MAY 2024

ANTELOPE VALLEY LOGISTICS CENTER – WEST (AVLC - WEST) PROJECT

PUBLIC REVIEW DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PREPARED FOR:

PREPARED BY:

Michael Baker INTERNATIONAL

PUBLIC REVIEW DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Antelope Valley Logistics Center – West (AVLC - West) Project

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1.0 INTRODUCTION

The Antelope Valley Logistics Center – West (AVLC - West) Project (herein referenced as the "project") is located within the Antelope Valley in unincorporated Los Angeles County (County). The proposed project would involve the construction of two speculative industrial short-term storage warehouse buildings on approximately 121 acres. Each new building would consist of approximately 1,007,536 square-foot building footprint, which includes approximately 40,000 square feet of office space. Each building would have dedicated 82 truck loading docks, 222 trailer parking stalls, and 849 passenger vehicle parking spaces; refer to Section 2.0, *Project Description*. Following a preliminary review of the proposed project, the County has determined that the project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). This Initial Study addresses the direct, indirect, and cumulative environmental effects of the project, as proposed.

1.1 STATUTORY AUTHORITY AND REQUIREMENTS

In accordance with CEQA (Public Resources Code Section 21000-21177) and pursuant to California Code of Regulations Section 15063, the County of Los Angeles, acting in the capacity of Lead Agency under CEQA, is required to undertake the preparation of an Initial Study to determine if the proposed project would have a significant environmental impact. If, as a result of the Initial Study, the Lead Agency finds that there is evidence that any aspect of the project may cause a significant environmental effect, the Lead Agency shall further find that an Environmental Impact Report (EIR) is warranted to analyze project-related and cumulative environmental impacts. Alternatively, if the Lead Agency finds that there is no evidence that the project, either as proposed or as modified to include the mitigation measures identified in the Initial Study, may cause a significant effect on the environment, the Lead Agency shall find that the proposed project would not have a significant effect on the environment and shall prepare a Negative Declaration for that project. Such determination can be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that such impacts may occur (Public Resources Code Section 21080(c)).

The environmental documentation, which is ultimately selected by the County in accordance with CEQA, is intended as an informational document undertaken to provide an environmental basis for subsequent discretionary actions upon the project. The resulting documentation is not, however, a policy document and its approval and/or certification neither presupposes nor mandates any actions on the part of those agencies from whom permits and/or other discretionary approvals would be required.

The environmental documentation is subject to a public review period. During this review, public agency comments on the document relative to environmental issues should be addressed to the County. Following review of any comments received, the County will consider these comments as a part of the project's environmental review and include them with the Initial Study documentation for consideration by the County.

1.2 PURPOSE

CEQA Guidelines Section 15063 identifies specific disclosure requirements for inclusion in an Initial Study. Pursuant to those requirements, an Initial Study shall include:

- A description of the project, including the location of the project;
- Identification of the environmental setting;
- Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
- Discussion of ways to mitigate significant effects identified, if any;

- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls; and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study.

1.3 CONSULTATION

As soon as a Lead Agency (in this case, the County of Los Angeles) has determined that an Initial Study would be required for the project, the Lead Agency is directed to consult informally with all Responsible Agencies and Trustee Agencies that are responsible for resources affected by the project, to obtain the recommendations of those agencies as to whether an EIR or Negative Declaration should be prepared for the project. Following receipt of any written comments from those agencies, the Lead Agency considers any recommendations of those agencies in the formulation of the preliminary findings. Following completion of this Initial Study, the Lead Agency initiates formal consultation with these and other governmental agencies as required under CEQA and its implementing guidelines.

1.4 INCORPORATION BY REFERENCE

The following documents were utilized during preparation of this Initial Study and are incorporated into this document by reference. The documents are available for review at the Los Angeles County Department of Regional Planning, 320 West Temple Street, Los Angeles, California 90012.

- *Los Angeles County General Plan* (updated July 14, 2022). The *Los Angeles County General Plan* (General Plan), updated July 14, 2022, is the foundational document for all community-based plans that serve the unincorporated areas. The General Plan identifies 11 Area Plans. The purpose of the Planning Areas Framework is to provide a mechanism for local communities to work with the County to develop plans that respond to their unique and diverse character. The 11 Planning Areas include: Antelope Valley Planning Area; Coastal Islands Planning Area; East San Gabriel Planning Area; Gateway Planning Area; Metro Planning Area; San Fernando Valley Planning Area; Santa Clarita Valley Planning Area; Santa Monica Mountains Planning Area; South Bay Planning Area; West San Gabriel Valley Planning Area; and Westside Planning Area. The General Plan also includes the following elements: Land Use, Mobility, Air Quality, Conservation and Natural Resources, Parks and Recreation, Noise, Safety, Public Services and Facilities, Economic Development, and Housing Elements.
- *Antelope Valley Town and Country Area Plan* (June 2015). The *Antelope Valley Town and Country Area Plan* (Area Plan), adopted June 2015, is a blueprint for future development and conservation in the Antelope Valley that informs decision-making at all levels to help ensure that individual activities are consistent with, and supportive of, the communities' vision. As a component of the General Plan, the Area Plan refines the County's goals and policies in the General Plan by addressing specific issues relevant to the Antelope Valley, including community maintenance and appearance. Further, the Area Plan provides greater detail to the guidance elements found in the General Plan.
- *Los Angeles County Code* (codified through Ordinance No. 2023-0042, passed September 26, 2023). The *Los Angeles County Code* (County Code) provides regulations for government administrative operations, construction, development, infrastructure, public safety, and business operations within the County's unincorporated areas. The Zoning Ordinance (Title 22 of the County Code) is intended to provide due and special consideration to the peculiar suitability of each and every zone identified in the Zoning Ordinance for the particular uses of area requirements, density of land occupancy, and the necessary, proper, and comprehensive groupings and arrangements of the various industries, businesses, and population of the unincorporated area of the County.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Antelope Valley is in the northern portion of the County of Los Angeles (County), in the geographic sub-region of the western tip of the Mojave Desert and is situated between the Tehachapi, Sierra Pelona, and the San Gabriel Mountains refer to Exhibit 2-1, *Regional Map*. On a regional basis, the area is accessible via State Route 14 (SR-14), and State Route 138 (SR-138). Cities surrounding the project site include the City of Lancaster to the south, and City of Rosamond to the north, with unincorporated Los Angeles County to the east and west.

The Antelope Valley Logistics Center – West (AVLC - West) project site is specifically located in Antelope Valley unincorporated Los Angeles County area, within the eastern portion of the County's *Antelope Valley Town and Country Area Plan*. It is situated immediately east of SR-14, south of Avenue F, and adjacent to 20th Street West; refer to Exhibit 2-2, *Site Vicinity*.

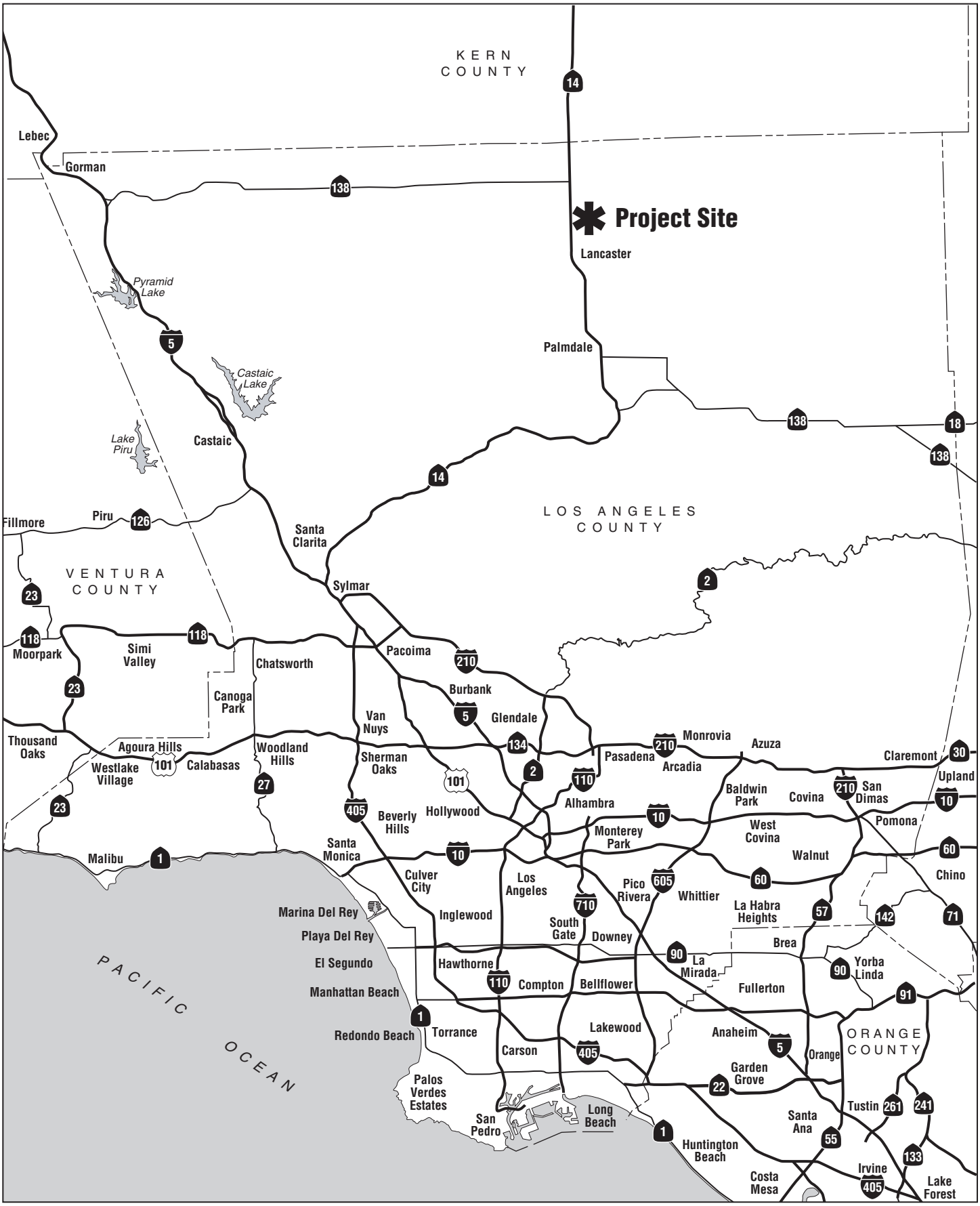
2.2 ENVIRONMENTAL SETTING

The project site is situated in a geographic sub-region of the southwestern Mojave Desert known as Antelope Valley. The region is commonly referred to as the "High Desert" due to its approximate elevation of 2,900 feet above sea level. The Mojave Desert is bounded to the west by the Tehachapi Mountains and to the south by the San Gabriel and San Bernardino Mountains. The project site and surrounding area are relatively flat.

The Antelope Valley Watershed is geographically unique since it does not outlet to the Pacific Ocean. The watershed straddles the Los Angeles-Kern County Line and encompasses approximately 1,220 square miles within Los Angeles County, 2006 square miles in Kern County, and 143 square miles in San Bernardino County. Numerous streams originating in the mountains and foothills flow across the valley floor and eventually pond in the dry lakes (Edwards Air Force Base) adjacent to the Northern County line. The valley lacks defined natural and improved channels outside of the foothills and is subject to unpredictable sheet flow patterns.

Hot summers, cool winters, low humidity, infrequent precipitation, and generally clear skies characterize the climate of the Antelope Valley area. Daily mean temperatures range from approximately 47 degrees Fahrenheit in the winter to 77 degrees Fahrenheit in the summer. Rainfall is typically less than 10 inches per year, snowfall is typically less than 2 inches per year, and humidity rarely exceeds 50 percent.

The project site is an approximately 121-acre property where the proposed industrial short-term storage warehouse buildings would be constructed. As shown on Exhibit 2-3, *Existing Site Photos*, the 121-acre project site is vacant and undeveloped and has not had any disturbance to date. The site is generally flat, with a gentle downward slope towards the north-east. The site is void of any improved structures.



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Regional Map

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Exhibit 2-1

Source: Google Earth Pro, December 2022

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Site Vicinity

Exhibit 2-2

View looking south from the northern portion of the project site.

View looking north from the southern portion of the project site.

View looking south from the northern portion of the project site.

View looking west from the central portion of the project site.

View looking east from the central portion of the project site.

View looking southwest from the central portion of the project site.

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Source: Michael Baker International, 2023.

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Existing Site Photos

Exhibit 2-3

SURROUNDING USES

Surrounding land uses in proximity to the project site are primarily comprised of airport, industrial, residential, and vacant land. Immediate surrounding land uses are as follows; refer to Table 2-1, *Surrounding Uses*:

- *North:* The site is bound by undisturbed, vacant land to the north. Leisure Lake Mobile Estates is located further north at the intersection of Avenue E and 20th Street West in unincorporated Los Angeles County.
- *East:* The site is bound by undisturbed, vacant land to the east. Scattered industrial and rural residential uses are located further east of Sierra Highway in unincorporated Los Angeles County.
- *South:* The site is bound by undisturbed, vacant land to the south. The Antelope Valley Fair and Event Center and residential uses are located further south in the City of Lancaster.
- *West:* The site is bound by undisturbed, vacant land to the west. The Apollo Community Regional Park and General William J. Fox Airfield are located further west in the City of Lancaster.

2.3 EXISTING GENERAL PLAN AND ZONING

Based on the County of Los Angeles' *Antelope Valley Town and Country Area Plan* (Area Plan), adopted on June 16, 2015, the Land Use Policy Map of the Area Plan identifies three economic opportunity areas (EOAs). These are areas where major infrastructure projects are being planned by State and regional agencies, which would bring opportunities for growth and economic development in the vicinity of these areas.

The project site is located within one of the three EOAs and is designated Light Industrial (IL) in the Area Plan and zoned Light Manufacturing (M-1). According to the Area Plan, the IL designation is intended for development of a broad range of industrial activities, including light manufacturing, assembly, warehousing, and distribution. According to County Code Section 22.22.010, *Purpose*, the M-1 zone allows for light industry, repair, wholesale, and packaging, including the manufacture, assembly, distribution, and storage of goods that have low nuisance impacts, but excluding raw-materials production, processing, or bulk handling. The M-1 zone also accommodates retail and service commercial uses to serve local employees and visitors. Surrounding uses including land use designations and zoning are shown in Table 2-1, below.

Table 2-1
Surrounding Uses

Direction from Site	Existing Uses	Jurisdiction	Land Use Designation	Zoning
North	Vacant Land	LA County Unincorporated Area	Antelope Valley Area Plan – Economic Opportunity Area (EOA)	Light Industrial (IL); Light Manufacturing (M-1)
East	Vacant Land	LA County Unincorporated Area	Antelope Valley Area Plan – Economic Opportunity Area (EOA)	Light Industrial (IL); Light Manufacturing (M-1)
South	Vacant Land	LA County Unincorporated Area	Antelope Valley Area Plan – Economic Opportunity Area (EOA)	Light Industrial (IL); Light Manufacturing (M-1)
West	Vacant Land	LA County Unincorporated Area	Antelope Valley Area Plan – Economic Opportunity Area (EOA)	Light Industrial (IL); Light Manufacturing (M-1)

2.4 PROJECT CHARACTERISTICS

The proposed project would include construction of two speculative industrial short-term storage warehouse buildings on approximately 121 acres. Each new building would consist of approximately 1,007,536 square-foot building footprint, which includes approximately 40,000 square feet of office space. Office space is a typical component of a modern warehouse, whereas in proportion to the total building area, the Institute of Transportation Engineers (ITE) trip generation manual indicates that the office or employee wellness areas are insignificant.[1] Modern warehouse building office space generally consists of common areas including but not limited to reception space, breakrooms, conference rooms, warehouse bathrooms, shipping and receiving centers, employee health and wellness rooms, and learning centers. These common areas often account for 25 to 50 percent of the 40,000 square feet of office area and are directly related to general warehouse operations. Furthermore, the office is purely ancillary to the warehousing operation and would not be an additional use separate from the warehouse tenant.

Each building would have dedicated 82 truck loading docks, 222 trailer parking stalls, and 849 passenger vehicle parking spaces; refer to Exhibits 2-4, *Conceptual Site Plan*. The project proposes to enhance the local economy and municipal revenue, and furnish local employment opportunities for residents, consistent with the goals of the Area Plan. To provide access to the project site, Avenue F would include half street improvements along the northerly project boundary in addition to half street improvements of 20th Street West along the westerly project boundary and Avenue F-8 along the southerly project boundary and full improvements of a new proposed public road on the eastern project boundary. Additional ancillary improvements such as landscaping, and utilities would also be provided.

Primary components of the proposed project are discussed in further detail below.

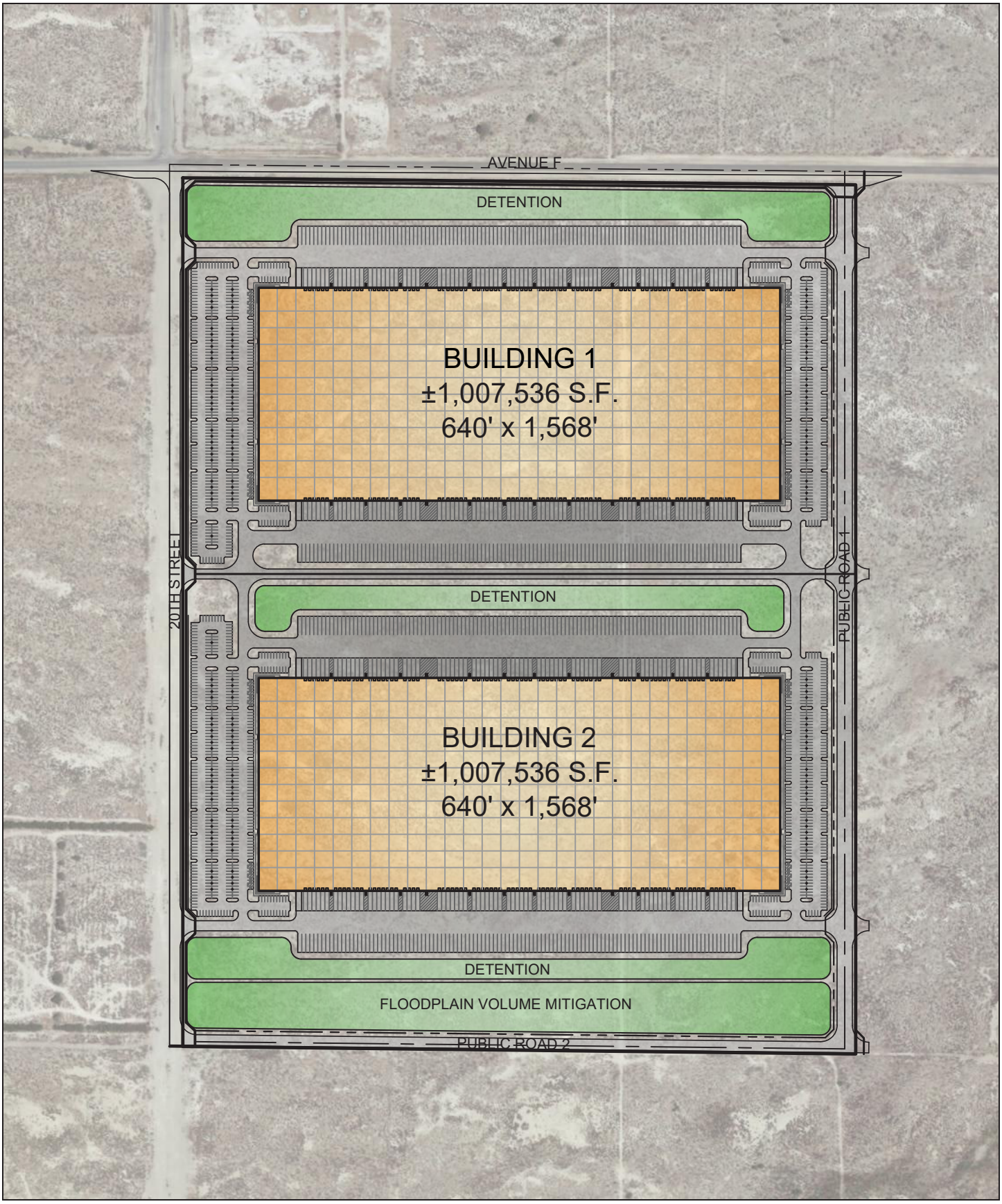
PROPOSED WAREHOUSE BUILDINGS

The two warehouse buildings would be identical to one another. Each building would consist of approximately 1,007,536 square feet, including approximately 40,000 square feet of office space. The proposed development would result in an approximate floor area ratio (FAR) of 0.38. Each building would have a maximum height of 49 feet; refer to Exhibit 2-5a, *Warehouse Building Elevations – Overall*, through Exhibit 2-5c, *Warehouse Building Elevations – North*. The buildings would be constructed with tilt-up concrete wall panels and painted with a variety of earth tone colors with either a hybrid wood and steel roof structure or a full steel metal deck roofing system. Each building would include a fire sprinkler suppression system and a fire alarm system to meet County Code requirements. The buildings would also include aluminum windows and storefront entrances with steel frame entry canopy consisting of prefinished composite aluminum panel fascia and ceiling system. Each warehouse building would have a total of 82 truck loading docks on the northern and southern sides of the building.

PROPOSED WAREHOUSE OPERATIONS

Each proposed industrial short-term warehouse building is being designed and built on a speculative basis with the intended function as a short-term storage warehouse, operating up to 24 hours a day, seven days a week, and employing up to approximately 1,000 people each (total of 2,000 on-site employees for both warehouses). The facility would receive products from vendors and other warehouses. Products would be stored in different storage types (mainly traditional pallet racking systems and shelving), providing the capability to fulfill customer orders and sort them to downstream transportation connections. Cages and pallets coming from inbound operations would be sent towards drop zones with forklifts or Powered Industrial Trucks (PITs) to perform the stowing process of the storage system (e.g., very narrow aisle [VNA] pallet racks, shelving, etc.) for short term storage.

[1] Each building contains 40,000 square feet of proposed office space. ITE Land Use Code 154 accounts for office space of approximately 1 percent of gross floor area, or approximately 10,000 square feet. Trips associated with remaining 30,000 square feet of proposed office space are estimated using ITE Land Use Code 710 for the purposes of the traffic analysis.



Source: NorthPoint Development, 2023.

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Conceptual Site Plan

Exhibit 2-4

Source: studioNorth Architecture, 2022.

