Rural Land 10 (RL 10)	
South	Undeveloped open space, residential	Rural Land 10 (RL10)	Heavy Agriculture Zone (A-2-2)
East	Vacant land	Rural Land (RL10)	Heavy Agriculture Zone (A-2-2)
West	Vacant land	Rural Land (RL10)	Heavy Agriculture Zone (A-2-2)
SOURCE: Los Angeles County Department of Regional Planning, GIS-NET Public.			

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

On January 22, 2024, the County mailed notification pursuant to Assembly Bill (AB) 52 to the following tribes: Fernandeno Tataviam Band of Mission Indians, Gabrieleno Tongva Indians of California, and the San Manuel Band of Mission Indians. See Section 18, *Tribal Cultural Resources,* for further details.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency	*Approval Required*
Los Angeles County Department of Regional Planning	Building or other related ministerial permits
Antelope Valley Air Quality Management District	Dust Control Management Plan

Major projects in the area: None

[3] Los Angeles County, Los Angeles County Code of Ordinances, Table 22.16.030-B Principal Use Regulations for Agricultural, Open Space, Resort and Recreation, and Watershed Zones, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV3ZO_CH22.16AGOPSPRERE WAZO_22.16.030LAUSREZOW. Accessed January 22, 2024.

Reviewing Agencies:

Responsible Agencies

- ☒ None
- ☐ Regional Water Quality Control Board:
  - ☐ Los Angeles Region
  - ☐ Lahontan Region
- ☐ Coastal Commission
- ☐ Army Corps of Engineers
- ☐ LAFCO

Special Reviewing Agencies

- ☒ None
- ☐ Santa Monica Mountains Conservancy
- ☐ National Parks
- ☐ National Forest
- ☐ Edwards Air Force Base
- ☐ Resource Conservation District of Santa Monica Mountains Area
- ☐ Rowland Water District

Regional Significance

- ☒ None
- ☐ SCAG Criteria
- ☐ Air Quality
- ☐ Water Resources
- ☐ Santa Monica Mtns. Area
- ☐

Trustee Agencies

- ☒ None
- ☐ State Dept. of Fish and Wildlife
- ☐ State Dept. of Parks and Recreation
- ☐ State Lands Commission
- ☐ University of California (Natural Land and Water Reserves System)

County Reviewing Agencies

- ☒ DPW:
- ☒ Fire Department
  - -Forestry, Environmental Division
  - -Planning Division
  - - Land Development Unit
  - - Health Hazmat
- ☒ Sanitation District
- ☒ Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- ☒ Sheriff Department
- ☐ Parks and Recreation
- ☐ Subdivision Committee

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project.

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

DETERMINATION: (To be completed by the Lead Department.)
On the basis of this initial evaluation:

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

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

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

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

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

_____ _____
Signature (Prepared by) Date

_____ _____
Signature (Approved by) 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 the Lead Department 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 Department 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 Section XVII, "Earlier Analyses," may be cross-referenced.)

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

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

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

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

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

7) The explanation of each topic should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

1. AESTHETICS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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?	☐	☐	☒	☐

A scenic vista is a viewpoint that provides expansive views of a highly valued landscape to the public benefit. The AVAP defines scenic resources as scenic drives, water features, significant ridgelines, buttes, and Hillside Management Areas and establishes Goal COS 5, which aims for "the Antelope Valley's scenic resources, including scenic drives, water features, significant ridgelines, buttes, and Hillside Management Areas, [to be] enjoyed by future generations."[4]

The Project is in an agricultural area of the County with limited tall or dense development in the vicinity. No additional tall or dense development is located within 0.5-mile of the Project Site. Surrounding development includes vacant land, roadways and several large-scale solar projects to the north, east, and south. The Project Site and surrounding land uses are not within a Scenic Resource Area or Significant Ecological Area (SEA) delineated by the AVAP. No designated scenic views, scenic vistas, or scenic resources as delineated by the AVAP are known to occur in the vicinity of the Project.

The Project Site and surrounding public roads have views of mountain foothills and ridgelines to the north, west, and south. During construction, any trash, debris, and waste would be removed from the Project Site. The eight-foot perimeter fence would be installed at the onset of construction to establish the Project Site boundaries. The solar equipment proposed to be constructed on the Project Site is low in profile, including PV modules mounted on fixed-tilt foundations or tracker units and associated electrical equipment that would display a height of up to 15 feet at maximum tilt. Implementation of the Project would also include collection lines, access roads, and an eight-foot chain-link perimeter fence. The proposed 10-foot landscape buffer on the northern and western boundaries of the Project Site along 230th Street W and W Avenue C 8 would screen the Project from motorists.

Visual character is measured by form, line, color, and texture, which in turn could directly impact visual quality. Although the Project would convert undeveloped areas of the parcel to solar use, the visual character of the existing landscape has already been fundamentally altered by surrounding solar projects. In particular, the dominant form of the Project area is geometric and angular in the foreground due to the surrounding existing solar projects, with mountain foothills and ridgelines in the background. Dominant colors are influenced by existing dark-colored solar panels of the surrounding renewable energy facilities. The dominant texture is smooth in the foreground due to the existing surrounding solar panels and irregular in the background due to the mountains. As such, construction and operation of the Project would be consistent with the visual character of the Project area which is already dominated by renewable energy facilities. Because the visual character would not change due to Project development, the existing visual quality of the Project area would also be preserved.

Further, the introduction of Project components would not substantially obstruct or interrupt views of the surrounding mountain foothills and ridgelines which, due their height, would remain visually prominent. Therefore, less than significant impacts on scenic vistas are expected to occur.

[4] Los Angeles County Department of Regional Planning, Antelope Valley Area Plan.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?	☐	☐	☒	☐

The Project Site is in an agricultural area with limited tall or dense development in the vicinity. No additional tall or dense development is located within 0.5-mile of the Project Site. According to the AVAP, there are no equestrian, hiking, or biking trails near the Project Site. The closest trail is the Pacific Crest Trail located approximately 5.7 miles west of the Project Site at the trail's closest point. Given the limited height of the Project, surrounding foothills, existing solar facilities in the Project vicinity, and distance between the Project Site and the trail, the Project Site would not be visible from the Pacific Crest Trail. In turn, the Project would comply with AVAP Goal COS 5 (as detailed above in Checklist Question 1.a) and Goal M 10, which aims for "a unified and well-maintained multi-use…trial system that links destinations…throughout the Antelope Valley." Project impacts on this trail or other regional multi-use trails would be less than significant.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

The Project Site is generally flat and contains no significant geologic features or vegetation unique to the area that could be considered a scenic resource. The AVAP designates a portion of Lancaster Road (approximately 1.2 miles south of the Project Site) as a Priority Scenic Drive. This scenic drive is not considered a State Scenic Highway. Nonetheless, Project components would not exceed a height of 15 feet and would therefore be unlikely to be seen from Lancaster Road. The closest eligible State Scenic Highway is a portion of State Route 14 (SR 14) located approximately 28 miles northeast of the Project Site.[5] The Project would have no impact on scenic resources.

[5] California Department of Transportation, California State Scenic Highway System Map, 2019, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed January 20, 2024.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
d) Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)	☐	☐	☒	☐

The Project is in a non-urbanized area and is surrounded by the public right of way, private streets, and undeveloped open space to the north, west, and east, and rural residential uses to the south. Several large-scale solar projects are also located further north, east, and south of the Project Site. As described in Checklist Question 1.a, public views in the vicinity of the Project Site largely comprise views of mountain foothills and ridgelines to the north, west, and south.

The Project would be fenced at the onset of construction activities to stake out the Project Site boundaries. The fence would partially screen construction activities from views at the street level from off-site locations. Therefore, construction activities and equipment would not result in adverse visual effects.

During Project operations, the Project would include low-profile solar equipment such that they would not obstruct or occlude views of the mountain foothills and ridgelines. While the Project would change the existing public views at the immediate foreground on the public right-of-way, the installation of low profile solar equipment (e.g., the arrays and the BESS) would not degrade the visual quality and character of the Project Site and its immediate vicinity as the public would still retain views of the mountain foothills and ridgelines to the north, west, and south. Therefore, the Project would not significantly alter the existing visual character or quality of public views of the Project Site and its surroundings. The Project would conform with the visual quality of the existing solar facilities located to the southwest of the Project Site. Upon approval of the CUP, the Project would be consistent with all AVAP policies and would comply with all zoning development standards and regulations, including standards governing scenic quality. The Project would also require the County and all applicable departments to review plans to determine compliance with development standards. Therefore, impacts on degrading existing visual character or quality of public views of the Project Site and surroundings would be less than significant.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

The Project Site is in an area with limited existing sources of shadow (e.g., utility poles), light (e.g., cars), and glare. Existing outdoor lighting near the Project Site exists from residential buildings, including a residence south of and adjacent to the Project Site. The Project would generate new sources of shadow, light, and glare compared to existing conditions.

Construction

While the majority of Project construction would occur during daylight hours, there is a potential that construction could require the use of artificial lighting (e.g., floodlights, spotlights), particularly during the winter season when daylight is no longer sufficient earlier in the day. To the extent artificial light sources are required, such use would be temporary and would cease upon completion of Project construction. Furthermore, the Project is located within the Rural Outdoor Lighting District and would be required to comply with the County's Rural Outdoor Lighting District Ordinance, which requires that only the minimum amount of lighting is used, lights are to be shielded and directed downward and away from the sky, and no light spillage occurs. Construction lighting would be focused on the particular area undergoing work.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that generate substantial glare are typically not an element of construction activities. Furthermore, temporary construction fencing comprised of a solid material or including screening would be placed along the periphery of the Project Site to screen construction activity from view at the street level from off-site locations. Therefore, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur.

Based on the above, light and glare associated with Project construction activities would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area. Therefore, impacts related to light and glare during construction would be less than significant, and no mitigation measures are required.

Operation

Operation of the Project would introduce new sources of light and glare that are typically associated with solar facilities (e.g., security or perimeter lighting). The Project does not use concentrated solar thermal technology, but rather includes photovoltaic panels that are designed to absorb, rather than reflect, sunlight. The Project is also located within the Rural Outdoor Lighting District and would therefore also be required to comply with the County's Rural Outdoor Lighting District Ordinance, which requires that only the minimum amount of lighting is used, lights are to be shielded and directed downward and away from the sky, and no light spillage occurs. Therefore, the proposed Project would not create a new source of substantial shadow and light, and impacts would be less than significant.

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

Kimley-Horn and Associates, Inc. (Kimley-Horn) prepared a Solar Glare and Glint Analysis Report for the Project (see **Appendix A**).[6] Based on the analysis provided therein, the potential glare receptors located in proximity to the Project are motorists from 230th Street W, motorists from SR 138, and single-family homes situated around the Project Site. As determined from the analysis, there would be low glare potential from four of the observation points, but no glare expected to impact motorists. Since the analysis does not factor interfering topography or buildings, if there is not a direct line of sight from the Project to the locations identified due to terrain or man-made objects, potential glare produced by the Project would be reduced.

The PV panels would not be expected to cause significant glare as the panels will absorb sunlight during daylight hours and therefore, produce minimal reflectivity. PV solar panels are designed to be highly absorptive of light that strikes the panel surfaces, generating electricity rather than reflecting light. Single-axis tracker systems are designed to track the sun to maximize panel exposure to the sun, which would direct the majority of any reflected light back toward the sun in a skyward direction. PV panels have a lower index of refraction/reflectivity than common sources of glare in residential environments. The glare and reflectance levels from a given PV system are lower than the glare and reflectance levels of steel, snow, standard glass, plexiglass, and smooth water. Single-axis tracker systems would employ a motor mechanism that would allow the arrays to track the path of the sun throughout the day. In the morning, the panels would face the east. Throughout the day, the panels would slowly move to the upright position at noon and on to the west at sundown. The panels would reset to the east in the evening or early morning to receive sunlight at sunrise. Therefore, the solar PV panels would not create a new source of substantial glare that would adversely affect day or nighttime views in the area, and impacts would be less than significant.

[6] Kimley-Horn and Associates, Inc., Solar Glare and Glint Analysis Report, October 2023. Appendix A of this IS/MND.

2. AGRICULTURE / FOREST

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.

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

The Project Site currently contains fallow land that was previously used for agricultural purposes. According to the Department of Conservation's Important Farmland Finder, the Project Site is designated as Grazing Land.[7] Surrounding properties are designated as Grazing Land, Farmland of Local Importance, or Other Land. Project activities would be contained within the Project Site's boundaries and would not affect surrounding agricultural properties.

Construction and/or operation of the Project would not result in the conversion of designated Farmland to a nonagricultural use as the Project Site is designated as Grazing Land. The Project Site contains fallow land, and the Project would not change the zoning for the Project Site, such that agricultural or grazing uses could continue upon decommissioning of the Project. Upon decommissioning the Project, the land could be reclaimed for agricultural production in compliance with all applicable local, State, and federal requirements and BMPs and in a manner consistent with the requirements of the Project Decommissioning Plan. Therefore, for the reasons described above, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use. Impacts would be less than significant.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Opportunity Area, or with a Williamson Act contract?	☐	☐	☐	☒

The Project Site has a AVAP land use designation of RL10, with a maximum density of one dwelling unit per 10 gross acres of land and is zoned Heavy Agricultural, Two Acres Minimum Required Lot Area (A-2-2). Pursuant to Los Angeles County Code of Ordinances Table 22.16.030-B, the use of utility-scale solar energy facilities in this zone is a permitted use with an approved CUP. According to the Department of Conservation's Williamson Act Enrollment Finder, the Project Site is not enrolled in a Williamson Act contract.[8] The Project Site is within an Agricultural Resource Area designated by the Area Plan. However, the Project would not seek to change the zoning for the Project Site such that agricultural uses could not continue

[7] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed December 20, 2023.

[8] California Department of Conservation, California Williamson Act Finder, https://maps.conservation.ca.gov/dlrp/WilliamsonAct/. Accessed January 30, 2024.

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

upon decommissioning. Upon decommissioning the Project, the land could be reclaimed for agricultural production in accordance with all applicable local, State, and federal requirements and BMPs and in a manner consistent with the requirements of the Project Decommissioning Plan. Therefore, the Project would not permanently conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act Contract, and no impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?	☐	☐	☐	☒

The Project Site is zoned for Heavy Agricultural and does not contain forested area or large trees. According to the California Department of Fish and Wildlife Habitat Conservation Planning Branch, the Project Site is not located in private timberlands or public lands with forests.[9] As such, the Project would not conflict with existing zoning for, nor would it cause rezoning of forest land, timberland, or timberland zoned Timberland Production. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

As mentioned above in Checklist Question 2.a, the Project Site is located on fallow land that was previously used for agriculture and does not include forest land. Thus, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact would occur.

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?	☐	☐	☒	☐

As previously mentioned in Checklist Question 2.a, the Project Site is vacant and undeveloped and supported agricultural uses in the past. At the end of the Project's operational term (approximately 35 years), the Project would be decommissioned. Upon decommissioning, the Project Site would be restored to agricultural land and reclaimed (if the landowner chooses) for agricultural production in compliance with all applicable local, State, and federal requirements and BMPs and in a manner consistent with the requirements of the Project Decommissioning Plan. Additionally, operation of the solar facility on the Project Site would not preclude the surrounding areas from being improved with agricultural uses. Therefore, the Project would not permanently convert farmland to non-agricultural use or convert forest land to non-forest use, and impacts would be less than significant.

[9] California Department of Fish and Wildlife Habitat Conservation Planning Brach, California Forests and Timberland Map, 2015, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109917&inline. Accessed January 24, 2024.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	☐	☐	☒	☐

The following air quality analysis is primarily based on the Air Quality Analysis Technical Memorandum prepared by Kimley-Horn (see **Appendix B**).[10] The State of California is divided geographically into 15 air basins, generally along geographic or topographic boundaries. The Project Site is located in the Mojave Desert Air Basin (Basin). The Basin includes the desert portion of Los Angeles and San Bernardino Counties, the eastern desert portion of Kern County, and the northeastern desert portion of Riverside County. The Antelope Valley Air Quality Management District (AVAQMD) has jurisdiction over stationary sources of air pollution located within the northern desert portion of Los Angeles County, which includes the Project Site. Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. Areas for which there is insufficient data available are designated unclassified. The Project Site is a Federal nonattainment area for ozone (O_3), and a State nonattainment area for O_3 and PM10. The Project Site is classified as attainment or unclassified for lead, visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

The AVAQMD PM10 Attainment Plan and Ozone Attainment Plan established under the Western Mojave Desert Air Quality Management Plans (AQMPs) set forth a comprehensive set of programs that will lead the Basin into compliance with Federal and State air quality standards. The control measures and related emission reduction estimates within the AVAQMD PM10 Attainment Plan and Ozone Attainment Plan are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, conformance with these attainment plans is determined by:

- Demonstrating Project consistency with local land use plans and/or population projections (**Criterion 1**);
- Demonstrating Project compliance with applicable AVAQMD Rules and Regulations (**Criterion 2**); and
- Demonstrating Project implementation will not increase the frequency or severity of a violation in the Federal or State ambient air quality standards (**Criterion 3**).

Criterion 1: Consistency with local land use plans and/or population projections.

Growth projections included in the AQMPs form the basis for the projections of air pollutant emissions and are based on general plan land use designations and the Southern California Association of Governments (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-

[10] Kimley-Horn and Associates, Inc., Air Quality Analysis Technical Memorandum, April 2025. Appendix B of this IS/MND.

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

2040 RTP/SCS) demographics forecasts. While SCAG has recently adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), the AVAQMD has not released an updated AQMP that utilizes information from the 2020-2045 RTP/SCS. As such, this consistency analysis is based off the 2016-2040 RTP/SCS. The population, housing, and employment forecasts within the 2016-2040 RTP/SCS are based on local general plans as well as input from local governments, such as the County. The AVAQMD has incorporated these same demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment) into the AQMPs.

The AVAP is the local land use plan, which is a component of the County General Plan, that guides future development through various goals and policies. The Project Site has a land use designation of RL10, as designated in the AVAP, and is zoned A-2-2 in the Antelope Valley Planning Area. Pursuant to the Los Angeles County Code of Ordinances Table 22.16.030-B, the use of utility-scale solar energy facilities is a permitted use with an approved CUP.

SCAG growth forecasts in the 2016-2040 RTP/SCS estimate unincorporated Los Angeles County's population to reach 1,273,700 persons by 2040, representing a total increase of 233,000 persons between 2012 and 2040. Additionally, SCAG growth forecasts in the 2016-2040 RTP/SCS estimate the County's employment to reach 288,400 jobs by 2040, representing a total increase of 65,500 jobs between 2012 and 2040.

The Project does not include a residential component and would not increase local population growth. The Project does not include a commercial component and would not substantially increase employment. Construction of the Project would not result in residential, commercial, or growth-inducing development that would result in a substantial increase in growth-related emissions. In addition, because of the presence of locally available construction workers, and because of the relatively short duration of construction (approximately seven months), workers are not expected to relocate to the area with their families.

The Project would operate year-round. Typical operational and maintenance activities during Project operations include, but are not limited to, facility monitoring; administration and reporting; remote operations of inverters, BESS system, and other equipment; repair and maintenance of solar facilities, electrical transmission lines, and other Project facilities; and periodic panel washing. Therefore, limited staff would be required during operations. As such, there would be no employee or population growth as a result of the Project, and the Project would not cause the SCAG growth forecast to be exceeded. As the AVAQMD has incorporated these forecasts on population, housing, and employment into the AQMPs, the Project would be consistent with the AQMPs. Impacts would be less than significant.

Criterion 2: Compliance with applicable AVAQMD Rules and Regulations.

The Project would be required to comply with all applicable AVAQMD Rules and Regulations. This would include AVAQMD Rules 401, 402, and 403. AVAQMD Rule 403 requires periodic watering for short-term stabilization of disturbed surface area to minimize visible fugitive dust (PM10) emissions, covering loaded haul vehicles, and reduction of non-essential earth moving activities during higher wind conditions. The Project would comply with applicable AVAQMD rules, enforced through Project Conditions of Approval, and not conflict with applicable AVAQMD Rules and Regulations. Therefore, impacts would be less than significant.

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

Criterion 3: Demonstrating Project implementation will not increase the frequency or severity of a violation in the Federal or State ambient air quality standards.

Analysis of the Project's potential to result in more frequent or severe violations of the CAAQS and NAAQS can be satisfied by comparing Project emissions to AVAQMD thresholds. As discussed under Checklist Question 3.b below, unmitigated short-term construction emissions would not exceed AVAQMD significance thresholds. Additionally, unmitigated long-term operational emissions of all criteria pollutants studied (nitrous oxides [NO_X], reactive organic gases [ROG], carbon monoxide [CO], PM10, and PM2.5) would be less than the applicable AVAQMD significance thresholds. Therefore, the Project would not delay the Basin's attainment goals for O_3, PM10, and PM2.5, and would not result in an increase in the frequency or severity of existing air quality violations. As such, the Project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMPs. Thus, impacts would be less than significant.

Conclusion: As discussed above, the Project would comply with AVAQMD Rules and Regulations and would not induce residential or worker population growth. Further, the Project would not cause or contribute to localized air quality violations or delay the attainment of air quality standard or interim emissions reductions specified in the AQMPs. Thus, the Project would not result in or cause National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) violations. As such, the Project would be consistent with the AVAQMD's AQMPs and impacts would be less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

Construction

Project construction involving the use of heavy-duty construction equipment is anticipated to be completed over a period of approximately seven months. The Project involves construction activities associated with demolition, site preparation, grading, paving, construction/installation, PV panel vendor trips, and paving.

The analysis of daily construction emissions has been prepared using CalEEMod. Refer to **Appendix B** for the CalEEMod outputs and results. **Table 2: Daily Construction-Related Emissions** and **Table 3: Annual Construction-Related Emissions** present the anticipated short-term construction emissions. As indicated in Table 2 and Table 3, criteria pollutant emissions during Project construction would not exceed the AVAQMD significance thresholds. Therefore, total Project construction-related air emissions would be less than significant.

Table 2: Daily Construction-Related Emissions

Construction Year	Maximum Pounds Per Day[1, 2]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Year (2025)	2.79	25.3	30.7	0.06	5.01	2.26
AVAQMD Thresholds	***137***	***137***	***548***	***137***	***82***	***65***
Exceed AVAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM10 = Particulate Matter 10 microns in diameter or less; PM2.5 = Particulate Matter 2.5 microns in diameter or less

Notes:
1. The highest values between summer and winter results were used as a worst-case scenario.
2. The reductions/credits for construction emissions are based on adjustments to CalEEMod and are required by the AVAQMD Rules. The adjustments applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; and limit speeds on unpaved roads to 15 miles per hour.

Source: CalEEMod version 2022.1.1.21 Refer to **Appendix B** for model outputs.

Table 3: Annual Construction-Related Emissions

Construction Year	Maximum Tons per Year[1]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Year (2025)	0.12	0.98	1.26	<0.005	0.19	0.09
AVAQMD Thresholds	***25***	***25***	***100***	***25***	***15***	***12***
Exceed AVAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM10 = Particulate Matter 10 microns in diameter or less; PM2.5 = Particulate Matter 2.5 microns in diameter or less

Notes:
1. The reductions/credits for construction emissions are based on adjustments to CalEEMod and are required by the AVAQMD Rules. The adjustments applied in CalEEMod includes the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stockpiles with tarps; and limit speeds on unpaved roads to 15 miles per hour.

Source: CalEEMod version 2022.1.1.21 Refer to **Appendix B** for model outputs.

Operations

Operational emissions associated with the Project would include those generated from panel washing, maintenance, and the BESS. **Table 4: Daily Operational Emissions** and **Table 5: Annual Operational Emissions**, present the Project's anticipated mobile source (i.e., motor vehicle use), energy source, and area source emissions. Each of these source types are described below.

Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Table 4: Daily Operational Emissions

Source	Maximum Pounds Per Day[1]					
	ROG	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Area	40.7	0.49	58.7	<0.005	0.10	0.08
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	0.01	0.40	0.06	<0.005	0.13	0.04
Total Emissions	*40.7*	*0.90*	*58.8*	*0.01*	*0.24*	0.12
AVAQMD Thresholds	***137***	***137***	***548***	***137***	***82***	***65***
Exceed AVAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM10 = Particulate Matter 10 microns in diameter or less; PM2.5 = Particulate Matter 2.5 microns in diameter or less

Note: Total values are from CalEEMod and may not add up 100 percent due to rounding.
1. The highest values between summer and winter results were used as a worst-case scenario.

Source: CalEEMod version 2022.1.1.21. Refer to **Appendix B** for model outputs.

Table 5: Annual Operational Emissions

Source	Maximum Tons per Year					
	ROG	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Area	6.53	0.04	5.28	<0.005	0.01	0.01
Energy	0.00	0.00	0.00	0.00	0.00	0.00
Mobile	<0.005	0.06	0.02	<0.005	0.02	0.01
Total Emissions	*6.53*	*0.010*	*5.29*	*<0.005*	*0.03*	0.01
AVAQMD Thresholds	***25***	***25***	***100***	***25***	***15***	***12***
Exceed AVAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = Reactive Organic Gases; NO_X = Nitrogen Oxides; CO = Carbon Monoxide; SO_2 = Sulfur Dioxide; PM10 = Particulate Matter 10 microns in diameter or less; PM2.5 = Particulate Matter 2.5 microns in diameter or less

Note: Total values are from CalEEMod and may not add up 100 percent due to rounding.

Source: CalEEMod version 2022.1.1.21. Refer to **Appendix B** for model outputs.

Area Source Emissions. Area source emissions would be generated due to potential BESS architectural coatings. Other typical area sources (e.g., consumer products, landscaping equipment, etc.) would not be utilized by the Project.

Energy Source Emissions. Energy source emissions would be generated due to electricity usage associated with the Project. The Project's operational activities would not consume natural gas. The Project would consume negligible amounts of electricity for auxiliary equipment, such as BESS HVAC units, communications equipment, and lighting.

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

Mobile Source Emissions. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, SO_X, PM10, and PM2.5 are all pollutants of regional concern (NO_X and ROG react with sunlight to form O_3 [photochemical smog], and wind currents readily transport SO_X, PM10, and PM2.5); however, CO tends to be a localized pollutant, dispersing rapidly at the source. During operations, it is estimated that the Project would require 6 maintenance-related visits per year and 4 solar panel and inverter washing visits per year, resulting in a total of approximately 10 operational roundtrips per year (20 one-way trips); refer to **Appendix B** for assumptions and calculations.

Total Operational Emissions. As shown in Table 4 and Table 5, estimated total Project operational emissions would not exceed established AVAQMD thresholds. Therefore, impacts associated with Project operational emissions would be less than significant.

Air Quality Health Impacts

Adverse health effects induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, and the number and character of exposed individual [e.g., age, gender]). In particular, O_3 precursors (volatile organic compounds [VOCs] and NO_X) affect air quality on a regional scale. Health effects related to O_3 are therefore the product of emissions generated by numerous sources throughout a region. Existing models have limited sensitivity to small changes in criteria pollutant concentrations resulting from individual projects. The NAAQS and CAAQS are set to be protective of human health, however, which means that the Project's less than significant increases in regional air pollution from criteria air pollutants would have less than significant impacts on human health.

The AVAQMD does not have clear thresholds or methodology to quantify health impacts of criteria pollutants from individual projects. Other air districts, including the South Coast Air Quality Management District (SCAQMD), have stated that it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants from individual projects for various reasons including modeling limitations as well as the fact that certain emissions are the result of chemical interactions and it is impossible to determine exactly where in the atmosphere precursor air pollutants will interact.

The SCAQMD acknowledges that health effects quantification from O_3, as an example, is correlated with the increases in ambient level of O_3 in the air (concentration) that an individual person breathes. SCAQMD has written that it would take a large amount of additional emissions to cause a modeled increase in ambient O_3 levels over the entire region. The SCAQMD states that based on their own modeling in the SCAQMD's 2012 Air Quality Management Plan, a reduction of 432 tons (864,000 pounds) per day of NO_X and a reduction of 187 tons (374,000 pounds) per day of VOCs would reduce ozone levels at the site with the highest ozone levels by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify ozone-related health impacts caused by NO_X or VOC emissions from relatively small projects (defined as projects with less than a regional scope) due to photochemistry and regional model limitations.

Because the Project would not exceed AVAQMD's thresholds for construction and operational air emissions, the Project would have a less than significant impact for air quality health impacts as well. The Project also would be required to comply with all applicable AVAQMD Rules and Regulations, including

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

Rules 401, 402, and 403, which require among other things periodic watering for short-term stabilization of disturbed surface area to minimize visible fugitive dust (PM10) emissions, covering loaded haul vehicles, and reduction of non-essential earth moving activities during higher wind conditions.

Decommissioning

At the end of the Project's operational term, the Applicant may determine that the Project should be decommissioned and deconstructed. The Applicant will work with the County to ensure decommissioning of the Project after its productive lifetime complies with all applicable local, State, and federal requirements and BMPs. The Project would include BMPs to ensure the collection and recycling of modules and to avoid the potential for modules to be disposed of as municipal waste.

Equipment would be de-energized prior to removal, salvaged (where possible), placed in appropriate shipping containers, and secured in a truck transport trailer for shipment off site to be recycled or disposed of at an appropriately licensed disposal facility. Site infrastructure would be removed, including fences and concrete pads that may support the inverters and related equipment. The exterior fencing would be removed, and materials would be recycled to the extent feasible. Project internal and access roads would be restored to their pre-construction condition to the extent feasible unless the landowner elects to retain the improved roads for access throughout the property. A collection and recycling program would be utilized to promote recycling of Project components and minimize disposal in landfills. Emissions associated with decommissioning activities would be similar to those during construction of the Project. As shown in Table 2 and Table 3, emissions would not exceed AVAQMD thresholds and impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐

Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, parks, daycare centers. The California Air Resources Board (CARB) has identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, athletes, and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. The nearest sensitive receptor to the Project Site is a residential use located approximately 110 feet south.

Construction

Project construction is anticipated to be completed over a period of approximately seven months. Project construction activities are anticipated to involve the operation of diesel-powered equipment, which would emit Diesel Particulate Matter (DPM). In 1998, the CARB identified diesel exhaust as a Toxic Air Contaminant (TAC). Cancer health risks associated with exposures to diesel exhaust typically are associated with chronic exposure, in which a 30-year exposure period often is assumed. Project construction would comply with the California Code of Regulations (CCR), Title 13, Section 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to nor more than five minutes. Implementation of these regulations would reduce the amount of DPM emissions from Project construction. The closest sensitive receptor is located 110 feet

(measured from the Project Site's fencing to the property line of the nearest sensitive receptor) south of the Project Site. While construction activities are anticipated to be completed over a period of approximately seven months, activities in the vicinity of this receptor would be even shorter, as construction moves throughout the Project Site. Due to the distance between the Project Site and the closest sensitive receptors, potential health impacts on sensitive receptors associated with exposure to DPM from Project construction would be less than significant.

Furthermore, construction activities are expected to occur well below the 30-year exposure period used in health risk assessments. Emissions would be short-term and intermittent in nature, and therefore would not generate TAC emissions at high enough exposure concentrations to represent a health hazard. Therefore, construction of the Project would not result in a significant increase in elevated cancer risk to nearby sensitive receptors and impacts would be less than significant.

Operations

Typical operational and maintenance activities during Project operations include, but are not limited to, facility monitoring; administration and reporting; remote operations of inverters, BESS system, and other equipment; repair and maintenance of solar facilities, electrical transmission lines, and other Project facilities; and periodic panel washing. None of these activities would result in the generation of excessive TAC emissions, or associated health risks. Therefore, operation of the Project is not anticipated to result in an elevated cancer risk to nearby sensitive receptors and potential impacts would be less than significant.

Carbon Monoxide Hotspots

CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels (i.e., adversely affecting residents, school children, hospital patients, the elderly, etc.). CO is primarily a product of incomplete combustion of gaseous or liquid fuels, meaning tailpipe emissions are worse in stop-and-go congested traffic as compared to free flowing conditions. The Project does not include any stationary sources of combustion, and results in a net increase of approximately 20 one-way operational trips per year. Construction would be temporary and is expected to last approximately seven months, such that construction would not result in a long-term source of CO emissions. The Project is not located near existing CO hotspots and the trips associated with the Project are insufficient to create a CO hotspot.

With such low existing ambient levels of CO, low levels of CO emissions from the Project, and lack of congested roadways around the Project, the Project would not cause CO hotspots in excess of applicable NAAQS or CAAQS standards at any intersections within the County. Impacts would be less than significant in this regard.

Naturally Occurring Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals that are a human health hazard when airborne. The most common type of asbestos is chrysotile, but other types such as tremolite and actinolite are also found in California. Asbestos is classified as a known human carcinogen by State, Federal, and international agencies and was identified as a toxic air contaminant by the CARB in 1986.

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

Asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities.

According to the Department of Conservation Division of Mines and Geology, A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos Report (August 2000), serpentinite and ultramafic rocks do not occur within the vicinity of the Project Site. Thus, there would be no impact in this regard.

Valley Fever

Coccidioidomycosis (CM), often referred to as San Joaquin Valley Fever or Valley Fever, commonly affects people who live in hot dry areas with alkaline soil and varies with the season. This disease, which affects both humans and animals, is caused by inhalation of arthroconidia (spores) of the fungus *Coccidioides immitis* (CI). CI spores are found in the top 2-12 inches of soil and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as a saprophyte in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus "blooms" and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-moving activities and become airborne. Agricultural workers, construction workers, and other people who work outdoors and who are exposed to wind and dust are more likely to contract Valley Fever. Children and adults whose hobbies or sports activities expose them to wind and dust are also more likely to contract Valley Fever.

The fugus is known to live in the soil in the southwestern United States and parts of Mexico and Central and South America. People and animals can get sick when they breathe in dust that contains the Valley fever fungus. This fungus infects the lungs and can cause respiratory symptoms including cough, fever, chest pain, and tiredness. In California, the number of reported Valley fever cases has greatly increased in recent years. The number of Valley Fever cases in the United States has been steadily increasing over the past few years. There were over 20,000 reported cases in 2019, and the Center for Disease Control and Prevention (CDC) estimates that an additional 150,000 cases go undiagnosed each year. About 32 percent of all cases occur in California.

When a susceptible human who is not immune inhales these airborne spores, they enter the lungs and may cause respiratory infections, such as pneumonia. Roughly 60 percent of individuals infected with CI have no symptoms. For the remaining 40 percent, a wide spectrum of clinical symptoms can occur. The most common presentation of CM is a mild, influenza-like illness while the more severe includes pneumonia-like symptoms requiring rest and medication (fungus-killing medicines). The symptoms of the disease typically begin about two weeks after inhaling the spores. These symptoms typically include flu-like symptoms such as fever, aching, chills, sweats, fatigue, cough, and headache. In uncomplicated CM, symptoms usually subside in a few weeks or months.

In approximately one percent of infected persons, disseminated disease develops, in which CM is spread from the lungs to other areas of the body such as the skin, bones, brain, or other organs. This spreading of CM infection beyond the lungs can be fatal. Meningitis, the most lethal complication of disseminated CM, may cause a stiff neck, severe and persistent headache, nausea, vomiting, and various other central nervous system symptoms such as disorientation, loss of balance or equilibrium, inability to think clearly and loss of

consciousness. People with diabetes and women who contract CM while they are pregnant are particularly prone to dissemination of the disease.

Currently, no vaccine is available to prevent this infection. Further, there is no effective way to detect and monitor CI growth patterns in the soil. Thus, controlling the growth of the fungus in the environment to reduce the risk to individuals is currently not a viable option. A skin test can be conducted to identify individuals who have been infected in the past and would have developed immunity to the fungus, although recurrence as a result of immuno-suppression is possible. Even if the fungus is present in soil, earthmoving activities may not result in increased incidence of valley fever. Propagation of Coccidioides is dependent on climatic conditions, with the potential for growth and surface exposure highest following early seasonal rains and long dry spells.

To reduce exposure to CI, development projects implement measures to prevent wind dispersion of arthrospores, such as applying dust control palliatives, water, or vegetation to fungus-bearing soils. To facilitate early identification of infection and subsequent treatment. The Los Angeles County Code of Ordinances Section 22.140.510 requires establishing a Fugitive Dust Control Plan based on the requirements of AVAQMD Rule 403 and AVAQMD CEQA Guideline Fugitive Dust Control Measures. The California Department of Public Health recommends stopping outside activity during conditions where the dust cannot be controlled well. Appropriate use of respiratory protect may be also needed in some circumstances.

During ground disturbing activities associated Project construction, the potential exists that such activities could disturb dust particles and, if present, CI spores, which could then be released into the air and potentially be inhaled by on-site workers and nearby sensitive receptors; exposure to these spores can cause Valley Fever. Rule 403 requires that fugitive dust be controlled with the best available control measures in order to reduce dust so that it does not remain visible in the atmosphere beyond the property line of the Project Site. Examples of best available control measures for dust include the application of water and soil stabilizers, covering of loads, avoiding track out onto public roads, and the minimization of non-essential grading during high wind conditions. Due to the distance of the nearest sensitive receptor, the Project is not anticipated to exacerbate the risk of existing sensitive receptors to contract Valley Fever. Although CEQA does not require the analysis of a Project's impacts on its construction workers, such analysis is included for informational purposes. The best approaches to reducing construction workers' risk of contracting Valley Fever are awareness and dust reduction because dust can be an indicator that increased efforts are needed to control other airborne particulates (including CI spores, if any). Compliance with AVAQMD rules reduce dust. For example, Rule 401 prohibits a person from discharging into the atmosphere any air emission contaminant for a period or periods aggregating more than three minutes in any single hour emissions that is: (a) as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines; or (b) of such opacity as to obscure an observer's view to a degree equal to or greater than 20 percent opacity. Rule 402 prohibits the discharge of air contaminants in quantities that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any such persons or the public. Additionally, the Project would be required to provide training and awareness of Valley Fever **MM AQ-1**. **MM AQ-1** would further ensure worker safety through education and ensuring implementation of required California Division of Occupational Safety and Health (Cal/OSHA) safety measures.

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

With the implementation of **MM AQ-1**, the potential for the release of CI spores, if present, and the associated potential for workers or nearby residents to contract Valley Fever from Project construction activities would be minimized. Accordingly, the Project would not add significantly to the existing exposure level of construction workers or nearby residents to the CI fugus. Therefore, potential impacts would be less than significant with mitigation incorporated.

MM AQ-1 Minimize Exposure to Potential Valley Fever-Containing Dust. Prior to ground disturbance activities, the Applicant must prepare a Dust Control Plan for the Antelope Valley Air Quality Management District (AVAQMD) review, including a Valley Fever Management Plan and training program, to be implemented during construction to address potential risks from Coccidioides immitis by minimizing the potential for unsafe dust exposure during construction. At a minimum, the following dust control measures shall be implemented as part of the VFMP as well as specific measures in Dust Control Plan during project construction:

- An educational Valley Fever Training Handout shall be provided to all onsite construction personnel. The handout shall provide information including, but not limited to, the causes, symptoms, and treatment instructions regarding Valley Fever, including contact information of local health departments and clinics knowledgeable about Valley Fever.
- Conducting Valley Fever training sessions to educate all Project construction workers regarding appropriate dust management and safety procedures, symptoms of Valley Fever, testing and treatment options. This training must be completed by all workers and visitors (expected to be on-site for more than 2 days) prior to participating in or working in proximity to any ground disturbing activities. Signed documentation of successful completion of the training is to be kept on-site for the duration of construction.
- Developing a job-specific Job Hazard Analyses (JHA), in accordance with Cal/OSHA regulations, to analyze the risk of worker exposure to dust, and maintain and manage safety supplies identified by the JHA.
- Provide and/or require, if determined to be needed based on the applicable JHA, National Institute for Occupational Safety and Health-approved half-face respirators equipped with a minimum N-95 protection factor for use during worker collocation with surface disturbance activities, following completion of medical evaluations, fit-testing, and proper training on use of respirators.
- Specific measures addressed in the approved Dust Control Plan that may be related to maintenance and cleaning of equipment, vehicles, construction areas, parking and staging areas, and unpaved access roads.

e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

According to the CARB's CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project includes construction of a PV

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

electricity generation and energy storage facility and does not include any uses identified by the CARB as being associated with odors.

Project construction activities may generate detectable odors from heavy-duty equipment exhaust. However, construction-related odors would be short-term in nature and cease upon completion of Project construction. Further, the nearest potential residence is too far from the Project Site to detect construction odors. In addition, the Project would be required to comply with the CCR, Title 13, Sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would further reduce the detectable odors, if any, from heavy-duty equipment exhaust. Therefore, potential impacts would be short-term and are considered less than significant.

As previously noted, land uses associated with odor complaints do not typically include PV electricity generation and energy storage facilities. During operations, the Project would generate an estimated 6 trips internal to the Project Site for required maintenance activities and approximately 4 trips associated with solar panel washing activities, resulting in a total of approximately 10 operational roundtrips per year (20 one-way trips). Project operational vehicle trips would be minimal and not of sufficient number to create concentrations of odorous fumes to form and cause a nuisance. As such, potential impacts would be easily dispersed in the atmosphere and are less than significant.

4. BIOLOGICAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐

The findings discussed below are based on the Biological Resources Assessment (BRA) prepared by Kleinfelder (see **Appendix C-1**) and the Biological Resources Supplemental Memorandum (Supplemental Memorandum) prepared by Rincon Consultants, Inc. (Rincon) (see **Appendix C-2**).[11,12]

Existing vegetation on the Project Site includes inactive agriculture/ruderal land and rubber rabbitbrush scrub that recolonized the Project Site after agricultural operations were discontinued. In addition, according to a January 2023 field survey conducted for the BRA, a row of juniper trees was planted along the western boundary of the Project Site sometime between the mid-1980s and mid-1990s. The Los Angeles County General Plan describes juniper woodland as an important habitat feature that supports multiple wildlife species in a concentrated area. However, this row of trees does not fall into the category of juniper woodland as described in the Plan, as it is not a natural aggregation of trees and does not therefore provide the benefits of a true woodland. This is due to the linear configuration of the trees directly adjacent to the road and the fact that approximately half of the trees were dead at the time the field survey was performed in January 2023. At present, the row of juniper trees provides little habitat value to wildlife. The Project would likely require the removal of one to three of the planted trees to support construction of the proposed access road into the Project Site. However, since the juniper trees are not a natural aggregation of trees and do not support substantial habitat value to wildlife, Project impacts would not be adverse.

No special-status plant species were observed during the January 2023 and April 2025 field survey, and none are expected to occur within the Project Site due to a lack of suitable habitat, history of agricultural on-site disturbance, or the fact that the Project Site is outside of the species' known range.

Eleven special-status avian species have a moderate potential to occur within the vicinity of the Project Site. Four of these species are known to occur within the two-mile/nine-quad search radius of the Project area in the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) and U.S. Fish and Wildlife's (USFWS) Information for Planning and Consultation (IPaC) searches: burrowing owl (*Athene cunicularia*)[13], loggerhead shrike (*Lanius ludovicianus*), mountain plover (*Charadrius montanus*), and Swainson's hawk (*Buteo swainsoni*). The Project Site and adjacent areas contain suitable habitat for these species, and there are several documented occurrences of these species within two to six miles of the Project Site. The

[11] Kleinfelder, Biological Resources Assessment, February 2023, Updated October 2024. Appendix C-1 of this IS/MND.
[12] Rincon Consultants, Inc., Biological Resources Supplemental Memorandum, May 2025. Appendix C-2 of this IS/MND.
[13] Based on Rincon's protocol-level BUOW survey conducted according to CDFW guidelines on April 3, 2025, no burrows of suitable size were observed during the survey, and no BUOW were detected. Therefore, there would be a low potential for this species to occur.