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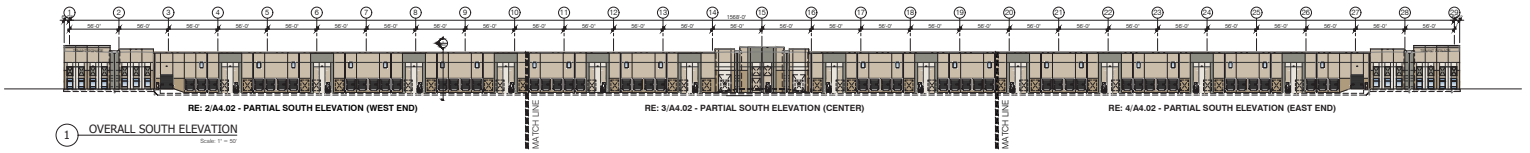
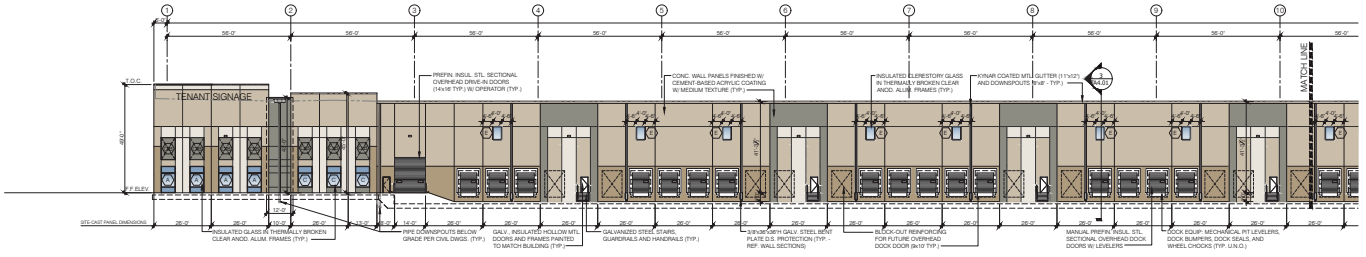
Warehouse Building Elevations – Overall

Exhibit 2-5a



1 OVERALL SOUTH ELEVATION
Scale: 1" = 50'



2 PARTIAL SOUTH ELEVATION (WEST END)
Scale: 1" = 20'

COLOR COATING LEGEND

1. ALL PAINT COLOR TRANSITIONS SHALL OCCUR AT INSIDE CORNERS IN VALLEY OF REVEALS. RE: REVEAL DETAILS ON AS.01.
2. COPING COLORS TO MATCH ADJACENT PAINT FINISH AS NOTED BELOW (U.N.O.)

SHERWIN WILLIAMS: SW7043 "WORLDLY GRAY" COPING COLOR: EQ. TO PAC-CLAD "SANDSTONE"

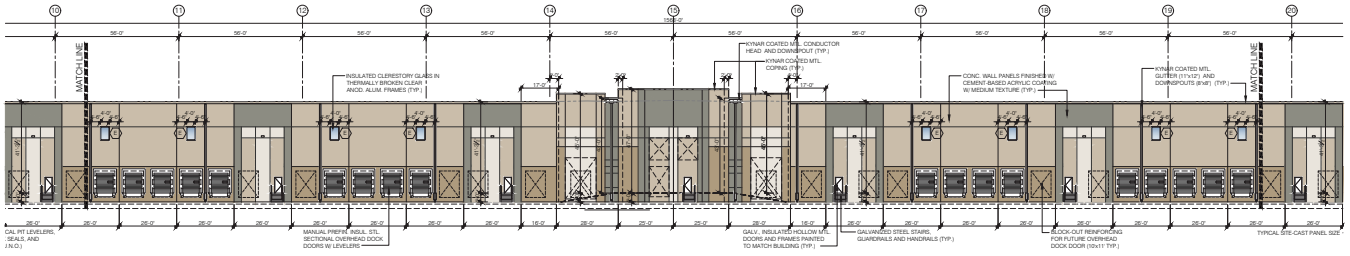
SHERWIN WILLIAMS: SW7039 "TONY TAUPE" COPING COLOR: EQ. TO PAC-CLAD "SIERRA TAN"

SHERWIN WILLIAMS: SW 7018 "DOVETAIL" COPING COLOR: EQ. TO PAC-CLAD "SLATE GRAY"

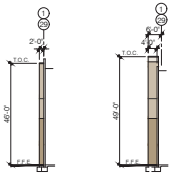
SHERWIN WILLIAMS: SW7046 "ANONYMOUS"

GUTTERS & DOWNSPOUTS TO MATCH SW7039 "TONY TAUPE" (EQ. TO PAC-CLAD "SIERRA TAN")

CONDUCTOR HEADS AND DOWNSPOUTS TO MATCH S7018 "DOVETAIL" (EQ. TO PAC-CLAD "SLATE GRAY")

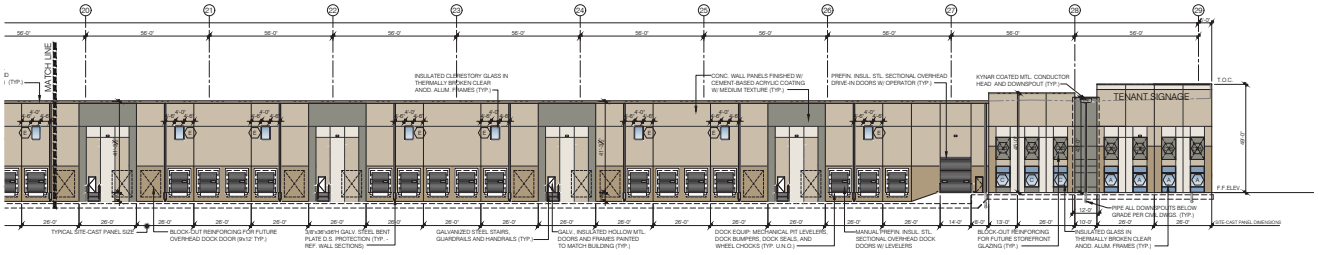


3 PARTIAL SOUTH ELEVATION (CENTER)
Scale: 1" = 20'

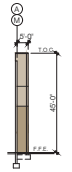


5 RETURN PANEL
Scale: 1" = 20'

6 RETURN PANEL
Scale: 1" = 20'



4 PARTIAL SOUTH ELEVATION (EAST END)
Scale: 1" = 20'



7 RETURN PANEL
Scale: 1" = 20'

Source: studioNorth Architecture, 2022.

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Warehouse Building Elevations – South

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Exhibit 2-5b

Source: studioNorth Architecture, 2022.

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Warehouse Building Elevations – North

Exhibit 2-5c

OFF-SITE IMPROVEMENTS

The project Applicant proposes several roadway improvements adjacent to the site.

- **Avenue F:** The project site includes half street improvements along the south side of existing Avenue F for ±2,200 linear feet, from the intersection of 20th Street West to a new proposed Interior Street "A" (along the eastern project boundary). Avenue F is currently improved with ±24-foot-wide asphalt surface with drainage ditches on both sides. The project proposes to widen the southside of Avenue F to ±50 feet by adding one additional lane to provide a total of two lanes of traffic with curb and gutter, sidewalk, and right-of-way dedication. The proposed improvements would not require right-of-way acquisition from adjacent property owners.

- **20th Street West:** The project Applicant also proposes half street improvements along the east side of 20th Street West for ±2,650 linear feet, extending from the intersection of Avenue F south to Avenue F-8. This corridor is currently unimproved as a dirt road. The project proposes to widen the east side of the roadway to ±50 feet by adding a center turn lane to provide a total of two lanes of traffic with curb and gutter, sidewalk, and right-of-way dedication. The proposed improvements would not require right-of-way acquisition from adjacent property owners.

- **Avenue F-8:** The project also includes potential half street construction of the north side of Avenue F-8 for ±2,200 linear feet, extending from 20th Street West to a proposed public road along the eastern project boundary subject to LA County approval. The corridor is currently unimproved as a dirt road. The improvements would provide for two lanes of traffic with curb and gutter, sidewalk, and right-of-way dedication. The proposed improvements would not require right-of-way acquisition from adjacent property owners.

- **New Proposed Interior Street "A" (along the east property boundary):** The project also includes full street construction of a new proposed north-south Interior Street "A" from Avenue F to Avenue F-8 along the eastern project boundary. There is currently no existing roadway in this location. The proposed improvements would provide the ultimate width for the road consisting of two lanes of traffic with curb and gutter and sidewalk on both sides of the road and full right-of-way dedication.

The project also proposes the following intersection controls and intersection turn lanes:

- One-way-stop control at the new northbound approach at the intersection of 20th Street West and Avenue F;
- One-way-stop control at the new northbound approach at the intersection of Interior Street "A" and Avenue F;
- One-way-stop control at each of six project driveways with the exiting site traffic controlled; and
- A 200-foot eastbound right-turn lane at the intersection of Interior Street "A" and Avenue F.

Additionally, the project would accommodate the flows associated with the Federal Emergency Management Agency (FEMA) flood zone by channelizing and conveying the flows from south to north along the east side of Interior Street A. The off-site FEMA predevelopment and post development flows shall remain unchanged. The channel would meet all County and FEMA requirements.

ON-SITE CIRCULATION

Project access would be provided along all sides of the development. Access to the individual buildings would be provided via private on-site roads that connect to the existing and proposed public roads. Three site access points are proposed along 20th Street West and along the new proposed public road for a total of six access points. These access points would serve both inbound and outbound tractor trailers and passenger vehicles. On-site circulation of tractor trailers and passenger vehicles would be separated from each other. Tractor trailers would access the docks and trailer parking areas on the north and south side of the buildings and passenger vehicles would access the parking lots on the east and west sides of each building. Emergency vehicles would have access to both buildings via the truck court

with designated fire access points and along the first bay of parking. These emergency access points are designed and designated for fire access in compliance with the Los Angeles County Fire Department regulations.

PARKING

Trailer parking would be provided north and south of each warehouse building. Employee and visitor passenger vehicle parking would be provided on the east and west of each warehouse building. To accommodate the parking needs associated with the warehouse and office uses for each building, 222 trailer parking stalls and 849 passenger car parking stalls (including Americans with Disabilities Act [ADA] stalls) are proposed. In total, the project would provide 444 trailer parking stalls and 1,698 passenger car parking stalls.

Long- and short-term bicycle parking and storage is also proposed on-site with 108 long-term bicycle spaces and 60 short-term spaces for each building. In total, 216 long-term bicycle spaces and 120 short-term spaces would be provided on-site. Bicycle racks would be distributed along the building perimeters.

Overall, the proposed vehicular and bicycle parking would meet or exceed the Los Angeles County's parking requirements as noted in Chapter 22.112 of the County Code.

UTILITIES

On-site utilities would include water, sewer, electricity, and telecommunications. The project proposes off-site water utility improvements to connect to an existing public water main to the south at the intersection of Avenue H and 20th Street West and extend the water main north along 20th Street West to the site. The project Applicant proposes to annex the site into the Los Angeles County Waterworks District 40 service area through the County of Los Angeles Local Agency Formation Commission (LAFCO) annexation process.

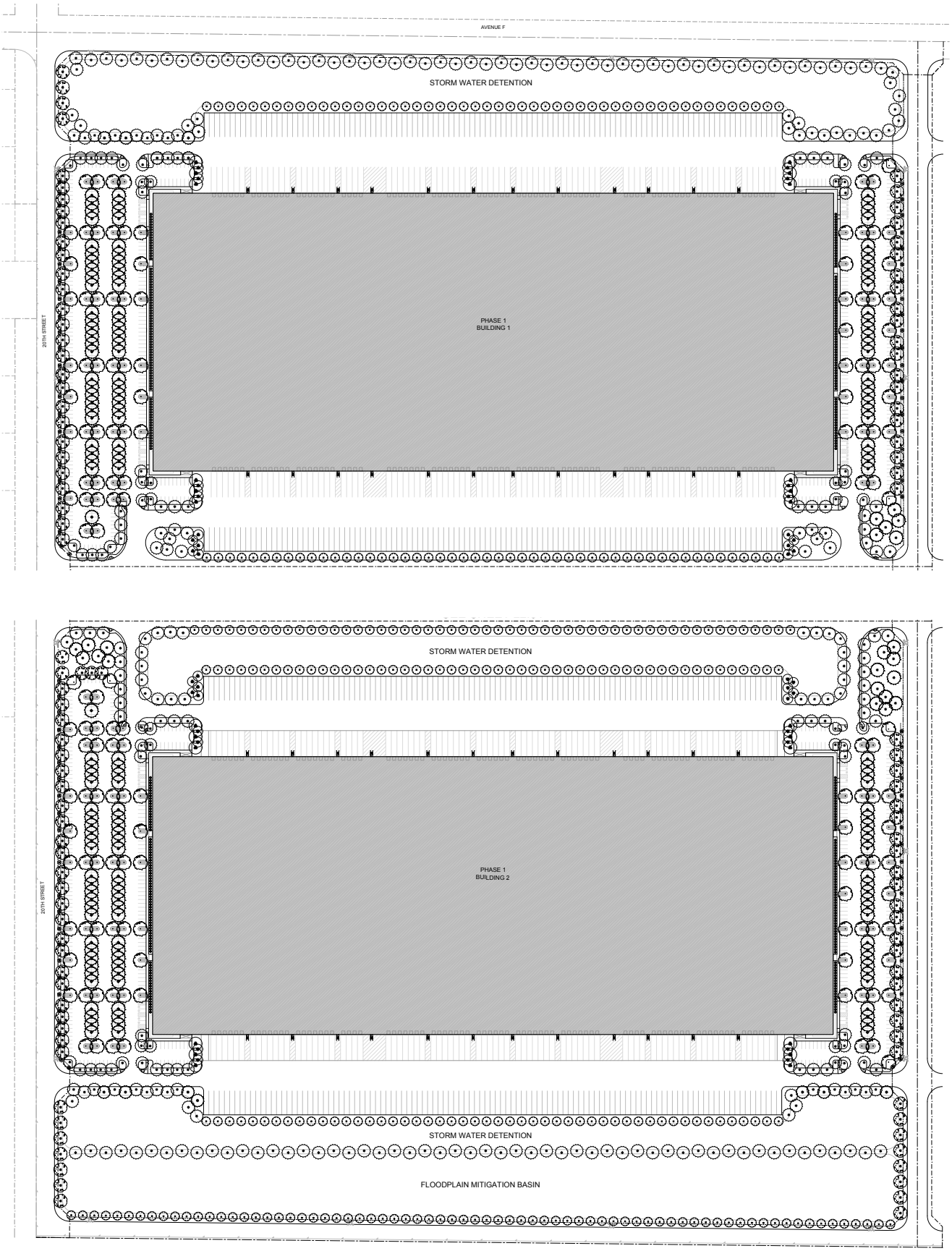
The proposed domestic water connection for each building would occur along 20th Street West. The domestic water line would extend east and branch off north and south to each of the industrial short-term storage warehouse buildings and connect at the center of each of the buildings. Additionally, a fire water line would extend around the perimeter of each building per Los Angeles County Fire Department regulations.

A 48- and 78-inch sanitary sewer main exists within existing easements along 20th Street West. Proposed sanitary sewer connections are proposed along the northern project boundary along Avenue F to connect each building to the existing sanitary sewer main. The project Applicant proposes to annex the site into the Los Angeles County Los Angeles County Sanitation District 14 service area through the LAFCO annexation process.

Electricity services would be provided by Southern California Edison (SCE). SCE electrical connections would be extended from the existing overhead distribution lines running along 10th Street West. Each building would be equipped with solar panels. The size of the solar array would be determined based on tenant requirements and included as part of the tenant improvements. The size of the solar system would also comply with all requirements from the local utility providers.

LANDSCAPING

Proposed landscaping consists of trees, shrubs, ground cover, mulch, and decorative rock; refer to Exhibit 2-6, *Conceptual Landscape Plan*. Landscaping would be provided along the site and building perimeters as well as throughout the parking areas. Further, the perimeters of the proposed stormwater detention basins and floodplain volume mitigation pond on-site would also be landscaped.



Source: JMD Landscape Architecture, 2022.

Michael Baker INTERNATIONAL

NOT TO SCALE

05/2023 • JN 192691

ANTELOPE VALLEY LOGISTICS CENTER – WEST (AVLC-WEST) PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Conceptual Landscape Plan

Exhibit 2-6

DRAINAGE

On-site surface water would be collected at the proposed storm drains located throughout the site and conveyed through the new stormwater pipes to the proposed stormwater detention basins located in the northern and southern portions of the site. It should be noted that the proposed stormwater detention basins that stores filtered water would be interconnected. The project also proposes a floodplain volume mitigation pond at the southern portion of the site to detain the water during potential flood events. Treated stormwater would ultimately discharge to the nearby Amargosa Creek.

LIGHTING

Nighttime parking lot, vehicle access, and building security lighting are proposed on-site. The types of lighting would include 30-foot wall-mounted security lighting along the exterior of the building and a range of 30-foot single-head to quadrant-head pole mounted lights proposed within the parking lots and vehicle access ways. All proposed lighting would comply with the Antelope Valley Town and Country Area Plan requirements, Los Angeles County's Zoning and Building Codes, and Rural Outdoor Lighting District requirements of Chapter 22.80 of the County Code.

PHASING AND CONSTRUCTION

The project would be constructed in a single phase. Anticipated grading consists of approximately 646,000 cubic yards of cut and approximately 649,600 cubic yards of fill material with a net import of approximately 3,600 cubic yards. Construction is anticipated to have a duration of approximately 24 months.

2.5 PERMITS AND APPROVALS

The County of Los Angeles is the Lead Agency for the project and has discretionary authority over the project proposal. Anticipated County discretionary approvals include, but are not limited to, the following. The permits and approvals described below may change as the project entitlement process proceeds.

- California Environmental Quality Act Clearance
- Conditional Use Permit
- Public Works Grading Permit
- Buildings and Safety Building Permit

In addition, the following permits/approvals may be required of other agencies:

Antelope Valley Air Quality Management District
- Construction/Operations Permit

Lahontan Regional Water Quality Control Board
- NPDES Construction General Permit

Los Angeles County Fire Department
- Plan Review and Permit

County of Los Angeles Local Agency Formation Commission
- Annexation to Los Angeles County Sanitation District 14
- Annexation to Los Angeles County Waterworks District 40

Federal Emergency Management Agency and County of Los Angeles Board of Supervisors
- Letter of Map Revision and Conditional Letter of Map Revision

3.0 INITIAL STUDY CHECKLIST

3.1 BACKGROUND

1. **Project Title:**
   Antelope Valley Logistics Center – West (AVLC - West) Project

2. **Lead Agency Name and Address:**
   County of Los Angeles
   320 West Temple Street, 13th Floor
   Los Angeles, California 90012

3. **Contact Person and Phone Number:**
   Richard Claghorn, Principal Planner
   County of Los Angeles
   213.974.6443

4. **Project Location:**
   The proposed project is located in Antelope Valley unincorporated Los Angeles County area, within the eastern portion of the County's *Antelope Valley Town and Country Area Plan*. The site is situated immediately east of SR-14, south of Avenue F, and adjacent to 20th Street West.

5. **Project Sponsor's Name and Address:**
   NorthPoint Development
   Jack Lac
   3315 North Oak Trafficway
   Kansas City, Missouri 64116

6. **General Plan Designation:**
   Light Industrial (IL) (Antelope Valley Area Plan)

7. **Zoning:**
   Light Manufacturing (M-1)

8. **Description of Project:**
   Refer to Section 2.4, *Project Characteristics*.

9. **Surrounding Land Uses and Setting:**
   Surrounding land uses are primarily comprised of airport, industrial, residential, and vacant land; refer to Section 2.2, *Environmental Setting*.

10. **Other public agencies whose approval is required:**
    Local Agency Formation Commission for the County of Los Angeles, Lahontan Regional Water Quality Control Board, Los Angeles County Sanitation District 14, and Los Angeles County Waterworks District 40.

11. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 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.?**
    In compliance with Assembly Bill 52, the County distributed letters to the applicable Native American tribes informing them of the project on April 6, 2023. Refer to Section 4.18, *Tribal Cultural Resources*, for additional information regarding the County's AB 52 consultation efforts. No tribes requested consultation for this project.

3.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

3.3 EVALUATION OF ENVIRONMENTAL IMPACTS

This Initial Study analyzes the potential environmental impacts associated with the proposed project. The issue areas evaluated include:

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

The environmental analysis in this section is patterned after the Initial Study Checklist recommended by the CEQA Guidelines Appendix G and used by the County of Los Angeles in its environmental review process. For the preliminary environmental assessment undertaken as part of this Initial Study's preparation, a determination that there is a potential for significant effects indicates the need to more fully analyze the development's impacts and to identify mitigation.

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the development. To each question, there are four possible responses:

- *No Impact*. The development will not have any measurable environmental impact on the environment.

- *Less Than Significant Impact*. The development will have the potential for impacting the environment, although this impact will be below established thresholds that are considered to be significant.

- *Less Than Significant Impact With Mitigation Incorporated*. The development will have the potential to generate impacts which may be considered as a significant effect on the environment, although mitigation measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.

- *Potentially Significant Impact*. The development will have impacts which are considered significant, and additional analysis is required to identify mitigation measures that could reduce these impacts to less than significant levels.

Where potential impacts are anticipated to be significant, mitigation measures are recommended to avoid or reduce such impacts to less than significant levels.

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4.0 ENVIRONMENTAL ANALYSIS

4.1 AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			✓	
b. Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?				✓
c. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
d. Substantially degrade the existing visual character or quality of public views 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)			✓	
e. Create a new source of substantial shadow, light, or glare, which would adversely affect day or nighttime views in the area?			✓	

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is generally defined as a view of undisturbed natural lands exhibiting a unique or unusual feature that comprises an important or dominant portion of the viewshed. Scenic vistas may also be represented by a particular distant view that provides visual relief from less attractive views of nearby features. Local open space or recreational areas may also offer scenic vistas if they represent a valued aesthetic view within the surrounding landscape of nearby features.

According to the County's *Antelope Valley Town and Country Area Plan* (Area Plan), the Antelope Valley possesses a unique rural character that serves both residents and visitors alike, drawing from a wide range of resources, such as dark night skies, significant ridgelines, Joshua trees, wild poppies, grazing lands, and cherry orchards. Specifically, the project site has long distance panoramas of the San Gabriel Mountains and Sierra Pelona Mountains to the south and southwest, and Tehachapi Mountains to the northwest. Further, scenic views of the desert are available throughout much of the County's undeveloped areas, including the project area.

Construction activities associated with the proposed project would include construction equipment, staging areas, vehicles, and construction workers on a site that currently consists of vacant, undeveloped areas. Following completion of the construction activities, all construction equipment would be removed from the site. Due to the temporary nature of construction activities, any changes to scenic vistas during construction of the proposed project would be less than significant.

Potential viewers of scenic vistas in the project vicinity are those on public lands and public rights-of-way and facilities. Development associated with the proposed project would have the potential to intermittently obscure distant views of the mountains and desert for motorists and pedestrians traveling in the vicinity of the project site. However, views of upper elevations of the mountains would not be blocked from public vantage points along roadways within the project site and panoramic views of desert expanses, Joshua trees, and other plant communities are available throughout the County. It is acknowledged that the proposed warehouse buildings would be developed in area of the County which is void of significant development. Nonetheless, the proposed project would not significantly block public vantage points or panoramic views and would result in less than significant impacts related to scenic vistas.

Mitigation Measures: No mitigation is required.

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?

No Impact. According to Los Angeles County General Plan (General Plan) Parks and Recreation Element Figure 10.1, *Regional Trail System*, there are no proposed or existing regional trails (i.e., County, Pacific Crest Trail, Conservancy [i.e., Rivers and Mountains Conservancy, Santa Monica Mountains Conservancy, Coastal Conservancy, and Baldwin Hills Conservancy] or Federal/National Forest trails) within proximity to the project site. As such, the project site is not visible from a regional riding, hiking, or multi-use trail and no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. According to the Area Plan and California Department of Transportation (Caltrans), *State Scenic Highway System Map*, there are no priority scenic drives or officially designated or eligible State scenic highways within proximity to the site; however, several are located throughout the Antelope Valley.[1] Based on Area Plan Map 4.2, *Town and Country Scenic Drives Map*, the nearest priority scenic drive is 90th Street West, approximately seven miles to the west of the project site. Further, the nearest Caltrans officially designated scenic highway is a segment of State Route 2 that intersects the San Gabriel Mountains in an east-west direction, approximately 29.3 miles to the south of the project site.[2] Given the distance, the proposed project would not have the potential to substantially damage scenic resources within a priority scenic drive or State scenic highway. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

d) Substantially degrade the existing visual character or quality of public views 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)

Less Than Significant Impact. The project site is located within one of three Area Plans designated economic opportunity areas and is designated Light Industrial (IL) in the Area Plan and zoned Light Manufacturing (M-1). Surrounding uses including vacant land designated IL and zoned M-1. Additionally, the project site is also located within the Rural Outdoor Lighting District (ROLD) which is intended to serve as a supplemental district for the rural areas of the County to promote and maintain dark skies for the health and enjoyment of individuals and wildlife.[3] Based on the definition of "urbanized area" in Public Resources Code Section 21071, the project site is not located within an

1 California Department of Transportation, *California State Scenic Highway System Map*, https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed March 8, 2023.