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

remaining seven bird species are listed on Part I of the Los Angeles County Sensitive Bird Species List, including ferruginous hawk (*Buteo regalis*), greater roadrunner (*Geococcyx californianus*), mountain bluebird (*Sialia currucoides*), prairie falcon (*Falco mexicanus*), short-eared owl (*Asio flammeus*), turkey vulture (*Cathartes aura*), and western meadowlark (*Sturnella neglecta*). Most bird nests and eggs are protected under the California Fish and Game Code (CFGC) Section 3503 and the Migratory Bird Treaty Act (MBTA). Common native and non-native species such as white-crowned sparrow (*Zonotrichia leucophrys*), common raven (*Corvus corax*), California quail (*Callipepla californica*), mountain bluebird (*Sialia currucoides*), mourning dove (*Zenaida macroura*), and red-tailed hawk (*Buteo jamaicensis*) have a potential to nest and/or forage in vegetation within and/or near the Project Site. Additionally, raptors that occur in agricultural landscapes such as barn owls (*Tyto alba*) and American kestrels (*Falco sparverius*) often nest in palm trees such as those found on-site, foraging in adjacent fields. Swainson's hawk (SWHA) occurrences in the vicinity of the Project Site are concentrated more than 15 miles east of the Project Site around Lancaster and east of Lancaster. A SWHA survey was performed by qualified Rincon biologists on April 15, 2025. No SWHA were observed within the 0.5-mile buffer of the Project Site during the survey. There is only one CNDDB documented occurrence of SWHA within 5 miles of the Project Site, dated 2020. Direct impacts (e.g., injury or mortality) to nesting birds or indirect impacts (e.g., noise, dust) that disrupt nesting behavior and reproductive success would be potentially significant. Additionally, trash and waste items generated from Project construction and operational activities could attract predators such as raccoons and American crows that could prey upon sensitive wildlife species, which would also result in potentially significant impacts.

The Project would be required to implement a nesting bird survey (see **MM BIO-1**) during construction and decommissioning for compliance with the MBTA and CFGC Guidelines and to reduce impacts on nesting birds to less than significant. The Project also would implement **MM BIO-2**, which requires avoidance buffers around any active SWHA nests, should the pre-construction nesting bird survey detect active SWHA nests. Nesting bird surveys will not be required during O&M activities due to the low frequency and short duration of O&M activities over the life of the Project (e.g., panel washing 2-3 days per year with 1-2 personnel and a pickup truck. However, the Project would be required to implement **MM BIO-3** to ensure that all persons working on the Project (during construction, O&M, and decommissioning) received worker environmental awareness training. The Project would also be required to implement **MM BIO-4** and **MM BIO-5** to properly contain trash receptacles and visually check all equipment, respectively.

On October 10, 2024, the California Fish and Game Commission designated the western burrowing owl as a candidate for listing under the California Endangered Species Act. As discussed in the Supplemental Memorandum, Rincon biologists performed a protocol-level burrowing owl (BUOW) survey on April 3, 2025 according to the CDFW 2012 *Staff Report on Burrowing Owl Mitigation.* No burrows of suitable size (4 inches or greater) were observed during the survey, and no BUOW were detected. Nevertheless, even with the low potential for BUOW to occur on the Project Site, the Project would implement pre-construction surveys and avoidance measures specific to BUOW (see **MM BIO-6**).

Additionally, there are two special-status mammal species with a low potential to occur within the Project Site: American badger (*Taxidea taxus*), a California species of special concern, and desert kit fox (*Vulpes macrotis arsipus*). There is low-quality habitat for American badger and desert kit fox in the Project area. No burrows of suitable size to support these species were observed during the field survey. As previously discussed, no burrows of suitable size for desert kit fox or American badger were observed during the April 3, 2025 BUOW survey. There are only two documented occurrences of American badger within eight miles of the Project area; one has no date or owner information, and the other is from 1906. Occurrence records for desert kit fox

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

are not kept by the CNDDB or IPaC, as this species is not listed under Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA); however, desert kit fox is protected by Title 14, Section 460 of the CCR (furbearing mammals). Therefore, the Project will be required to implement **MM BIO-3** through **MM BIO-5** as well as pre-construction surveys and avoidance/eviction plans for desert kit fox (see **MM BIO-7**) and American badger (see **MM BIO-8**).

The Crotch's bumble bee (*Bombus crotchii)* is a candidate species under the California Endangered Species Act. The Crotch's bumble bee requires availability of suitable colony nesting sites, floral resources to obtain nectar and pollen throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for queens. While there is low quality habitat for the Crotch's bumble bee on the Project Site, the species has been documented in the Antelope Valley. A formal habitat assessment was performed on April 8, 2025 to determine if suitable nesting or foraging habitat for Crotch's bumble bee is present on the Project Site. Rincon biologists observed potentially suitable foraging and nesting habitat; however, the Project Site provides limited suitable habitat compared to surrounding areas due to previous agricultural activities, and no bumble bees were observed during the habitat assessment. A protocol survey pass was performed on April 21, 2025 by two qualified Rincon biologists, each possessing a Memorandum of Understanding to perform surveys for Crotch's bumble bee. No Crotch's bumble bees were observed. Accordingly, there is low potential for Crotch's bumble bee on the Project Site. Nevertheless, the Project would implement **MM BIO-9** to minimize potential impacts to Crotch's bumble bee.

A rare plant survey was performed on April 8, 2025 by two Rincon botanists. No rare plants were observed on the Project Site. The vegetation communities mapped on the Project Site included cheat grass grassland and rubber rabbit brush scrub. Although some small patches of native wildflowers were observed on the Project Site (including California poppy [*Eschscholzia californica*] and yellowray goldfields [*Lasthenia glabrata*], none were large enough to be classified as a "wildflower field" according to Holland types and minimum mapping standards employed during the survey. Therefore, there is low potential for impacts to rare plants or sensitive vegetation communities. Nevertheless, to minimize the potential impacts to native vegetation and to promote Project Site revegetation following Project construction, the Project would implement **MM BIO-10** to minimize impacts to soil and native vegetation.

Solar PV panels have a strong polarization signature, which is an element thought to mimic water. As a result, some have theorized that PV panels can attract species that mistake the panels for bodies of water, potentially leading to increased risk of collisions, being stranded within site fencing once they land, or other forms of distress.[14] The phenomenon is sometimes referred to as the "lake effect." The strongest evidence for lake effect is mortality of water-dependent species found at PV solar farms in desert environments with no natural waterbodies in the region.[15] Recent studies have shown that some species of birds that use aquatic habitats could be attracted to solar PV panels; however, it is unlikely that all aquatic birds at all times would be attracted to the panels.[16] The potential for this effect also depends on the regional context and the availability of natural waterbodies near the solar site. There are large waterbodies within 12 miles of the Project Site, including Quail

[14] The Nature Conservancy of California, Mojave Desert Ecoregional Assessment, September 2010, https://www.scienceforconservation.org/assets/downloads/Mojave_Desert_Ecoregional_Assessment_2010.pdf. Accessed April 10, 2025.

[15] Kosciuch K, Riser-Espinoza D, Moqtaderi C, Erickson W., Aquatic Habitat Bird Occurrences at Photovoltaic Solar Energy Development in Southern California, USA. Diversity. 13(11):524, 2021, https://doi.org/10.3390/d13110524. Accessed April 10, 2025.

[16] Ibid.

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

Lake, Tehachapi Afterbay, and Fairmont Reservoir, but there are no large waterbodies within or directly adjacent to the Project Site. Therefore, the potential for aquatic birds to collide with solar PV panels due to "lake effect" is very small. Nevertheless, the Project would implement **MM BIO-11** to place panels in a close to vertical position at the end of the day. **MM BIO-11** would reduce the risk of birds attempting to land on the PV array at sunset or sunrise by mistaking it for water, and impacts would be reduced to less than significant.

With implementation of **MM BIO-1** through **MM BIO-11**, impacts to special-status species would be reduced to less than significant.

On a cumulative level, the 29-acre Project Site is consistent with the land uses analyzed in the Los Angeles County General Plan EIR. Given its small size, consistency with General Plan goals and policies addressing biological resources such as special-status species, wetlands, and sensitive habitats, and implementation of the listed mitigation measures, the Project would not have a cumulatively considerable effect on biological resources or habitat for special-status species. The potential effects of the Project on biological resources have been adequately addressed in the BRA and Supplemental Memorandum. Multiple surveys have been conducted on the Project Site from 2023 to 2025, and during that time, no special-status plant or wildlife species, sign of these species, or sensitive vegetation communities have been observed on the site. All burrows on the site were mapped and none were of sufficient size to support BUOW, desert kit fox, or American badger. Similarly, no rare plants were observed during focused surveys, and no sensitive habitat types, as defined by CDFW and California Native Plant Society (CNPS), have been mapped on the Project Site. The absence of special-status species and lack of high-value habitat on the site is likely due to past agricultural uses that included regular disking, which resulted in the degradation of natural habitats and disturbance of native soils, making it a poor candidate for burrowing animals and rare plants. Thus, the Project Site overall provides low quality habitat, and development of the Project Site would not cause a significant loss of high-value foraging, sheltering, or nesting habitat. The surrounding undeveloped parcels that have not been disturbed by agricultural uses are of much higher value to special-status species.

In addition to being of poor habitat value, the small footprint of the Project means that the relative scale of potential Project impacts is limited and contributes little to any potential cumulative effects in the larger vicinity of the Project, as it does not reduce movement corridors or significant amounts of potential habitat for special-status plant and wildlife species. In addition, the habitat on the Project Site would not be removed completely, as annual grassland will be retained under the arrays. This will provide foraging opportunities for multiple species. Moreover, the Project was designed to allow for movement around and through the arrays by requiring a gap at the bottom of the fence, therefore encouraging movement of wildlife species through and in the vicinity of the Project Site. The land that the Project is sited on has not been designated as critical habitat by USFWS, nor has it been set aside for conservation by any other entity. Although the Project Site may provide low-quality habitat for some species, the Project is subject to robust mitigation measures designed to avoid and minimize impacts to these species. Because of this, the Project would not result in significant impacts to any species as a whole or their habitat.

A realistic assessment of potential impacts of the Project has been taken into account, and the mitigation proposed is equivalent to the level of potential impacts. Although other solar projects have been developed or may be proposed in the vicinity of this Project in the future, those projects would be subject to similar measures designed to reduce impacts. As stated previously, the Project has been designed in a manner that avoids and minimizes potential impacts to biological resources to the maximum extent practicable. All Project-

related impacts would be less-than-significant due to robust mitigation measures that have been developed during the planning phase, as well as Project design elements that would limit potential impacts during construction and operation of the Project, and other projects would be subject to similar requirements designed to avoid and minimize impacts. Thus, cumulative impacts would be less than significant, and the Project's contribution to any cumulative impacts would not be cumulatively considerable.

MM BIO-1 **Nesting Bird Surveys.** To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and CFGC, activities related to the Project construction and decommissioning, including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season (February 1 through August 31) to the extent feasible. If construction or decommissioning must begin within the breeding season, then a nesting bird survey shall be conducted no more than seven (7) working days prior to initiation of ground disturbance and vegetation-removal activities. The nesting bird survey shall be conducted within the Project area, plus a 300-foot buffer (250-foot for raptors and 0.50-mile for Swainson's hawk), on foot, and within inaccessible areas (i.e., private lands) afar using binoculars to the extent practical. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California desert communities. Construction and decommissioning phasing and/or a lapse in work activity during the nesting season may require subsequent nesting surveys by the biologist. A report of nesting bird survey findings will be provided to the County. Nesting bird surveys shall not required during O&M activities.

If nests are found, an avoidance buffer (which is dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary that provides adequate marking but does not disturb the nest itself. All construction personnel shall be notified as to the existence of the buffer zone and instructed to avoid entering the buffer zone during the nesting season. No ground-disturbing activities shall occur within this buffer until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist. The active nests shall be monitored for a minimum of one hour for passerines and three hours for raptors to determine a baseline of behavior, and shall be avoided by a sufficient buffer, to be determined by the qualified biologist, based on species and Project activities in the vicinity of the nest. After the initial baseline monitoring event, the nest shall be monitored once weekly to determine the stage of the nest. The buffer shall remain in place until the young have fledged or the nest is inactive, to be determined by the qualified biologist.

A memorandum shall be prepared at the conclusion of surveys to be submitted to Los Angeles County. The memorandum shall include graphics and figures as necessary to support the results of the survey.

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

MM BIO-2 Swainson's Hawk. If active Swainson's hawk nests are detected within the 0.5 mile buffer, they shall be monitored for a minimum of three hours to determine a baseline of behavior and shall be avoided by a minimum 0.25-mile buffer. After this initial baseline monitoring event, the nest shall be monitored once weekly, including at the initiation of construction activity, to determine the stage of the nest. The nest shall be monitored for at least two hours each week between 7:00 a.m. and 10:00 a.m., and notes on adult behaviors, presumed stage and number of young, and any other breeding behaviors (e.g., copulation, prey deliveries) shall be kept in a field notebook or digital field data collection application. If construction activity is determined to be disturbing the birds, the monitor may increase the buffer width as necessary to alleviate the disturbance. The buffer shall remain in place until the young have fledged or the nest is inactive, to be determined by the qualified biologist.

MM BIO-3 Worker Environmental Awareness Training. A qualified biologist shall conduct a worker environmental awareness training (WEAT) program, which shall be reviewed by Los Angeles County, for all persons working on the Project prior to the onset of construction for construction, O&M, and decommissioning activities. A discussion of the biology and general behavior of any sensitive species which may be in the area, how they may be encountered within the work area, and procedures to follow when they are encountered shall be included in the training. Special-status species, including legal protection, penalties for violations, and Project specific protective measures shall also be discussed. Contact information for the qualified biologist and other useful wildlife-related contacts (e.g., CDFW, venomous snake humane relocation services, etc.) shall be included in the WEAT. Interpretation shall be provided for non-English speaking workers, and the same instruction shall be provided for any new workers prior to on-site Project activity. Copies of the training shall be maintained at the worksite with the Project supervisor, and a handout containing this information shall be distributed for workers to carry on-site. Upon completion of the program, employees shall sign an attendance log stating they attended the program and understand all protective measures. The WEAT shall be sent to the County for review prior to implementation.

MM BIO-4 Trash Receptacles. All trash and waste items generated by construction, O&M, and decommissioning or crew activities shall be properly contained in a covered and locked trash receptacle and/or removed from the Project Site daily. All containers shall be wildlife-proof. This includes biodegradable items, such as apple cores and banana peels, that attract predators such as raccoons and American crows that could prey upon sensitive wildlife species.

MM BIO-5 Common and Special-Status Wildlife Awareness. All Project personnel shall visually check for animals in any pipes, culverts, or other open-ended materials and equipment stored on-site for one or more overnight periods prior to moving, burying, or capping to ensure that no animals are present within the materials and equipment. To prevent accidental entrapment of wildlife during constructional phases of the Project (construction, O&M, and decommissioning), all excavated holes, ditches, or trenches greater than six (6) inches deep shall be covered at the end of each workday by suitable materials that cannot be displaced or escape ramps shall be placed in excavations. After

opening and before filling, such holes, ditches, and trenches shall be thoroughly inspected for trapped animals. To prevent wildlife entrapment during construction, BMPs (e.g., straw wattles, etc.) shall not contain monofilament netting.

All security fencing installed around the Project Site shall meet the standards set forth in Section 20.140.510(E)(3)(c) of the County Code, including the requirement that perimeter fencing shall incorporate small animal permeable design. The bottom of the fence fabric shall be knuckled (wrapped back to form a smooth edge) to protect wildlife that pass under the fence. Larger species will be able to move freely in all directions around the fence, and to prevent bat and raptor entrapment, no barbed wire shall be installed around the top of the fence. Fences shall be monitored quarterly to ensure that any damage or vandalism is quickly repaired.

MM BIO-6 **Burrowing Owl Avoidance.** A qualified biologist shall conduct surveys following the California Burrowing Owl Consortium's (CBOC) Burrowing Owl Survey Protocol and Mitigation Guidelines (CBOC 1993) and the CDFW Staff Report on Burrowing Owl Mitigation (CDFG 2012) during the survey season immediately prior to construction and decommissioning to assess the presence of burrowing owl on or adjacent to the site.

Should burrowing owl individuals or sign at burrows (e.g., whitewash, feathers, pellets, etc.) be detected on the site at any time during construction or decommissioning, including during any pre-construction surveys, work shall stop within 500 meters of the individual or burrow during the breeding season (February 1 – August 31), and within 50 meters of the individual or burrow during the non-breeding season (September 1 – January 31). If maintaining the avoidance buffers is infeasible, CDFW shall be notified to determine next steps, which may include additional surveys to determine baseline behavior of the individual and whether nesting is occurring on the site, and/or consultation to determine whether an Incidental Take Permit for burrowing owl is warranted for the Project duration.

MM BIO-7 **Desert Kit Fox.** During protocol-level burrowing owl surveys and within 48 hours prior to the onset of construction, a survey shall be performed by a qualified biologist to determine the presence of potential desert kit fox burrows. If no suitable burrows are detected, or no desert kit foxes are detected during remote camera monitoring, no further mitigation would be required. If occupied desert kit fox dens are detected during the pre-construction survey, a Desert Kit Fox Avoidance Plan shall be prepared and submitted to CDFW for written approval. The Plan shall include details on the procedures to collapse or block unoccupied dens which shall be developed in consultation with CDFW. Suitably sized dens (6 inches or greater in size) shall be avoided by 200 feet during the desert kit fox pupping season (January 1 – August 31) and 100 feet outside of the pupping season (September 1 – December 31), where feasible. If avoidance is infeasible, camera monitoring shall occur for 3 nights. If no desert kit foxes are detected during the camera monitoring period, the den shall be collapsed according to the Desert Kit Fox Avoidance Plan. If kit foxes are detected during the camera monitoring period, the dens shall be avoided by a 200-foot buffer during the pupping season and a 100-foot buffer outside of the pupping season until

the adults and young have left the burrow, as evidenced by weekly biological monitoring to determine if sign is present at the burrow, and camera monitoring for 2 nights weekly to determine occupancy. Avoidance buffers shall be determined in consultation with CDFW, and variances may be allowed with approval from CDFW.

MM BIO-8 American Badger. During protocol-level burrowing owl surveys and within 48 hours prior to the onset of construction, a survey shall be performed by a qualified biologist to determine the presence of potential American badger burrows. If no suitable burrows are detected, or no American badgers are detected during remote camera monitoring, no further mitigation would be required. If an active American badger den is detected in or within 100 feet of the work area (where accessible) during the preconstruction survey, the den shall be protected with a no disturbance buffer, as determined by a qualified biologist, based on the location of the den and construction activities in the vicinity of the den. If an active den cannot be avoided, a Badger Eviction Plan shall be prepared and submitted to CDFW for approval. The Plan shall describe eviction of American badgers and may include camera station monitoring of burrows to ensure badgers are not inside, and timing of eviction to occur outside of the season that young could be present (March 1 – August 31).

MM BIO-9 Crotch's bumble bee. Protocol surveys following the CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023) shall be performed prior to construction to determine if Crotch's bumble bee is present on the Project Site. If no Crotch's bumble bees are detected on the site, no further mitigation would be required.

If this species is detected foraging within 100 feet of the Project Site (where accessible), nesting surveys shall be conducted to identify active colonies. If an active nest is observed on the Project Site, the nest shall be avoided by a 50-foot buffer. The nest shall be monitored daily by the qualified biologist (for at least 2 hours between 7:00 am and 11:00 am) and the following shall be implemented:

- If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project construction activities or over the life of the Project, the Project proponent shall consult with CDFW regarding the potential need for take authorization pursuant to Fish and Game Code Section 2081 subdivision (b).
- Any floral resource associated with Crotch's bumble bee (i.e. specific plant species that Crotch's bumble bee is observed foraging on) that will be removed or damaged by the Project shall be replaced at a 1:1 ratio or as otherwise determined during any ITP application process. Floral resources shall be replaced as close to their original location as is feasible after the Project is constructed. These floral resources shall be maintained during the life of the Project and shall be replanted and managed as needed to ensure the habitat is preserved.

MM BIO-10 Vegetation and Revegetation. To the extent practicable, construction activities shall be performed during the dry season to minimize impacts to soil and native vegetation. Where feasible, rubber-tired vehicles shall be used during construction and grading of Project areas shall be limited the minimum necessary to meet Project objectives.

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

Application of seed shall be limited to that required to meet Project objectives and seed mixes shall be provided to the County for review prior to application.

MM BIO-11 Panel Positioning. To minimize "lake effect" related adverse impacts to bird species, the panels shall be positioned overnight where they last tracked the sun or pre-positioned toward the east to capture sunrise (i.e., panels shall be in a close to vertical position).

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	☐	☐	☒	☐

The Project Site contains fallow land that was previously used for agricultural uses. Additional plant species beyond the existing ruderal vegetation are minimal and dominated by non-native species that likely colonized the Project Site after agricultural purposes were discontinued. According to the USFWS National Wetlands Inventory (NWI), a riverine feature is mapped outside the northwestern corner of the Project Site. However, this system is intermittent: the substrate is usually exposed, and surface water is present for variable periods without detectable seasonal periodicity.[17] Furthermore, the riverine system does not support any sensitive plant species within the Project Site, as vegetation within the Project Site is comprised of ruderal and non-native species, as mentioned above. Additionally, no wetland indicators (e.g., visible Ordinary High Water Mark [OHWM], bed and bank, soil surface cracks, hydrology, or hydrophytic vegetation) were observed in the vicinity of this feature or in any other part of the Project Site during the field survey, which was performed during the wet season. This feature is likely no longer present due to modification of the landscape during the last several decades of agricultural practices. Nevertheless, to avoid potential encroachment on the riverine system, the Project would include a 50-foot setback from the intermittent riverine system, and all Project construction and operational activities would be contained within the Project Site. No other sensitive natural communities were identified within the Project Site in the BRA. Therefore, the Project would not have a substantial adverse effect on any riparian habitats or other sensitive natural communities, and impacts would be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐

As described in Checklist Question 4.b, a riverine feature is mapped outside the northwestern corner of the Project Site. However, the USFWS NWI identifies this system as an intermittent system in which the substrate is usually exposed, and surface water is present for variable periods without detectable seasonal periodicity. This feature is likely no longer present due to modification of the landscape during the last several decades of agricultural practices. No other jurisdictional waters or wetlands were identified on-site during the field survey, and no riparian vegetation, hydrologic, or wetland indicators were observed in the vicinity of the riverine

[17] United States Fish and Wildlife Service, National Wetlands Inventory, https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed January 4, 2024.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

feature or in any other part of the Project Site. Therefore, the Project would not have a substantial adverse effect on State or federally protected wetlands, and impacts would be less than significant.

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?	☐	☒	☐	☐

Existing vegetation on the Project Site includes inactive agriculture/ruderal land and rubber rabbitbrush scrub that recolonized the Project Site after agricultural operations were discontinued. According to the BRA, the Project Site is not recognized as an important wildlife corridor or native wildlife nursery site by any regional or state agency or jurisdiction and is not considered critical to the ecological functioning of adjoining open space areas. However, the Project Site likely supports local movement patterns and provides food and cover resources for common wildlife species such as coyotes (*Canis latrans*). Small mammal burrows were present throughout the Project Site. Additionally, as described in Checklist Question 4.a, special-status and common avian species could nest/forage within the Project Site and adjacent areas. Therefore, impacts to nesting or migratory species could be potentially significant. With implementation of **MM BIO-1** through **MM BIO-6,** impacts would be reduced to less than significant.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, southern California black walnut, etc.)?	☐	☐	☒	☐

Existing vegetation on the Project Site includes inactive agriculture/ruderal land and rubber rabbitbrush scrub that recolonized the Project Site after agricultural operations were discontinued. Additionally, as further explained in Checklist Question 4.a, the western boundary of the Project Site contains a row of juniper trees. The Los Angeles County General Plan describes juniper woodland as an important habitat feature that supports multiple wildlife species in a concentrated area. However, the row of juniper trees on-site is not a natural aggregation of trees and therefore does not provide the benefits that a true woodland would and provides little habitat value to wildlife. Therefore, although the Project would remove one to three of these trees, the Project would not remove any natural aggregation of juniper trees. The Project Site does not contain any other oak or other unique native or protected trees. Therefore, impacts would be less than significant.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?				

The Project Site is not within a Wildflower Reserve Area, Significant Ecological Area, Specific Plan, Community Standard District, or Coastal Resource Area outlined in the Los Angeles County General Plan or the Los Angeles County Code of Ordinances. The nearest protected area is a SEA for Joshua Tree Woodlands, located approximately one mile east of the Project Site, which would not be impacted by the Project. According to the BRA, the Project Site does not contain oak trees; therefore, the Project would not conflict with the Los Angeles County Oak Tree Ordinance. Additionally, as described in the Project Description above, the Project would not conflict with the standards outlined in the Los Angeles County's Renewable Energy Ordinance. Furthermore, as described in Checklist Question 2.b, although the Project Site is within an Agricultural Resources Area designated by the AVAP, the Project would not seek to change the zoning for the Project Site such that agricultural uses could not continue upon decommissioning. Upon decommissioning the Project, the land could be reclaimed for agricultural production in accordance with all applicable local, State, and federal requirements and BMPs and in a manner consistent with the requirements of the Project Decommissioning Plan. Therefore, Project implementation would not conflict with any local policies or ordinances protecting biological resources, and no impact would occur.

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

The Project Site is located within the West Mojave Habitat Conservation Plan (WMHCP). The WMHCP is a habitat conservation plan adopted by the Bureau of Land Management (BLM) in 2006. However, the plan only applies to BLM public lands, as other agencies did not adopt the habitat conservation plan proposed in the WMHCP to cover their jurisdictions[18]. Therefore, the plan provisions have not been adopted by the County. Thus, the Project does not conflict with the provisions of the WMHCP. The Project Site is not located within any other adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Therefore, no impact would occur.

[18] Los Angeles County, Los Angeles County General Plan Update Draft EIR, 2014, page 5.4-6 and 5.4-118 https://planning.lacounty.gov/wp-content/uploads/2022/11/gp_2035_deir.pdf. Accessed January 4, 2024.

5. CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?	☐	☐	☐	☒

The findings discussed below are based, in part, on the Cultural Resources Identification Report (CRIR) prepared by Kleinfelder (see **Appendix D**).[19]

The Project Site is undeveloped and is generally surrounded by undeveloped land and some sporadic rural residences and small- to large-scale solar installations to the north and east. As stated in the CRIR, the Project Site was used for agriculture until approximately 2011 or 2012 and appears to have remained fallow land since then. Based on background research and review of historic maps of the Project Site, no historic buildings or structures were identified within the Project Site. Since the on-site agricultural development is from 2011 or 2012 and no buildings or structures were identified on-site, no historical resources pursuant to CEQA Guidelines Section 15064.5 exist on the Project Site. Therefore, the Project would not cause any adverse change in the significance of a historical resource. No impacts would occur.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	☐	☒	☐	☐

Kleinfelder conducted a record search at the South Central Coastal Information Center (SCCIC) on February 6, 2023 which identified two previously recorded cultural resources within 0.5-mile of the Project Site. In February 2023, the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search returned with negative findings. The pedestrian survey found one isolated chert flake (portion of sedimentary rock) on-site. The isolated flake lacks context with no associated materials, appears to have been displaced from the original location, and/or represents an isolated, singular event. Therefore, it is not eligible as a cultural resource under the California Register of Historic Resources (CRHR) or the National Regional of Historic Places (NRHP) under any criteria.

No previously recorded prehistoric or tribal resources were identified on the Project Site. Additionally, since no buildings, structures, or historic-era resources were identified within the Project Site, the Project Site is considered to have a low sensitivity for buried historic-era resources. However, the Project Site is near an intermittent drainage located approximately 0.23-mile east of the Project Site. The proximity to a water source along with the presence of the prehistoric isolated chert flake indicates prehistoric activity in the area. Therefore, the Project Site has a moderate sensitivity for buried pre-historic resources, and impacts would be potentially significant during Project construction and ground-disturbing activities.

To address potential impacts to archaeological resources during Project constriction, the Project would be required to implement **MM CUL-1** and **MM CUL-2**. With implementation of **MM CUL-1** and **MM CUL-2**, the Project's potential impacts archaeological resources would be reduced to less than significant.

[19] Kleinfelder, Cultural Resources Identification Report, June 2023. Appendix D of this IS/MND.

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

Mitigation Measures

MM CUL-1 Worker Environmental Awareness Program. Prior to the start of ground disturbance, the Permittee shall hire a qualified archaeologist ("Project Archaeologist") to provide the construction crew with on-site training on the proper procedures to follow if cultural resources are uncovered during the Project excavations, site preparation, or other related activities. This Worker Environmental Awareness Program (WEAP) shall include a comprehensive discussion of applicable laws and penalties under the law, samples or visuals of artifacts that might be found in the vicinity of the Project Site, a discussion of what such artifacts may look like when partially buried or wholly buried and then freshly exposed, a discussion of what prehistoric and historic-period archaeological deposits look like at the surface and when exposed during construction, and instruction that employees are to halt work in the vicinity of a discovery (within 100 feet). This information may be provided in an informational brochure that outlines reporting procedures in the event of a discovery and shall be provided to all individuals working on site.

MM CUL-2 Unanticipated Discovery of Cultural Resources. In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 100 feet of the find shall halt and the Project Archaeologist shall be contacted immediately to evaluate the resource. If the resource is determined by the Project Archaeologist to be prehistoric, a Native American Monitor(s) shall also be contacted to participate in the evaluation of the resource pursuant to MM TCR-5. If the Project Archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via Project redesign, the Project Archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the Project Archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The County shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

MM CUL-3 Cultural Resources Monitoring. The Project Archaeologist shall be onsite to monitor ground disturbing activities twice a week. Ground disturbing activities include clearing vegetation, grubbing, digging, pavement removal, grading, excavation, trenching, plowing, drilling, blasting, potholing/auguring, and stripping topsoil. The Project Archaeologist shall have the authority to increase or decrease the monitoring effort should the monitoring results indicate that a change is warranted. The Project Archaeologist shall consult with the Consulting Tribes (defined below) prior to

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
increasing or decreasing the monitoring schedule. Monitoring requirements shall end once ground disturbing activities are complete.				
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The Project Site does not include any unique geologic features, and Project implementation would not directly or indirectly destroy a unique geologic feature. The Project Site has been previously disturbed by paving and agricultural activities. While there are no known paleontological resources on the Project Site, undiscovered paleontological resources may be discovered and disturbed during ground-disturbing activities, and impacts may be potentially significant. To address potential impacts to paleontological resources during Project constriction, the Project would be required to implement **MM CUL-4**. With implementation of **MM CUL-4**, the Project's potential impacts paleontological resources would be reduced to less than significant.

Project operation is not anticipated to require ground-disturbing activities. Therefore, no impacts to paleontological resources are anticipated during Project operation.

MM CUL-4 Unanticipated Discovery of Paleontological Resources. Prior to start of ground disturbance, the construction crew shall participate in on-site training on the proper procedures to follow if paleontological resources are uncovered during the Project excavations, site preparation, or other related activities. This Worker Environmental Awareness Program (WEAP) shall include a comprehensive discussion of applicable laws and penalties under the law, samples or visuals of artifacts that might be found in the vicinity of the Project Site, a discussion of what paleontological resources may look like when partially buried or wholly buried and then freshly exposed, a discussion of what paleontological resources look like when exposed during construction, and instruction that employees are to halt work in the vicinity of a discovery (within 50 feet). This information may be provided in an informational brochure that outlines reporting procedures in the event of a discovery and should be provided to all individuals working on site.

In the event that paleontological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and a qualified paleontologist who meets the Society of Vertebrate Paleontology guidelines shall be contacted immediately to evaluate the resource. If the find is large enough to warrant further evaluation and/or extraction, then the following fossil "discovery" protocol shall be followed:

a) The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.

b) The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.

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

c) Any fossils recovered during mitigation should be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

Prior to the issuance of any building permit, the Applicant shall submit a letter to the County for the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no material was discovered.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

The California Health and Safety Code (HSC) Sections 7050.5, 7051, and 7054 collectively address the illegality of interference with human burial remains, as well as the disposition of Native American burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation and reburial procedures.

No human remains are known to be present on the Project Site. However, there is a possibility that human remains could be interred underneath the Project Site. Should human remains be encountered during Project construction, the Project would be required to implement **MM CUL-5**. With implementation of **MM CUL-5**, the Project's potential impacts to human remains would be reduced to less than significant.

MM CUL-5 Inadvertent Discovery of Human Remains. If human remains or funerary objects are encountered during construction, all ground disturbance activities within 100 feet of the discovery shall be suspended and the construction manager shall immediately notify the County coroner pursuant to State Health and Safety Code §7050.5. This state code shall be enforced for the duration of the Project. If the human remains are determined to be of Native American descent, the coroner shall notify the Native American Heritage Commission (NAHC). The NAHC shall identify and immediately notify the Most Likely Descendant (MLD) of the deceased Native American. Within 48 hours of being granted access to the site, the MLD shall complete the inspection of the site of the discovery and make recommendations to the Applicant/landowner for the treatment or disposition of the human remains and any associated funerary objects. All measures, as required by the County, shall be implemented under the supervision of the MLD and/or Tribal Monitor.

6. ENERGY

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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?	☐	☐	☒	☐

The Project would increase the demand for energy at the Project Site during construction. The energy needs during Project construction would be temporary and would not require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumption would be typical for that associated with the construction projects of this size. Thus, the Project's energy consumption during the construction phase would not be considered wasteful, inefficient, or unnecessary.

The Project would not require natural gas at the Project Site during operations. The Project does not include any permanent components that would significantly increase demand for existing sources of energy. The Project would develop a solar energy and BESS facility that would provide a new secure and reliable electricity supply, improve community infrastructure, and support sustainable electricity generation. Project development would provide a clean, reliable resource and include energy storage to help integrate renewable energy sources, reduce dependence on gas-fired generation, eliminate ocean water for cooling, reduce freshwater consumption, and reduce greenhouse gas (GHG) emissions and criteria air pollutant emissions.

The analysis of construction and operational energy consumption is based on CalEEMod version 2022.1.1.21 modeling results for the Project. The Project's estimated energy consumption is based primarily on CalEEMod's default setting for the County and consumption factors provided by SCE, who is the electricity provider for the Project Site. The results of the CalEEMod and energy consumption modeling are included in **Appendix E**. The amount of operational fuel consumption was estimated using CARB Emission Factor 2021 (EMFAC2021) computer program which provides projections for typical daily fuel from CalEEMod. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips. Energy consumption associated with the proposed Project is summarized in **Table 6: Project and Countywide Energy Consumption.**

Table 6: Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption[1,2]	Percentage of Countywide Consumption
Construction[4,5]			
Electricity Consumption			
Water[1]	11,452 kWh	68,484,956,280 kWh	<0.00002%
Fuel Consumption[3]			
Diesel	24,992 gallons	532,570,627 gallons	0.0047%
Gasoline	7,051 gallons	3,536,229,368 gallons	0.0002%

		Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Operations					
Electricity Consumption					
Area[1]	0 kWh		68,484,956,280 kWh	<0.00001%	
Water[1]	347 kWh			<0.00001%	
Total Electricity	270 kWh			<0.00001%	
Fuel Consumption[3]					
Diesel	93 gallons		532,570,627 gallons	0.00002%	
Gasoline	0 gallons		3,536,229,368 gallons	0.0000%	

Notes:
1. The Project increases in electricity consumption is compared with the total consumption in Los Angeles County in 2022.
2. The Project increases in automotive fuel consumption are compared with the Countywide fuel consumption (projected) in 2025 (start of construction).
3. Countywide fuel consumption is from the CARB EMFAC2021 model.
4. Construction fuel consumption is based equipment and load factors from California Emissions Estimator Model (CalEEMod version 2022.1.1.20).
5. The estimated construction fuel consumption is based on the Project's construction equipment list timing/phasing, and hours of duration for construction equipment, as well as vendor, hauling, and construction worker trips.

Refer to **Appendix E** for assumptions used in this analysis.

Construction-Related Energy Consumption

During construction, the Project would consume energy in three general forms: (1) the fuel consumed by construction vehicles and equipment; (2) electricity associated with the conveyance of water used for dust control and (3) bound energy in construction materials, such as asphalt, steel, concrete, and pipes. It should be noted that the construction activities would not consume natural gas.

Project construction is anticipated to be completed over a period of up to approximately seven months. Thus, energy consumed during Project construction would be temporary and would not represent a significant demand on energy resources.

Construction Transportation Energy Demand: Fossil fuels such as gasoline and diesel would be consumed during Project construction. Fuel consumed by construction equipment would be the primary energy resource expended over the course of construction. VMT associated with transportation of construction materials and construction worker commutes would also result in fuel consumption. Heavy-duty construction equipment associated with construction activities would primarily rely on diesel fuel. It is conservatively assumed that construction workers would travel to and from the Project Site throughout construction in gasoline-powered vehicles.

As shown in Table 6, a total of 24,992 gallons of gasoline and 7,051 gallons of diesel is estimated to be consumed during Project construction. This constitutes percent 0.0047 percent and 0.0002 percent of the County's typical annual gasoline and diesel consumption, respectively. However, this fuel consumption would be short-term and finite, only being consumed over the course of the seven-month construction period. Additionally, some incidental energy conservation would occur during construction through compliance with State requirements and through USEPA and CARB engine emissions standards. These engine emissions

standards require the use of more efficient engines in vehicles and equipment to encourage fuel efficiencies and reduce fuel consumption. Further, idling time of vehicles and equipment will be minimized to limit the amount of fuel consumption while no work is being completed. Therefore, Project construction activities would comply with existing energy standards with regard to transportation fuel consumption. As such, the demand for petroleum-based fuel during construction would not be considered wasteful, inefficient, or unnecessary. As such, the Project would have a less than significant impact as it relates to construction transportation energy demand.

Construction Electricity Demand: During construction of the Project, electricity would be consumed to supply and convey water for dust control. As shown in Table 6, a total of approximately 11,452 kWh electricity is anticipated to be consumed during Project construction. Electricity consumed during construction would result in a nominal increase (less than 0.00002 percent) in energy use in the County. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. As such, the demand for electricity during construction would not be considered wasteful, inefficient, or unnecessary. As such, the Project would have a less than significant impact as it relates to construction electricity demand.

Construction Material Energy Demand: The Project-related incremental increase in the use of energy bound in construction materials such as metal, concrete, and manufactured or processed materials would not substantially increase demand for energy compared to overall local and regional demand for construction materials. Additionally, it is noted that there are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar projects of this nature. Further, energy consumed to construct a renewable energy project to reduce the State's GHG emissions from energy would not be considered wasteful, inefficient, or unnecessary. As such, the Project would have a less than significant impact as it relates to material energy demand.

Construction Conclusion: As summarized above, energy consumed during construction would result in a nominal increase in energy use in the County. As such, Project construction would have a minimal effect on the local and regional energy supplies. It is noted that construction energy use is temporary and would cease upon completion of construction activities. There are no unusual Project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction energy consumption would not be inefficient, wasteful, or unnecessary, and impacts would be less than significant.

Operational-Related Energy Consumption

During Project operations, energy would be consumed for multiple purposes, including, but not limited to panel washing and maintenance, BESS HVAC units, and lighting.

Operational Transportation and Fuel Energy Demand: Table 6 provides an estimate of the annual fuel consumed by the Project vehicles traveling to and from the Project Site during operations. During operation, the Project is estimated to generate approximately 20 one-way trips per year for typical O&M activities such as maintenance-related visits and solar panel and inverter washing visits. As a result of these 20 trips per year generated by the Project, the Project would consume approximately 93 gallons of diesel, which represents a 0.00002 percent

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

of the County's diesel use. Additionally, the Project does not propose any unusual features that would result in excessive long-term operational fuel consumption. Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. Therefore, Project operations would not result in wasteful, inefficient, or unnecessary fuel consumption. As such, the Project would have a less than significant impact as it relates to transportation and fuel energy demand.

Energy Demand and Generation: During Project operation, the electricity usage for HVAC units, communications equipment, and other typical O&M activities would be minimal and would sufficiently offset by electricity produced by the Project. Additionally, the Project is anticipated to consume approximately 347 kWh for panel washing activities. As shown in Table 6, the Project's operational electricity consumption would constitute less than 0.00001 percent of the County's typical annual electricity consumption. The Project would not require additional energy capacity or supplies. Additionally, as a power-generating facility with solar PV and energy storage, the Project would generate energy that would ease stress on intensive peak or base period electricity demands. Furthermore, the Project would generate a significantly higher amount of energy that will consume.

The Project would provide the County and the State with additional renewable energy sources on previously disturbed land that would assist the State in complying with the Renewable Portfolio Standards (RPS) under Senate Bill (SB) 350 and SB 100. The increase in reliance of renewable energy resources further ensures that new development projects would not result in the waste of the finite energy resources. Therefore, the Project would not cause wasteful, inefficient, and unnecessary consumption of energy during Project operation, and impacts would be less than significant.

Operations Conclusion: As shown in **Table 6**, the Project's operational energy consumption would represent less than 0.00001 percent and 0.00002 percent of Countywide electricity and fuel consumption, respectively. Additionally, the Project would not result in a substantial increase in demand for transmission service, resulting in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. Therefore, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy during operations, and impacts would be less than significant.

Decommissioning Related Energy Consumption

At the end of the Project's operational term, the Applicant may determine that the Project Site should be decommissioned and deconstructed. However, due to the lack of available in-depth details on decommissioning at this time, as a worst-scenario analysis, it was assumed that the decommissioning phase would utilize the same amount of energy as the construction phase. As discussed above, impacts related to construction-related energy consumption would be less than significant. As such, energy impacts during Project decommissioning would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels.

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

The Project, which comprises the building of solar PV and BESS, would be part of a sustainable solution to enable increasing amounts of renewable energy-generating sources to be accessed. The County's General Plan and AVAP include the following guiding policies and implementing policies related to energy resources.

- LU 11.1 Encourage new development to employ sustainable energy practices, such as passive solar techniques and/or active solar technologies.
- Policy AQ 3.2: Reduce energy consumption in County operations by 20 percent by 2015.
- Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.
- Policy PS/F 6.8: Encourage projects that incorporate onsite renewable energy systems.
- Policy C/NR 12.1: Encourage the production and use of renewable energy resources.
- Policy ED 1.2: Encourage and foster the development of the renewable energy economic sectors.
- Goal COS 10: Diverse energy systems that utilize existing renewable or waste resources to meet future energy demands.
- Goal COS 13: Utility-scale energy production facilities for offsite use that reduce consumption of nonrenewable resources while minimizing potential impacts on natural resources and existing communities.
- Policy ED 1.11: Encourage the development of utility-scale renewable energy projects at appropriate locations and with appropriate standards to ensure that any negative impacts to local residents are sufficiently mitigated.

The Project would not develop structures or buildings, so the Project would not be required to comply with the policies regarding buildings meeting the State energy efficiency standards. No conflicts with renewable energy or energy efficiency plans would occur. The applicable State plans and policies for renewable energy and energy efficiency include SB 350 and SB 100. As discussed under Checklist Question 6.a above, the Project would provide the County and the State with additional renewable energy sources. Additionally, the Project would support the State's RPS goals of achieving at least 60 percent renewable energy by 2030. Therefore, the Project is supportive of the County's policies and State's goals and would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

7. GEOLOGY AND SOILS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

The following geology and soils analysis is primarily based on the Geotechnical Engineering Investigation prepared by Salem Engineering Group, Inc., for the Project (see **Appendix F**).[20]

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those that have shown evidence of movement within the past 11,000 years (i.e., during the Holocene Epoch). Potentially active faults are those that have shown evidence of movement between 11,000 and 1.6 million years ago (i.e., during the Pleistocene Epoch). Inactive faults are those that have not exhibited displacement younger than 1.6 million years before the present. Additionally, there are blind thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of blind thrust faults is usually not known until they produce an earthquake.