2 Ibid.

3 The project site is located within the Rural Outdoor Lighting District as indicated in *Figure 22.80.030-A: Rural Outdoor Lighting District* within County Code Section 22.80.100, *Exemptions*.

urbanized area and thus, the following analysis focuses on the project's potential to substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Public views of the site and surrounding area consist predominantly of rural and undeveloped land. As stated, the project site has long distance panoramas of the San Gabriel Mountains and Sierra Pelona Mountains to the south and southwest, and Tehachapi Mountains to the northwest. Additionally, scenic views of the desert are available throughout much of the County's undeveloped areas, including the project area. It is acknowledged that the proposed project would result in development in an area currently void of other significant developments; however, it should be noted that homeless encampments and illegal dumping were observed within the western third of the project site near 20th Street West. While the project would introduce large industrial buildings on-site, the project would not substantially degrade the existing visual character of the surrounding area, and the development is consistent with the light industrial uses intended for this area in the Area Plan and zoning classifications. The proposed buildings would be constructed of tilt-up concrete panels painted earth tone colors to complement the existing desert environment. Landscaping is also proposed to include a mixture of street and parking lot trees, shrubs, and groundcovers to provide screening of the proposed buildings and complement existing habitat and vegetation in the area. Proposed architectural features, signage, lighting, fences/walls, and landscaping would also comply with the applicable County Code sections for development in the M-1 zone and would be verified by the County during the plan check review process. Thus, while the project would introduce new structures in a predominantly undeveloped area, it would not degrade the visual character or quality of public views of the site and surrounding area. The expansive desert environment surrounding the project site would remain and continue to provide the rural desert character of the project area. Overall, impacts in this regard would be less than significant.

As a result, implementation of the proposed project would result in less than significant impacts in this regard.

Mitigation Measures: No mitigation is required.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. A potentially significant impact would occur if a new source of substantial light or glare causes an adverse effect on day or nighttime views. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprising highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point source lighting that contrasts with existing low ambient light conditions.

There are no existing lighting sources on the project site. Existing light sources in the project area contributing towards ambient lighting are predominantly associated with vehicular lights from vehicles travelling along nearby roadways, including West Avenue F to the north and SR-14 and 20th Street West to the west of the project site. As such, the proposed project would increase lighting at the project site compared to existing conditions.

County Code Chapter 22.80, *Rural Outdoor Lighting District*, is established as a supplemental district for the rural areas of the County to promote and maintain dark skies for the health and enjoyment of individuals and wildlife by: curtailing light pollution and preserving the nighttime environment; permitting reasonable uses of outdoor lighting for nighttime safety, security, productivity, and enjoyment, while protecting the natural environment from the adverse effects of excessive outdoor nighttime lighting from artificial sources; conserving energy and resources; and minimizing adverse off-site impacts of outdoor lighting, such as light trespass. The project site is located within the ROLD and thus, pursuant to County Code Section 22.80.050, *General Development Standards*, all lighting associated with the proposed project, including interior and exterior building lighting, security lighting, surface parking lot area lighting, and landscape lighting

is required to be directed away from all adjoining uses and shielded in a manner that would minimize light trespass and spillover onto adjacent uses. Additionally, the project's lighting plan would be designed to limit light and glare in accordance with CALGreen Section 4.106.8. Conformance with CalGreen requirements would reduce the project's operational lighting impacts to less than significant levels.

Vehicular headlights entering and exiting the project site via the proposed vehicle access ways would also result in increased lighting in the project vicinity; however, screening vegetation (street trees and ornamental landscaping) would be planted along the project perimeters and in the parking areas, and 30 to 42 inch high walls or a landscaped berm would be provided as required pursuant to County Code Section 22.112.080.F, *Walls*, which would screen vehicular headlights. As a result, vehicular headlights are not anticipated to result in a significant increase in lighting conditions in the immediate project vicinity.

The proposed project's exterior building materials would be constructed of tilt-up concrete panels painted earth tone colors with either a hybrid wood and steel roof structure or a full steel metal deck roofing system. The buildings would also include small aluminum windows and storefront entrances with steel frame entry canopy consisting of prefinished composite aluminum panel fascia and ceiling system. Proposed landscaping would provide a mixture of street and parking lot trees, shrubs, and groundcovers to provide screening which would reduce the minimal glare emanating from the site. As such, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

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?

No Impact. Per the California Department of Conservation, the project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] The site is currently undisturbed, vacant land. No farmland exists within the site vicinity. The nearest farmland designated as Prime Farmland, Unique Farmland, or Farmland of

[1] California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed April 19, 2024.

Statewide Importance is located approximately four miles to the northwest. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Conflict with existing zoning for agricultural use, within a designated Agricultural Resources Area, or with a Williamson Act contract?

No Impact. The project site is zoned Light Manufacturing (M-1) and is not covered under an existing Williamson Act contract.[2] Thus, project implementation would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is zoned M-1 and is not occupied by or used for forest land or timberland. Project implementation would not result in the rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts would occur.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.2(c). No impacts would occur.

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Responses 4.2(a) through 4.2(d). No impacts would occur.

Mitigation Measures: No mitigation is required.

[2] California Department of Conservation, *Los Angeles County Williamson Act FY 2016/2017 Map*, updated 2019.

4.3 AIR QUALITY

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

Background

The project site is under the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD), which covers the western portion of the Mojave Desert Air Basin (MDAB). The County's checklist item "a" also references the South Coast Air Quality Management District (SCAQMD) as portions of Los Angeles County fall under the jurisdiction of the SCAQMD. However, the area where the project is located falls fully under the jurisdiction of the AVAQMD; therefore, the SCAQMD's thresholds are not applicable to this project. The U.S. Environmental Protection Agency (EPA) designated the Western Mojave Desert Nonattainment Area (WMDONA) as nonattainment for the 2015 70 parts per billion (ppb) 8-hour ozone National Ambient Air Quality Standard (NAAQS) pursuant to the provisions of the Federal Clean Air Act. AVAQMD is charged with achieving Federal and State air quality standards within the WMDONA. As such, the AVAQMD adopted the *AVAQMD Federal 70 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area)* (AVAQMD 70 ppb Plan) on January 17, 2023.[1] The document sets forth a comprehensive program that would lead the area into compliance with Federal and State air quality standards. The AVAQMD 70 ppb Plan includes the latest planning assumptions regarding population, vehicle, and industrial activity and addresses all existing and forecasted ozone precursor-producing activities within the Antelope Valley through the year 2026. According to the AVAQMD 70 ppb Plan, AVAQMD would be in attainment of the 70 ppb ozone NAAQS by August 3, 2033.

In August 2016, the AVAQMD adopted the *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines* (AVAQMD CEQA and Federal Conformity Guidelines) to provide direction on the preferred analysis approach in preparing environmental analysis or document review.[2] The guidelines characterize the topography and climate of the MDAB, defines cumulative impacts, and provide emission thresholds for construction and operation. The AVAQMD CEQA and Federal Conformity Guidelines establish significance thresholds for projects. Any project is

[1] Antelope Valley Air Quality Management District, *AVAQMD Federal 70 ppb Ozone Attainment Plan (Western Mojave Desert Nonattainment Area),* January 17, 2023.

[2] Antelope Valley Air Quality Management District, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*, August 2016.

significant if it triggers or exceeds the most appropriate evaluation criteria. The evaluation criteria are: (1) generates total emissions (direct and indirect) in excess of the thresholds given in AVAQMD CEQA and Federal Conformity Guidelines Table 6, *Significant Emissions Thresholds*; (2) generates a violation of any ambient air quality standard when added to the local background; (3) does not conform with the applicable attainment or maintenance plan(s); and (4) exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1. This air quality analysis is based on these four criteria.

a) Conflict with or obstruct implementation of applicable air quality plan of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?

Less Than Significant Impact. As discussed above, pursuant to the AVAQMD CEQA and Federal Conformity Guidelines, any project is significant if it triggers or exceeds the most appropriate evaluation criteria. The evaluation criteria are: (1) generates total emissions (direct and indirect) in excess of the thresholds given in AVAQMD CEQA and Federal Conformity Guidelines Table 6, *Significant Emissions Thresholds*; (2) generates a violation of any ambient air quality standard when added to the local background; (3) does not conform with the applicable attainment or maintenance plan(s); and (4) exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.

The following analysis evaluates criterion (3). As such, this air quality analysis assesses the project's consistency with the AVAQMD 70 ppb Plan pursuant to the AVAQMD CEQA and Federal Conformity Guidelines. The AVAQMD and Federal Conformity Guidelines explain that projects consistent with the existing land use plan are deemed consistent with the AVAQMD 70 ppb Plan because the AVAQMD 70 ppb Plan's assumptions for future air quality emissions are based largely on the adopted land use plans within its territory. Projects that involve zoning changes, specific plans, general plan amendments and similar land use plan changes which do not increase dwelling unit density, do not increase vehicle trips, and do not increase vehicle miles traveled, are also deemed consistent with the AVAQMD 70 ppb Plan because these projects produce less emissions than what was assumed in the land use plan and; therefore, produce less emissions than what was assumed in the AVAQMD 70 ppb Plan

The purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans, and thus, if it would interfere with the region's ability to comply with Federal and State air quality standards. It is important to note that even if a project is found consistent it could still have a significant impact on air quality under CEQA. Consistency with plans means that a project is consistent with the goals, objectives, and assumptions in the respective plan to achieve the Federal and State air quality standards.

With respect to conformity impacts, the AVAQMD CEQA and Federal Conformity Guidelines notes the following:

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

COMPLIANCE WITH APPLICABLE DISTRICT RULES AND REGULATIONS

The project would be required to comply with all AVAQMD rules and regulations to improve air quality. Specifically, adherence with AVAQMD Rule 402 would minimize any discharge of contaminants that could be detrimental or would cause a nuisance; adherence with AVAQMD Rule 403 would reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (man-made) fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions; adherence with AVAQMD Rule 1113 would limit the quantity of volatile organic compounds (VOC) in architectural coatings; and adherence with AVAQMD Rule 1120 would minimize odor impacts from ROG emissions during asphalt paving activities.

Further, the proposed project would result in less than significant impacts with regard to localized and regional air pollutants concentrations during project construction and operations; refer to Responses 4.3(b) and 4.3(c). As such, the project would not delay the timely attainment of air quality standards or AVAQMD 70 ppb Plan emissions reductions goals.

CONSISTENCY WITH LAND USE PLANS AND GROWTH FORECASTS

The project site is designated Light Industrial (IL) and zoned Light Manufacturing (M-1) and is located within one of the three economic opportunity areas (EOAs) identified in the County of Los Angeles' *Antelope Valley Town and Country Area Plan* (Area Plan), adopted in 2015. The Industrial designation is intended for development of a broad range of industrial activities, including light manufacturing, assembly, warehousing, and distribution. EOAs are areas where major infrastructure projects are being planned by state and regional agencies, which would bring tremendous opportunities for growth and economic development in the vicinity of these projects.

The proposed project would include construction of two speculative industrial warehouse buildings. As detailed in Section 4.11, *Land Use and Planning*, the proposed project development and operation (warehousing) would be consistent with the existing IL land use designation and zoning for the site as envisioned the Area Plan.

As detailed in Section 4.14, *Population and Housing*, the project involves the construction of two industrial short-term storage warehouse buildings on a project site that is currently vacant and undeveloped land. The employment generated by the proposed project could result in future employees (and their families) relocating into the unincorporated County area or other nearby areas, resulting in direct population growth. However, it should be noted that future employees of the proposed industrial warehouse buildings would likely be existing residents of the Antelope Valley area (both unincorporated County areas and incorporated cities).

Further, the proposed project is a permitted use under the site's land use designation and zoning per the Area Plan. The project site is also located within the Central EOA of the Area Plan. As stated, the site has a land use designation of IL and is zoned M-1, and thus, the proposed warehouse use is permitted on-site. As such, the Area Plan and SCAG's regional forecasts have accounted for the proposed development on-site as an industrial development and no substantial unplanned population growth beyond future projections would occur.

As the project would be consistent with land uses previously envisioned for the site based on the Area Plan and would not induce substantial population growth beyond future projections, the project would be considered consistent with the growth forecasts in the AVAQMD 70 ppb Plan.

In conclusion, the determination of project consistency with the AVAQMD 70 ppb Plan is primarily concerned with the long-term influence of a project on MDAB air quality. The project would not result in long-term impacts on the region's ability to meet State and federal air quality standards. As discussed above, the proposed project would not conflict with the goals and policies of the AVAQMD 70 ppb Plan. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. As discussed above, pursuant to the AVAQMD CEQA and Federal Conformity Guidelines, any project is significant if it triggers or exceeds the most appropriate evaluation criteria. The evaluation criteria are: (1) generates total emissions (direct and indirect) in excess of the thresholds given in AVAQMD CEQA and Federal Conformity Guidelines Table 6, *Significant Emissions Thresholds*; (2) generates a violation of any ambient air quality standard when added to the local background; (3) does not conform with the applicable attainment or maintenance plan(s); and (4) exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.

The following analysis evaluates: AVAQMD CEQA and Federal Conformity Guidelines criteria (1) and (2). As such, this air quality analysis would assess the project's air pollutants emissions pursuant to the AVAQMD CEQA and Federal Conformity Guidelines.

CRITERIA POLLUTANTS

Carbon Monoxide (CO) – Common product of incomplete combustion. A criteria pollutant with state and federal standards. Not a primary photochemical reaction compound but involved in photochemical reactions. Dissipates rapidly and is therefore only important on a local scale near sources.

Oxides of Nitrogen (NO_x) – Common product of combustion in the presence of nitrogen. Includes NO_2, which is a criteria pollutant with state and federal standards. Locally and regionally important due to its involvement in the photochemical formation of ozone.

Oxides of Sulfur (SO_x) – Common product of combustion in the presence of sulfur. Associated primarily with diesel and coal burning. Includes SO_2, a criteria pollutant with state and federal standards. Primarily of concern near sources.

Ozone (O_3) – A gas mainly produced by a photochemical reaction between reactive organic gases and oxides of nitrogen in the presence of sunlight (also produced by molecular oxygen in the presence of ultraviolet light or electrical discharge). A strong oxidant that is damaging at ground level but necessary at high altitude (in the stratosphere, where it absorbs dangerous ultraviolet light). Also considered an important greenhouse gas. A criteria pollutant with state and federal standards.

Respirable Particulate Matter (coarse or PM_{10}, and fine or $PM_{2.5}$) – That portion of particulate matter that tends to penetrate into the human lung. The subscript refers to aerodynamic diameter. Criteria pollutants with state and federal standards. Locally and regionally important.

Reactive/Volatile Organic Compounds/Gases (ROG, VOC, NMOG, NMOC) – A portion of total organic compounds or gases, excludes methane, ethane and acetone (due to low photochemical reactivity). "ROG" is generally used by the California Air Resources Board, "VOC" is generally used by the United States Environmental Protection Agency, but all four terms are interchangeable for most uses. Regionally important due to its involvement in the photochemical reaction that produces ozone.

CONSTRUCTION

The California Emissions Estimator Model (CalEEMod) version 2022.1 was utilized to calculate the project's construction and operational air pollutants emissions. The CalEEMod default construction schedule was modified based on project-specific information provided by the Applicant, including adjusted timelines for construction phases hat better fit the nature of the proposed development and are more accurate than the default construction schedule provided by CalEEMod. The project would be constructed in a single phase. Anticipated grading consists of

approximately 646,000 cubic yards of cut and approximately 649,600 cubic yards of fill material with a net import of approximately 3,600 cubic yards. Construction is anticipated to have a duration of approximately 24 months. Table 4.3-1, *Construction Emissions*, presents the project's anticipated construction emissions. As shown, construction emissions generated by the proposed project would not exceed AVAQMD thresholds. The thresholds of significance recommended by the AVAQMD for construction emissions were developed for individual development projects as outlined in the AVAQMD CEQA and Federal Conformity Guidelines Table 6.

Table 4.3-1
Construction Emissions

Construction Year	Pollutant (pounds/day) [1,2]						Pollutant (tons/year) [1,2]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Year 1 (2023)	3.84	37.90	33.10	0.06	4.38	2.52	0.08	0.83	0.72	<0.01	0.10	0.05
Year 2 (2024)	97.80	62.80	118.0	0.17	18.70	6.34	3.85	4.09	11.40	0.01	1.88	0.53
Year 3 (2025)	98.10	28.20	118.0	0.11	16.60	4.43	3.65	2.96	9.15	0.01	1.62	0.44
Maximum Daily / Yearly Emissions	**98.10**	**62.80**	**118.0**	**0.17**	**18.70**	**6.34**	**3.85**	**4.09**	**11.40**	**0.01**	**1.88**	**0.53**
AVAQMD Significance Threshold [3]	*137*	*137*	*548*	*137*	*82*	*65*	*25*	*25*	*100*	*25*	*15*	*12*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***

Notes: AVAQMD = Antelope Valley Air Quality Management District; CO = carbon monoxide; NO_X = nitrogen oxide; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter; PM_{10} = particulate matter no more than 10 microns in diameter; ROG = reactive organic gases.

1. Emissions were calculated using CalEEMod version 2022.1. Winter emissions are presented here as winter represents the worst-case scenario.
2. The reduction/credits for construction emissions applied in CalEEMod are based on the application of dust control techniques as required by AVAQMD Rule 403. The dust control techniques include the following: water exposed surfaces three times daily; and limit speeds on unpaved roads to 25 miles per hour.
3. Source: Antelope Valley AQMD, California Environmental Quality Act (*CEQA) and Federal Conformity Guidelines Table 6, Significant Emissions Thresholds*, August 2016. In developing these thresholds, AVAQMD considered levels at which project emissions are cumulatively considerable. Consequently, exceedances of project-level thresholds would be cumulatively considerable.

Source: Refer to the CalEEMod outputs provided in Appendix A, *Air Quality/Greenhouse Gas Emissions/Energy Data*.

Fugitive Dust Emissions

Construction activities are a source of fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the project area. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill, and truck travel on unpaved roadways (including demolition as well as construction activities). Fugitive dust emissions vary substantially from day to day, depending on the level of activity, specific operations, and weather conditions. Fugitive dust from demolition, grading and construction is expected to be short-term and would cease upon project completion. Most of this material is inert silicates, rather than the complex organic particulates released from combustion sources, which are more harmful to health.

Dust (larger than 10 microns) generated by such activities usually becomes more of a local nuisance than a serious health problem. Of particular health concern is the amount of PM_{10} generated as a part of fugitive dust emissions. PM_{10} poses a serious health hazard alone or in combination with other pollutants. $PM_{2.5}$ is mostly produced by mechanical processes. These include automobile tire wear, industrial processes such as cutting and grinding, and re-suspension of particles from the ground or road surfaces by wind and human activities such as construction or agriculture. $PM_{2.5}$ is

mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary sources. These particles are either directly emitted or are formed in the atmosphere from the combustion of gases such as NO_X and SO_X combining with ammonia. $PM_{2.5}$ components from material in the Earth's crust, such as dust, are also present, with the amount varying in different locations.

The project would implement all required dust control techniques per AVAQMD Rule 403 (i.e., at least three times of watering exposed surfaces per day) to reduce PM_{10} and $PM_{2.5}$ concentrations. As depicted in Table 4.3-1, total PM_{10} and $PM_{2.5}$ emissions would not exceed AVAQMD thresholds during construction. Thus, impacts in this regard would be less than significant.

Construction Equipment and Worker Vehicle Exhaust

Exhaust emissions from construction activities include emissions associated with the transport of machinery and supplies to and from the project site, employee commutes to the project site, emissions produced on-site as equipment is used, and emissions from trucks transporting materials to/from the site. As presented in Table 4.3-1, construction equipment and worker vehicle exhaust emissions would not exceed the established thresholds for all criteria pollutants. Therefore, impacts in this regard would be less than significant.

ROG Emissions

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. The ROG emissions associated with paving and architectural coating have been quantified with the CalEEMod model. As required, all architectural coatings for the proposed project structures would comply with AVAQMD Rule 1113. Rule 1113 provides specifications on painting practices as well as regulates the ROG content of paint. As presented in Table 4.3-1, ROG emissions associated with the proposed project construction would not exceed the established threshold and 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 human health hazards 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 CARB in 1986.

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. Asbestos may be released to the atmosphere due to vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. All of these activities may have the effect of releasing potentially harmful asbestos into the air. Natural weathering and erosion processes can act on asbestos bearing rock and make it easier for asbestos fibers to become airborne if such rock is disturbed. 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 are not known to occur within the project area.[3] Thus, there would be no impact in this regard.

[3] 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, https://ww3.arb.ca.gov/toxics/asbestos/ofr_2000-019.pdf, accessed February 24, 2023.

Cumulative Short-Term Construction Impacts

The thresholds of significance recommended by the AVAQMD for construction emissions were developed for individual development projects as outlined in the AVAQMD CEQA and Federal Conformity Guidelines Table 6. In developing these thresholds, AVAQMD considered levels at which project emissions are cumulatively considerable. Consequently, exceedances of project-level thresholds would be cumulatively considerable.

As discussed above, the project's construction emissions would be below the established thresholds and would result in less than significant air quality impacts. Thus, it can be reasonably inferred that the project's construction emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants (i.e., O_3) in the MDAB. A less than significant impact would occur in this regard.

OPERATIONS

Long-term air quality impacts would consist of mobile source emissions generated from project-related traffic (i.e., motor vehicle use by employees, deliveries travelling to and from the site), and emissions from stationary, area, and energy sources. Emissions associated with each of these sources were calculated and are discussed below. Operational emissions generated by the proposed project are detailed in Table 4.3-2, *Maximum Operational Emissions*. Table 4.3-2 shows that the proposed project's maximum operational emissions would not exceed AVAQMD operational thresholds. Therefore, a less than significant impact would occur in this regard.

Mobile Source

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, PM_{10}, and $PM_{2.5}$ 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, PM_{10}, and $PM_{2.5}$). However, CO tends to be a localized pollutant, dispersing rapidly at the source.

Project-generated vehicle emissions have been estimated using CalEEMod. According to the VMT Analysis (refer to Appendix G, *VMT Analysis*), the proposed two warehouses with offices would generate approximately 3,388 total daily trips. The operational air quality analysis utilizes the total daily trips, which does not account for pass-by trips, to provide a worst-case scenario. In addition, CalEEMod default fleet mix was adjusted to account for the heavy-duty truck traffic that would be generated by the project; refer to Table 4.3-2.

Table 4.3-2
Maximum Operational Emissions

Source	Pollutant (pounds/day) [1]						Pollutant (tons/year) [1]					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Maximum Operational Emissions												
Mobile	16.60	67.10	218.0	0.80	21.70	4.98	2.82	12.40	33.00	0.14	3.97	0.91
Area	60.90	0.74	87.60	0.01	0.12	0.16	9.78	0.07	7.89	<0.01	0.01	0.01
Energy [2]	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Stationary Source [3]	0.00	0.00	0.00	0.00	0.00	0.00	0.23	0.99	0.58	<0.01	0.03	0.03
Total Emissions	**77.50**	**67.84**	**305.6**	**0.81**	**21.82**	**5.14**	**12.83**	**13.46**	**41.47**	**0.14**	**4.01**	**0.95**
AVAQMD Significance Threshold [3]	*137*	*137*	*548*	*137*	*82*	*65*	*25*	*25*	*100*	*25*	*15*	*12*
Is Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***	***No***

Notes: AVAQMD = Antelope Valley Air Quality Management District; CO = carbon monoxide; NO_X = nitrogen oxide; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter; PM_{10} = particulate matter no more than 10 microns in diameter; ROG = reactive organic gases.

1. Emissions were calculated using CalEEMod version 2022.1.
2. The project would not consume natural gas. Energy emissions would be primarily associated with electricity usage. However, criteria air pollutants emissions associated with electricity usage are not quantified.
3. The project would include two emergency generators and one firewater pump per warehouse.
4. Source: Antelope Valley AQMD, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines Table 6, Significant Emissions Thresholds*, August 2016. In developing these thresholds, AVAQMD considered levels at which project emissions are cumulatively considerable. Consequently, exceedances of project-level thresholds would be cumulatively considerable.

Source: Refer to the CalEEMod outputs provided in Appendix A, *Air Quality/Greenhouse Gas Emissions/Energy Data*.

Area Source Emissions

Area source emissions would be generated from consumer products, architectural coatings, and landscaping. The project's area source emissions would not exceed the established thresholds; refer to Table 4.3-2.

Energy Source Emissions

The primary use of electricity by the project would be for space heating and cooling, water heating, ventilation, lighting, appliances, landscaping equipment, and electronics. It should be noted that the project would not consume natural gas. Criteria air pollutant emissions from electricity use were not quantified since criteria pollutants emissions occur at the site of the power plant, which is off-site. Therefore, energy source emissions would be zero and not exceed established thresholds; refer to Table 4.3-2.

Stationary Source Emissions

The project proposes to use two 2,000 kilo-watts diesel emergency generators and one 2,000 gallon-per-minute firewater pump per warehouse building. Criteria air pollutant emissions from these stationary sources would be minimal due to the small size and minimal usage of these equipment. Stationary source emissions would not exceed established thresholds; refer to Table 4.3-2.

Total Operational Emissions

As shown in Table 4.3-2, the total operational mitigated emissions for both daily and annual would not exceed established thresholds. Therefore, impacts in this regard would be less than significant.

Cumulative Long-Term Operational Impacts

The thresholds of significance recommended by the AVAQMD for construction emissions were developed for individual development projects as outlined in the AVAQMD CEQA and Federal Conformity Guidelines Table 6. In developing these thresholds, AVAQMD considered levels at which project emissions are cumulatively considerable. Consequently, exceedances of project-level thresholds would be cumulatively considerable. As such, if the project does not exceed any of the established thresholds, then cumulative impacts resulting from the project would not be considered cumulatively considerable by the AVAQMD.

As discussed above, the project's operational emissions would be below the established thresholds and would result in less than significant air quality impacts. Thus, it can be reasonably inferred that the project's operational emissions would not contribute to a cumulatively considerable air quality impact for nonattainment criteria pollutants (i.e., O_3) in the MDAB. A less than significant impact would occur in this regard.

As discussed above, the project's operational emissions would be below the established thresholds and would not result in long-term operational air quality impacts. Additionally, adherence to applicable AVAQMD rules and regulations would alleviate potential impacts related to cumulative conditions on a project-by-project basis. Emission reduction technology, strategies, and plans are constantly being developed. As a result, the proposed project would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Therefore, no cumulative operational impacts associated with implementation of the proposed project would result.

Similarly, as the project would not exceed AVAQMD established thresholds for construction and operational air emissions, the project would have a less than significant impact for air quality health impacts.

Mitigation Measures: No mitigation is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As discussed above, pursuant to the AVAQMD CEQA and Federal Conformity Guidelines, any project is significant if it triggers or exceeds the most appropriate evaluation criteria. The evaluation criteria are: (1) generates total emissions (direct and indirect) in excess of the thresholds given in AVAQMD CEQA and Federal Conformity Guidelines Table 6, *Significant Emissions Thresholds*; (2) generates a violation of any ambient air quality standard when added to the local background; (3) does not conform with the applicable attainment or maintenance plan(s); and (4) exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1. The following analysis evaluates criterion (4).

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, and daycare centers. 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 receptors are residences located approximately 3,200 feet to the west of the project site. Based on this distance, a quantified Health Risk Assessment (HRA) was not conducted.

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, 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 and, as such, translating project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. In other words, the project's less than significant increases in regional air pollution from criteria air pollutants during construction would have negligible impacts on human health.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD) (April 6, 2015) for the *Sierra Club vs. County of Fresno*, the SCAQMD acknowledged it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons including modeling limitations as well as where in the atmosphere air pollutants interact and form. Further, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (SJVAPCD) (April 13, 2015) for the *Sierra Club vs. County of Fresno*, SJVAPCD acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts.

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's Brief of Amicus Curiae states 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 further 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 O_3 levels at highest monitored site by only nine parts per billion. As such, the SCAQMD concludes that it is not currently possible to accurately quantify O_3-related health impacts caused by NO_x or VOC emissions from relatively small projects (defined as projects with regional scope) due to photochemistry and regional model limitations.

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.).

The MDAB is designated as an attainment/maintenance area for the Federal CO standards and an attainment area for State standards. There has been a decline in CO emissions even though vehicle miles traveled on U.S. urban and rural roads have increased. Nationwide estimated anthropogenic CO emissions have decreased 68 percent between 1990 and 2014. In 2014, mobile sources accounted for 82 percent of the nation's total anthropogenic CO emissions. CO emissions have continued to decline since this time. The MDAB was re-designated as attainment and is no longer addressed in the AVAQMD's AQMP. Three major control programs have contributed to the reduced per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs.

Localized concentrations of CO are typically associated with the idling of vehicles, particularly in highly congested areas. For this reason, the areas of primary concern are congested roadway intersections that experience high levels of vehicle traffic with degraded levels of service (LOS). With regard to potential increases in CO concentrations that could potentially exceed applicable ambient air quality standards, signalized intersections that are projected to operate at an unacceptable LOS E or F are of particular concern.

A detailed CO analysis was conducted in the *Federal Attainment Plan for Carbon Monoxide* (CO Plan) for SCAQMD's *2003 Air Quality Management Plan*. The locations selected for microscale modeling in the CO Plan include the worst-

case intersections (those with heavy traffic volumes) in the South Coast Air Basin, and these intersections would likely experience the highest CO concentrations. Of these locations, the Wilshire Boulevard/Veteran Avenue intersection in Los Angeles experienced the highest CO concentration (4.6 parts per million [ppm]), which is well below the 35-ppm 1-hr CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily trip of approximately 100,000 vehicles per day.

As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection (100,000 vehicle trips per day), it can be reasonably inferred that CO hotspots would not be experienced at any intersections with lower volume of traffic. As discussed in Section 2.2, *Environmental Setting*, the project is surrounded by vacant land uses and no signalized intersections are located within project vicinity. Further, it is acknowledged that the proposed project would generate approximately 3,388 total daily trips, significantly lower than 100,000 vehicles per day experienced at the Wilshire Boulevard/Veteran Avenue intersection. As such, it is unlikely that the proposed project would contribute to a significant increase in CO concentrations that could potentially exceed applicable ambient air quality standards within project vicinity. Impacts would be less than significant in this regard.

TOXIC AIR CONTAMINANTS

Toxic Air Contaminants (TACs) (also referred to as hazardous air pollutants [HAPs]), are pollutants that result in an increase in mortality, a serious illness, or pose a present or potential hazard to human health. Health effects of TACs may include cancer, birth defects, and immune system and neurological damage.

Project construction may result in temporary increases in emissions of diesel particulate matter (DPM) associated with the use of off-road diesel equipment. Health-related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. As such, the calculation of cancer risk associated with exposure of to TACs are typically calculated based on a long-term (e.g., 70-year) period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. As such, exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 1 in one million) during project construction.

As a warehousing project, the proposed project is anticipated to generate approximately 850 heavy-duty truck trips per day; refer to Appendix G. As such, the amount of TACs may be significant near the project site. However, as the amount to which the nearest sensitive receptors (i.e., residences located approximately 3,200 feet to the west of the project site) are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards), the project is not anticipated to result in significant impacts in this regard. As such, project operation is not anticipated to result in significant exposure to TAC and impacts in this regard would be less than significant.

VALLEY FEVER

Coccidioidomycosis, more commonly known as "Valley Fever," is primarily a disease of the lungs caused by the spores of the Coccidioides immitis fungus. The spores are found in soils, become airborne when the soil is disturbed, and are subsequently inhaled into the lungs. After the fungal spores have settled in the lungs, they change into a multicellular structure called a spherule. Fungal growth in the lungs occurs as the spherule grows and bursts, releasing endospores, which then develop into more spherules. The *Coccidioides immitis* fungal spores are often found in the soil around rodent burrows, Indian ruins, and burial grounds. The spores become airborne when the soil is disturbed by winds, construction, farming, and soil disturbing activities. This type of fungus is endemic to the southwestern United States and is common in the Antelope Valley. The project is in an area designated as suspected endemic for Valley Fever by the Center for Disease Control and Prevention (CDC). [4] Annual morbidity reports for 2011 through 2016 from Los

[4] Centers for Disease Control and Prevention, *More information about the estimated areas with blastomycosis, coccidioidomycosis (Valley fever), and histoplasmosis in the United States*, https://www.cdc.gov/fungal/diseases/coccidioidomycosis/maps.html#aa, accessed February 24, 2023.

Angeles County Public Health (LACPH) indicate that the Los Angeles County has the reported case rate that are approximately 30 per 100,000 population.[5]

Any nearby sensitive receptors as well as workers could be exposed to Valley Fever from fugitive dust generated during project construction. There is the potential that Coccidioides spores would be stirred up during excavation, grading, and earth-moving activities, exposing construction workers and nearby sensitive receptors to these spores and thereby, to the potential of contracting Valley Fever. However, project construction would be required to comply with AVAQMD Rules 401 and 403 emissions during construction. With project adherence to AVAQMD Rules 401 and 403, dust from potential future construction activity would be limited and would not expose nearby sensitive receptors to the Valley Fever fungus. In addition, the project site is located approximately 3,200 feet from the nearest sensitive receptor. Impacts would be less than significant in this regard.

It should be noted that the ambient air quality standards are developed and represent levels at which the most susceptible persons (i.e., children and the elderly) are protected. In other words, the ambient air quality standards are purposefully set in a stringent manner to protect children, elderly, and those with existing respiratory problems. As discussed above, the project's emissions would be below the established thresholds and would not result in short-term construction or long-term operational air quality impacts. Thus, the project is not anticipated to expose nearby sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact.

CONSTRUCTION

Construction activities associated with the project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon project completion. In addition, the project would be required to comply with the California Code of Regulations, 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 reduce detectable odors from heavy-duty equipment exhaust. The project would also comply with the AVAQMD Rule 1113, which would minimize odor impacts from ROG emissions during architectural coating. Project adherence with AVAQMD Rule 1120 would minimize odor impacts from ROG emissions during asphalt paving activities. As such, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and less than significant impacts would occur in this regard.

OPERATIONS

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 proposed project involves the construction of two speculative industrial short-term storage warehouse buildings. As such, the project would not involve land uses typically associated with odor complaints. In relation to truck operations, the proposed project would be required to comply with the California Code of Regulations, Title 13, Sections 2485(C)(1) which limits the idling time of trucks to no more than five minutes and would further minimize emissions and possible

[5] Los Angeles County Department of Public Health, *Acute Communicable Disease Control 2016 Annual Morbidity Report*, http://publichealth.lacounty.gov/acd/docs/2011to2016.pdf, accessed February 24, 2023.

odors. As discussed above, project adherence with AVAQMD Rule 402 would minimize any discharge of contaminants that could be detrimental or would cause a nuisance. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		✓		
b. Have a substantial adverse effect on any 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?		✓		
c. Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		✓		
e. 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 other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?				✓
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 Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?				✓
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?				✓

This section is primarily based upon the following technical studies (refer to Appendix B, *Biological Resources Documentation*):

- *Antelope Valley Logistics Center West Project, Unincorporated Los Angeles County, California Biological Resources Assessment* (Biological Resources Assessment), prepared by Michael Baker International (Michael Baker), dated April 2024; and

- *Delineation of Jurisdictional Waters for the proposed Antelope Valley Logistics Center West (AVLC West) Development Project located in unincorporated County of Los Angeles, California* (JD Memo), prepared by Michael Baker, dated February 8, 2023.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated. A Biological Resources Assessment was prepared for the project and included a literature review and records search of the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California (CIRP), and the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation Project Planning Tool (IPaC). The records search encompassed four United States Geologic Survey (USGS) 7.5-minute quadrangles, including the *Rosamond, Rosamond Lake, Lancaster East, and Lancaster West, California* quadrangles. In addition, Michael Baker reviewed publicly available reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the project site, including the USFWS Critical Habitat Mapper and Environmental Conservation Online System, U.S. Department of Agriculture *Custom Soil Resource Report for Antelope Valley Area, California*, Cornell Lab of Ornithology's *Birds of the World* and *eBird Database* (eBird database), and historic/current aerial photographs. A report by Rincon Consultants, Inc. (Rincon) summarizing results of a database search and field survey conducted in May 2022 was also reviewed and is referenced further in this section. Biological reports previously prepared by Michael Baker for projects in the general area of the City of Lancaster were also reviewed.

A field survey/habitat assessment within the boundaries of the project site was also conducted on November 21, 2022, and November 29, 2022, to observe existing biological resource conditions; refer to Biological Resources Assessment Figure 3, *Project Site*. Additional site visits were conducted in 2023 to conduct focused surveys for burrowing owl (*Athene cunicularia*) on March 8, March 28, May 9, June 5, and July 6, 2023, and for rare plants on May 1, May 23, and June 16, 2023. Based on the field surveys, the project site is mainly comprised of undisturbed natural vegetation communities. It should be noted that observations of homeless encampments and illegal dumping within the western third of the project site (in the vicinity of 20th Street West), as well as off-road vehicle tracks were noted throughout the project site.

One natural vegetation community was observed and mapped within the boundaries of the project site during the field survey: disturbed *Atriplex confertifolia* Shrubland Alliance. Additionally, one land cover type (Disturbed) was observed within the project site; refer to Biological Resources Assessment Figure 5, *Vegetation Communities and Land Cover Types*.

Nearly the entire project site is composed of *Atriplex confertifolia* Shrubland Alliance, dominated by shadscale saltbush (*Atriplex confertifolia*), with allscale saltbush (*Atriplex polycarpa*), a co-dominant species observed within this community. Fourwing saltbush (*Atriplex canescenes*) and rubber rabbitbrush (*Ericameria nauseosa*) were also occasionally observed. Herbaceous species observed within the project site include non-native short pod mustard (*Hirschfeldia incana*), brome grasses (*Bromus* sp.), Russian thistle (*Salsola* sp.), and native salt grass (*Distichlis spicata*).

Special-Status Plants

A total of 14 regional special-status plant species have been recorded in the USGS *Rosamond, Rosamond Lake, Lancaster East, and Lancaster West, California* 7.5-minute quadrangles during reviews of the CNDDB, CIRP, and IPaC. One special-status plant species, Mojave spineflower (*Chorizanthe spinosa*; CNPS California Rare Plant Rank [CRPR] 4.2), was observed within the project site during Michael Baker's field survey and was similarly recorded during a reconnaissance-level survey in the general area in May 2022 by Rincon.[1] Mojave spineflower was observed in the western third of the project site, where individuals were dormant and almost undetectable during the field survey conducted by Michael Baker on November 21, 2022 and November 29, 2022.

Additionally, the Biological Resources Assessment also determined that there is a high potential for the project site to support alkali mariposa-lily (*Calochortus striatus*; CNPS CRPR 1B.2). Alkali mariposa-lily was detected by Rincon's reconnaissance-level survey in May 2022, to the east of the project site (along Amargosa Creek and within a few hundred feet of the project site). As such, rare plant surveys were conducted in May and June 2023 to define the current extent of special-status plant species, including Mojave spineflower and alkali mariposa-lily, within the project site. All other remaining special-status plant species identified by the CNDDB, CIRP, and IPaC databases have either a low potential to occur or are not expected to occur within the project site.

Rare Plant Survey Results

Rare plant surveys were conducted during the regional blooming period in the Antelope Valley. Michael Baker biologists tracked weather conditions and blooming periods and conducted three surveys of the project site during May and June 2023, which coincided with the blooming period of special-status plant species that were determined to have potential to occur within the project site. Two special-status plant species were detected and mapped during these surveys, including alkali mariposa lily and Mojave spineflower.. According to the Biological Resources Assessment, the project has the potential to impact up to 16 individual alkali mariposa lily and up to 4,179,468 individual Mojave spineflower covering 15.16 acres.

Impacts to alkali mariposa lily, a species with a CRPR of 1B.2, would be considered significant under CEQA and as such would require mitigation to reduce impacts to below a level of significance. However, only a total of 16 individual alkali mariposa lily, covering a negligible area, were recorded within the survey area. Impacts to alkali mariposa-lily may be achieved in conjunction with compensatory mitigation implemented for impacts to other special-status species mapped on-site (i.e., Mojave spineflower).

Mojave spineflower is a special-status species with a CRPR of 4.2; species with a CRPR of 3 or 4 generally do not require evaluation under CEQA when small numbers or areas of such species are impacted. However, given the quantity of Mojave spineflower present on-site, an evaluation of this CRPR 4 species under CEQA may be warranted and mitigation for impacts to the species ultimately required.

To ensure proper avoidance of special-status plant species, prior to construction, and during the appropriate blooming periods for special-status plant species with the potential to occur within the project site, Mitigation Measure BIO-1 would require focused rare plant surveys across the entire project site following CDFW and CNPS guidelines to determine presence or absence of special-status plant species. The surveys would be required to be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity), and include site visits covering early, mid, and late-blooming species. Documentation of surveys and findings would be submitted to the County Planning Department and CDFW for review. Additionally, for the loss of on-site habitat supporting special-status plant species known to occur on-site (i.e., Mojave spineflower and alkali mariposa-lily), the project proponent is required to coordinate with a regional conservation agency or land trust to identify off-site lands that may be acquired and held in

[1] Rincon Consultants, Inc., *Biological Resources Assessment for an Industrial Warehouse Facility in Antelope Valley, Los Angeles County, California*, August 2022; refer to Appendix B.

a restrictive deed for perpetuity to compensate for the loss of 15.16 acres of on-site habitat occupied by special-status plant species at a ratio of 0.5:1. It is expected that the acquired lands would be located in the Antelope Valley region of Los Angeles County and would support populations of each special-status plant species approximately equal in number to those recorded within the project site. With implementation of Mitigation Measure BIO-1, impacts to special-status plant species would be reduced to less than significant levels.

Special-Status Wildlife

A total of 21 special-status wildlife species have been recorded in the USGS *Rosamond, Rosamond Lake, Lancaster East, and Lancaster West, California* 7.5-minute quadrangles by the CNDDB and IPaC. One special-status wildlife species was observed during the field survey. Specifically, Loggerhead shrike (*Lanius ludovicianus*, California Species of Special Concern [SSC]) was observed during the surveys in November 2022.

Although no burrowing owl (SSC) were observed during protocol surveys conducted in 2023 and during the general biological surveys in November 2022, one individual was incidentally observed on December 12, 2022, by Michael Baker personnel conducting other site investigations, unrelated to biological resources. Northern California legless lizard (*Anniella pulchra*, SSC) was determined to have moderate potential to occur on-site, due to recent nearby observations recorded in the CNDDB and iNaturalist database. All other remaining special-status wildlife species identified during reviews of the CNDDB and IPaC either have a low potential to occur or are not expected to occur within the project site.

Due to observations on-site during field surveys or their regional significance, burrowing owl, Swainson's hawk (*Buteo swainsoni*; State-listed Threatened [ST]), loggerhead shrike (SSC), Mohave ground squirrel (*Xerospermophilus mohavensis*; ST), desert tortoise (*Gopherus aggassizii*, federally-listed Threatened [FT] and ST), Crotch bumble bee (*Bombus crotchii*; candidate for State-listing), and desert kit fox (*Vulpes macrotis arsipus*) are described in further detail below.

Burrowing Owl

There are 29 occurrence records for burrowing owl within the USGS *Rosamond, Rosamond Lake*, *Lancaster East*, *and Lancaster West*, *California* 7.5-minute quadrangles by the CNDDB and IPaC. The nearest extant occurrence was recorded in 2004, approximately one mile to the east of the project site (active burrow sites were observed during a field survey on an abandoned agricultural field). Additionally, another occurrence was recorded in 2013, approximately 3.25 miles to the southwest of the project site (two adults and one juvenile were observed using a burrow). In addition, there is a large number of records of this species in the eBird database, both within and just outside of a five mile radius from the project site, and burrowing owl was incidentally observed within the western portion of the project site during surveys unrelated to biological resources on December 12, 2022. As such, this species has high potential to be identified on-site.

Nesting birds are protected pursuant to the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. Specifically, the MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests.

Based on the high potential for burrowing owls to be identified on-site, protocol surveys were conducted on the project site in March 8, March 28, May 9, June 5, and July 62023. Based on the protocol surveys, no burrowing owl are currently nesting on-site. No individual burrowing owl or recent sign of the species were detected, and potentially suitable burrows found on-site during the surveys were determined to be unoccupied by burrowing owl, given the lack of recent sign.

Nonetheless, construction-related disturbance may have an adverse impact on burrowing owl, if determined present, especially during the breeding season when individuals may be attempting to incubate eggs or raise young within or

adjacent to the project site. As such, Mitigation Measure BIO-2 would require a qualified biologist present a Worker Environmental Awareness Program (WEAP) to all construction crews and contractors prior to starting any work on the project site. The WEAP training would include a review of the special-status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources as well as their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. Mitigation Measure BIO-3 would require the contractor to cover or backfill all trenches, holes, and open water sources (e.g., water buffalos, water tanks, and slurry dumpsters) the same calendar day they are opened, where practicable. These areas would be required to be covered to prevent wildlife from becoming trapped or drowning. Mitigation Measure BIO-4 would require a pre-construction survey to reconfirm the absence of burrowing owls. If the pre-construction survey indicates the presence of nesting burrowing owl, an avoidance and minimization plan would be prepared and submitted to CDFW for approval prior to initiating project activities**.** Mitigation Measure BIO-5 would require proposed project activities, including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates, to occur outside of the avian breeding season which generally runs from February 1 to August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys would be required to conduct weekly bird surveys beginning 30 days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. With implementation of Mitigation Measures BIO-2 through BIO-5, impacts to burrowing owl would be reduced to less than significant levels.

Swainson's Hawk

Swainson's Hawk are known to nest in the Antelope Valley with CNDDB occurrence records in the County both east and west of SR-14. The closest known extant record in the CNDDB is located approximately two miles east-southeast of the project site (a nesting pair of Swainson's hawk). This nesting pair was detected in June 2016 with no further information on nesting substrate or surrounding habitat. All other CNDDB records of Swainson's hawk are located more than five miles from the project site.

Trees suitable for nesting by Swainson's hawk are absent from the project site. Native vegetation occurring on-site provides value as foraging habitat; however, this species often prefers foraging in and around agricultural areas that provide a suitable food source of small mammals, birds, and insects, species often attracted to agricultural areas that may provide food and water sources for prey of Swainson's hawk. Therefore, this species may occur as a rare migrating or foraging transient across the project site but is not expected to nest in the project site due to the lack of suitable trees for nesting.

Nonetheless, Mitigation Measure BIO-2 would require a qualified biologist present a WEAP to all construction crews and contractors prior to starting any work on the project site. The WEAP training would include a review of the special-status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources as well as their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. Additionally, Mitigation Measure BIO-5 would require proposed project activities to occur outside of the avian breeding season to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys would be required to conduct weekly bird surveys beginning 30 days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. Upon implementation of Mitigation Measures BIO-2 and BIO-5, impacts to Swainson's hawk would be reduced to less than significant levels.