The seismically active region of southern California is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. The CGS has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. Therefore, impacts related to rupture of a known earthquake fault would be less than significant.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The Project Site is located within the seismically active Southern California region. For these reasons, the Project Site may be subject to shaking during earthquake events. The level of ground shaking that would be experienced at the Project Site from active or potentially active faults or blind thrust faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, topography, and geology. The closest

[20] Salem Engineering Group, Inc., Geotechnical Engineering Investigation, November 2023. Appendix F of this IS/MND.

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

known active fault to the Project Site is the San Andreas fault, located approximately 5.4 miles south of the Project Site, which could produce secondary effects from ground shaking.

Project construction would be required to adhere to applicable regulations in the 2022 California Building Code and County Building Code to minimize seismic-related hazards, because of the Project Site's location in seismically active southern California. Therefore, with compliance with applicable regulations, Project impacts related to seismic ground shaking would be less than significant.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?	☐	☐	☒	☐

Soil liquefaction is a state of soil particles suspension caused by a complete loss of strength when the effective stress drops to zero. Liquefaction normally occurs under saturated conditions in soils such as sand in which the strength is purely frictional. Primary factors that trigger liquefaction are: moderate to strong ground shaking (seismic source), relatively clean, loose granular soils (primarily poorly graded sands and silty sands), and saturated soil conditions (shallow groundwater). Due to the increasing overburden pressure with depth, liquefaction of granular soils is generally limited to the upper 50 feet of a soil profile.

In general, the soils encountered during the Geotechnical Engineering Investigation conducted for the Project Site included silty sands to depths of approximately 10 to 15 feet below site grade (BSG) underlain by poorly graded sands with silt to the maximum depth explored of 21.5 feet BSG. Groundwater was not encountered to the depth of exploration conducted on the Project Site. Based on available water well data, historic groundwater depths are greater than 100 feet BSG. Based on the historic depth to groundwater (greater than 100 feet BSG), liquefaction/seismic settlement is not a concern to Project Site development.

Lateral spreading is a phenomenon in which soils move laterally during seismic shaking and is often associated with liquefaction. The amount of movement depends on the soil strength, duration and intensity of seismic shaking, topography, and free face geometry. Due to the relatively flat Project Site topography, the likelihood of lateral spreading is low.

Based on the factors described above, Project impacts associated with seismic-related ground failure, including liquefaction and lateral spreading, would be less than significant.

iv) Landslides?	☐	☐	☐	☒

There are no known landslides at the Project Site, or is the Project Site in the path of any known or potential landslides. The Project Site is relatively flat, ranging from approximately 2,821 to 2,825 feet above mean sea level. Further, the Project Site is not in immediate proximity to any mountains or steep slopes. As such, there is no potential for landslides to occur on or near the Project Site, and the Project would not expose people or structures to potential substantial adverse effects involving landslides. No impact would occur.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

During construction, the Project Site would be subject to ground-disturbing activities. These activities would expose soils for a limited time, allowing for possible erosion. Since Project construction would require greater than one acre of ground-disturbing activities, the Applicant would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit. The SWPPP incorporates BMPs in accordance with the California Stormwater Best Management Practices Handbook, to control erosion and to protect the quality of surface water runoff during Project construction.

With respect to soil erosion during Project operations, the potential is relatively low due to the fact that the Project Site would be entirely developed and landscaped. The use of vegetation and groundcover would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and on-site soils. Moreover, with implementation of operational BMPs per the County's Standard Urban Stormwater Management Plan (SUSMP), erosion of any exposed soil would be controlled, and associated impacts would be less than significant.

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?	☐	☐	☒	☐

As stated in Checklist Questions 7.a)iii) and -iv), impacts related to liquefaction, lateral spreading, and landslides are considered less than significant.

Subsidence is commonly caused by the removal of subsurface water and underground mining. According to the United States Geologic Survey (USGS) Areas of Land Subsidence in California Map, there is no groundwater pumping, peat loss, or oil extraction at or near the Project Site.[21] The frames of solar modules would be mounted on steel posts, which would be driven or screwed into the ground to a depth between 8 and 10 feet. The Project does not propose any mining activities or removal of subsurface water. Additionally, groundwater was not encountered to the maximum depth of exploration of 21.5 BSG during exploration. The Project would be designed and constructed in accordance with the 2022 California Building Code, as enforced by the County, which includes building foundation requirements appropriate to site-specific conditions. With compliance with the California Building Code, impacts related to unstable geologic units or soils would be less than significant.

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?	☐	☐	☒	☐

Subsurface soils within the Project Site include silty sands to depths of approximately 10 to 15 feet BSG underlain by poorly graded sands with silt to the maximum depth explored of 21.5 feet BSG. An expansion

[21] United States Geologic Survey, Areas of Land Subsidence in California Map, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html. Accessed January 4, 2024.

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

index test indicated that the soils have very low expansion potential. With compliance with the California Building Code, impacts related to unstable geologic units or soils would be less than significant.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

The Project would be unmanned and does not propose to use septic tanks or alternative wastewater disposal systems. Temporary sanitary systems will be brought in during construction and removed when the Project is operational. Therefore, the Project would not result in impacts related to the use of septic tanks or alternative wastewater disposal systems.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?	☐	☐	☐	☒

As discussed in Checklist Question 7.a.iv, the Project Site is relatively flat and is not in immediate proximity to any hillsides or steep slopes. Therefore, it would not conflict with County ordinances related to hillside management and design standards, and no impact would occur.

8. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

The following GHG analysis is primarily based on the Greenhouse Gas Emissions Technical Memorandum prepared by Kimley-Horn (see **Appendix G**).[22] The AVAQMD's CEQA and Federal Conformity Guidelines identifies both annual and daily construction significant thresholds for GHG emissions of 100,000 $MTCO_2e$ and 548,000 pounds CO_2e, respectively.[23] The significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For the Project, the AVAQMD's numeric thresholds are used as the significance thresholds in addition to a qualitative discussion of the Project's compliance with applicable plans, policies, regulations, and requirements.

Project-related GHG emissions are not confined to a particular air basin; instead, GHG emissions are dispersed worldwide. No single project is large enough to result in a measurable increase in global concentration of GHG emissions. Therefore, impacts identified below are not project-specific impacts to global climate change, but the Project's contribution to this cumulative impact. The Project would result in direct and indirect GHG emissions. Direct GHG emissions include emissions from construction and decommissioning activities, and mobile sources, while indirect sources include emissions from energy consumption and water demand. The California Emissions Estimator Model (CalEEMod), version 2022.1.1.21, was used to estimate direct and indirect Project-related GHG emissions.

Construction

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by Project construction equipment is depicted in **Table 7: Construction-Related Greenhouse Gas Emissions**.

Table 7: Construction-Related Greenhouse Gas Emissions

Category	**$MTCO_2e$**
Construction	329
Water Usage[1]	2.41
Total Construction	331.41
30-Year Amortized Construction	11
Note:	

[22] Kimley-Horn and Associates, Inc., Greenhouse Gas Emissions Technical Memorandum, October 2024. Appendix G of this IS/MND.
[23] Antelope Valley Air Quality Management District, CEQA and Federal Conformity Guidelines, August 2016, Table 6: Significant Emissions Thresholds, https://www.avaqmd.ca.gov/files/e5b34d385/AV+CEQA+Guides+2016.pdf. Accessed April 10, 2025.

1. Construction water usage emissions are based on an anticipated consumption of 13 (AF) during construction. During construction, water is anticipated to be supplied from an off-site source.

Source: CalEEMod version 2022.1.1.21. Refer to **Appendix G** for model outputs.

As shown in Table 7, the Project would result in the generation of approximately 331.4 metric tons of CO_2e ($MTCO_2e$) over the course of construction. Construction GHG emissions are typically summed and amortized over a 30-year period, then added to the operational emissions. The amortized Project construction emissions would be 11 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Operations

Operational or long-term emissions occur over the life of the Project. Operational emissions associated with the Project would include those generated from panel washing, maintenance, and the BESS. Total GHG emissions from both construction and operation associated with the Project are summarized in **Table 8: Project Greenhouse Gas Emissions**.

Table 8: Project Greenhouse Gas Emissions

Emissions Source	Annual $MTCO_2e$	Annual CO_2e (ton)	Daily CO_2e (pounds)
Construction	11	12.2	7,917
Operations			
Area Source	19.8	21.8	242.0
Energy	0.0	0.0	0.0
Mobile	56.8	62.6	481
Waste	0.0	0.0	0.0
Water	0.0	0.0	0.0
Decommissioning	11	12.2	7,917
Total Project Emissions	***98.7***	***108.8***	***16,557***
AVAQMD Threshold	--	*100,000*	*548,000*
Exceeds Threshold?	**--**	**No**	**No**

Source: CalEEMod version 2022.1.1.21 Refer to **Appendix G** for model outputs (Annual $MTCO_2e$ and pounds per day).
1 $MTCO_2e$ = 1.10231 tons.

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

Decommissioning

At the end of the Project's operational term, the Applicant may determine that the Project Site should be decommissioned and deconstructed. The Applicant will work with the County to ensure decommissioning of the Project after its productive lifetime complies with all applicable local, State, and federal requirements BMPs. The Project would include BMPs to ensure the collection and recycling of modules and to avoid the potential for modules to be disposed of as municipal waste.

Equipment would be de-energized prior to removal, salvaged (where possible), placed in appropriate shipping containers, and secured in a truck transport trailer for shipment off site to be recycled or disposed of at an appropriately licensed disposal facility. Site infrastructure would be removed, including the fences and the concrete pads that may support the inverters, transformers, and related equipment. The exterior fencing and gates would be removed, and materials would be recycled to the extent feasible. Project roads would be restored to their pre-construction condition to the extent feasible unless the landowner elects to retain the improved roads for access throughout the property. The area would be thoroughly cleaned, and all debris removed. A collection and recycling program would be utilized to promote recycling of Project components and minimized disposal in landfills. Decommissioning is expected to take one year or less, using similar equipment and an equal or lower number of workers on a daily basis. As a worst-scenario analysis, it was assumed that GHG emissions related to decommissioning would be equal to the GHG emissions related to construction. This is a conservative (higher) estimate due to GHG emissions from electricity and vehicles are likely to be much lower 30 years in the future due to the continued implementation of existing regulations, plans, and policies.

Total Project-Related Sources of Greenhouse Gas Emissions

As shown in Table 8, the Project would generate approximately 108.8 tons of CO_2e (98.7 $MTCO_2e$) per year and approximately 16,557 pounds per day of CO_2e from construction, operations, and decommissioning. Therefore, the proposed Project's total GHG emissions would be below the AVAQMD thresholds of 100,000 tons CO_2e per year and 548,000 pounds CO_2e per day. Further, the Project is a solar generation and energy storage facility, which would meet regional and federal ambient air quality standards and offset GHG emissions that would otherwise have resulted from producing an equivalent amount of electricity from fossil fuel-fired electric generators. Thus, Project-related emissions would have a less than significant impact related to generation of GHG emissions.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Consistency with the Antelope Valley Area Plan

The AVAP includes goals and policies that all new projects are required to comply with, as applicable. Project consistency with the AVAP goals and policies is discussed in **Table 9: Project Consistency with the Antelope Valley Area Plan**. As depicted in Table 9, the Project would be consistent with the AVAP, and impacts would be less than significant.

Table 9: Project Consistency with the Antelope Valley Area Plan

Antelope Valley Area Plan Policy	Project Consistency
Policy LU 5.1: Ensure that development is consistent with the sustainable Communities Strategy adopted in 2012, an element of the Regional Transportation Plan developed by the Southern California Association of Governments.	**Consistent.** The Project is a solar generation and energy storage facility, which would meet regional and federal ambient air quality standards and offset GHG emissions that would otherwise have resulted from producing an equivalent amount of electricity from fossil fuel-fired electric generators. Therefore, the Project would be consistent with this policy.
Policy COS 9: Promote recycling and composting throughout the Antelope Valley to reduce air quality impacts from waste disposal activities and landfill operations.	**Consistent.** The Project would include BMPs to ensure the collection and recycling of modules upon decommissioning to avoid the potential for modules to be disposed of as municipal waste. Therefore, the Project would be consistent with this policy.
Policy COS 10.1: Encourage the use of non-hazardous materials in all individual renewable energy systems and all utility-scale renewable energy production facilities to prevent the leaching of potentially dangerous run-off materials into the soil and watershed**.**	**Consistent.** The proposed Project is a solar PV and energy storage facility that would utilize non-hazardous materials. Therefore, the Project would be consistent with this policy.
Policy COS 10.5: Encourage the development of emerging energy technologies, such as "solar roads".	**Consistent.** The Project would encourage the development of solar generation and energy storage facilities in Los Angeles County. The proposed Project would promote access to clean energy and displace fossil fuel energy production. Therefore, the Project would be consistent with this policy.
Policy COS 13.3: Require all utility-scale renewable energy production facilities to develop and implement a decommissioning plan, with full and appropriate financial guarantee instruments that will restore the full site to its natural state upon complete discontinuance of operations and will restore non-operational portions of the site while the remainder continues operating.	**Consistent.** At the end of the operation of the proposed Project, the Applicant may determine that the Project Site should be decommissioned and deconstructed. The area would be thoroughly cleaned, and all debris removed. A collection and recycling program would be utilized to promote recycling of Project components and minimized disposal in landfills. Therefore, the Project would be consistent with this policy.
Source: Antelope Valley Area Plan, June 2015.	

Consistency with the County's 2015 Community Climate Action Plan (CCAP)

The 2015 County Community Climate Action Plan (CCAP) describes the County's plan for reducing GHG emissions. Project consistency with the CCAP goals and policies is discussed in **Table 10: Project**

Consistency with the Unincorporated Los Angeles County Community Climate Action Plan (CCAP). As depicted in Table 10, the Project would be consistent with the CCAP, and impacts would be less than significant.

Table 10: Project Consistency with the Unincorporated Los Angeles County Community Climate Action Plan (CCAP)

Unincorporated Los Angeles County Community Climate Action Plan (CCAP)	Project Consistency
BE-3 Solar Installation: Promote and incentivize solar installation for new and existing homes, commercial buildings, carports, and parking areas, water heaters, and warehouses.	**Consistent.** The Project would provide a solar generation and energy storage facility. The proposed Project would promote access to clean energy and help the region meet its RPS goals. Therefore, the Project would be consistent with this policy.
LUT-9 Idling Reduction Goal: Encourage idling limits of 3 minutes for heavy-duty construction equipment, as feasible within manufacturer's specifications.	**Consistent.** The Project may include occasional light- and heavy-duty truck uses for operations and maintenance activities. Truck use associated with the Project would be required to comply with all CARB regulations, including the LCFS and newer engine standards. The Project would produce little waste during Project construction and operations. Therefore, the proposed Project would be consistent with this policy.
LU 12 Electrify Construction and Landscaping Equipment Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	**Consistent.** The proposed Project would utilize electric equipment wherever feasible during Project construction, operations, and maintenance. Therefore, the proposed Project would be consistent with this policy.
Source: Unincorporated Los Angeles County Community Climate Action Plan (CCAP)	

Consistency with the 2017 and 2022 CARB Scoping Plan

The 2017 and 2022 Scoping Plan identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Provided in **Table 11: Consistency with the 2017 and 2022 Scoping Plan**, is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the 2017 and 2022 Scoping Plan. As shown, the Project would be consistent with the 2017 and 2022 CARB Scoping Plan and potential impacts would be less than significant in this regard.

Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

Table 11: Consistency with the 2017 and 2022 Scoping Plan

Actions and Strategies	Project Consistency Analysis
2017 Scoping Plan	
SB 350	
Achieve a 50 percent Renewables Portfolio Standard (RPS) by 2030, with a doubling of energy efficiency savings by 2030.	**Consistent.** The Project includes the construction and operation of a renewable energy generation and storage facility. Therefore, the Project would help the State achieve the RPS goals. As such, the Project would be consistent with SB 350 (and SB 100).
Low Carbon Fuel Standard (LCFS)	
Increase stringency of carbon fuel standards; reduce the carbon intensity of fuels by 18 percent by 2030, which is up from 10 percent in 2020.	**Consistent.** This standard applies to all vehicle fuels sold in California including those that could be used in vehicles associated with the Project. The Project would be consistent with this goal.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy	
Reduce the GHG emissions of methane and hydrofluorocarbons by 40 percent below the 2013 levels by 2030. Furthermore, reduce the emissions of black carbon by 50 percent below the 2013 levels by the year 2030.	**Consistent.** As a solar renewable energy project, the Project would not emit a large amount of CH_4 (methane) emissions. Furthermore, the Project would comply with all applicable CARB and AVAQMD hydrofluorocarbon regulations. As such, the Project would be consistent with the SLCP reduction strategy.
Post-2020 Cap and Trade Programs	
The Cap-and-Trade Program will reduce greenhouse gas (GHG) emissions from major sources (covered entities) by setting a firm cap on statewide GHG emissions while employing market mechanisms to cost-effectively achieve the emission-reduction goals.	**Not Applicable.** As shown in **Table 3**, the Project is estimated to generate approximately 98.7 $MTCO_2e$ per year, which is below the 25,000 $MTCO_2e$ per year Cap-and-Trade screening level. Therefore, this goal is not applicable to the Project..
2022 Scoping Plan	
AB 1279	
Assembly Bill (AB) 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon	**Consistent.** As a solar renewable project, the proposed Project would promote renewable energy production and would generate less than significant GHG emissions from Project construction and operations. Community and utility-scale solar project with BESS will help the region and State meet its RPS goals and ultimately carbon neutrality. The Project would be consistent with this goal.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
capture, utilization, and storage (CCUS) technologies.				
SB 1020				
SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target of 2045 to 2035.	**Consistent.** As a solar renewable energy project, the Project would promote renewable energy production. The Project brings zero carbon energy to the regional supply grid. The Project would be consistent with this goal.			

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project is consistent with applicable plans, policies, regulations and GHG reduction actions/strategies, such as those outlined in the AVAP, CCAP, and 2017 and 2022 Scoping Plan Update, including State laws listed above. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Thus, the Project would not make a cumulatively considerable contribution to significant cumulative climate change impacts, and impacts would be less than significant.

9. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	☐	☐	☒	☐

The following hazards and hazardous materials analysis is primarily based on the Phase I Environmental Site Assessment (ESA) prepared by HEI Corporation (see **Appendix H**).[24] Construction would involve short-term use of hazardous substances such as fuels, lubricants, adhesives, and solvents. The potential risk associated with the accidental discharge during use and storage of such construction-related hazardous materials is considered low because the use, storage, transport, and disposal of hazardous materials used in construction of the facility would be carried out in accordance with federal, state, and County regulations. These regulations include those set forth by the Los Angeles County Department of Environmental Health, Cal/OSHA, the California Accidental Release Prevention (CalARP) Program, the California HSC, and the USEPA Hazardous Waste Control Act. Additionally, the Project would implement BMPs pursuant to the NPDES Construction General Permit. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls. Safety Data Sheets (SDSs) for all applicable materials present on the Project Site would be made readily available to personnel as required by the Los Angeles County Department of Environmental Health. During construction, non-hazardous construction debris would be generated and disposed of in local landfills. Sanitary waste would be managed using portable toilets, with waste being disposed of at approved sites.

Underground electrical conductors would be installed in trenches at a depth in compliance with the National Electric Code. The conductors would be buried in either a PVC conduit or equivalent. This may include preparing a Business Emergency Contingency Plan and securing a Certified Unified Program Agency (CUPA) Permit for hazardous materials handling and/or hazardous waste generation, as required by the Los Angeles County Department of Environmental Health.

Operation of the Project would include limited chemical use such as lithium ion in the battery structures. The Project is designed to comply with the Los Angeles County Code of Ordinances and Los Angeles County Department of Environmental Health requirements, and all materials would be used in stable applications and contained in accordance with applicable regulatory requirements, which include the Hazardous Materials Transportation Act, International Fire Code, and CCR Titles 22 and 27. The BESS would include redundant safety measures, such as hydrogen detection, active ventilation, fire detection and remote shutdown, fireproof insulation, and internal fire suppression technology. The BESS will be designed to comply with all applicable codes in Chapter 12 of the County of Los Angeles Fire Code as well as Energy Storage Standard UL 9540 and UL 9540a. Following compliance with the applicable regulations, impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	☐	☐	☒	☐

[24] HEI Corporation, Phase I Environmental Site Assessment, July 27, 2022. Appendix H of this IS/MND.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

According to the Phase I ESA, there are no recognized environmental conditions associated with the Project Site. Therefore, it is unlikely that development of the Project Site would result in the release of hazardous materials into the environment. See also the discussion in Question 9.a, above, regarding the control of hazardous substances used during construction and operation. Impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive lands?	☐	☐	☒	☐

Nearby sensitive uses include residences south of the Project Site, with the closest one located adjacent to the Project Site. In addition, there are no existing or proposed schools within one-quarter mile of the Project Site. The nearest school is Lancaster High School approximately 20 miles southeast of the Project Site in the City of Lancaster. As described in Checklist Question 9.a, Project operations would involve minimal chemical use and would be required to comply with regional, State, and federal regulations. Furthermore, as there are no existing structures on-site, the Project Site does not pose any hazards related to lead or asbestos. Therefore, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing proposed school. Impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

According to the Phase I ESA, the Project Site is not located on a known site or in the vicinity of a known site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the Project would result in no impacts associated with hazardous materials sites.