Loggerhead Shrike

One loggerhead shrike was observed in the far northern portion of the project site, along West Ave F during the November 2022 field survey; this species was not observed during surveys conducted in 2023. The shadscale scrub habitat occurring on-site provides suitable foraging habitat for the species, but generally only marginally suitable nesting

habitat. One CNDDB record (Occurrence Number 70) from the USGS *Lancaster East*, *California* 7.5-minute quadrangle was identified during the database review. This observation was from 2008 and approximately 7.5 miles south-southeast of the project site. This species would most likely occur in the project site as a foraging or migrating transient and is not expected to nest on-site.

Nevertheless, Mitigation Measure BIO-2 would require a qualified biologist present a WEAP to all construction crews and contractors prior to starting any work on the project site, and Mitigation Measure BIO-5 would require proposed project activities to occur outside of the avian breeding season. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys would be required to conduct weekly bird surveys beginning 30 days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. With implementation of Mitigation Measures BIO-2 and BIO-5, impacts to loggerhead shrike would be reduced to less than significant levels.

Mohave Ground Squirrel

There are three occurrence records for Mohave ground squirrel within the USGS *Rosamond*, *Rosamond Lake*, *Lancaster East*, and *Lancaster West*, *California* 7.5-minute quadrangles. The closest known extant record in the CNDDB is within a five-mile radius but was recorded more than 20 years ago in 1984. The project site is located near the southwestern-most edge of the Mohave ground squirrel geographic range; however, the project site is not within any area containing a core or peripheral Mohave ground squirrel population. In addition, Mohave ground squirrel were not detected within any regional surveys or protocol grids conducted within the Palmdale area between 2008 and 2012, and Mohave ground squirrel have not been trapped or observed anywhere in the County away from Edwards Air Force Base (EAFB) and its immediate boundary since 1991, with the closest positive results occurring approximately 15 miles northeast of the project site at the southern end of Rogers Lake. A recent update on the status of Mohave ground squirrel indicates that results of trapping efforts since the 2000's largely failed to document the species' occurrence in the County, except for recent occurrences in the extreme northeastern corner of the County, on or adjoining EAFB. These results strongly suggest Mohave ground squirrel is essentially extirpated in the County.

No sign of Mohave ground squirrel were observed during the general biological resource site surveys conducted in November 2022 or incidentally observed during focused rare plant and burrowing owl surveys conducted during spring and summer 2023. Due to the marginally suitable habitat within the project, the lack of occurrence records within the vicinity, results of past and recent documentation efforts reflecting negative results, and distance from existing populations, Mohave ground squirrel are not expected to occur on-site. No impacts would occur in this regard.

Desert Tortoise

There is one occurrence record for desert tortoise within the *USGS Rosamond*, *Rosamond Lake*, *Lancaster East*, and *Lancaster West*, *California* 7.5-minute quadrangles. Specifically, the closest extant record in the CNDDB is located over 10 miles to the east of the project site and was recorded in 2004. The project site is located near the southwestern-most edge of the desert tortoise geographic range. There are no occurrence records within five-miles of the project site.

No incidental observations of desert tortoise or sign of the species were made during general, focused burrowing owl, and focused rare plant surveys conducted in 2022 and 2023. Additionally, the species prefers sandy loam soils and avoids soils with excess levels of salt. Pond Oban soils occurring on-site have a profile of silt or clay loams and contain elevated levels of salts. Due to the marginally suitable habitat within the project, the lack of occurrence records within the vicinity, and distance from existing populations, desert tortoise has a low expectancy to occur on-site. Less than significant impacts would occur in this regard.

Crotch Bumble Bee

One CNDDB record (Occurrence Number 130) for this species was identified within the USGS *Rosamond*, *Rosamond Lake*, *Lancaster East*, and *Lancaster West*, *California* 7.5-minute quadrangles. The CNDDB record is from 1971 and was recorded approximately three miles to the southwest of the project site. Two observations in the Lancaster area are recorded within the past three years in the iNaturalist database. One survey for the species was conducted in 2023 by Dudek. No Crotch bumble bee were observed and no nests were found. Due to the lack of potential floral resources and limited small rodent burrows on-site, no further surveys were conducted after the first survey. It was determined that it was unlikely that Crotch bumble bee would be found on-site and that additional surveys would not be acceptable, due to a lack of plants in flower and natural senescence of desert vegetation during hot summer months. Dudek also determined that the nearest area with sufficient foraging opportunities for Bombus species is the Piute Pond complex, located approximately four miles northeast of the project site. Due to the marginally suitable habitat within the project site, Crotch bumble bee is not expected to occur on-site. No impacts would occur in this regard.

Desert Kit Fox

While desert kit fox is not a special-status species, burrows suitable for denning/nursing by the species were observed on-site. A few observations of the species are documented in the iNaturalist database from the Antelope Valley, with one observation noted approximately five miles from the project site in 2018. While a potentially suitable burrow/den for this species was found on-site, no individuals or sign of the species were observed during field surveys; however, impacts to desert kit fox denning and nursing during construction would be considered significant under CEQA. No indications of the site currently serving as a significant denning/nursing location for the species were observed; however, the species could utilize the project site for such activities prior to construction. As stated, Mitigation Measure BIO-2 would require a qualified biologist present a WEAP to all construction crews and contractors prior to starting any work on the project site. The WEAP training would include a review of special-status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources as well as their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. Additionally, Mitigation Measure BIO-3 would require the contractor to cover or backfill all trenches, holes, and open water sources (e.g., water buffalos, water tanks, and slurry dumpsters) the same calendar day they are opened, where practicable. These areas would be required to be covered to prevent wildlife from becoming trapped or drowning. Further, Mitigation Measure BIO-6 would require preparation of a Desert Kit Fox Management Plan for County Planning and CDFW review and approval. The plan is required to incorporate pre-approval survey data of the desert kit fox population, identify pre-construction survey methods, and describe pre-construction and construction-phase biological monitoring and passive/active relocation methods. Upon implementation of Mitigation Measures BIO-2, BIO-3 and BIO-6, impacts to desert kit fox would be reduced to less than significant levels.

Mitigation Measures:

BIO-1 To ensure proper compensatory mitigation for impacts to special-status plant species, prior to construction, and during the appropriate blooming periods for special-status plant species with the potential to occur within the project site, a qualified botanist approved by County Planning shall have conducted focused rare plant surveys across the entire project site following 2018 CDFW and/or 2001 CNPS guidelines to determine presence or absence of special-status plant species. Resumes of botanists conducting the survey shall be submitted to County Planning as part of the documentation regarding the surveys. The surveys shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity) and include site visits covering early, mid, and late-blooming season species. Documentation of surveys and findings shall be submitted to County Planning and the CDFW for review within fourteen (14) days of completion of surveys.

For the loss of Mojave spineflower and alkali mariposa-lily known to occur on-site, the project proponent shall coordinate with a regional conservation agency or land trust to identify off-site lands that may be acquired and held in a restrictive deed for perpetuity to compensate for the loss of 15.16 acres of on-site

habitat occupied by special-status plant species at a ratio of at least 0.5:1. It is expected that the acquired lands would be located in the Antelope Valley region of Los Angeles County and would support populations of each special-status plant species approximately equal in number to those recorded within the project site. During selection of the mitigation lands, consideration of the mitigation site's suitability to support burrowing owl, desert kit fox, and nesting birds should be taken into consideration. Acquisition of mitigation lands would be fully funded to support management and maintenance of the property by the conservation agency. The project proponent shall be fully responsible to implement this measure to the satisfaction of County Planning. Although not expected, if State- and/or Federally-listed plant species are present and avoidance is infeasible, consultation with the CDFW and/or USFWS would be required prior to initiating any on-site project activities. *(Corresponds to Biological Resources Assessment AMM BIO-3)*

BIO-2 Prior to the issuance of a grading permit and fourteen (14) days prior to the initiation of any project activities, the resume of a proposed qualified biologist shall be submitted to County Planning for review and approval. That person shall serve as the lead biological monitor and ensure that impacts to all biological resources are minimized or avoided, and shall conduct (or supervise) pre-grading field surveys for species that may be avoided, affected, or eliminated as a result of grading or any other site preparation activities. The lead biological monitor shall ensure that all surveys are conducted by qualified personnel (e.g., avian biologists for bird surveys, herpetologists for reptile surveys, etc.), the resumes of which shall be submitted to County Planning for review and approval, and that they possess all necessary permits and memoranda of understanding with the appropriate agencies for the handling of potentially-occurring special-status species. The lead biological monitor shall also ensure that daily monitoring reports (e.g., survey results, protective actions, results of protective actions, adaptive measures, etc.) are prepared, and shall make these monitoring reports available to County Planning and CDFW at their request.

A qualified biologist shall present a Worker Environmental Awareness Program (WEAP) to all construction crews and contractors prior to starting any work on the project site. The WEAP shall be submitted to County Planning for review and approval no less than fourteen (14) days prior to the initiation of any project activities. The WEAP training would include a review of the special-status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources as well as their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. A record of all personnel trained shall be maintained and submitted to County Planning upon their request.

Project limits shall be clearly delineated with fencing or other boundary markers prior to the start of construction. During construction, construction workers shall strictly limit their activities, vehicles, equipment, and construction materials to the designated construction limits and staging areas.

The biological monitor shall be present during vegetation and ground disturbance activities to inspect and enforce mitigation requirements and to relocate any species that may come into harm's way to an appropriate offsite location of similar habitat. Upon completion of vegetation and earth disturbance activities, the biological monitor shall be available to conduct as needed spot checks during construction and respond to requests from project personnel as they arise to remove wildlife, answer any questions, and generally provide as-needed support to confirm project measures are implemented. The biological monitor shall be authorized to stop specific grading or construction activities if violations of mitigation measures or any local, state, or federal laws are suspected. The biological monitor shall submit weekly reports of the monitoring activities to County Planning and CDFW. Reports shall include a description of the construction activities monitored, any compliance issues observed, how they were resolved, any avoidance and minimization measures implemented, and lists of wildlife and plant species observed within the project area. If ongoing biological monitoring of construction activities reveals the presence of any special-status wildlife within an active work area, then work shall be temporarily halted until the animals leave on their own volition or can be collected and relocated to areas outside of the designated work zones. Work areas shall be surveyed for special-status species during construction activities. Any

special-status species occurring within the work area shall be collected and relocated to areas outside of the designated work zones (unless such relocation would require an Incidental Take Permit for take of a listed species, in which case the appropriate trustee agencies (CDFW or USFWS) will be consulted first).

During construction, all equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas within the project limits. Equipment shall be checked daily for leaks prior to operation and repaired as necessary, and secondary containment shall be implemented during equipment and vehicle staging.

During construction, the project limits shall be kept as clean of debris and trash as possible to avoid attracting predators of sensitive wildlife. Food-related trash items shall be kept in sealed containers and removed daily from the construction work zone. *(Corresponds to Biological Resources Assessment AMM BIO-1)*

BIO-3 The contractor shall cover or backfill all trenches, holes, and open water sources (e.g., water buffalos, water tanks, and slurry dumpsters) the same calendar day they are opened, where practicable. These areas shall be covered to prevent wildlife from becoming trapped or drowning.

If trenches or holes cannot be closed the same day they are made, covers shall be firmly secured at ground level in such a way that small wildlife cannot slip beneath. At sites that require the presence of a biological monitor, trench covers shall be approved by the monitor. If covers cannot be provided, escape ramps shall be placed in all trenches and holes.

Open trenches shall be inspected regularly throughout the day and prior to filling to remove any trapped wildlife (e.g., small mammals, reptiles, amphibians) and to check for the presence of protected wildlife species at project sites that require the presence of a biological monitor.

If a State or federal listed wildlife species are present in the trench, the on-site Biological Monitor shall contact the California Department of Fish and Wildlife (CDFW) or U.S Fish and Wildlife Service (USFWS) immediately, ensure the protected species is not in immediate danger, and wait for instruction by CDFW or USFWS.

Covered trenches and holes at sites where biological monitors are present shall be inspected by the monitor at the end of the work day and prior to initiating construction activities the next day.

In locating trenches or holes, disturbance to natural vegetation, including plant root systems shall be minimized. *(Corresponds to Biological Resources Assessment AMM BIO-2)*

BIO-4 A burrowing owl clearance survey shall be conducted no more than fourteen (14) days prior to any vegetation removal or ground disturbing activities to avoid impacts to burrowing owls and/or occupied burrows. The pre-construction clearance survey shall be conducted by qualified biologists approved by County Planning and in accordance with the methods outlined in the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). The resumes of qualified biologists shall be submitted to County Planning no less than fourteen (14) days prior to the clearance survey. Documentation of surveys and findings shall be submitted to County Planning and the California Department of Fish and Wildlife (CDFW) for review within fourteen (14) days of completion of the clearance survey. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required.

Regardless of pre-construction survey results, to account for the presence of owls if a burrow becomes occupied after construction has commenced or is detected during pre-construction surveys, a burrowing owl avoidance and minimization plan in accordance with the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012) shall be prepared and submitted to County Planning and CDFW for approval no less than thirty (30) days prior to the initiation of any project activities. The plan

would detail implementation of "no-disturbance" buffers and burrow exclusion activities in the event an occupied burrow is detected. *(Corresponds to Biological Resources Assessment AMM BIO-4)*

BIO-5 Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season which generally runs from February 1 to August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (California Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty (30) days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. The resumes for biologists conducting pre-construction surveys shall be submitted to County Planning for review and approval no less than fourteen (14) days before surveys are initiated. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. The results of each weekly survey shall be submitted to County Planning no more than seven (7) days after completion of the survey.

If a protected native bird is found, the project proponent may delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist may continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent shall include the results of the recommended protective measures described above in weekly pre-construction survey reports to document compliance with applicable State and federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to County Planning and, upon request, the California Department of Fish and Wildlife (CDFW). Based on the submitted information, County Planning (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

The biological monitor shall be present on-site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to County Planning during the grubbing and clearing of vegetation and shall notify County Planning immediately if project activities damage active avian nests. *(Corresponds to Biological Resources Assessment AMM BIO-5)*

BIO-6 At least thirty (30) days prior to project ground disturbance activities, a Desert Kit Fox Management Plan shall be prepared and submitted to County Planning and the CDFW for review and approval. The plan shall (1) incorporate pre-approval survey data of the desert kit fox population; (2) identify preconstruction survey methods for kit fox; and (3) describe preconstruction and construction-phase biological monitoring and passive relocation methods or outline any identified California Department of Fish and Wildlife permit

and Memorandum of Understanding requirements for active relocation of the species, if either are necessary. *(Corresponds to Biological Resources Assessment AMM BIO-6)*

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS?

Less Than Significant Impact With Mitigation Incorporated. Special-status vegetation communities include those identified as sensitive natural communities within the CNDDB, listed as sensitive by CDFW, and aquatic features that fall under the jurisdiction of State and/or federal regulatory agencies. Special-status communities also include USFWS-designated Critical Habitat and other native vegetation communities that provide suitable habitat for special-status plant and wildlife species and may be occupied by such species.

Based on the Biological Resources Assessment, no riparian or other sensitive natural communities have been reported in the USGS *Rosamond*, *Rosamond Lake*, *Lancaster East*, and *Lancaster West*, *California* 7.5-minute quadrangles by the CNDDB and none were documented within the project site. Additionally, according to the JD Memo, the project site consists of disturbed land on which there has been evidence of homeless encampments, illegal dumping, and off-road vehicle activity. Due to the disturbed nature of the site, no riparian vegetation, aquatic drainage features, or evidence of hydrology was observed during the site visit. As such, the project site consists of uplands, typical of the high desert environment.

While the existing native disturbed *Atriplex confertifolia* Shrubland community is not listed as a California Sensitive Natural Community by CDFW, it does support special-status species known to occur on-site (i.e., Mojave spineflower and alkali mariposa-lily). As such, Mitigation Measure BIO-1 requires the project proponent to coordinate with a regional conservation agency or land trust to identify off-site lands that may be acquired and held in a restrictive deed for perpetuity to compensate for the loss of 15.16 acres of on-site habitat occupied by special-status plant species at a ratio of 0.5:1. It is expected that the acquired lands would be located in the Antelope Valley region of Los Angeles County and would support populations of each special-status plant species approximately equal in number to those recorded within the project site. Additionally, Mitigation Measure BIO-2 would require a qualified biologist present a WEAP to all construction crews and contractors prior to starting any work on the project site. The WEAP training would include a review of the special-status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources as well as their legal status and protections, and measures to be implemented for avoidance of these sensitive resources. With implementation of Mitigation Measures BIO-1 and BIO-2, impacts to riparian habitat or other sensitive natural communities would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measures BIO-1 and BIO-2 above.

c) Have a substantial adverse effect on State or Federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. According to the JD Memo, the project site consists entirely of uplands, typical of the high desert environment. As such, the project site does not contain any State or federally protected wetlands or any areas potentially falling under the jurisdiction of regulatory agencies. Thus, project implementation would not impact State or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact With Mitigation Incorporated. Wildlife corridors and linkages are key features for wildlife movement between habitat patches. Wildlife corridors are generally defined as those areas that provide opportunities for individuals or local populations to conduct seasonal migrations, permanent dispersals, or daily commutes, while linkages generally refer to broader areas that provide movement opportunities for multiple keystone/focal species or allow for propagation of ecological processes (e.g., for movement of pollinators), often between areas of conserved land.

The project site is not located within any designated wildlife corridor or Significant Ecological Area (SEA) identified in the General Plan, Area Plan, or *City of Lancaster General Plan 2030*. The Antelope Valley SEA is located approximately 1.5-mile northeast of the project site and extends from the Angeles National Forest north to the playa lakes within EAFB. This SEA encompasses two large drainages originating along the northern slope of the San Gabriel Mountains. The geographical features of these drainages serve as major habitat linkages and movement corridors for all wildlife species within the vicinity. Additionally, the Antelope Valley region serves as an important migration route within the greater Pacific Flyway for numerous songbirds and raptors that migrate through and inhabit areas of the western Mojave Desert.

Although wildlife species are more likely to utilize the Antelope Valley SEA as a wildlife corridor or linkage to other natural habitats, the project site does constitute a large open area of native vegetation, surrounded by similar habitats that have experienced limited anthropogenic disturbances. Areas to the north, west, and east of the project site include some past and current agricultural land uses, scattered rural residential developments, and paved and dirt roadways, but is largely undeveloped, connecting to vast open areas in southern Kern County and beyond. As a result, mobile wildlife, such as large mammals and birds may utilize the project site to move throughout the Antelope Valley region and further areas to access resources. The project site also supports dispersal of smaller terrestrial species, such as reptiles and small mammals, across the localized area. Nevertheless, similar habitat to that occurring on the project site occurs in the surrounding area and the proposed project would still allow wildlife to move around the project site.

Mammal burrows were observed, although no recent sign of use or occupation where observed; it is possible that significant rain events during the 2022-2023 wet season obscured sign of mammal use. Mammal activity during the November 2022 survey and during burrowing owl surveys was very minimal, with only observations of a few mammal species. Larger burrows suitable for coyote denning were observed on-site, as well as the previously noted burrows potentially suitable for burrowing owl and desert kit fox. While indications of the site serving as a significant denning or nursery site were not observed during field surveys, with the presence of suitable burrows for fossorial species, the project site provides suitable mammal denning opportunities, although likely only supporting a localized population.

As such, Mitigation Measure BIO-2 would require a qualified biologist present a WEAP to all construction crews and contractors prior to starting any work on the project site. Mitigation Measure BIO-3 would require the contractor to cover or backfill all trenches, holes, and open water sources (e.g., water buffalos, water tanks, and slurry dumpsters) the same calendar day they are opened, where practicable. These areas would be required to be covered to prevent wildlife from becoming trapped or drowning. Mitigation Measure BIO-5 would require proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) to occur outside of the avian breeding season which generally runs from February 1 – August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys would be required to conduct weekly bird surveys beginning 30 days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. Further, Mitigation Measure BIO-6 would require preparation of a Desert Kit Fox Management Plan for County Planning and CDFW review and approval. The plan is required to incorporate pre-approval survey data of the desert kit fox population, identify pre-

construction survey methods, and describe pre-construction and construction-phase biological monitoring and passive/active relocation methods. With implementation of Mitigation Measures BIO-2, BIO-3, BIO-5, and BIO-6, impacts regarding the movement of native resident or migratory fish or wildlife species would be reduced to less than significant levels.

Mitigation Measures: Refer to Mitigation Measures BIO-2, BIO-3, BIO-5, and BIO-6 above.

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 other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

No Impact. The project site does not contain any oak woodlands or other unique native woodlands. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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 Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

No Impact. The project site does not include areas classified as Wildflower Reserve Areas, SEAs, Coastal Resource Areas, Community Standards Districts, or Coastal Resource Areas, and does not contain any trees or biological resources covered under the Los Angeles County Oak Tree Ordinance, or Specific Plans. As such, the proposed project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. The project site is not located within or directly adjacent to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Further, the project site is not located within or directly adjacent to a designated County SEA. Thus, project implementation would not conflict with the provisions of any such plans or the County's SEA Program. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?			✓	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?		✓		
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		
d. Disturb any human remains, including those interred outside of formal cemeteries?		✓		

The information presented in this analysis is primarily based on the following technical studies (refer to Appendix C, *Cultural and Paleontological Resources Reports*):

- *Phase 1 Cultural Resources Assessment for the Antelope Valley Logistics Center West Project, Los Angeles County, California* (Cultural Resources Assessment), prepared by Michael Baker International (Michael Baker), dated February 2023; and
- *Paleontological Resources Identification Report for the Antelope Valley Logistics Center West Project, Los Angeles County, California* (Paleontological Report), prepared by Michael Baker, dated February 9, 2023.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Less Than Significant Impact. As part of the Cultural Resources Assessment, a South Central Coastal Information Center (SCCIC) records search, Native American Heritage Commission (NAHC) Sacred Lands File search, historical society consultation, archaeological field survey, buried site sensitivity analysis, National Register of Historic Places (NRHP), and California Register of Historical Resources (CRHR) evaluations were conducted to determine whether the project could result in a significant adverse change to cultural resources in accordance with CEQA. Field surveys were conducted between December 12, 2022 and December 16, 2022. The records search of the California Historical Resources Inventory System (CHRIS) was conducted at the SCCIC to identify previously recorded cultural resources and previously conducted cultural resources studies within a 0.5-mile radius of the project site. The CHRIS search results were provided on November 9, 2022 and included a review of the National Register of Historic Places, California Inventory of Historic Resources, Archaeological Resources Directory for Los Angeles County, and the Built Environmental Resource Database for Los Angeles County. The Cultural Resources Assessment also included a review of available historic United States Geologic Survey 7.5-minuted topographic quadrangle maps. Additionally, the West Antelope Valley Historical Society was notified via email on December 22, 2022 requesting information or concerns regarding historical resources within the project area. No response was received from the West Antelope Valley Historical Society.

The records search identified nine previous cultural resource studies conducted within a 0.5-mile radius of the project site. Of these, one study overlaps the project site. The record search also identified three previously recorded cultural resources within a 0.5-mile radius of the project site, one of which was identified within the project site (P-19-003044/CA-LAN-3044). However, this previously recorded cultural resource was recommended ineligible for inclusion in the CRHR or NRHP. Nevertheless, the previously recorded cultural resource was revisited during Michael Baker's field survey in December 2022. In addition to P-19-003044/CA-LAN-3044, the field survey identified five additional historic-in-age cultural resources within the project site. All six resources consist of refuse deposits dominated by metal and glass dating to the twentieth century and appear to be associated with roadside dumping. Additionally, all six resources were evaluated for listing in the CRHR; however, none were recommended eligible for listing in the CRHR. As such, based on the evaluation of identified cultural resources from the project site and lack of identified buildings or structures on-site, project development would not result in adverse effects to historical resources. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. As discussed in Response 4.5(a) and detailed in the Cultural Resources Assessment, one previously recorded cultural resource was identified within the project site as part of the records search. As such, the previously recorded cultural resource was revisited during the field survey, and five additional historic-in-age cultural resources were identified within the project site. All six resources consist of refuse deposits dominated by metal and glass dating to the twentieth century and appear to be associated with roadside dumping. The resources were evaluated for listing in the CRHR; however, none were recommended eligible for listing in the CRHR.

No Native American place names are recorded within or near the project site, largely the result of a lack of contact between the local Desert Serrano population and European and European-American colonizers rather than a lack of ethnohistoric occupation of the area. Water has always been the most important resource determining the placement and intensity of settlement in the Antelope Valley. Late Pleistocene and Early Holocene inhabitants of the closed valley operated on the shores of vast inland lakes, including Lake Thompson. The project site was likely inundated when Lake Thompson was at its height, but as the lake receded the land within the project site would have provided access to the lake and its abundant tule swamps. Even as the Antelope Valley turned to desert, there still would have been wetter periods when the area was more suitable than today for human use if not occupation. Sporadic or seasonal use of the project site likely continued after the desertification of the valley. Today, the project site is devoid of permanent sources of water, but before groundwater exploitation began in the late nineteenth century, the water table would have been higher. Springs dot the nearby valley floor. Amargosa Creek, located less than 0.25 miles to the east of the project site, was an important water source during the Late Prehistoric period and remains so, if somewhat less reliable. The project site consists of Quaternary alluvium, alluvial fan deposits, and younger playa deposits, all of which were coeval with the Antelope Valley's prehistoric human occupation and which may conceal buried archaeological deposits. The project site would have been an important resource procurement area, and significant archaeological sites may lie buried within the project site. As such, the Cultural Resources Assessment concluded that the archaeological sensitivity of the project site for potentially unknown prehistoric archaeological sites is moderate.

Additionally, the Cultural Resources Assessment concluded the sensitivity for potential undocumented historic period archaeological sites is low. Topographic maps, aerial photographs, and the historic setting indicated that, although historic period homesteads were established nearby, the project site has never been developed except for the construction of roads in the twentieth century. The six historic period archaeological sites all lie near these roads and appear to be associated with roadside dumping, which continues to this day. Although Quaternary deposits overlie the project site, the conditions observed during the field survey indicate that there was likely little deposition during the relatively brief historic period. During the historic period, the project site may have been used for hunting, prospecting,

and similar activities in addition to dumping, but the potential for significant buried historic period resources appears low. No significant historic period archaeological sites or built features are anticipated within the project site.

Project construction activities would involve approximately 646,000 cubic yards of cut and approximately 649,600 cubic yards of fill. Additionally, the project site has moderate archaeological sensitivity for potentially unknown prehistoric archaeological resources. Thus, project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. As such, prior to the commencement of ground-disturbing activities, Mitigation Measure CUL-1 would require a qualified archaeologist to prepare an archaeological resources monitoring and discovery plan (ARMDP) which is required to specify appropriate steps (e.g., monitoring methods, personnel, and procedures) to mitigate potential impacts to archaeological resources in the event of a discovery. Mitigation Measure CUL-2 would require archaeological monitoring during all ground-disturbing activities in all areas with potential to contain significant archeological deposits. In the event that archaeological resources are encountered during project construction, Mitigation Measure CUL-3 would require all project construction efforts to halt until the archaeologist examines the site and evaluates the significance of the find. If the archaeological resource uncovered is of archaeological significance, additional excavation may be required for a Phase II archaeological testing plan. If the resource is determined to be significant and avoidance is not feasible, a Phase III (data recovery) phase of investigation would be required prior to recommencing ground-disturbing activities that may impact the resource in accordance with Mitigation Measure CUL-4. Further, Mitigation Measure CUL-5 would require preparation of a final report documenting the findings to a level satisfactory to the County. Any archaeological materials collected during project excavations must be processed and curated according to current professional repository standards unless otherwise determined by the County pursuant to Mitigation Measure CUL-6. With implementation of Mitigation Measures CUL-1 through CUL-6, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be reduced to less than significant levels.

Mitigation Measures:

CUL-1 Archaeological Resources Monitoring and Discovery Plan. Prior to the commencement of ground-disturbing activities, the project Applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738). The qualified professional archaeologist shall prepare an archaeological resources monitoring and discovery plan (ARMDP). The ARMDP shall clearly specify the steps to be taken to mitigate impacts to archaeological resources. The ARMDP shall specify monitoring methods, personnel, and procedures to be followed in the event of a discovery. The monitoring plan shall, at a minimum, include an introduction; project description; statement of archaeological sensitivity and rationale for the monitoring program; archaeological context and research design; statement of methods and identification of what activities require monitoring; description of monitoring procedures; and protocol to be followed in the event of a find. Criteria shall be outlined, and triggers identified when further consultation is required for the evaluation and treatment of a find. Key staff, including Native American representatives and other consulting parties, shall be identified, and the process of notification and consultation shall be specified in the ARMDP. A curation plan shall also be outlined in the ARMDP.

CUL-2 Archaeological Resources Monitoring. Archaeological monitoring for all ground-disturbing activities shall be conducted by a qualified archaeological monitor who is working under the guidance of the qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738). Ground-disturbing activities include, but are not limited to, geotechnical boring, boring, trenching, grading, excavating, and the demolition of building foundations, as defined in the archaeological resources monitoring and discovery plan (ARMDP) developed in compliance with Mitigation Measure CUL-1. The archaeological monitor shall observe ground-disturbing activities in all areas with potential to contain significant archaeological deposits. If discoveries are made during ground-disturbing activities, additional work may be required in accordance with the terms specified in the ARMDP in compliance with Mitigation Measures CUL-3 and CUL-4.

CUL-3 Evaluation of Unanticipated Finds; Phase II Testing. In the event an unanticipated archaeological resource is unearthed during excavation activities associated with construction of any individual development project, work shall stop immediately within 50 feet of the find and the discovery shall be evaluated by the qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738), pursuant to the procedures set forth in CEQA Guidelines Section 15064.5. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II archaeological testing plan. As the lead agency, the County of Los Angeles shall make a determination of significance on the basis of the recommendations of the qualified archaeologist. The results of testing shall be presented in the final report in accordance with Mitigation Measure CUL-6 and communicated to the South Coastal Central Information Center.

If the resource is determined not to be significant, then resource-specific work is complete and construction may proceed. If the resource is determined to be significant and avoidance is not feasible, then a resource-specific archaeological resources treatment plan shall be prepared and executed prior to recommencing ground-disturbing activities that may impact the resource in accordance with Mitigation Measure CUL-4.

CUL-4 Archaeological Resources Treatment Plan and Phase III Data Recovery. If, as a result of the evaluation required by Mitigation Measure CUL-3, a significant resource is identified within the project site, then prior to the beginning of the earth-moving construction activities within the boundaries of the resource, an archaeological resources treatment plan shall be developed that will govern the treatment of the resource. Avoidance and preservation-in-place are the preferred treatment for archaeological resources, and the treatment plan shall detail plans for avoidance, if possible, such as restricting work to disturbed soil or limiting the depth of excavations to avoid archaeological deposits.

If disturbance to resources cannot be avoided, a Phase III (data recovery) phase of investigation shall be required, pursuant to CEQA Guidelines Section 15064.5. The Phase III study shall generally consist of a limited scale program of archaeological excavation, radiocarbon dating of organic materials (e.g., shell midden and faunal remains), laboratory analysis, and report writing designed to assess the importance of the resource in question. Any resources recovered shall be properly curated, as appropriate.

Ground-disturbing construction activities may commence when excavations are completed in accordance with the Phase III plan and to the satisfaction of the County of Los Angeles (County). However, the Phase III work shall not be considered complete until excavations and associated analyses are completed and a final report is prepared in accordance with Mitigation Measure CUL-5. The report shall be completed and presented to the County for comment within 18 months of the completion of Phase III excavations.

CUL-5 Reporting. Mitigation associated with discovered archaeological resources on-site shall be considered complete when documentation of findings are completed to a level satisfactory to the County of Los Angeles (County) and filed with the South Coastal Central Information Center (SCCIC) of the California Historical Resources Information System. Specific reporting requirements shall be detailed in the archaeological resources monitoring and discovery plan.

If the results of monitoring are negative, the report shall take the form of a memorandum and be submitted to the County for comment within eight weeks of the completion of project fieldwork and communicated to the SCCIC when completed to the satisfaction of the County.

If the results of monitoring are positive, the report shall be prepared in accordance with the California Office of Historic Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format." The report shall include a management summary; undertaking information; appropriate maps of both the project area and impacted resources; an environmental setting; prehistoric, ethnographic, and historic

contexts; research design; methods; a thorough report of findings; a discussion of the data obtained and the resource's significance in reference to the historic, ethnographic, and prehistoric contexts; a record of the final disposition of excavated artifacts and any intact archaeological deposits; management considerations and recommendations for future work that may impact the resource; and references. Other report sections may also be required as determined by the County with the recommendations of the qualified archaeologist. The report shall be submitted to the County for concurrent review and comment within 18 months of the completion of project fieldwork and shall be communicated to the SCCIC when completed to the satisfaction of the lead agencies.

Appropriate Department of Parks and Recreation (DPR) 523 series forms shall also be prepared for each find and submitted to the SCCIC. Minimal documentation of previously unknown isolated finds shall consist of a sufficient description of the find to prepare a DPR 523a Primary Form (including photographs) and appropriate maps. Minimum documentation of previously unknown archaeological sites shall consist of a sufficient description of the find to prepare a DPR 523a Primary Form (including photographs); a DPR 523c Archaeological Site Record; a DPR 523j Location Map; and a DPR 523k Sketch Map. Minimum documentation of known resources shall consist of a DPR 523L Update form. Additional forms may also be required to appropriately document resources at the discretion of the qualified archaeologist.

CUL-6 Curation and Final Disposition of Archaeological Materials. Archaeological materials collected during project excavations shall be processed and curated according to current professional repository standards unless otherwise determined by the lead agency as the result of consultation. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation. The tribal significance of some materials may override their scientific value, in which case reburial may be preferred for some archaeological materials of tribal significance. If artifacts are reburied, the reburial shall only occur after the County of Los Angeles is satisfied that they have been suitably studied and documented. Minimum documentation shall consist of count, weight, and basic description of all artifacts and include photographic documentation of any diagnostic artifacts and a representative sample of non-diagnostic artifacts.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation Incorporated. As part of the Paleontological Report, a Natural History Museum of Los Angeles County (NHMLAC) records search, literature review, and paleontological sensitivity assessment were conducted to determine whether the project could result in significant impacts to paleontological resources in accordance with CEQA.

The paleontology collection records search for locality and specimen data from the NHMLAC was received on November 27, 2022. Supplemental paleontological records searches within three miles of the project site were also conducted and included a review of the University of California Museum of Paleontology Locality Search, the San Diego Natural History Museum Collection Database, The Paleobiology Database (PBDB), and the FAUNMAP database.

The records search at NHMLAC showed no previously identified fossil localities within the project site. However, several fossil localities from similar sedimentary deposits to those mapped within the project site occurred nearby. The closest fossil locality is LACM VP 7853, a rich fossil locality approximately two miles east of the project site. While the supplemental search databases showed no previously identified fossil localities within the project site, one locality reported by the PBDB is located within two miles of the project site. Upon further examination of this locality, it was discovered that the reported geologic formation does not appear on the local geologic maps and the source document for this locality reports fossil localities for Lockwood Valley in Ventura County (approximately 50 miles west of the project). As such, the Paleo Report noted that it is possible that the GPS coordinates for this PBDB record were entered incorrectly. Overall, the Paleo Report determined that although the NHMLAC paleontological records search and fossil

locality searches of online databases (FAUNMAP, PBDB, SDNHM, and UCMP) did not identify any paleontological resources within the project site, two localities have been found at shallow depths and within three miles of the project site from similar rock formations to those underlying the project site, including one locality with several mammal, reptile, and fish fossils. Per mitigation impact guidelines set forth by the Society of Vertebrate Paleontology, due to the fossil sensitivity of the rock formations present within the project area (younger playa deposits of Holocene to late Pleistocene age), the Paleo Report concluded that the project has a high potential to disturb paleontological resources within undisturbed bedrock.

As such, the project would be required to implement Mitigation Measures CUL-7 and CUL-8 to reduce potential impacts in this regard. Mitigation Measure CUL-7 would require a paleontological sensitivity training be provided to all personnel planned to be involved with earth-moving activities prior to the beginning of ground-disturbing activities and Mitigation Measure CUL-8 provides instructions if any uncovered fossils are determined to be significant. With implementation of Mitigation Measures CUL-7 and CUL-8, the project is not anticipated to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Impacts in this regard would be reduced to less than significant levels.

Mitigation Measures:

CUL-7 The Applicant shall retain a Society of Vertebrate Paleontology (SVP) qualified paleontologist to provide or supervise a paleontological sensitivity training to all personnel planned to be involved with earth-moving activities prior to the beginning of ground-disturbing activities. The training session shall focus on how to identify paleontological localities such as fossils that may be encountered and the procedures to follow if identified.

CUL-8 If any paleontological resources are encountered during construction or the course of any ground-disturbance activities, all such activities shall halt immediately within a 100-foot radius of the find. At this time, the Applicant shall notify the County and consult with a qualified paleontologist to assess the significance of the find. The assessment shall follow Society of Vertebrate Paleontology (SVP) standards as delineated in the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the County shall be followed unless avoidance is determined to be infeasible by the County. If avoidance is infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. The recommendations of the qualified paleontologist shall be implemented with respect to the evaluation and recovery of fossils, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the fossil discovery. Any fossils recovered during mitigation shall be cleaned, identified, catalogued, and permanently curated with an accredited and permanent scientific institution with a research interest in the materials.

If no fossils have been recovered after 50 percent of excavation has been completed, full-time monitoring may be modified to weekly spot-check monitoring at the discretion of the qualified paleontologist. The qualified paleontologist may recommend to the client to reduce paleontological monitoring based on observations of specific site conditions during initial monitoring (e.g., if the geologic setting precludes the occurrence of fossils). The recommendation to reduce or discontinue paleontological monitoring in the project area shall be based on the professional opinion of the qualified paleontologist regarding the potential for fossils to be present after a reasonable extent of the geology and stratigraphy has been evaluated.

A qualified professional paleontologist is a professional with a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California, as well as at least one year of full-time professional experience or equivalent specialized training in paleontological research (i.e., the identification of fossil deposits, application of paleontological field and

laboratory procedures and techniques, and curation of fossil specimens), and at least four months of supervised field and analytic experience in general North American paleontology as defined by the SVP.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact With Mitigation Incorporated. It is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or ground-disturbing activities. Nonetheless, project construction activities would involve approximately 646,000 cubic yards of cut and approximately 649,600 cubic yards of fill. Thus, project excavation may encounter native soils that have the potential to support unknown buried human remains. If any human remains are found during ground-disturbing activities, Mitigation Measure CUL-9 requires all activities to stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains. If the remains are found to be archaeological resources, the qualified archaeologist, in consultation with the most likely descendant, must prepare an archaeological treatment plan in accordance with Mitigation Measure CUL-4. Following conformance with Mitigation Measure CUL-9, which detail the appropriate actions necessary in the event human remains are encountered, impacts in this regard would be reduced to less than significant levels.

Mitigation Measures:

CUL-9 Treatment of Unanticipated Finds of Human Remains. If human skeletal remains are found during earth-moving activities, work in the immediate vicinity (within a 100-foot buffer of the find) shall be suspended and the Los Angeles County Coroner's Office shall be notified. Standard guidelines set by California law provide for the treatment of skeletal material of Native American origin (California Public Resources Code, Sections 5097.98 et seq.; Health and Safety Code, Section 7050.5). If the remains are found to be archaeological, then after the coroner releases the site, the qualified professional archaeologist, in consultation with the most likely descendant, shall prepare an archaeological treatment plan in accordance with Mitigation Measure CUL-4 that also incorporates the guidance in "A Professional Guide for the Preservation and Protection of Native American Remains and Associated Grave Goods," published by the California Native American Heritage Commission.

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4.6 ENERGY

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

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

REGULATORY FRAMEWORK

State

Senate Bill 100

Senate Bill (SB) 100 (Chapter 312, Statutes of 2018) requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt-hours (kWh) of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024; 52 percent by December 31, 2027; 60 percent by December 31, 2030; and 100 percent by December 31, 2045. SB 100 requires the California Public Utilities Commission (CPUC), California Energy Commission (CEC), State board, and all other State agencies incorporate this policy into all relevant planning. In addition, SB 100 requires the CPUC, CEC, and State board to utilize programs authorized under existing statutes to achieve such renewable energy goals.

California Building Energy Efficiency Standards (Title 24)

The 2022 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

California Green Building Standards (CALGreen)

The 2022 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as CALGreen, went into effect on January 1, 2023. The California Green Building Standards (CALGreen) is the first-in-the-nation mandatory green buildings standards code. The California Building Standards Commission developed the green building standards in an effort to meet the goals of California's landmark initiative Assembly Bill (AB) 32, which established a comprehensive program of cost-effective reductions of greenhouse gases (GHGs) to 1990 levels by 2020. CALGreen was developed to (1) reduce GHGs from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the environmental directives of the administration. CALGreen requires that new buildings employ water

efficiency and conservation, increase building system efficiencies (e.g., lighting, heating/ventilation and air conditioning [HVAC], and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. There is growing recognition among developers and retailers that sustainable construction is not prohibitively expensive, and that there is a significant cost-savings potential in green building practices and materials.[1]

California Public Utilities Commission Energy Efficiency Strategic Plan

The CPUC prepared an *Energy Efficiency Strategic Plan* (Strategic Plan) in September 2008 with the goal of promoting energy efficiency and GHG reductions. In January 2011, a lighting chapter was adopted and added to the Strategic Plan. The Strategic Plan is California's single roadmap to achieving maximum energy savings in the State from 2009 to 2020 and beyond. The Strategic Plan contains the practical strategies and actions to attain significant Statewide energy savings, as a result of a year-long collaboration by energy experts, utilities, businesses, consumer groups, and governmental organizations in California, throughout the West, nationally and internationally. The plan includes the following four strategies:

1. All new residential construction in California will be zero net energy by 2020;
2. All new commercial construction in California will be zero net energy by 2030;
3. HVAC will be transformed to ensure that its energy performance is optimal for California's climate; and
4. All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the CEC to develop an Integrated Energy Policy Report (IEPR) every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the *2021 Integrated Energy Policy Report* (2021 IEPR) Volume I, Volume II, and Volume IV on February 1, 2022, and Volume III on February 24, 2022. The 2021 IEPR provides information and policy recommendations on advancing a clean, reliable, and affordable energy system for all Californian.[2] Volume I of the 2021 IEPR addresses actions needed to reduce the GHG emissions related to the buildings in which California live and work, with an emphasis on energy efficiency; Volume II examines actions needed to increase the reliability and resiliency of California's energy system; Volume III looks at the evolving role of gas in California' energy system; and Volume IV reports on California's energy demand outlook, including a forecast to 2035 and long-term energy demand scenarios of 2050. The 2021 IEPR builds on the goals and work in response to AB 758 (Energy: energy audit), SB 350 (Clean Energy and Pollution Reduction Act), AB 3232 (Zero-emissions buildings and sources of heat energy), and the 2019 IEPR to further a comprehensive approach toward decarbonizing buildings in a cost-effective and equitable manner. For the 2021 IEPR, the CEC extends the forecast timeframe to 15 years to coincide with several state goals that are planned for 2035 and improves methodologies to better quantify and predict the likelihood, severity, and duration of future extreme heat events.

1 U.S. Green Building Council, *Green Building Costs and Savings*, https://www.usgbc.org/articles/green-building-costs-and-savings, accessed February 22, 2023.

2 California Energy Commissions, *Final 2021 Integrated Energy Policy Report Volume I Building Decarbonization*, February 2022.

Executive Order N-79-20

Executive Order N-79-20, issued September 23, 2020, directs the State to require all new cars and passenger trucks sold in the State to be zero-emission vehicles by 2035. Executive Order N-79-20 further states that all medium- and heavy-duty vehicles sold in the State will be zero-emission by 2045.

Local

Los Angeles Countywide Sustainability Plan

The *OurCounty Los Angeles Countywide Sustainability Plan* (OurCounty Sustainability Plan) was adopted by the County in August 2019. It outlines what local governments and stakeholders can do to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution. This plan envisions streets and parks that are accessible, safe, and welcoming to everyone; air, water, and soil that are clean and healthy; affordable housing that enables all residents to thrive in place; and a just economy that runs on renewable energy instead of fossil fuels. The OurCounty Sustainability Plan includes twelve primary goals that have a total of 37 separate strategies, with a total of 159 separate actions. The following are goals, strategies, and actions from the OurCounty Sustainability Plan that may apply to the proposed project:

Goal 2: Buildings and infrastructure that support human health and resilience.

Strategy 2B: Require sustainable and healthy building design and construction.

Action 31: Adopt CALGreen Tier 1 green building standards and identify which Tier 2 standards could be adopted as code amendments.

Goal 3: Equitable and sustainable land use and development without displacement

Strategy 3E: Limit development in high climate-hazards areas.

Action 56: Evaluate options to limit new large-scale development in high climate-hazard areas.

Goal 7: A fossil fuel-free LA County

Strategy 7A: Transition to a zero-carbon energy system that reduces air and climate pollution and that minimizes the dangers of a changing climate to our communities and economy

Goal 9: Sustainable production and consumption of resources

Strategy 9B: Implement strong water conservation measures.

Strategy 9B: Implement strong water conservation measures.

Los Angeles County 2045 Climate Action Plan

The County adopted the *2045 Climate Action Plan* (2045 CAP) on April 16, 2024. This 2045 CAP is the County's path toward meeting the goals of the Paris Agreement and achieving carbon neutrality for unincorporated Los Angeles County by the years of 2030, 2035, and 2045. The 2045 CAP builds on previous climate action work from the *Unincorporated Los Angeles County Community Climate Action Plan 2020* (2020 CCAP), adopted in October 2015 as a subcomponent of the Air Quality Element of the *Los Angeles County General Plan 2035* (General Plan). The 2045 CAP includes the following elements:

- A GHG emissions inventory from communitywide activities in unincorporated Los Angeles County in 2018, along with a baseline inventory for 2015.
- Projections of future emissions for 2030, 2035, and 2045.
- GHG emissions reduction targets for 2030, 2035, and 2045.
- A long-term aspirational goal for carbon neutrality by 2045.
- Climate strategies, measures, and actions to reduce GHG emissions from major sectors.
- Technical modeling appendix to explain the GHG emissions reduction estimates.
- A consideration of environmental justice and equity concerns.
- Implementation and monitoring measures to ensure successful climate action.
- A new development review consistency checklist to allow future projects to streamline GHG emissions analyses pursuant to the CEQA.

The 2045 CAP includes 10 strategies, 25 measures, and almost 90 actions that shall be implemented by the County to achieve its proportional share of state GHG emissions reductions for the target year 2030. These strategies, measures, and actions are organized into four sectors: (1) transportation; (2) stationary energy; (3) waste (including wastewater); and (4) agriculture, forestry, and other land use (AFOLU).

CEQA Guidelines Section 15183.5 allows public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs. The 2045 CAP itself, the 2045 CAP Consistency Review Checklist (2045 CAP Checklist), and the certified Final Program Environmental Impact Report (PEIR) for the 2045 CAP together meet all requirements of Section 15183.5(b) of the CEQA Guidelines. Accordingly, the 2045 CAP represents the County's qualified climate action plan in compliance with CEQA.