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

There are no public airport or public use airports within two miles of the Project Site. The nearest airport is Lloyd's Landing Airport, a private airport located approximately 15 miles northeast of the Project Site in Kern County. The nearest public or public use airport is the Mountain Valley Airport located approximately 23 miles north of the Project Site in Kern County. Therefore, the Project Site is not located within an airport land use plan or within two miles of a public airport or public use airport, and no impact would occur.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Regional access to the Project Site would be provided via SR 138, which is identified as a Primary Disaster Route (Freeway) in the County.[25] Project-related construction activities could temporarily impact street access and traffic flow due to roadway improvements and potential extension of construction activities into the rights-of-way for utility connections, resulting in temporary lane closures. However, Project construction would not require the complete closure of any public streets during construction. Furthermore, signage and flag crews would direct the flow of traffic with the lane closure. Temporary construction activities would not impede use of the streets for emergencies or access for emergency response vehicles. The Project would not interfere with protocol identified in the Los Angeles County Operational Area Emergency Response Plan.[26] Further, the Project design and Project Site access would be reviewed by the LACFD and the Los Angeles County Sheriff's Department (LACSD) to ensure that emergency access would be maintained. Project operations would require minimal traffic that would not impact use of the streets for emergencies or access for emergency response vehicles. Therefore, the Project would not conflict with the County's adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:				
i) within a high fire hazard area with inadequate access?	☐	☐	☒	☐

According to the State of California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone (FHSZ) Map, the Project Site is located in a Local Responsibility Area (LRA) and is not within a Very High FHSZ.[27,28] Project design and Project Site access would adhere to LACFD regulations. Therefore, the Project would not expose people or structures, either directly or indirectly, to a significance risk of loss, injury, or death involving wildland fires because the Project is located within a fire hazard severity area with inadequate access, and impacts would be less than significant.

ii) within an area with inadequate water and pressure to meet fire flow standards?	☐	☐	☒	☐

As part of the County plan review process, the LACFD has requested that a 10,000-gallon water storage tank be kept on-site during Project operation. As no existing infrastructure adjacent to the Project Site would

[25] Los Angeles County Department of Public Works, Disaster Routes with Road District North Los Angeles County, 2012, https://pw.lacounty.gov/dsg/disasterroutes/map/disaster_rdm-North.pdf. Accessed January 4, 2024.
[26] Los Angeles County, Operational Area Emergency Response Plan, 2012, https://ceo.lacounty.gov/wp-content/uploads/2019/12/OAERP-Approved-Adopted-Version-6-19-2012.pdf. Accessed January 4, 2024.
[27] California Department of Forestry and Fire Protection (CAL FIRE), State Responsibility Area Fire Hazard Severity Zones, 2023, https://osfm.fire.ca.gov/media/1hxhnkbu/fhsz_county_sra_11x17_2022_losangeles_2.pdf. Accessed January 4, 2024.
[28] CAL FIRE, Los Angeles County Draft Fire Hazard Severity Zones in LRA, 2011, https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf. Accessed January 4, 2024.

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

require water and pressure fire flow standards, and with inclusion of the 10,000 gallon water storage tank, impacts would be less than significant.

iii) within proximity to land uses that have the potential for dangerous fire hazard?	☐	☐	☐	☒

As described in Checklist Question 9.g.i, the Project Site and surrounding area is not within a Very High FHSZ. No impacts would occur.

h) Does the proposed use constitute a potentially dangerous fire hazard?	☐	☐	☒	☐

The Project would construct a solar PV facility and BESS. Project construction activities would be consistent with other construction activities in the region and would not represent an increased fire risk. All construction vehicles and equipment would comply with applicable regulations to limit the potential for malfunction.

Operation of the proposed BESS could potentially cause a fire hazard. The Project would install redundant safety measures, such as hydrogen detection, active ventilation, fire detection and remote shutdown, fireproof insulation, and internal fire suppression technology. Further, pursuant to Los Angeles County Code of Ordinances Title 32, the Project would be required to comply with the California Fire Code. The Project would also be required to comply with the AVAP Policies PS 1.1 through 1.4 and PS 7.1 through 7.3, which require implementation of fire prevention measures, compliance with the California Fire Code, and provision of adequate emergency services and access. Equipment associated with the Project such as transformers, capacitors, electric transmission lines, vehicles, and gas- or electric-powered small hand tools may be potential sources of ignition during construction and operation and maintenance. To address potential fire risks, the Project would comply with the 2022 California Fire Code, 2021 National Fire Code, and 2021 International Fire Code. These regulations implement state-of-the-art development and performance standards that ensure the safe installation, operations, and maintenance of utility scale BESS. The Project would also implement fire and safety features including hydrogen detection, active ventilation, fire detection and remote shutdown, fireproof insulation, and internal fire suppression technology. Furthermore, the Project Site would be serviced by an on-site access road, which would be designed in accordance with LACFD requirements and accessed by operation and maintenance staff and emergency responders in the event of an emergency. With compliance to the California Fire Code and the AVAP, the Project would not constitute a potentially dangerous fire hazard, and impacts would be less than significant.

Module Level: The first priority in fire safety is to prevent an event from ever occurring and limit the extent of that fire if it does occur. Pursuant to the National and International Fire Codes, the voltages, currents, and temperatures of battery modules would be required to be monitored and controlled 24 hours 7 days a week to ensure every cell remains within its safe operating parameters. These monitoring and control systems are required to transmit an alarm signal if potentially hazardous temperatures or other conditions such as short circuits, over voltage or under voltage, are detected. If a module-level system failure is detected, the system automatically controls and isolates individual modules from the rest of the system preventing the conditions that could lead to an event. Furthermore, battery manufacturers must prove that battery modules, if they catch fire, will not cause a fire to propagate to other modules, racks, or other enclosures. As part of this process, manufacturers must show that their batteries can pass rigorous UL 1973 and UL 9540A testing and certification. This testing includes demonstration of adequate system controls and alarms, separations between

equipment, protections such as fire-retardant barriers and coatings, fire suppression systems, and ventilation systems to limit failure to a single battery module.

Container Level: The National and International Fire Codes contain safety standards for construction of battery enclosures include: mounting, elevation of enclosures from the ground, materials, fire resistant barriers as well as requirements addressing insulation, wiring, switches, transformers, spacing and grounding; safety standards for performance, such as tests for temperature, volatility, impact, overload of switches, and an impact drop test; as well as standards for manufacturing, ratings, markings, and instruction manuals. In addition to the many individual standards referenced, a Failure Mode and Effects Analysis (FMEA) must be performed for each system enclosure and requires a test to ensure safe compatibility of the system's parts. The Project would also be equipped with integrated fire and safety systems, such as air cooling/conditioning systems, deflagration, gas-ventilation, gas, heat and smoke detection and alarms, and fire extinguishing and suppression systems within each container.

Site Plan Level: The Project Site layout is designed for operational safety pursuant to California Fire Code requirements, including fire access routes, setbacks, 10,000-gallon water tank for fire department use only, and fire-resistant perimeter walls.

Operational Level: The Project would obtain an operational permit and would be operated in accordance with the California Fire Code's standards for commissioning, inspection, repair, and decommissioning. This will include the creation and implementation of an Emergency Response Plan as required by applicable law that will govern coordination and response to a fire emergency at the Project Site.

Compliance with the 2022 California Fire Code, 2021 National Fire Code, and 2021 International Fire Code, as well as inclusion of the Project's fire and safety features, would reduce the potential for a fire event. Implementation of these safety measures would reduce fire risk, and impacts would be less than significant.

10. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 groundwater quality?	☐	☐	☒	☐

The following hydrology and water quality analysis is primarily based on the Onsite and Offsite Drainage Report (Drainage Report) prepared by Kimley-Horn (see **Appendix I**).[29] The Project would be required to obtain a NPDES General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities. Compliance with the General Construction Permit requires the development of a SWPPP by a qualified SWPPP developer, the elimination or reduction of non-stormwater discharge off site into storm drainage systems or other water bodies, and the implementation of BMPs throughout the Project construction period. Stormwater BMPs would be required to limit erosion, minimize sedimentation, and control stormwater runoff water quality during Project construction activities. The SWPPP requires a description of the Project Site; identification of sources of sediment and other pollutants that may affect the quality of stormwater discharges; and a list of BMPs to provide sediment and erosion control, waste handling measures, and non-stormwater management. The specific BMPs that would be implemented with the Project would be identified during development of the SWPPP, which would occur concurrently with final Project design and be completed prior to construction. Typical construction BMPs include, but are not limited to, watering soil, soil cover of inactive areas, gravel bags, and fiber rolls. Compliance with the SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would exceed the standards considered acceptable by the Lahontan Regional Water Quality Control Board (LRWQCB) or other regulatory agencies.

Maintenance of the Project would include cleaning, inspections, drive motor repair, tracker repair, electrical connection repair, and panel replacement. Cleaning of the solar panels is expected to be conducted one to four times per year, and water used would not contain any cleaning agents or other additives. No on-site operations and maintenance buildings are proposed, and all facilities would be unmanned. Therefore, the Project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the projects may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

The Project would obtain construction and operational water by purchasing it from a local purveyor. The Project Site is located within the Antelope Valley Groundwater Basin, which is managed by the Antelope Valley Regional Water Management Group that includes 11 public agencies such as the Antelope Valley-East Kern Water Agency (AVEKWA), City of Palmdale, City of Lancaster, Littlerock Creek Irrigation District, Palmdale Water District, Quartz Hill Water District, and Rosamond Community Services District. The total

[29] Kimley-Horn and Associates, Inc., Onsite and Offsite Drainage Report, September 2024. Appendix I this IS/MND.

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

storage capacity is estimated at 68 million to 70 million AF.[30] Natural recharge is estimated at approximately 29,000 to 58,000 AF per year with an annual extraction of approximately 130,000 AF.[31,32] The primary source of recharge to the groundwater basin is runoff from surrounding mountain ranges.

Water services to the Project Site are provided by AVEKWA. AVEKWA obtains potable water from groundwater and imported water, which are sourced from the Antelope Valley Groundwater Basin and the State Water Project, respectively. The Antelope Valley Groundwater Basin was adjudicated in 2015 per the Judgment and Physical Solution for the Antelope Valley Groundwater Adjudication (Judgment), which governs most groundwater pumping in the AVEKWA service area. The Judgement stipulated production rights to each party, and other methods to access additional groundwater rights, such as from imported water return flows. AVEKWA's customers have 12,084 acre-feet per year (AFY) of production rights and have received roughly 12,000 AFY of return flow rights since 2016.[33]

Construction and operational water would be provided by AVEKWA. Water demand during construction would be trucked in and is estimated at 13 AF. Operational water use would be small, estimated at approximately 0.2 AF per year or less. The small amount of water to be used and the large amount of permeable surface within the Project Site would not deplete groundwater supplies or interfere substantially with groundwater recharge such that a net deficit in aquifer volume or a lowering of the local groundwater table level would result. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; 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, amount, or depth 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?	☐	☐	☒	☐

[30] Antelope Valley Regional Water Management Group, Antelope Valley Integrated Regional Water Management Plan, 2019, page 2-28, https://pw.lacounty.gov/wwd/avirwmp/docs/finalplan/2019%20Final%20AV%20IRWMP.pdf. Accessed January 5, 2024.
[31] United States Geological Survey, Water-Level Studies in the Antelope Valley and Fremont Valley Groundwater Basins, https://ca.water.usgs.gov/projects/antelope-valley/antelope-valley-study-area.html, Accessed January 5, 2024.
[32] Antelope Valley Regional Water Management Group. Antelope Valley Integrated Regional Water Management Plan, page 2-29.
[33] Antelope Valley-East Kern Water Agency, 2020 Urban Water Management Plan, 2021, https://www.avek.org/files/f2739f83e/AVEK+2020+UWMP_FINAL.pdf. Accessed March 25, 2025.

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

As previously mentioned in Checklist Question 10.a, the Project would not result in substantial erosion or siltation, as BMPs would be implemented during construction in compliance with the SWPPP and the General Construction Permit issued for the Project, which would ensure that erosion and siltation do not result in any off-site water quality impacts. Los Angeles County Code of Ordinances Chapter 12.84 requires that the Project implement site design measures, source control, and/or permanent post-construction pollutant and hydro-modification control BMPs to reduce sediment from erosion or siltation to the maximum extent practicable from entering stormwater runoff during operations. The incremental amount of impervious surface that would be introduced by the Project would be small and would not substantially interfere with surface runoff. Furthermore, as described in Checklist Question 10.c.iv, pursuant to the County's LID and hydromodification requirements, the Project would be required to construct retention basins to attenuate assumed increases to peak flow and volume. Additionally, spoils from excavation of the basin would be distributed on-site in a manner that would not substantially alter pre-development drainage patterns. As such, the Project would not substantially alter the existing drainage pattern of the Project Site or substantially increase the rate or amount of surface runoff in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk or loss or damage involving flooding?	☐	☐	☒	☐

According to Figure 12.2b of the Los Angeles County General Plan, the Project is not within or in proximity to a County Capital Flood floodplain. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center and Figure 12.2a of the County General Plan, the Project Site is entirely within Zone X (unshaded). The Project Site is also adjacent to portions of land designated Zone A to the northwest and southeast. Zone X (unshaded) is defined as minimal risk areas outside the 0.2-percent-annual-chance floodplain. Zone A is defined as special flood hazard areas (SFHAs) subject to inundation by the one percent annual chance of flooding with no base flood elevations determined.[34] As the Project is adjacent to areas designated as Zone A, the Drainage Report included analysis of the Project's potential impacts to on-site and off-site runoff flows and discharge volumes. According to the Drainage Report, post-development peak flow rates for a 50-year storm event would exceed those of pre-development conditions by 41,690 cubic feet. Pursuant to the County's LID and hydromodification requirements, the Project would be required to construct retention basins capable of retaining 42,336 cubic feet of flow to attenuate assumed increases to peak flow and volume.

As the volume of the proposed retention basin is greater than the proposed change in peak flow rates, installation of the retention basin would attenuate peak runoff flows. Therefore, no increase in runoff flow rates or discharge volumes would be anticipated from pre-development to post-development conditions up to the 50-year storm event. Furthermore, Project equipment would be designed such that it is at least 12 inches above the base flood elevation (BFE) and therefore would be designed in a manner so as not to add or decrease baseline stormwater on- or off-site. Additionally, the Project would include a 10-foot landscape buffer along the perimeter of the Project Site to reduce potential Project impacts on flood flows. With

[34] Federal Emergency Management Agency (FEMA), FEMA Flood Map Service Center, https://msc.fema.gov/portal/home. Accessed January 5, 2024.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

implementation of these measures, the Project would not significantly impede or redirect flood flows, and impacts would be less than significant.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	☐	☐	☒	☐

As discussed in Checklist Question 10.c.iv, the Project Site is not located within or near a County capital Flood floodplain area but is located adjacent to Federal 100- year flood hazard areas. The Project would be required to construct an on-site retention basin that would contain peak runoff flows for the 50-year storm event. Construction of the proposed retention basin would result in no increase in runoff or flow rates or discharge volumes for the 50-year storm event. Additionally, Project equipment would be designed such that it is at least 12 inches above the BFE, and a 10-foot landscape buffer would be located along the perimeter of the Project Site. Implementation of these measures would sufficiently reduce the risk of damage due to flooding. No additional flood proofing or flood insurance would be required for the proposed Project, and impacts would be less than significant.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 22, Ch. 12,84)?	☐	☐	☒	☐

The Project would be required to comply with the Los Angeles County LID Ordinance, which is intended to promote sustainability and improve the County's watersheds by preserving drainage paths and natural water supplies to "…retain, detain, store, change the timing of, or filter stormwater or runoff." As described in Checklist Question 10.c, implementation of the Project would not substantially change drainage patterns, the amount of runoff, and the square footage of impervious surfaces compared to those under existing conditions. The incremental amount of impervious surface that would be introduced by the Project would be small and would not substantially interfere with surface runoff. As such, the Project would not conflict with the Los Angeles County LID Ordinance. Impacts would be less than significant.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?	☐	☐	☐	☒

As mentioned above, the Project would be unmanned during operations, with no habitable structures or restroom facilities. Temporary sanitary facilities would be placed on-site during construction and removed upon operation. Any operational water that may be required for routine maintenance would be trucked in from off site. The Project would therefore not construct on-site wastewater treatment systems, and no impact would occur.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒

The Project Site is located approximately 55 miles from the Pacific Ocean and is therefore not at risk of tsunami. As described in Checklist Question 10.c.iv, the entire Project Site is within Zone X (unshaded) but is adjacent to areas designated Zone A by FEMA. Furthermore, according to the California Division of Safety of Dams Dam Breach Inundation Map Web Publisher, the Project Site is not within an area of dam breach inundation.[35] Therefore, the Project would not release pollutants due to Project inundation, and no impact would occur.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

As mentioned above, the Project would be unmanned during operations, with no habitable structures or restroom facilities. Any operational water that may be required for routine maintenance would be trucked in from off site. The majority of the Project would be vegetated and remain pervious to allow infiltration of precipitation. The incremental amount of impervious surface that would be introduced by the Project would be small and would not substantially interfere with groundwater recharge. As a result, the Project would not conflict with or obstruct implementation of the Antelope Valley Integrated Regional Water Management Plan or a future water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

[35] California Department of Water Resources Division of Safety of Dams, Dam Breach Inundation Web Publisher, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2. Accessed January 4, 2024.

11. LAND USE AND PLANNING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

Existing development in the area includes rural access roads and sparce rural residences. The Project Site is located in an unincorporated part of the County, and the Project Site is primarily bordered by undeveloped vacant land. Therefore, the Project would not divide an established community. No impact would occur.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

The Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The current land use designation for the Project Site is RL10 and is zoned A-2-2. Per the Area Plan Rural Preservation Strategy Map, the Project Site is located within the "Rural Preserve Area," which are generally defined as areas of the unincorporated Antelope Valley that are largely undeveloped and generally not served by existing infrastructure and public facilities. According to the General Plan, renewable energy production facilities, like the Project, are "allowed in Rural Land designations without a Plan Amendment." As mentioned in Checklist Question 2.b, the Project is also within an Agricultural Resource Area designated by the AVAP. The Project is considered as a "utility scale solar facility," which requires a CUP in the A-2 Zone pursuant to Los Angeles County Code of Ordinances Section 22.16.030.[36] As described in other sections, the Project would be consistent and would not conflict with relevant policies of the County's General Plan; AVAP (including the Land Use Element, Mobility Element, Conservation and Open Space Element, Public Safety, Services, and Facilities Element, and Economic Development Element of the AVAP); and the Los Angeles County Code of Ordinances, including the development standards of the Los Angeles County Renewable Energy Ordinance (Section 22.140.510) for fencing, height, lighting, setbacks, and landscaped buffers requirements.

The AVAP represents a comprehensive vision for growth within the Area Plan area, which encompasses the Antelope Valley region of Los Angeles County. As a component of the Los Angeles County General Plan, the AVAP refines the countywide goals and policies in the General Plan by addressing specific issues relevant to the region. The vision for the AVAP includes creating a pattern of development that reinforces the region's small-town and rural feel. The Project Site would allow for the proposed solar PV and BESS uses, and the Project would not seek to rezone the Project Site. Upon decommissioning of the Project, the Project Site could fully restore the property as defined in the Project's Decommissioning Plan. The Applicant will work with the County to ensure decommissioning of the Project after its productive lifetime complies with all applicable local, State, and federal requirements and BMPs and in a manner consistent with the requirements of the Project's Decommissioning Plan. Furthermore, the Project Site is not located within an SEA, Economic Opportunity Area, or Community Standards District outlined by the AVAP. Therefore, the Project would

[36] Los Angeles County Code of Ordinances, Title 22 – Planning and Zoning, Division 7 – Standards for Specific Uses, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT22PLZO_DIV7STSPUS. Accessed January 4, 2024.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*

not conflict with the County's General Plan, the AVAP, or the Los Angeles County Code of Ordinances, and impacts would be less than significant.

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?	☐	☐	☐	☒

Hillside Management Areas (HMAs) are defined as areas with 25 percent or greater natural slopes. The Project Site is not located within a Hillside Management Area. The Project Site is also not within a SEA. Therefore, no impact would occur.

12. MINERAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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?	☐	☐	☐	☒

According to Map 4.4 of the AVAP, the Project Site is not located within a Mineral Resource Zone (MRZ).[37] According to the California Department of Conservation Mines Online map, the closest active mine is the La Liebra mine (ID 91-15-0045), an open pit sand and gravel mine that is located approximately 9.5 miles northwest of the Project Site.[38] Furthermore, according to the California Department of Conservation Well Finder, there are no active oil or gas wells on or around the Project Site.[39] The closest well to the Project Site is a plugged dry hole approximately 1.8 miles north of the Project Site. Due to the relative distance from any active mining sites, the Project would not result in the loss of availability of mineral resources that would be of value to the region and the residents of the State. No impact would occur.

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?	☐	☐	☐	☒

As mentioned above in Checklist Question 12.a, the Project Site is not located in a MRZ. Additionally, the Project does not involve extensive grading or excavation that would preclude the extraction of any potential mineral resources in the future. No impact would occur.

[37] Los Angeles County, AVAP, Map 4.4.
[38] California Department of Conservation Division of Mine Reclamation, Mines Online, 2016, https://maps.conservation.ca.gov/mol/index.html. Accessed January 5, 2024.
[39] California Department of Conservation Geologic Energy Management Division, Well Finder, https://maps.conservation.ca.gov/doggr/wellfinder/. Accessed January 5, 2024.

13. NOISE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project result in:				
a) Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	☐	☐	☒	☐

The following noise analysis is primarily based on the Noise Technical Memorandum prepared by Kimley-Horn (see **Appendix J**).[40]

Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation). Noise would be generated by construction equipment, including earth movers, and material handlers. During construction, exterior noise levels could affect the nearest sensitive receptors in the vicinity of the construction site. The nearest sensitive receptor is a residential use located approximately 110 feet to the south of the Project Site. However, construction activities would occur throughout the Project Site and would not be concentrated at the point closest to the sensitive receptor.

Project construction is anticipated to be completed over a period of approximately seven months. The Project involves construction activities associated with demolition, site preparation, grading, construction/installation, PV panel vendor trips, and paving (road access installation). **Table 12: Typical Construction Noise Levels** reflects maximum sound levels (L_{max}) that could be expected from the equipment-types listed at a reference distance of 50 feet from the noise source, which are the highest individual sound occurring at an individual time period. Operating cycles for the listed types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other sources of construction noise could include random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts).

Table 12: Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA) at 50 feet from Source (L_{max})
Air Compressor	80
Backhoe	80
Compactor	82
Concrete Mixer	85
Concrete Pump	82
Concrete Vibrator	76
Crane, Derrick	88

[40] Kimley-Horn and Associates, Inc., Noise Technical Memorandum, April 2025. Appendix J of this IS/MND.

Crane, Mobile	83
Dozer	85
Generator	82
Grader	85
Impact Wrench	85
Jack Hammer	88
Loader	80
Mounted Impact Hammer (hoe ram)	90
Paver	85
Pneumatic Tool	85
Pump	77
Roller	85
Saw	76
Scraper	85
Shovel	82
Truck	84
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018; Federal Highway Administration, Roadway Construction Noise Model User's Guide, January 2006.	

The Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) was used to calculate the worst-case construction noise levels at the nearest sensitive receptor in the vicinity of the Project Site during construction. The modeled receptor location represents the closest existing receiving land use to Project construction activities. Noise levels at other sensitive receptors surrounding the Project Site would be located further away and would experience lower construction noise levels than the closest receptors modeled.

The Los Angeles County Code of Ordinances establishes quantitative construction noise standards. Construction activities should not exceed those listed in Los Angeles County Code of Ordinances Section 12.08.440 Construction Noise. The Ordinance sets forth a threshold of s. Under the Ordinance, construction activities also shall be limited to the daytime hours of 7 a.m. to 8 p.m. Monday through Saturday. Construction is prohibited on Sundays and on Holidays. Since construction equipment would move throughout the Project Site during each of the construction phases, the mobile equipment threshold of 75 dBA was used for this analysis.

The noise levels calculated in **Table 13: Project Construction Noise Levels** show estimated noise levels for the worst-case construction noise scenario without accounting for attenuation from intervening barriers, structures, or topography. The nearest noise sensitive receptor (residential use) is located approximately 110 feet to the south of the Project Site. Following the Federal Transit Administration (FTA) methodology, when calculating construction noise, all equipment is assumed to operate at the center of the Project Site because equipment would operate throughout the Project Site and not at a fixed location for extended periods of time. Therefore, the distance used in the RCNM model for the Project Site was 718 feet for the nearest sensitive receptor (i.e., residential use) to the center of the Project Site.

Other receptors in the Project vicinity would be located further away and would experience lower construction noise levels than the closest receptor modeled. All construction equipment was assumed to operate simultaneously to represent a worst-case noise scenario as construction activities would routinely be spread throughout the construction site and would operate at different intervals.

Table 13: Project Construction Noise Levels

Construction Phase	Land Use	Receptor Location			Noise Threshold[2] (dBA L_{eq})	Exceeded?
		Direction	Distance (feet)[1]	Worst Case Modeled Exterior Noise Level (dBA L_{eq})		
Demolition	Residential	South	718	63.3	75	**No**
Site Preparation	Residential	South	718	58.9	75	**No**
Grading	Residential	South	718	59.2	75	**No**
Construction/Installation	Residential	South	718	71.8	75	**No**
PV Vendor Trips	Residential	South	718	56.9	75	**No**
Paving	Residential	South	718	49.9	75	**No**

1. Per the methodology described in the FTA *Transit Noise and Vibration Impact Assessment Manual* (September 2018), distances are measured from the nearby sensitive receptor property line to the center of the Project construction site.
2. The Los Angeles County Code of Ordinances Section 12.08.440 Construction Noise establishes a threshold of 75 dBA for residential uses.

Source: Federal Highway Administration, Roadway Construction Noise Model, 2006. Refer to **Appendix J** for noise modeling results.

As depicted in Table 13, the closest sensitive receptor could be exposed to temporary and intermittent noise levels up to 72 dBA during the overlap of Construction/Installation, which would not exceed the County's residential construction noise standard of 75 dBA L_{eq}. As previously noted, noise levels presented in Table 14 are conservative, as these noise levels assume the simultaneous operation of all construction equipment at the same precise location. More likely, construction equipment would be used throughout the Project Site and would not be concentrated at the point closest to the nearest sensitive receptor. Therefore, impacts would be less than significant.

Construction Traffic: Construction activities would also cause increased noise along access routes to and from the Project Site due to movement of equipment and workers, as well as hauling trips. Grading at the Project Site would be balanced on-site and no import or export of soil is anticipated. It is anticipated that construction worker trips would be a maximum of 41 total daily trips, water truck trips from off-site wells would be a maximum of 11 daily trips, and vendor trips would be a maximum of 2 daily trips (PV panel vendor trips). As a result, mobile source noise would increase along access routes to and from the Project Site during

construction. However, mobile traffic noise from construction trips would be temporary and would cease upon completion of Project construction. Further, construction activities would be limited to the daytime hours of 7 a.m.to 8:00 p.m. Monday through Saturday and prohibited on Sundays and on Holidays. Therefore, upon compliance with the County's allowable construction hours, short-term noise impacts from construction traffic would be less than significant.

Operations

Operation and maintenance of the Project would include permanent and temporary noise sources associated with the solar PV systems, electrical collection lines, gen-tie power lines, BESS, and maintenance activities. For purposes of this analysis, noise regulations included in the Los Angeles Code of Ordinances have been utilized.

Solar PV Systems: The solar PV arrays would include operation of single-axis tracking systems. Single-axis tracking systems employ a motor mechanism that would allow the arrays to track the path of the sun throughout the day. In the morning, the panels would face the east. Throughout the day, the panels would slowly move to the upright position at noon and on to the west at sundown. The panels would reset to the east in the evening or early morning to receive sunlight at sunrise.

Noise from the tracker motor is approximately 40 dBA at 10 feet from the source. During daylight hours, the tracking system motors would operate for a short period of time (normally two seconds) and pause for a longer period of time (about five minutes) before operating again. After sunset and before sunrise the next day, the array must reset to face easterly; this reset motion occurs once daily and takes approximately three minutes. The nearest sensitive noise receptor to any tracker would be the residential use located approximately 110 feet to the south of the Project Site. At this distance, noise levels associated with solar PV array tracker would be inaudible. Impacts would be less than significant.

Inverters and Transformers: Additional permanent noise sources from the Project Site would include small-scale inverters, AC combiner boxes, medium voltage transformers, and/or medium voltage switchgear. Small-scale inverters typically generate 65 dBA at 1 meter (3.28 feet) and medium voltage transformers typically generate 63 dBA at 1 meter (3.28 feet). The inverter, transformer, and switchpad would be located within the center portion of the Project Site. As the nearest sensitive receptor could be located as close as 110 feet south from the Project's fence line, small-scale inverter and medium voltage transformer noise levels would be inaudible at the nearest sensitive receptor.

Electrical Collection Lines: The Project includes installation of collection lines. Therefore, noise levels associated with electrical collection lines would be inaudible at the nearest sensitive receptor, which is located approximately 110 feet to the south of proposed collection lines. Impacts would be less than significant.

Battery Energy Storage System (BESS): The primary noise source associated with BESS operations would be the use of heating, ventilation, and air conditioning units (the BESS does not generate noise itself). The Project includes a BESS, which would require multiple heating, ventilation, and air conditioning units to operate simultaneously. Standard HVAC units for similar energy storage projects produce 52.3 dBA at a distance of 50 feet during full operation. The BESS would be located in the southwest area of the Project Site. Therefore, a distance of 130 feet, measured from the nearest BESS unit at the southwest corner of the Project Site to the nearest sensitive receptor was used for the calculated BESS HVAC noise levels. At this distance, noise levels

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

from the BESS HVAC units are estimated at approximately 44.0 dBA. Therefore, the Project would not exceed County daytime or nighttime noise standards of 50 dBA and 45 dBA, respectively. Impacts would be less than significant.

Maintenance Activities: The Project would generate minimal periodic operational vehicle trips internal to the Project Site for required maintenance activities and would not increase personnel daily trips external to the site when compared to existing conditions. Project maintenance activities would include 6 maintenance-related visits per year and 4 solar panel and inverter washing visits per year, resulting in a total of approximately 10 operational roundtrips per year (20 one-way trips). These activities are not expected to occur on a daily basis and would not generate a significant amount of traffic or create a substantial increase of vehicular noise in the area. Any increase in traffic would be minimal and sporadic; therefore, impacts from vehicular noise would be less than significant.

Decommissioning

When the Project is decommissioned, equipment operation and site restoration activities would result in a temporary increase in ambient noise levels in the Project vicinity. Given the fact that much of the construction equipment necessary to construct the Project would also be required for Project decommissioning, it is reasonable to assume that noise generated from decommissioning activities would be similar in nature to construction activities. Similar to the construction noise analysis above, Project decommissioning would potentially result in increased noise levels compared to existing conditions. However, the Los Angeles County Code of Ordinances, states that construction activities shall be limited to the daytime hours of 7 a.m. to 8 p.m. Monday through Saturday and construction is prohibited on Sundays and on Holidays. Noise associated with decommission also would be expected to fall below the County's construction noise threshold of 75 dBA, as discussed above. Therefore, upon compliance with the County's allowable construction hours; short-term noise impacts from decommissioning activities would be less than significant.

b) Generate of excessive ground borne vibration or groundborne noise levels?	☐	☐	☒	☐

Project construction would include demolition, site preparation, grading, construction/installation, PV vendor trips, and paving (access road installation) but would not require blasting. While these construction activities would result in groundborne vibration, such groundborne vibration would attenuate rapidly from the source and would not generally be perceptible beyond the boundaries of the Project Site.

The FTA has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inches per second [in/sec]) appears to be conservative. The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. Caltrans and the FTA have identified various vibration damage criteria for different building classes. As the closest receptor is a residential use, this evaluation uses the FTA architectural damage criterion for continuous vibrations at non-engineered timber and masonry buildings of 0.2 in/sec peak particle velocity (PPV) and the human annoyance criterion of 0.04 in/sec PPV. The vibration produced by

construction equipment is illustrated in **Table 14: Typical Vibration Levels for Common Construction Equipment**.

Table 14: Typical Vibration Levels for Common Construction Equipment.

Equipment	Reference PPV at 25 feet (in/sec)	Approximate PPV at 110 feet (in/sec)[1]
Vibratory Compactor/Roller	0.210	0.023
Large bulldozer	0.089	0.010
Loaded trucks	0.076	0.008
Small bulldozer	0.003	<0.001

Notes:
1. Calculated using the following formula:
   PPV equip = PPV_{ref} x $(25/D)^{1.5}$
   where: PPV (equip) = the peak particle velocity in inch-per-second of the equipment adjusted for the distance
   PPV (ref) = the reference vibration level in inch-per-second from Table 7-4 of the FTA Transit Noise and Vibration Impact Assessment Manual
   D = the distance from the equipment to the receiver

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

Groundborne noise and vibration decreases rapidly with distance. As indicated in Table 14, based on the FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from <0.001 to 0.023 in/sec PPV at 110 feet from the source of activity. The nearest noise-sensitive receptor to the Project Site is a residence located approximately 110 (measured from the edge of construction activity to the nearest structure) feet to the south of the Project Site boundary line. At these distances, vibration velocities would be imperceptible (i.e., up to 0.023 in/sec PPV for a vibratory roller at the Project Site). Therefore, the 0.2 in/sec PPV architectural damage significance threshold and the 0.04 in/sec PPV human annoyance criteria would not be exceeded as a result of Project construction activities. Thus, no sources of groundborne vibration or groundborne noise would be expected to affect sensitive receptors in the Project vicinity, and there would not be any potential for excessive exposure of persons to or generation of groundborne vibration levels. Impacts would be less than significant.

Operations

The Project would have operation and maintenance components, such as HVAC systems for the BESS, maintenance vehicles, small-scale inverters, and medium voltage transformers, that would not generate noticeable groundborne vibration levels. Project operations would not involve any sources capable of generating perceptible levels of vibration in the surrounding area. There would be no permanent source or potential to change vibration levels, except during unscheduled maintenance or repair activities, which would be similar to construction activities. Regular maintenance trucks could generate 0.076 in/sec PPV a distance of 25 feet (refer Table 14). Pursuant to the FTA, Transit Noise and Vibration Impact Assessment Manual, groundborne vibration should not exceed 0.2 in/sec PPV at the nearest property line within a residential, commercial, and industrial land use zoning district. Land use zoning districts surrounding the Project Site include Heavy Agriculture Zoning (A-2-2), which allow residential uses. Although residential land use zoning

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

districts surround the Project Site, regular maintenance trucks would not generate groundborne vibration levels exceeding the FTA's 0.2 in/sec PPV vibration threshold at the Project Site boundary. As the nearest vibration-sensitive receptor is located approximately 110 feet from the Project Site (measured from the edge of construction activity to the nearest structure) and structures in the Project area are not located nearer than 25 feet to roadways, operational vibration levels at the nearest off-site receptors would be imperceptible. Thus, the FTA's 0.2 in/sec PPV vibration threshold would not be exceeded, and impacts would be less than significant.

Decommissioning

When the Project is decommissioned, equipment operation and site restoration activities could result in temporary vibration impacts at close distances. Given that much of the construction equipment necessary to construct the Project would also be required for Project decommissioning, vibration generated from decommissioning activities would be similar in nature to construction activities. As with the construction activities described above, decommissioning activities would not be expected to generate groundborne noise that would affect sensitive receptors in the Project vicinity, and there would not be any potential for excessive exposure of persons to or generation of groundborne vibration levels. Impacts would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

As discussed in Checklist Question 9.e, there are no public airport or public use airports within two miles of the Project Site. No impacts would occur.

14. POPULATION AND HOUSING

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Induce substantial 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 develop a solar energy facility with BESS and does not include residential uses. The Project would not induce substantial population growth in the area because the Project does not propose extension of new major infrastructure or uses that would induce substantial unplanned population growth.

Project construction would temporarily increase the number of persons present at the Project Site, with the on-site construction workforce expected to peak at approximately 50 people. However, these workers would only be present at the Project Site during construction of the Project Site. Once operational, the Project Site would not require the same amount of staff needed during construction. The Project Site would be unmanned and would only require minimum staff for inspection and maintenance and would not introduce a significant amount of employment that would require additional permanent housing within the area. Impacts would be less than significant.

b) Displace substantial numbers of existing housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The Project would not displace housing as the Project Site consists of undeveloped vacant land. The nearest residence is located approximately 110 feet south of the Project Site. This residence would not be impacted by the Project as construction and operation of the Project would be contained entirely within the boundaries of the Project Site. The Project would not displace off-site housing, and no impact would occur.

15. PUBLIC SERVICES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐

Fire protection and prevention services are provided by the LACFD. The closest LACFD station to the Project Site is LACFD Station 112 located at 8812 W Avenue E 8, approximately 14 miles east of the Project Site. The entire LACFD is staffed with a total of 228 engine companies, 34 truck companies, 112 paramedic units, and numerous other specialized apparatuses.[41]

Construction

The Project would construct a solar PV facility and BESS on fallow land and would not involve the construction or physical alteration of a fire station. Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with Cal/OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Furthermore, fire suppression equipment specific to construction would be maintained on the Project Site. Further, pursuant to Los Angeles County Code of Ordinances Title 32, the Project would be required to comply with the California Fire Code. As applicable, construction activities would be required to comply with AVAP Policies PS 1.1 through 1.4 and PS 7.1 through 7.3, which require implementation of fire prevention measures; as well as the 2022 California Fire Code, 2021 National Fire Code, and 2021 International Fire Code, which implement state-of-the-art development and performance standards that ensure the safe installation, operations, and maintenance of BESS. The Project would also be required to comply with Energy Storage Standard UL 9540 and UL 9540a, and applicable NFPA standards.

Project-related construction activities could temporarily impact street access and traffic flow due to roadway improvements, and potential extension of construction activities into the rights-of-way along 230th Street W for utility connections and construction of the proposed access roads, resulting in the temporary closure of the lane closest to the Project Site. However, Project construction would not require the complete closure of any public streets during construction. Furthermore, signage and flag crews would direct the flow of traffic with the lane closure. Temporary construction activities would not impede use of the streets for emergencies or access for emergency vehicles. Further, the Project design and Project Site access would be reviewed by LACFD to ensure that emergency access would be maintained. During temporary partial street closure, emergency access and traffic detours would be established in coordination with the County.

[41] Los Angeles County Fire Department, Los Angeles County Fire Department 2022 Strategic Fire Plan, 2022, https://osfm.fire.ca.gov/media/ugwfw535/2022-los-angeles-county-unit-fire-plan.pdf. Accessed January 6, 2024.

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

Due to the limited duration of construction activities, maintenance of emergency access, and compliance with applicable codes, Project-related construction would not be expected to adversely impact firefighting and emergency services so as to necessitate a new or expanded fire station in order to maintain acceptable service ratios, response times, or other performance objectives of the LACFD. Therefore, construction impacts on fire protection and emergency medical services would be less than significant and no mitigation measures are required.

Operation

The Project would be a solar PV and BESS facility that would not induce significant or unplanned population growth such that there would be a need for new or physically altered fire protections or emergency services. Further, as mentioned in Checklist Question 9.h, the BESS will be designed to comply with all applicable codes in Chapter 12 of the County of Los Angeles Fire Code; Energy Storage Standard UL 9540 and UL 9540a; National Fire Protection Association (NFPA) standards; AVAP Policies PS 1.1 through 1.4 and PS 7.1 through 7.3, which require implementation of fire prevention measures; as well as the 2022 California Fire Code, 2021 National Fire Code, and 2021 International Fire Code, which implement state-of-the-art development and performance standards that ensure the safe installation, operations, and maintenance of BESS. Compliance with applicable international, federal, State, and local regulations, as well as inclusion of the Project's fire and safety features, would reduce the potential for a fire event. Therefore, the Project would maintain acceptable service ratios, response times, and other performance objectives for fire protection services. Impacts to fire protection would be less than significant.

Sheriff protection?	☐	☐	☒	☐

The Project Site is served by the LACSD. The nearest LACSD station is in the City of Lancaster at 501 W Lancaster Boulevard, approximately 23 miles southeast of the Project Site.

Construction

Since the daytime population generated at the Project Site during construction (i.e., construction workers) would be temporary in nature, construction of the Project would not generate a permanent population on the Project Site that would substantially increase the demand for police services. However, construction sites can be sources of nuisances and hazards and invite theft and vandalism. When not properly secured, construction sites can contribute to a temporary increased demand for police protection services. As such, during Project construction, the Project Site would be fenced or screened along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

Project-related construction activities could temporarily impact street access and traffic flow due to roadway improvements, and potential extension of construction activities into the rights-of-way along 230th Street W for utility connections and construction of the proposed access roads, resulting in the temporary closure of the lane closest to the Project Site. However, Project construction would not require the complete closure of any public streets during construction. Furthermore, signage and flag crews would direct the flow of traffic with the lane closure. Temporary construction activities would not impede use of the streets for emergencies or access for police vehicles. Further, the Project design and Project Site access would be reviewed by the LACSD to ensure that emergency access would be maintained. During temporary partial street closure, emergency access and traffic detours would be established in coordination with the County.

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

Given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the County, maintained emergency access, and construction fencing, the Project's construction activities are not expected to increase demand on existing police services to an extent that a new police facility would be required. Therefore, construction of the Project would have a less than significant temporary impact on police protection.

Operation

During Project operations, the Project would be unmanned, remotely monitored, and fenced for security. As previously stated, the Project would not introduce additional permanent residences to the Project Site that would require increased demand for public services including police protection. Furthermore, the Project Site would be serviced by an on-site access road, which would be accessed by operation and maintenance staff and emergency responders in the event of an emergency. Therefore, the Project would not substantially impact service ratios, response times, or other performance objectives related to police protection. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. Impacts would be less than significant.

Schools?	☐	☐	☐	☒

Project construction would introduce a temporary increase in workers, but they would not be anticipated to relocate to the area or bring their families for the construction, as the workers would be sourced from the County or surrounding counties and/or be active for only a few months. During operations, the Project Site would be unmanned and would only require minimum staff for inspection and maintenance over approximately 6 maintenance-related visits and 4 solar panel and inverter washing visits per year. Employees would be traveling from an existing area to the Project, and would not require expansion of public services, including expanding school services to the area to service new residences. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools. As such, the Project would not result in an increase in population in the area that would necessitate additional schooling services. No impacts would result from the Project.

Parks?	☐	☐	☐	☒

Project construction would introduce a temporary increase in workers, but they would not be anticipated to relocate to the area or bring their families for the construction, as the workers would be active only for the duration of the construction phase. During operations, the Project Site would be unmanned and would only require minimum staff for inspection and maintenance over approximately 6 maintenance-related visits and 4 solar panel and inverter washing visits per year. Staff would be traveling from an existing area to the Project. As such, the Project would not result an increase in population into the area that would necessitate additional park services. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. There would be no impact in this regard.

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

Project construction would introduce a temporary increase in workers, but they would not be anticipated to relocate to the area or bring their families for the construction, as the workers would be active only for the duration of the construction phase. During operations, the Project Site would be unmanned and would only require minimum staff for inspection and maintenance over approximately 6 maintenance-related visits and 4 solar panel and inverter washing visits per year. Staff would be traveling from an existing area to the Project. As such, the Project would not result an increase in population into the area that would necessitate additional library services. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for libraries. There would be no impact in this regard.

Other public facilities?	☐	☐	☐	☒

Project construction would introduce a temporary increase in workers, but they would not be anticipated to relocate to the area. As such, the Project would not cause an increase in population in the area that would necessitate addition of other public facilities such as hospitals, and most employees would likely visit hospitals near their homes. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities such as hospitals or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities such as hospitals. There would be no impact in this regard.