The 2045 CAP Checklist applies to discretionary projects that are subject to and not exempt from CEQA, including both new projects and expansion of existing land uses, and including agency and public projects discretionary projects that are subject to and not exempt from CEQA, including both new projects and expansion of existing land uses, and including agency and public projects. The purpose of the 2045 CAP Checklist is to:

1. Implement relevant GHG emissions reduction actions from the 2045 CAP for projects.

2. Provide a streamlined review process for analyzing the impacts of GHG emissions resulting from proposed projects that are subject to CEQA.

The 2045 CAP Checklist may be updated to incorporate new GHG emissions reduction techniques or to comply with later amendments to the 2045 CAP or local, state, or federal law without the need for an amendment to the General Plan.

METHODOLOGY

The impact analysis focuses on the two sources of energy that are relevant to the proposed project: electricity and transportation fuel for vehicle trips associated with project operations as well as the fuel necessary for project construction. Natural gas consumption would not be included as the project would not use natural gas on-site. The analysis of electricity usage is based on the California Emissions Estimator Model (CalEEMod) version 2022.1 modeling, which quantifies energy use for occupancy. The project's estimated electricity consumption is based primarily on CalEEMod's default settings for Los Angeles County, and consumption factors provided by Southern California Edison (SCE), the electricity provider for the project site. The results of the CalEEMod modeling are included in Appendix A, *Air Quality/Greenhouse Gas Emissions/Energy Data*. The amount of operational fuel use was estimated using the California Air Resources Board (CARB) Emissions Factor 2021 (EMFAC2021) computer program, which provides projections for typical daily fuel (i.e., diesel and gasoline) usage in the County, and the project's trip generation from the VMT Analysis; refer to Appendix G, *VMT Analysis*. 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. The results of EMFAC2021 modeling and construction fuel estimates are included in Appendix A.

CEQA Guidelines Appendix F is an advisory document that assists in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis on Response 4.6(a) relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- **Criterion 2**: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3**: The effects of the project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4**: The degree to which the project complies with existing energy standards.
- **Criterion 5**: The effects of the project on energy resources.
- **Criterion 6**: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Quantification of the project's energy usage is presented and addresses **Criterion 1**. The discussion on construction-related energy use focuses on **Criteria 2, 4, and 5**. The discussion on operational energy use is divided into transportation energy demand and building energy demand. The transportation energy demand analysis discusses **Criteria 2, 4, and 6**, and the building energy demand analysis discusses **Criteria 2, 3, 4, and 5**.

Less Than Significant Impact. The project's estimated energy consumption is summarized in Table 4.6-1, *Project and Countywide Energy Consumption*. As shown in Table 4.6-1, the project's energy usage would constitute an approximate 0.0044 percent increase over County's typical annual electricity consumption. The project's off-road construction equipment diesel fuel consumption, on-road construction fuel consumption, and operational vehicle fuel consumption would increase Los Angeles County's consumption by 0.0148 percent, 0.0125 percent, and 0.0464 percent, respectively (**Criterion 1**).

Table 4.6-1
Project and Countywide Energy Consumption

Energy Type	Project Annual Energy Consumption	Los Angeles County Annual Energy Consumption [2]	Percentage Increase Countywide [2]
Electricity Consumption [1]	2,872 MWh	65,374,721 MWh	0.0044%
Fuel Consumption			
Construction Off-Road Fuel Consumption [3]	55,352 gallons	374,830,981 gallons	0.0148%
Construction On-Road Fuel Consumption [3]	493,012 gallons	3,929,799,320 gallons	0.0125%
Operational Automotive Fuel Consumption [3]	1,734,690 gallons	3,742,125,048 gallons	0.0464%

Notes:
1. As modeled in CalEEMod version 2022.1.
2. The project increases in electricity consumption are compared to the total consumption in Los Angeles County in 2021. The project increases in construction off-road and on-road fuel consumption are compared with the projected Los Angeles Countywide off-road fuel consumption and Los Angeles Countywide on-road fuel consumption in 2023, respectively. The project increase in Operational automotive fuel consumption is compared with the projected Countywide on-road fuel consumption in 2025.
   Los Angeles County electricity consumption data source: California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed February 22, 2023.
3. Project fuel consumption calculated based on CalEEMod results. Countywide operational fuel consumption, off-road construction equipment diesel fuel consumption, and on-road fuel consumption are from CARB EMFAC2021.

Refer to Appendix A, *Air Quality/Greenhouse Gas Emissions/Energy Data*, for assumptions used in this analysis.

CONSTRUCTION ENERGY CONSUMPTION

During construction, the project would consume energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used during grading, building construction, paving, and architectural coating. As indicated in Table 4.6-1, the project's off-road fuel consumption and on-road fuel consumption from construction would be approximately 55,352 gallons and 493,012 gallons, respectively. The project's off-road fuel consumption and on-road fuel consumption from construction would increase off-road construction equipment diesel fuel use in the County by approximately 0.0148 percent, and on-road vehicle fuel consumption in the County by approximately 0.0125 percent, respectively. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (**Criterion 2**).

Some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off (i.e., Title 13, California Code of Regulations Section 2485). Project construction equipment would also be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption. In addition, because the cost of fuel and transportation is a significant aspect of construction budgets, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction (**Criterion 4**).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than nonrecycled materials.[3] It is reasonable to assume that production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. It is noted that construction fuel use is temporary and would cease upon completion of construction activities. There are no unusual project

[3] California Department of Resources Recycling and Recovery, *Green Building Materials*, https://www.calrecycle.ca.gov/greenbuilding/materials, accessed February 22, 2023.

characteristics that would necessitate the use of construction equipment, or building materials, or methods that would be less energy efficient than at comparable construction sites in the region or State. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (**Criterion 5**) and a less than significant impact would occur in this regard.

OPERATIONAL ENERGY CONSUMPTION

Transportation Energy Demand

Pursuant to the Federal Energy Policy and Conservation Act of 1975, the National Highway Traffic and Safety Administration is responsible for establishing additional vehicle standards and for revising existing standards. Compliance with federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. Based on the VMT Memo, the proposed project is projected to result in approximately 3,388 daily trips. Since the proposed project would include warehouse uses, it is expected to attract heavy-duty vehicle traffic, mainly in the form of large multi-axle trucks. The truck trips have been accounted in the fuel consumption calculation. As indicated in Table 4.6-1, project operations are estimated to increase approximately 1,734,690 gallons of fuel consumption per year, which would increase Countywide automotive fuel consumption by 0.0464 percent. The project does not propose any unusual features that would result in excessive long-term operational fuel consumption (**Criterion 2**).

The key drivers of transportation-related fuel consumption for the proposed project are heavy-duty trucks traveling to and from the project site. Additionally, passenger vehicle and light- and medium-duty trucks trips also account for a portion of the transportation-related fuel consumption. At the time of this analysis, it has not been determined if the ultimate tenant would operate its own fleet and most warehouse operators have no control over the trucks entering and exiting their facilities. Consequently, it is infeasible to require trucks with particular emission profiles (e.g., zero-emission [ZE], near-zero-emission [NZE], or 2010 or beyond model year trucks) to visit the project site.

The project would also consume fuel in the form of employees driving to and from the project site. However, employee commuting factors are outside of the scope of the design of the proposed project. Notwithstanding, the project would include electric vehicle spaces for passenger vehicles, as well as bicycle parking, in compliance with CALGreen Code. This requirement would encourage and support alternative modes of travel and thus reduce the petroleum fuel consumption (**Criterion 4** and **Criterion 6**). Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region. A less than significant impact would occur in this regard.

Building Energy Demand

The CEC developed 2020 to 2035 forecasts for energy consumption and peak demand in support of the 2021 IEPR for each of the major electricity and natural gas planning areas and the State based on the economic and demographic growth projections.[4] CEC forecasts that the Statewide annual average growth rates of energy demand between 2021 and 2035 would be 1.3 percent to 2.3 percent for electricity and less than 0.1 percent to 0.8 percent increase for natural gas.[5] As shown in Table 4.6-1, operational energy (electricity) consumption of the project would represent approximately 0.0044 percent increase in electricity consumption over the current Countywide usage, which would be significantly below CEC's forecasts. Therefore, the project would be consistent with the CEC's energy consumption forecasts and would not require additional energy capacity or supplies (**Criterion 2**). Additionally, the project would consume energy during the same time periods as commercial and light industrial developments and would consume

4 California Energy Commission, *Final 2021 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*, February 2022. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Figure 10 and Figure 14, respectively.

5 Ibid.

energy evenly throughout the day. As a result, the project would not result in unique or more intensive peak or base period electricity demand (**Criterion 3**).

The proposed project would be required to comply with the most current Title 24 (2022 Title 24), which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the most current Title 24 standards significantly reduces energy usage. Title 24 Building Energy Efficiency Standards are updated every 3-year and become more stringent between each update, as such complying with the most current Title 24 standards would make the proposed project more energy efficient than existing buildings built under the earlier versions of the Title 24 standards (**Criterion 4**).

The electricity provider, SCE, is subject to California's Renewables Portfolio Standard (RPS) reflected in SB 100. The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by the end of 2020, 44 percent by the end of 2024, 52 percent by the end of 2027, 60 percent of total procurement from eligible renewable energy resources by 2030, and 100 percent of total procurement by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that new development projects will not result in the waste of the finite energy resources (**Criterion 5**).

The project would not cause wasteful, inefficient, and unnecessary consumption of building energy during project operation, or preempt future energy development or future energy conservation. A less than significant impact would occur.

Mitigation Measures: No mitigation is required.

b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As discussed above, operational energy (electricity) consumption of the project would represent approximately 0.0044 percent increase in electricity consumption over the current Countywide usage, which would be significantly below CEC's forecasts in the 2021 IEPR (i.e., Statewide annual average growth rates of energy demand between 2021 and 2030 would be 1.3 percent to 2.3 percent for electricity); refer to Table 4.6-1. Therefore, the project would be consistent with the CEC's 2021 IEPR. Further, the proposed project would be required to comply with the most current Title 24 (2022 Title 24), which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. The project would also comply with CALGreen Code which requires that new buildings employ water efficiency and conservation, increase building system efficiencies (e.g., lighting, HVAC, and plumbing fixtures), divert construction waste from landfills, and incorporate electric vehicles charging infrastructure. Specifically, the project Applicant will be installing EV parking spaces and installing end-of-trip facilities for bicycles. Further, the project Applicant will provide more short-term and long-term bicycle parking spaces than required, utilize water-efficiency irrigation, and install drought-tolerant landscape. The project will provide solar production and be LEED-certified. Additionally, per the RPS, the project would utilize electricity provided by SCE that would achieve 60 percent of total procurement from eligible renewable energy resources by 2030, and 100 percent renewable energy by 2045. As such, the project would comply State energy plans including the 2021 IEPR, the most current Title 24 as well as CalGreen Code.

The OurCounty Sustainability Plan identifies goals, strategies, and actions outlines what local governments and stakeholders can do to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate, particularly focusing on those communities that have been disproportionately burdened by environmental pollution. Provided in Table 4.8-2, *Consistency with OurCounty Sustainability Plan – Energy*, is an evaluation of all applicable energy-related goals, strategies, and actions identified in the OurCounty Sustainability Plan to determine how the project would be consistent with this community plan.

Table 4.6-2
Consistency with OurCounty Sustainability Plan – Energy

Goals, Strategies, and Actions	Project Consistency Analysis
Goal 2: Buildings and infrastructure that support human health and resilience. **Strategy 2B**: Require sustainable and healthy building design and construction. **Action 31**: Adopt CALGreen Tier 1 green building standards and identify which Tier 2 standards could be adopted as code amendments.	**Consistent**. In compliance with sustainable practices included in the most current Title 24 standards and CALGreen Code, the project would utilize water-efficiency irrigation, and install drought-tolerant landscape, all of which would reduce energy consumption associated with transportation of water. The project would also provide solar production and be LEED-certified. Therefore, the proposed project would result in sustainable buildings and would support this goal.
Goal 7: A fossil fuel-free LA County **Strategy 7A**: Transition to a zero-carbon energy system that reduces air and climate pollution and that minimizes the dangers of a changing climate to our communities and economy	**Consistent**. The project would provide solar production and be LEED-certified. Further, as described below, the project would aim to utilize 100% zero-carbon electricity on-site. Therefore, the proposed project would support this goal.
Source: County of Los Angeles, *OurCounty Los Angeles Countywide Sustainability Plan*, August 2019.	

As shown, the project would comply with applicable goals, strategies, and actions in the OurCounty Sustainability Plan.

Additionally, provided in Section 4.8, *Greenhouse Gas Emissions*, Table 4.8-4, *Consistency with 2045 CAP Checklist*, is an evaluation of applicable 2045 CAP Checklist items to determine project consistency with reduction measures and actions outlined in the 2045 CAP; refer to Appendix A. The project would be consistent with land use designation/zoning for the site. The project would also provide end-of-trip bicycle facilities (i.e., more short-term and long-term bicycle storage than required; shower and changing rooms) and meet the requirement for electric vehicle parking spaces. The project would provide roadway improvements that would increase pedestrian connectivity in the region. Overall, the consistency analysis provided in Table 4.8-4 demonstrate that the project would comply with the plans, policies, regulations and GHG reduction actions/strategies identified in the 2045 CAP Consistency Checklist, and subsequently, be consistency with the 2045 CAP. As such, the proposed project would result in less than significant impacts in this regard.

Mitigation Measures: No mitigation is required.

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4.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
2) Strong seismic ground shaking?			✓	
3) Seismic-related ground failure, including liquefaction?			✓	
4) Landslides?				✓
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				✓
e. Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?				✓
f. Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?				✓

The information presented in this analysis is primarily based on the *Feasibility-Level Geotechnical Investigation, Draft Antelope LAC 234, Lancaster Area of Los Angeles County, California* (Geotechnical Investigation), prepared by Kleinfelder, Inc. and dated June 23, 2022; refer to Appendix D, *Geotechnical Investigation*.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. Southern California, including the project area, is subject to the effects of seismic activity due to the active faults that traverse the area. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated Earthquake Fault Zone. Based on the Geotechnical Investigation, no portion of the project site is located within a State of California-Special Studies Zone (formerly Alquist-Priolo Earthquake Fault Zone). The closest fault to the project site is the San Andreas fault zone located approximately 10.8 miles southwest of the site. Because of the distance to known active faults and the lack of surficial evidence of fault breaks expressed in air photos or published geologic maps, the Geotechnical Investigation determined that the risk of surface rupture resulting from faulting is considered low. Thus, implementation of the proposed project would not result in the rupture of a known earthquake fault as delineated on an Alquist-Priolo Earthquake Fault Zoning Map. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

2) Strong seismic ground shaking?

Less Than Significant Impact. Southern California has numerous active seismic faults subjecting people to potential earthquake and seismic-related hazards. Seismic activity poses two types of potential hazards for people and structures, categorized either as primary or secondary hazards. Primary hazards are caused by the direct interaction of seismic energy with the ground; examples include ground rupture, ground shaking, ground displacement, subsidence, and uplift from earth movement. Secondary hazards are consequences of ground shaking; examples include ground failure (lurch cracking, lateral spreading, and slope failure), liquefaction, water waves (seiches), movement on nearby faults (sympathetic fault movement), dam failure, and fires. Although no known active or inactive faults exists within the project vicinity and there is a low probability of exposure to primary seismic hazards, secondary hazards pose a threat to the community because of the project's proximity to active regional faults.

As stated in Response 4.7(a)(1), the San Andreas fault zone is located approximately 10.8 miles southwest of the site. Although the Geotechnical Investigation determined that the risk of surface rupture resulting from faulting is considered low and the site is not in close proximity to known active faults, it is likely that the site would periodically experience ground shaking as a result of moderate to large magnitude earthquakes.

Accordingly, the proposed structures could be susceptible to damage during a seismic event. To minimize potential impacts related to seismic ground motion, the project would be required to adhere to current seismic design requirements of the California Building Code (CBC), which is adopted and incorporated by reference into County Code Title 26, *Building Code*. As detailed in County Code Title 26 Section 110.2, *Geotechnical Hazards*, no building or grading permit would be issued when the Building Official finds that property outside the site of the proposed work could be damaged by activation or acceleration of a geotechnically hazardous condition and such activation or acceleration could be attributed to the proposed work on, or change in use of, the site for which the permit is requested. Subject to such conditions of County Code Section 110.2.1, permits may be issued when the Applicant has submitted an engineering geology and/or soils engineering report or reports complying with the provisions of Section 111 such that said reports show to the satisfaction of the Building Official that the hazard will be eliminated prior to the use or occupancy of the land or structures, or that the site is safe for the intended use. Thus, upon adherence to applicable legislations including the CBC and County Code, impacts related to seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation is required.

3) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction and seismically-induced settlement or ground failure is generally related to strong seismic shaking events where the groundwater occurs at shallow depth (generally within 50 feet of the ground surface) or where lands are underlain by loose, cohesionless deposits. Liquefaction typically results in the loss of shear strength of a soil, which occurs due to the increase of pore water pressure caused by the rearrangement of soil particles induced by shaking or vibration. During liquefaction, soil strata behave similarly to a heavy liquid. Based on the Geotechnical Investigation, the project site is located within a mapped generalized liquefaction potential zone. As such, a liquefaction analysis was prepared as part of the Geotechnical Investigation to assess the seismically induced settlement potential.

According to the Geotechnical Investigation, the peak ground acceleration (PGA) of 0.55g with an earthquake magnitude of 8.1 was used as the design-level seismic event in the liquefaction analysis, which is defined as an earthquake event with 2 percent probability of being exceeded in 50 years. Based on the analysis, it is determined that layers of sands and silty sands at depths approximately 35 to 50 feet bgs (below the design groundwater depth of 13 feet below ground surface) may be subject to liquefaction in the event of a major earthquake occurring on a nearby fault. The calculated total liquefaction-induced settlement is on the order of less than 1 inch. Differential liquefaction-induced settlement may be estimated as half of the total seismically induced settlement over a distance of about 30 feet. Additionally, shallow groundwater is not present on-site; groundwater was not encountered during the field exploration drilled to a maximum explored depth of 51.5 feet below ground surface.

Overall, the Geotechnical Investigation concluded that the proposed structures would be able to tolerate the estimated seismic settlement associated with potential liquefaction (i.e., it will not collapse creating a life safety issue) when constructed on conventional shallow foundations on a zone of compacted fill. Further, the proposed structures would be required to adhere to the current design requirements of the CBC as well as County Code Title 26. As such, impacts related to seismic-related ground failure, including liquefaction, would be less than significant.

Mitigation Measures: No mitigation is required.

4) Landslides?

No Impact. According to the Geotechnical Investigation, the project site is not located within a State or County designated landslide hazard zone. The site and surrounding area are relatively flat and risk from landslides or other forms of mass wasting is considered very low. As such, no impact would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact.

Construction

Grading, earthwork, and landscape/hardscape installation activities associated with the proposed project could expose on-site soils to potential short-term erosion by wind and water. The project site is generally flat and currently mostly vegetated. As detailed in Section 4.10, *Hydrology and Water Quality*, construction activities associated with the project would be required to implement best management practices (BMPs) to prevent sedimentation from stormwater runoff and winds in accordance with a Stormwater Pollution Prevention Plan (SWPPP) prepared as part of the required National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Compliance with the

Construction General Permit would minimize the potential of erosion and loss of topsoil at the project site during construction activities to a less than significant level.

Operations

As analyzed in Section 4.10, operations of the proposed project would not result in substantial soil erosion or the loss of topsoil as the majority of the project site would be impervious. Unpaved area would be improved with landscaping to minimize the potential for erosion or siltation on- or off-site. In addition, the project would be required to incorporate properly designed, technically appropriate BMPs and other low impact development (LID) strategies in accordance with County Code Chapter 12.84, *Low Impact Development Standards*. With implementation of all BMPs and LID strategies required by the County Code, operational impacts with regards to erosion or loss of topsoil would be less than significant.

Mitigation Measures: No mitigation is required.

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?

Less than Significant Impact. Refer to Responses 4.7(a)(3) and 4.7(a)(4) for project impact analyses regarding liquefaction and landslides, respectively.

Lateral Spreading

Lateral spreading is typically exemplified by the formation of vertical cracks on the surface of liquefied soils, and usually takes place on gently sloping ground or level ground with nearby free surface such as a drainage or stream channel. It is noted that lateral spreading may be present where conditions conductive to shallow liquefaction exist.

As discussed in Response 4.7(a)(3), the project site is located within areas identified as susceptible to liquefaction. However, the Geotechnical Investigation concluded that, based on the results of the field exploration, laboratory testing, and geotechnical analyses, potential liquefaction-induced settlement is on the order of less than 1 inch. Differential liquefaction-induced settlement may be estimated as half of the total seismically induced settlement over a distance of about 30 feet. Additionally, shallow groundwater is not present on-site; groundwater was not encountered during the field exploration drilled to a maximum explored depth of 51.5 feet below ground surface. The Geotechnical Investigation recommends the proposed warehouses be supported on conventional shallow foundations on a zone of compacted fill and that site soils be overexcavated and replaced as engineered fill to a minimum depth of three feet from existing grade and at least three feet below the bottom of footings, whichever is greater, to provide uniform support for the proposed spread foundations and slab-on-grade floors. The proposed structures would also be required to adhere to the current design requirements of the CBC as well as County Code Title 26. As such, impacts related to lateral spreading in this regard would be less than significant.

Subsidence

Subsidence is defined as “the settling or sinking of the ground surface” by the County Code. According to the USGS, land subsidence is a gradual settling or sudden sinking of the Earth's surface due to removal or displacement of subsurface earth materials. The principal causes include aquifer-system compaction associated with groundwater withdrawals; drainage of organic soils; underground mining; and natural compaction or collapse, such as with sinkholes or thawing permafrost.

The project does not propose substantial groundwater withdrawal, drainage of organic soils, or underground mining. Additionally, as stated, groundwater was not encountered during the field exploration drilled to a maximum explored

depth of 51.5 feet below ground surface. With adherence to current design requirements of the CBC as well as County Code Title 26, impacts regarding subsidence hazards in this regard would be less than significant.

Hydro-Collapse

Hydro-collapsible soils are characterized by their ability to undergo significant shrinkage (collapse) during inundation. Inundation in soils can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors, and may result in unacceptable settlement of structures or concrete slabs supported on grade.

According to the Geotechnical Investigation, the collapse potential of the surficial soils is approximately 1.3 percent collapse under inundation. Collapse potential less than two percent is considered low since soil conditions are not met to induce significant shrinkage during inundation. As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking (and potentially collapsing) when dry. Soil expansion can damage structures by cracking foundations, causing settlement and collapse, and distorting structural elements. As defined in CBC Section 1803A.5.3, *Expansive Soils*, soils meeting all four of the following provisions are considered to be expansive: 1) plasticity index of 15 or greater, determined in accordance with American Society for Testing and Materials (ASTM) D4318; 2) more than 10 percent of the soil particles pass a number 200 sieve, determined in accordance with ASTM D422; 3) more than 10 percent of the soil particles are less than five micrometers in size, determined in accordance with ASTM D422; 4) expansion index greater than 20, determined in accordance with ASTM D4829.[1] It should be noted that provisions one, two, and three are not necessary if the soil test prescribed in provision four is conducted.

According to the Geotechnical Investigation, expansion index testing of surficial soils resulted in a value of five, indicating a very low expansion potential of on-site soils. Thus, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. No septic tanks or alternative wastewater systems would be constructed as part of the project. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is generally flat, with a gentle downward slope towards the north-east, and is at a distance from any hillsides. The project site does not contain terrain with a natural slope gradient of 25 percent or steeper. As such, the project would not have the potential to conflict with the Hillside Management Area Ordinance, and no impacts would occur in this regard.