16. RECREATION

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

The Project involves construction of a solar PV facility in a rural area of unincorporated Los Angeles County. No public parks or recreational facilities are in the vicinity of the Project Site. The Project does not propose any residential uses that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. The Project would include additional employment during construction. However, the employees would only be present during the construction phase. As discussed in Checklist Question 15 above regarding Parks, the Project would be unmanned and would only require minimum staff for inspection and maintenance over approximately 6 maintenance-related visits and 4 solar panel and inverter washing visits per year. Employees would be traveling from an existing area to the Project and therefore, would not require expansion of any parks or recreational facilities. Therefore, the construction or expansion of recreational facilities would not have an adverse physical effect on the environment. No impacts would occur.

c) Would the project interfere with regional trail connectivity?	☐	☐	☐	☒

The Project Site is in an agricultural area with limited tall or dense development in the vicinity. As stated in Checklist Question 1.b, according to the Los Angeles County General Plan, there are no regional trails near the Project Site. The closest trail is the Pacific Crest Trail approximately 5.7 miles west of the Project Site at the trail's closest point. Given distance between the Project Site and the Pacific Coast Trail, the Project Site would not interfere with the trail. There would be no impacts on this trail or other regional multi-use trails.

17. TRANSPORTATION

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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, bicycles, and pedestrian facilities?	☐	☐	☒	☐

Construction

Automobile and truck traffic volumes associated with Project-related construction activities would vary throughout the construction phases, as different activities occur. It is anticipated that construction worker trips would be a maximum of 41 total daily trips, water truck trips would be a maximum of 11 daily trips, and vendor trips would be a maximum of 2 daily trips (PV panel vendor trips). All construction activities would be staged within the Project Site, apart from the construction of an access road via 230th Street W into the Project Site that would encroach onto the existing right-of-way. At times in which the access road is constructed, the lane closest to the Project Site may have to be temporarily closed. However, during temporary partial street closure, emergency access and traffic detours would be established in coordination with the County. Additionally, Project-related construction traffic would be temporary and cease upon construction completion. Construction traffic associated with the Project would have a less than significant impact.

The Los Angeles County General Plan's Mobility Element discusses the County's goals to create a balanced transportation system that serves bicyclists and pedestrians as well as motor vehicles. Additionally, the AVAP's Mobility Element discusses goals and policies to create a balanced, multi-modal transportation system across Antelope Valley. Regional access to the Project Site is provided via SR 138 to the south of the Project Site. 230th Street W is a two-lane roadway adjacent to and west of the Project Site. There are no existing pedestrian sidewalks or bicycle facilities along 230th Street W. The Project's trips during construction would not impact the generally free-flowing traffic that characterizes the SR 138 segments south and east of the Project Site, respectively. The Project does not propose any modifications to any pedestrian or bicycle facilities and would not interfere with any future plans as none are located in the Project vicinity.

Public transit service is provided by the Antelope Valley Transit Authority (AVTA).[42] The AVTA 9 Route goes through the urbanized areas of the Antelope Valley region but does not travel near the Project Site. No public transit stations are located in close proximity to the Project Site. The nearest public bus transit stops are provided at the station on 60th Street, approximately 17 miles southeast of the Project Site. Project construction would be temporary in nature and would not result in any road closures and therefore would not affect public transit service operation. Therefore, construction of the Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Operation

Project maintenance activities would include facility monitoring; administration and reporting; remote operations of inverters, BESS system, and other equipment; repair and maintenance of solar facilities; and

[42] Antelope Valley Transit Authority, Local Transit Service, https://www.avta.com/userfiles/files/System-Map-2021.pdf. Accessed January 6, 2024.

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

periodic panel and inverter washing. It is estimated that the Project would require 6 maintenance-related visits per year and 4 solar panel and inverter washing visits per year, resulting in a total of approximately 10 operational roundtrips per year (20 one-way trips). These activities are not expected to occur on a daily basis and therefore would not generate a significant amount of traffic in the area.

Similar to Project construction, the Project's trips during operation would not impact the generally free-flowing traffic that characterizes the SR 138 segments south of the Project Site. The Project does not propose any modifications to any pedestrian or bicycle facilities, and would not interfere with any future plans as none are located in the Project vicinity. Additionally, as discussed above, no public transit stations are located in close proximity to the Project Site, Therefore, Project operation would not affect public transit service operation. Therefore, the proposed Project would not conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

Decommissioning

At the end of the life of the Project (approximately 35 years), the Project would be decommissioned and removed from the Project Site. The Project Site would then be converted to other uses in accordance with applicable land use regulations in effect at that time. All decommissioning and restoration activities would adhere to the requirements of the appropriate governing authorities and would be in accordance with all applicable federal, State, and County regulations. Impacts would be less than significant.

b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐

The County's Transportation Impact Analysis Guidelines includes thresholds for determining CEQA impacts for VMT pursuant to SB 743. The County's Transportation Impact Analysis Guidelines for Vehicle Miles Traveled identify that projects that generate fewer than 110 daily vehicle trips are presumed to have a less than significant impact absent substantial evidence to the contrary. As stated in Checklist Question 17.a, the Project would generate approximately 20 one-way trips per year. Therefore, as the Project would meet the screening criteria, it is presumed that the Project would have a less than significant VMT impact, and no further VMT analysis is required. Impacts would be less than significant.

The small project screening threshold addresses VMT from long-term operations; Project construction activities would be temporary and would not result in long-term or permanent change in VMT. Further, VMT primarily is a metric for assessing project-related GHG emissions impacts. The analysis related to GHG emissions associated with Project-related construction traffic is analyzed elsewhere in this IS/MND; see Greenhouse Gas Emissions, above. Overall, as the Project would provide a source of clean renewable energy to the grid and would reduce new GHG emissions that would have otherwise resulted from producing energy from a non-renewable source, the Project will have a beneficial impact on GHG emissions. Therefore, because the increase in VMT related to construction is temporary and localized, Project construction is not anticipated to result in long-term, permanent changes to the surrounding vehicle transportation system. Impacts from construction would be less than significant.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

The Project would not substantially increase driving hazards, as the on-site access road would be used only by operations and maintenance staff and emergency responders in the event of an emergency. Alterations to the immediate access roads are not proposed such that a geometric design feature or incompatible use would increase hazards. Project Site access would be provided via a new driveway constructed at 230th Street W at the western portion of the Project Site and new on-site roads. The driveway entrance would be upgraded using gravel, and would transition to native compacted soil. The proposed perimeter road would encircle the whole solar field and bisect the Project Site in a west-east orientation from 230th Street W to 227th Street W. The road would be wide enough to accommodate emergency vehicles and designed in compliance with County building and fire department standards. A minimum of 11.5 feet of space would be maintained between each row of solar modules for operations and maintenance access. The access roads would be placed such that no panel is more than 175 feet from a fire road and would connect directly to the BESS. Thus, the on-site access road would accommodate large trucks and vehicles, including fire trucks, per County regulations and would provide a clear line of sight for merging into the adjacent roads. Therefore, the Project would not significantly increase hazards due to design features or incompatible uses, and impacts would be less than significant.

D) Result in inadequate emergency access?	☐	☐	☒	☐

As mentioned in Checklist Question 9.f, regional access to the Project Site would be provided via SR 138, which is identified as a Primary Disaster Route (Freeway) in the County of Los Angeles. The proposed construction would be staged on-site and would have a temporary impact on circulation. At times, the Project may require the closure of one lane on 230th Street W closest to the Project Site for the construction of the proposed access road. However, the Project would not result in the complete closure of existing roadways that might have an effect on emergency response or evacuation plans in the vicinity of the Project Site. Accordingly, construction of the Project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

The Project would not generate traffic volumes that would impede emergency access to the Project Site and would not result in a significant and permanent delay for emergency vehicles accessing 230th Street W. The Project would comply with emergency access requirements, per the California Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances, provision of water tanks, and construction of internal access roads. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

18. TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or	☐	☐	☐	☒

As concluded in response to Checklist Question 5.a, the Project Site contains fallow land with no historical resources. There are no national, State, or locally-designated historic resources on the Project Site or in the immediate vicinity of the neighborhood setting. The examination of numerous historic maps was also negative for older historic cultural resources. Therefore, the Project would have no significant impact on causing a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Code 5020.1(k).

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Chapter 532 Statutes of 2014 (AB 52) requires that lead agencies evaluate a project's potential impact on "tribal cultural resources," which include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the CRHR or included in a local register of historical resources." AB 52 also gives lead agencies the discretion to determine, based on substantial evidence, whether a resource qualifies as a "tribal cultural resource." In compliance with PRC Section 21080.3.1(b), the City provided formal notification to California Native American tribal representatives identified by the California NAHC. Native American groups may have knowledge about the area's cultural resources and may have concerns about a development's adverse effects on tribal cultural resources, as defined in PRC Section 21074. The County has contacted the tribal representatives of the Tribes noted below. Correspondence to and from tribal representatives is included as **Appendix K**.

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

AB 52 Native American Groups Contacted:

- Fernañdeno Tataviam Band of Mission Indians (FTBMI), Sarah Brunzell
- The Gabrieleno Tongva Indians of California, Christina Conley
- Yuhaaviatam of San Manuel Nation (YSMN, also known as the San Manuel Band of Mission Indians), Lee Clauss

According to the CRIR, the NAHC response to the SLF search request stated that the results of the SLF search were negative. A list was provided by NAHC of Native American Tribes who may have knowledge of cultural resources in the area. Pursuant to AB 52, the County contacted the Tribes listed above on January 22, 2024. The County received a response from the FTBMI and the YSMN; both Tribes indicated that they had an interest in the Project at the time. To date, no other responses from the Native American community have been received as part of the AB 52 tribal consultation effort. The FTBMI and YSMN both requested preferred tribal mitigation measures be made part of the Project and be implemented during construction of the Project. These mitigation measures are discussed below and in Section 5: Cultural Resources.

Mitigation Measures

MM TCR-1 Tribal Monitor. Prior to the commencement of any ground disturbance activities, the Permittee shall retain a Tribal monitor(s) (Tribal Monitor) who is approved by the Fernandeno Tataviam Band of Mission Indians (FTBMI) and the Yuhaaviatam of San Manuel Nation (YSMN, also known as San Manuel Band of Mission Indians) (the "Consulting Tribes") to provide tribal monitoring/consulting services alongside the Project Archaeologist in accordance with MM CUL-3. The Permittee shall submit a letter to the County of Los Angeles (County) to confirm the name and contact information of the Tribal Monitor(s) who is retained for the Project.

MM TCR-2 Tribal Cultural Resources Monitoring Plan. Prior to the commencement of any ground disturbance activities, the Project Archaeologist, in consultation with the Consulting Tribes shall prepare and submit a Tribal Cultural Resources Monitoring and Treatment Plan (Monitoring and Treatment Plan) to the County for review. The Monitoring and Treatment Plan shall be approved by the County and the Consulting Tribes before those activities commence. The Monitoring and Treatment Plan shall include methods for monitoring ground disturbance activities; procedures to follow when resources are discovered; protocol for identifying and evaluating tribal cultural resources; and shall incorporate measures to mitigate potential impacts to tribal cultural resources as provided in MM TCR-5, below.

MM TCR-3 Worker Environmental Awareness Program (WEAP) Training. Prior to the commencement of any ground disturbance activities, all project construction managers and workers shall attend a tribal cultural resources awareness training. The Project Archaeologist and the Tribal Monitor shall administer the training to inform construction managers and workers about the types of resources that could be encountered; the procedures to follow if tribal cultural resources are discovered; and the potential penalties for failing to adhere to applicable laws and regulations. The procedures include work curtailment or redirection and immediate contact of the on-

call archaeologist and, if appropriate, the FTBMI and SMBMI representative. Construction managers shall maintain a log to document all construction personnel who have completed the training. The log shall be provided to the County upon request within five business days. The training requirement should be stated on all construction plans. The Tribal representatives from the Consulting Tribes shall be allowed to attend and participate in the training. The WEAP required under this measure may be combined with the WEAP described in MM CUL-1.

MM TCR-4 Tribal Monitoring. Tribal monitor(s) shall be present onsite to monitor ground disturbing activities based on a schedule coordinated and agreed by the Consulting Tribes or established by the County. Tribal monitor(s) shall monitor ground disturbing activities when the Project Archaeologist is onsite in accordance with MM CUL-3.

If the Project's scheduled activities require the Tribal Monitor to leave the Project Site for a period of time and return, confirmation shall be submitted to the Tribes by the Permittee, in writing, upon completion of each set of scheduled activities and five (5) days' notice (if possible) shall be submitted to the Tribes by the Permittee, in writing, prior to the start of each set of scheduled activities. The Project Archaeologist and Tribal Monitor shall complete a log documenting all ground disturbance activities monitored, the locations where those activities occurred, the types of soils involved, and any tribal cultural resources encountered. Monitoring shall end when ground disturbance activities are completed, or earlier if a Tribal Monitor has determined that the site has a low potential for impacting tribal cultural resources. Within 30 days after monitoring has ended, the Project Archaeologist and Tribal Monitor shall submit the logs to the County and the Permittee shall submit in writing to the Consulting Tribes that all scheduled activities are complete

MM TCR-5 Discovery of Tribal Cultural Resources. If tribal cultural resources are encountered during construction, all ground disturbance activities within 100 feet of the find shall stop until the Tribal Monitor and the Project Archaeologist can evaluate the significance of the find and an area barrier shall be constructed. Construction activities may continue in other areas of the project site. The Project Archaeologist shall develop a research design including a plan to evaluate the resource for significance under CEQA criteria pursuant to Public Resources Code Section 21074. The archaeologist and the Consulting Tribes shall confer regarding the research design, evaluation efforts, and the resource's archaeological significance. If the discovery proves significant as determined by the Project Archaeologist and Consulting Tribes shall recommend appropriate measures subject to County's approval, to mitigate potential impacts to tribal cultural resources. Such measures may include but are not limited to resource avoidance, reburial, and preservation for educational purposes.

Should it occur that avoidance, preservation in place, or on-site reburial are not an option for treatment, the Consulting Tribes and Project Archaeologist shall develop a curation agreement to be approved by the County and agreed between landowner and museum. The agreement may include legal and physical transfer of the collections and associated recordation, fees, and maintenance of the collection.

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

The Consulting Tribes shall coordinate with the Permittee to ensure that all measures approved by the County are implemented. Within 90 days after monitoring has ended, the Project Archaeologist shall prepare and submit a final monitoring report documenting all encountered tribal cultural resources, the significance of the resources, and the treatment of the resources to the tribes for review and comment. An approved final report shall be submitted to the California Native American Heritage Commission, local CHRIS Information Center, the County, and Consulting Tribes.

19. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐

Regarding stormwater, see Checklist Question 10.c.iii. Regarding electric power and natural gas, see Checklist Questions 6.a and 6.b.

Water

Water services on the Project Site are currently provided by one irrigation well and an irrigation pipeline system on the southeastern portion of the subject property. Water services to the Project Site are provided by the AVEKWA. According to the 2020 AVEKWA Urban Water Management Plan (UWMP), the region's water is provided from groundwater and imported water.[43] The Project would utilize water during construction for dust suppression and during operation for routine panel washing. Water would be trucked to the Project Site from an off-site source. Project construction and operation would not utilize new or expanded water facilities, and no construction or relocation of water facilities would cause a significant environmental effect. Impacts would be less than significant.

Wastewater

Temporary sanitary facilities would be placed on-site during construction. As the Project would be unmanned during operation, no wastewater facilities would be required. Therefore, the Project is not anticipated to generate additional wastewater. Project construction and operation would not utilize wastewater facilities, and no construction or relocation of wastewater facilities would cause a significant environmental effect. Impacts would be less than significant.

Telecommunications

Telecommunication equipment, including fiber optics, microwave, and meteorological data collection systems or supervisory control and data acquisition would be installed on the Project Site to connect the Project to remote monitoring locations and ultimately to the SCE substation. Project construction would be coordinated with any telecommunications service providers prior to installation. Therefore, installation of telecommunications infrastructure would not cause significant environmental effects. Impacts would be less than significant.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

As described in Checklist Question 10.b, the Project would obtain construction and operational water by purchasing it from a local purveyor. The Project Site is located within the Antelope Valley Groundwater Basin,

[43] Antelope Valley-East Kern Water Agency, 2020 Urban Water Management Plan.

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

which is managed by the Antelope Valley Regional Water Management Group. The total storage capacity is estimated at 68 million to 70 million AF. Natural recharge is estimated at approximately 29,000 to 58,000 AF per year with an annual extraction of approximately 130,000 AF. The primary source of recharge to the groundwater basin is runoff from surrounding mountain ranges. Water demand during construction would be trucked in and is estimated at 13 AF. Water consumption for washing solar panels during Project operations and maintenance is anticipated to be approximately 0.2 AF of water per year. The water to be utilized during Project construction and O&M is minor compared to the water currently used on the Project Site for agricultural uses and would be sourced from the existing supplies of a local purveyor. Therefore, the Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development, and impacts would be less than significant.

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 projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

As described in Checklist Question 19.a, the Project would not require wastewater facilities and would not generate additional wastewater. As such, the Project would not interfere with any wastewater treatment provider's service capacity. Impacts would be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

Project construction would result in the generation of various waste materials including soil, vegetation, and sanitation waste from portable toilets. Soil excavated for the Project Site would be balanced on-site. Sanitation waste (i.e., human-generated waste) would be disposed of according to sanitation waste management practices. The Project would be unmanned during Project operations, and minimal solid waste would be generated and sent to a publicly owned permitted landfill/disposal site. As the Project would generate minimal construction and operational waste, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

As previously mentioned in Checklist Question 19.d, Project construction would result in the generation of waste materials such as soil, vegetation, and sanitation waste. The Project would also be required to comply with AB 341 which requires a 75 percent diversion of construction materials. During operations, the Project would be unmanned and would generate minimal solid waste. Therefore, the Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

20. WILDFIRE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*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 impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐
e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

As described in Checklist Question 9.g, the Project Site is located in an LRA and is not within a Very High FHSZ. Therefore, the Project Site is not located within an area prone to wildfire. Nevertheless, as described in Checklist Question 9.h, Project construction activities would be consistent with other such activities in the region and would not represent an increased fire risk. All construction vehicles and equipment would comply with applicable regulations to limit the potential for malfunction. Additionally, the proposed BESS would include redundant fire safety measures and would be designed and constructed according to applicable international, federal, State, and local standards. Furthermore, as described in Checklist Question 9.f, the Project would provide adequate emergency access during construction and operational activities and would not impede the use of the streets for emergencies or access for emergency response vehicles. Moreover, the Project Site is relatively flat with ruderal vegetation; therefore, the Project is not expected to expose people or structures to significant risks. As such, for the reasons substantiated above, impacts related to wildfires would be less than significant.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

As discussed throughout this Initial Study, the Project does not have the potential to degrade the environment's quality or result in significant environmental impacts that cannot be reduced to less than significant following compliance with the established regulatory framework (i.e., local, State, and federal regulations) and the recommended mitigation measures.

As concluded in Section 2: Air Quality, following compliance with **MM AQ-1**, which addresses a Valley Fever Management Plan, the Project would not expose sensitive receptors to substantial pollutant concentrations.

As concluded in Section 4: Biological Resources, following compliance with **MM BIO-1**, which addresses potential impacts to nesting birds; **MM BIO-2**, which addresses potential impacts to Swainson's Hawk; **MM BIO-3**, which addresses implementation of a WEAT; **MM BIO-4**, which requires proper containment of trash and waste items; **MM BIO-5**, which requires common and special-status wildlife awareness through visual checking and inspection; **MM BIO-6,** which addresses potential impacts to burrowing owls; **MM BIO-7**, which addresses potential impacts to desert kit fox; **MM BIO-8**, which addresses potential impacts to American badger; **MM BIO-9**, which addresses potential impacts to Crotch's bumble bee; **MM BIO-10**, which requires vegetation and revegetation measures; and **MM BIO-10**, which requires panel positioning to a close to vertical position, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

As concluded in Section 5: Cultural Resources, following compliance with **MM CUL-1, MM CUL-2** and **MM CUL-3**, which address potential impacts to archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. Following compliance with **MM CUL-4**, which addresses potential impacts to paleontological resources, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Following compliance with **MM CUL-5,** which addresses the inadvertent discovery of human remains, the Project would not directly or indirectly disturb any human remains.

As concluded in Section 18: Tribal Cultural Resources, following compliance with **MM TCR-1** through **MM TCR-5**, which address potential impacts to tribal cultural resources, the Project could not cause an adverse change in the significance of a tribal cultural resource.

	Potentially Significant Impact	*Less Than Significant Impact with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
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 the past projects, the effects of other current projects, and the effects of probable future projects.)?	☐	☐	☒	☐

CEQA Guidelines Section 15065(a)(3) defines "cumulatively considerable as times when "the incremental effects of an individual project are significant 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 would result in less than significant impacts with mitigation incorporated for the following environmental issues: air quality (Valley Fever only), biological resources, cultural resources, and tribal cultural resources. The impacts associated with these resource areas are localized and, as explained in detail above, project level impacts would be less than significant with mitigation incorporated. The Project site primarily is surrounded by fallow agricultural land, vacant land, and open space. Given the limited development in the area, there is no evidence of any cumulative impacts to these resource areas. Thus, cumulative impacts would be less than significant, and the Project's incremental contribution would not be cumulatively considerable.

All other Project impacts were determined either to have no impact or to be less than significant following compliance with the established regulatory framework, without the need for mitigation. Cumulatively, the proposed Project would not result in any significant impacts that would substantially combine with impacts of other current or probable future impacts. Therefore, the proposed Project would not result in any cumulatively considerable significant impacts.

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

A significant impact may occur if the Project has the potential to result in significant environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly. All potential impacts of the Project have been identified in the respective sections of this Initial Study, and mitigation measures have been prescribed, where applicable, to reduce all potential impacts to less than significant levels. As such, upon implementation of mitigation measures identified and compliance with existing regulations, the Project would not have significant environmental effects, and the Project would not have substantial adverse effects on human beings, directly or indirectly. Therefore, impacts would be less than significant.