[1] The 1994 Uniform Building Code (UBC), in conjunction with the 1997 UBC, are the base code for the 1998 and 2001 editions of the California Building Code (CBC), which was last updated in 2022.

Mitigation Measures: No mitigation is required.

4.8 GREENHOUSE GAS EMISSIONS

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

GLOBAL CLIMATE CHANGE

California is a substantial contributor of global greenhouse gases (GHGs), emitting over 418 million tons of carbon dioxide (CO_2) per year.[1] Climate studies indicate that California is likely to see an increase of three to four degrees Fahrenheit over the next century. Methane (CH_4) is also an important GHG that potentially contributes to global climate change. GHGs are global in their effect and increase the Earth's ability to absorb heat in the atmosphere. As primary GHGs have a long lifetime in the atmosphere, accumulate over time, and are generally well-mixed, their impact on the atmosphere is mostly independent of the point of emission.

The impact of human activities on global climate change is apparent in observational records. Air trapped by ice has been extracted from core samples taken from polar ice sheets to determine the global atmospheric variation of CO_2, CH_4, and nitrous oxide (N_2O) from before the start of industrialization (approximately 1750) to over 650,000 years ago. For that period, it was found that CO_2 concentrations ranged from 180 to 300 parts per million (ppm). For the period from approximately 1750 to the present, global CO_2 concentrations increased from a pre-industrialization period concentration of 280 to 379 ppm in 2005, with the 2005 value far exceeding the upper end of the pre-industrial period range. As of February 2023, the highest monthly average concentration of CO_2 in the atmosphere was recorded at 421.23 ppm.[2]

The Intergovernmental Panel on Climate Change (IPCC) constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. It concluded that a stabilization of GHGs at 400 to 450 parts per million carbon dioxide equivalents (CO_2e)[3] concentration is required to keep global warming below two degrees Celsius, which in turn is assumed to be necessary to avoid dangerous climate change.

1 California Environmental Protection Agency, *California Greenhouse Gas Emissions for 2000 to 2019, Trends of Emissions and Other Indicators*, July 28, 2021.

2 Scripps Institution of Oceanography, *Carbon Dioxide Concentration at Mauna Loa Observatory*, https://scripps.ucsd.edu/programs/keelingcurve/, accessed February 28, 2023.

3 Carbon Dioxide Equivalent (CO_2e) – A metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential.

REGULATORY FRAMEWORK

Federal

On May 13, 2010, the U.S. Environmental Protection Agency (EPA) issued the Title V Operating Permit Greenhouse Gas (GHG) Tailoring Rule (Tailoring Rule), which establishes a commonsense approach to addressing GHG emissions from stationary sources under the Clean Air Act (CAA) permitting programs. Through the Tailoring Rule, EPA raised the major source regulatory threshold for GHGs from the 100/250 ton per year levels to 100,000 tons per year of CO_2e emissions. New facilities with GHG emissions of at least 100,000 tons per year CO_2e and existing facilities with at least 100,000 tons per year CO_2e making changes that would increase GHG emissions by at least 75,000 tons per year CO_2e are required to obtain New Source Review Prevention of Significant Deterioration (PSD) permits. Facilities that must obtain a PSD permit anyway, to cover other regulated pollutants, must also address GHG emissions increases of 75,000 tons per year CO_2e or more. New and existing sources with GHG emissions above 100,000 tons per year CO_2e must also obtain operating permits.

State

Various Statewide and local initiatives to reduce the State's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a result makes an incremental cumulative contribution to global climate change; therefore, global cooperation is necessary to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then California Air Resources Board (CARB) should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

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

Senate Bill 32. Signed into law on September 2016, Senate Bill (SB) 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030.

California Building Energy Efficiency Standards (Title 24). The 2022 California Building Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6), commonly referred to as "Title 24," became effective on January 1, 2023. In general, Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The 2022 Title 24 standards encourage efficient electric heat pumps, establish electric-ready requirements for new homes, expand solar photovoltaic and battery

storage standards, strengthen ventilation standards, and more. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Title 24 standards.

California Air Resources Board Scoping Plan. On December 11, 2008, CARB adopted the *Climate Change Scoping Plan* (Scoping Plan), which functions as a roadmap to achieve GHG reductions in California required by AB 32 through subsequently enacted regulations. The Scoping Plan contains the main strategies California implement; to reduce CO_2e emissions by 174 million metric tons (MT), or approximately 30 percent, from the State's projected 2020 emissions level of 596 million $MTCO_2e$ under a business as usual (BAU)[4] scenario. This is a reduction of 42 million $MTCO_2e$, or almost ten percent, from 2002 to 2004 average emissions, but requires the reductions in the face of population and economic growth through 2020.

The Scoping Plan calculates 2020 BAU emissions as the emissions that would be expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. The measures described in the Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32.

AB 32 requires CARB to update the Scoping Plan at least once every five years. CARB adopted the first major update to the Scoping Plan on May 22, 2014. The updated Scoping Plan identifies the actions California has already taken to reduce GHG emissions and focuses on areas where further reductions could be achieved to help meet the 2020 target established by AB 32. The Scoping Plan update also looks beyond 2020 toward the 2050 goal, established in Executive Order S-3-05, and observes that "a mid-term statewide emission limit will ensure that the State stays on course to meet our long-term goal."

In December 2017, CARB approved the *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Scoping Plan). This update focuses on implementation of a 40 percent reduction in GHGs by 2030 compared to 1990 levels. To achieve this, the updated 2017 Scoping Plan draws on a decade of successful programs that addresses the major sources of climate changing gases in every sector of the economy.

On December 15, 2022, CARB released the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), which identifies the strategies achieving carbon neutrality by 2045 or earlier. The 2022 Scoping Plan contains the GHG reductions, technology, and clean energy mandated by statutes. The 2022 Scoping Plan was developed to achieve carbon neutrality by 2045 through a substantial reduction in fossil fuel dependence, while at the same time increasing deployment of efficient non-combustion technologies and distribution of clean energy. The plan would also reduce emissions of short-lived climate pollutants (SLCPs) and would include mechanical CO_2 capture and sequestration actions, as well as emissions and sequestration from natural and working lands and nature-based strategies. Under 2022 Scoping Plan, by 2045, California aims to cut GHG emissions by 85 percent below 1990 levels, reduce smog-forming air pollution by 71 percent, reduce the demand for liquid petroleum by 94 percent compared to current usage, improve health and welfare, and create millions of new jobs. This plan also builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan, to ensure that all communities can reap the benefits of this transformational plan.

[4] "Business as Usual" refers to emissions that would be expected to occur in the absence of GHG reductions; refer to http://www.arb.ca.gov/cc/inventory/data/bau.htm. Note that there is significant controversy as to what BAU means. In determining the GHG 2021 limit, CARB used the above as the "definition." It is broad enough to allow for design features to be counted as reductions.

Local

Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines

In August 2016, the Antelope Valley Air Quality Management District (AVAQMD) adopted the *Antelope Valley AQMD California Environmental Quality Act (CEQA) and Federal Conformity Guidelines* (AVAQMD CEQA and Federal Conformity Guidelines) to provide direction on the preferred analysis approach in preparing environmental analysis or document review. The guidelines characterize the topography and climate of the MDAB, defines cumulative impacts, and provide emission thresholds for construction and operation.

On May 13, 2010, EPA issued the Title V Greenhouse Gas Tailoring Rule (Tailoring Rule), which establishes a commonsense approach to addressing GHG emissions from stationary sources under the Clean Air Act (CAA) permitting programs. Through the Tailoring Rule, EPA raised the major source regulatory threshold for GHGs from the 100/250 ton per year levels to 100,000 tons per year of CO_2e emissions. Subsequently, AVAQMD established a daily and yearly significance thresholds for GHG emissions for all CEQA projects within its jurisdiction based on the Tailoring Rule: a project that generates total GHG emissions (direct and indirect) in excess of the annual threshold of 100,000 tons per year and the daily threshold of 548,000 pounds per day may presumed to have resulted in significant impacts.[5] Although the EPA Tailoring Rule is intended to regulate stationary sources, AVAQMD determined, based on their best knowledge and judgement, that the threshold is applicable to all types of development projects subject to CEQA, and therefore included it in the AVAQMD CEQA and Federal Conformity Guidelines. As such, this threshold is applicable to the proposed project.

Southern California Association of Governments Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Regional Council of SCAG formally adopted the *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS). The SCS portion of the 2020-2045 RTP/SCS highlights strategies for the region to reach the regional target of reducing GHGs from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels). Specially, these strategies are to:

- Focus growth near destinations and mobility options;
- Promote diverse housing choices;
- Leverage technology innovations;
- Support implementation of sustainability policies; and
- Promote a green region.

Furthermore, the 2020-2045 RTP/SCS discusses a variety of land use tools to help achieve the State-mandated reductions in GHG emissions through reduced per capita vehicle miles traveled (VMT). Some of these tools include center focused placemaking, focusing on priority growth areas, job centers, transit priority areas, as well as high quality transit areas and green regions.

Los Angeles Countywide Sustainability Plan

The *OurCounty Los Angeles Countywide Sustainability Plan* (OurCounty Sustainability Plan) was adopted by the County in August 2019. It outlines what local governments and stakeholders can do to enhance the well-being of every community in the County while reducing damage to the natural environment and adapting to the changing climate,

[5] Antelope Valley AQMD Executive Director Barbara Lods, *Email communication – GHG Threshold*, November 13, 2023. Also see: Antelope Valley AQMD, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines Table 6, Significant Emissions Thresholds*, August 2016.

particularly focusing on those communities that have been disproportionately burdened by environmental pollution. This plan envisions streets and parks that are accessible, safe, and welcoming to everyone; air, water, and soil that are clean and healthy; affordable housing that enables all residents to thrive in place; and a just economy that runs on renewable energy instead of fossil fuels. The OurCounty Sustainability Plan includes twelve primary goals that have a total of 37 separate strategies, with a total of 159 separate actions. The following are goals, strategies, and actions from the OurCounty Sustainability Plan that may apply to the proposed project:

Goal 2: Buildings and infrastructure that support human health and resilience.

Strategy 2B: Require sustainable and healthy building design and construction.

Action 31: Adopt CALGreen Tier 1 green building standards and identify which Tier 2 standards could be adopted as code amendments.

Goal 3: Equitable and sustainable land use and development without displacement

Strategy 3E: Limit development in high climate-hazards areas.

Action 56: Evaluate options to limit new large-scale development in high climate-hazard areas.

Goal 7: A fossil fuel-free LA County

Strategy 7A: Transition to a zero-carbon energy system that reduces air and climate pollution and that minimizes the dangers of a changing climate to our communities and economy

Goal 9: Sustainable production and consumption of resources

Strategy 9B: Implement strong water conservation measures.

Los Angeles County 2045 Climate Action Plan

The County adopted the *2045 Climate Action Plan* (2045 CAP) on April 16, 2024. This 2045 CAP is the County's path toward meeting the goals of the Paris Agreement and achieving carbon neutrality for unincorporated Los Angeles County by the years of 2030, 2035, and 2045. The 2045 CAP builds on previous climate action work from the *Unincorporated Los Angeles County Community Climate Action Plan 2020* (2020 CCAP), adopted in October 2015 as a subcomponent of the Air Quality Element of the *Los Angeles County General Plan 2035* (General Plan). The 2045 CAP includes the following elements:

- A GHG emissions inventory from communitywide activities in unincorporated Los Angeles County in 2018, along with a baseline inventory for 2015.
- Projections of future emissions for 2030, 2035, and 2045.
- GHG emissions reduction targets for 2030, 2035, and 2045.
- A long-term aspirational goal for carbon neutrality by 2045.
- Climate strategies, measures, and actions to reduce GHG emissions from major sectors.
- Technical modeling appendix to explain the GHG emissions reduction estimates.
- A consideration of environmental justice and equity concerns.
- Implementation and monitoring measures to ensure successful climate action.
- A new development review consistency checklist to allow future projects to streamline GHG emissions analyses pursuant to the CEQA.

The 2045 CAP includes 10 strategies, 25 measures, and almost 90 actions that shall be implemented by the County to achieve its proportional share of state GHG emissions reductions for the target year 2030. These strategies, measures, and actions are organized into four sectors: (1) transportation; (2) stationary energy; (3) waste (including wastewater); and (4) agriculture, forestry, and other land use (AFOLU).

CEQA Guidelines Section 15183.5 allows public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs. The 2045 CAP itself, the 2045 CAP Consistency Review Checklist (2045 CAP Checklist), and the certified Final Program Environmental Impact Report (PEIR) for the 2045 CAP together meet all requirements of Section 15183.5(b) of the CEQA Guidelines. Accordingly, the 2045 CAP represents the County's qualified climate action plan in compliance with CEQA.

The 2045 CAP Checklist applies to discretionary projects that are subject to and not exempt from CEQA, including both new projects and expansion of existing land uses, and including agency and public projects discretionary projects that are subject to and not exempt from CEQA, including both new projects and expansion of existing land uses, and including agency and public projects. The purpose of the 2045 CAP Checklist is to:

1. Implement relevant GHG emissions reduction actions from the 2045 CAP for projects.

2. Provide a streamlined review process for analyzing the impacts of GHG emissions resulting from proposed projects that are subject to CEQA.

The 2045 CAP Checklist may be updated to incorporate new GHG emissions reduction techniques or to comply with later amendments to the 2045 CAP or local, state, or federal law without the need for an amendment to the General Plan.

SIGNIFICANCE THRESHOLDS

The following thresholds of significance are based on CEQA Guidelines Appendix G. For the purposes of this analysis, implementation of the proposed project would be considered to have a significant impact on GHG emissions if it would do any of the following:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment;

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The County has not adopted a numerical threshold. However, AVAQMD has adopted an annual emissions threshold for GHG emissions: 100,000 tons of CO_2e per year, according to the AVAQMD CEQA and Federal Conformity Guidelines.[6] In developing this threshold, AVAQMD considered levels at which project emissions are cumulatively considerable. Consequently, an exceedance of this project-level threshold would be cumulatively considerable. A project is considered significant for the first CEQA threshold described above if it triggers or exceeds this annual emissions threshold.

It should be acknowledged that a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a "qualified" CAP pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b). It should be acknowledged that a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of a "qualified" CAP pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d),

6 Antelope Valley AQMD, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines Table 6, Significant Emissions Thresholds*, August 2016.

and 15183(b). Based on the 2045 CAP, the significance of the project's GHG emissions impacts is based on the project's consistency with the CAP, which is a qualified GHG emissions reduction plan in accordance with State CEQA Guidelines Section 15183.5. As discussed, the 2045 CAP represents the County's qualified climate action plan in compliance with CEQA. As such, the project would be evaluated in accordance with the 2045 CAP Checklist. According to the 2045 CAP Checklist, the project would be evaluated based on the four following steps to demonstrate conformance with the 2045 CAP:

Step 1. Demonstrate consistency with the Los Angeles County General Plan 2035.

Step 2. Determine whether the project screens out of using the 2045 CAP Checklist.

Step 3. Demonstrate consistency with the 2045 CAP GHG emissions reduction measures and actions.

Step 4. Identify alternative project emissions reduction measures and additional GHG reductions (Table F-2 for the 2045 CAP Checklist), as needed.

The 2045 CAP Checklist Table F-1, *General Plan and 2045 CAP Greenhouse Gas Emissions Reduction Measure and Action Consistency Checklist*, allows the project applicant to demonstrate compliance with the County's General Plan and the 2045 CAP's GHG emission reduction measures and actions. The table addresses Step 1 through Step 3 requirements. All projects are required to complete this checklist. The 2045 CAP Checklist Table F-2, *2045 CAP Greenhouse Gas Emission Reduction Alternative Measures* allows the project applicant to document alternative GHG emission reduction measures utilized to demonstrate compliance with the Table F-1. The table addresses Step 4. Only projects proposing to use alternative GHG emission reduction measures are required to complete this checklist.

The 2045 CAP consistency requirements outlined in Table F-1 are listed as either "Tier 1" or "Tier 2." These two levels are defined as follows:

Tier 1: Required for all discretionary projects to demonstrate consistency with the 2045 CAP.

Tier 2: Encouraged for all discretionary projects to the maximum extent feasible. Although these are not required, projects are strongly encouraged to implement as many of these as feasible.

In general, Tier 1 requirements were quantified in the 2045 CAP for GHG emission reductions needed to achieve the 2030 and 2035 emission reduction targets. Because these measures were quantified, they would be required for the 2045 CAP to achieve its full emission reduction potential. Some Tier 1 measures were not quantified, but they are either required through other code or ordinance (such as complying with County Transportation Demand Management Ordinance), or they are deemed essential for the overall success of the 2045 CAP. Tier 2 requirements were identified as supporting actions but are not deemed essential for the overall success of the 2045 CAP.

Projects that are not consistent with the 2045 CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the 2045 CAP Checklist to the extent feasible, as defined by CEQA and subject to County's discretion. Cumulative GHG impacts may be significant for any project that is not consistent with the 2045 CAP.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Project-related GHG emissions would include emissions from direct and indirect sources. The proposed project would result in direct and indirect emissions of CO_2, CH_4, and N_2O, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct project-related GHG emissions include emissions from construction activities, area sources, mobile sources, stationary sources, and

refrigerant, while indirect sources include emissions from energy consumption, water demand, and solid waste generation.

The proposed project would include construction of two speculative industrial storage warehouse buildings. The California Emissions Estimator Model (CalEEMod) version 2022.1 was utilized to calculate the project's construction and operational GHG emissions. Table 4.8-1, *Estimated Greenhouse Gas Emissions*, presents the estimated CO_2, CH_4, and N_2O emissions of the proposed project. It should be noted that the project would not consume natural gas on-site. The CalEEMod outputs are contained within Appendix A, *Air Quality/Greenhouse Gas Emissions/Energy Data*.

Direct Project-Related Sources of Greenhouse Gases

Construction Emissions. Construction GHG emissions are typically summed and amortized over the lifetime of the project (assumed to be 30 years), then added to the operational emissions.[7] As detailed in Table 4.8-1, the proposed project construction would result in 182.13 $MTCO_2e$ when amortized over 30 years (5,464.00 $MTCO_2e$ in total, without amortization).

Area Source. Area source emissions were calculated using CalEEMod and project-specific land use data. Project-related area sources include exhaust emissions from landscape maintenance equipment, such as lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the site. As noted in Table 4.8-1, the proposed project would result in 29.50 $MTCO_2e$ per year of area source GHG emissions.

Mobile Source. The CalEEMod model relies upon trip data within the VMT Analysis and project-specific land use data to calculate mobile source emissions. According to the VMT Analysis, the project would generate approximately 3,388 daily vehicle trips. Since the proposed project would include warehouse uses, it is expected to attract heavy-duty vehicle traffic, mainly in the form of large multi-axle trucks. The truck trips have been accounted in the fuel consumption calculation. The project would directly result in 13,669.00 $MTCO_2e$ per year of mobile source-generated GHG emissions; refer to Table 4.8-1.

Refrigerant. Refrigerants are substances used in equipment for air conditioning and refrigeration. Most of the refrigerants used today are HFCs or blends thereof, which can have high global warming potentials (GWP) values. All equipment that uses refrigerants has a charge size (i.e., quantity of refrigerant the equipment contains), and an operational refrigerant leak rate, and each refrigerant has a GWP that is specific to that refrigerant. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime, and then derives average annual emissions from the lifetime estimate. As noted in Table 4.8-1, the proposed project would result in 0.03 $MTCO_2e$ per year of GHG emissions from refrigerants.

Stationary Source. The project Applicant proposes to use two 2,000 kilo-watts diesel emergency generators and one 2,000 gallon-per-minute firewater pump per warehouse building. As a conservative analysis, it is assumed that the emergency generators and firewater pumps would operate for 24 hours per year during emergencies. As noted in Table 4.8-1, the proposed project would result in 106.00 $MTCO_2e$ per year of GHG emissions from stationary sources.

[7] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008).

Table 4.8-1
Estimated Greenhouse Gas Emissions

Source	CO_2	CH_4	N_2O	Refrigerants	CO_2e
	Metric Tons/year[1]				
Direct Emissions					
Construction (amortized over 30 years) [2]	177.77	<0.01	<0.01	0.25	182.13
Mobile Source	13,247.00	0.27	1.32	22.00	13,669.00
Area Source	29.40	<0.01	<0.01	0.00	29.50
Refrigerants	0.00	0.00	0.00	0.03	0.03
Stationary Source	105.00	<0.01	<0.01	0.00	106.00
Total Direct Emissions [2]	*13,559.17*	*0.28*	*1.33*	*22.28*	*13,986.66*
Indirect Emissions					
Energy [3]	693.00	0.04	0.01	0.00	696.00
Water	788.00	15.10	0.36	0.00	1,272.00
Solid Waste	42.20	4.22	0.00	0.00	148.00
Total Indirect Emissions [2]	*1,523.20*	*19.36*	*0.37*	*0.00*	*2,116.00*
Total Project-Related Emissions (Metric Tons/year)	***16,103 $MTCO_2e$/year***				
Total Project-Related Emissions (Tons/year) [4]	***17,750 tons CO_2e/year***				
AVAQMD GHG Threshold [5]	*100,000 tons CO_2e/year*				

Notes:
1. Emissions calculated using California Emissions Estimator Model Version 2022.1 (CalEEMod) computer model.
2. Totals may be slightly off due to rounding.
3. The project would not consume natural gas.
4. Total project related GHG emissions was converted from metric tons of CO_2e per year to tons of CO_2e per year to compare to AVAQMD's GHG threshold. Source: U.S. Environmental Protection Agency, *Greenhouse Gas Equivalencies Calculator*, http://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator, accessed April 19, 2023.
5. AVAQMD threshold source: Antelope Valley Air Quality Management District, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines Table 6, Significant Emissions Thresholds*, August 2016. In developing these thresholds, AVAQMD considered levels at which project emissions are cumulatively considerable. Consequently, exceedances of project-level thresholds would be cumulatively considerable.

Source: Refer to Appendix A, *Air Quality/Greenhouse Gas Emissions/Energy Data* for CalEEMod outputs.

Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy consumption emissions were calculated using CalEEMod; refer to Appendix A. Electricity would be provided to the project site by SCE. According to the project Applicant, there would be no natural gas consumption on-site. The project would indirectly result in 696.00 $MTCO_2e$ per year due to energy consumption; refer to Table 4.8-1.

Solid Waste. Solid waste associated with operations of the proposed project would result in 148.00 $MTCO_2e$ per year; refer to Table 4.8-1.

Water Demand. The project would install low-flow water fixtures and utilize water-efficient irrigation systems and drought-tolerant landscaping. Emissions from indirect energy impacts due to water supply would result in 1,272.00 $MTCO_2e$ per year; refer to Table 4.8-1.

Conclusion

As shown in Table 4.8-1, the total amount of project related operational GHG emissions from direct and indirect sources combined would be below the AVAQMD GHG threshold of 100,000 tons of CO_2e per year. AVAQMD considered levels at which project emissions are cumulatively considerable in developing this threshold. Consequently, an exceedance

of this project-level threshold would be cumulatively considerable. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. This analysis would evaluate the project's consistency with SCAG's 2020-2045 RTP/SCS, CARB's 2022 Scoping Plan, and the County's 2045 CAP (through consistency with the 2045 CAP Checklist).

Consistency with the 2020-2045 RTP/SCS

On September 3, 2020, the Regional Council of SCAG formally adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS includes performance goals that were adopted to help focus future investments on the best-performing projects, as well as different strategies to preserve, maintain, and optimize the performance of the existing transportation system. Table 4.8-2, *Consistency with the 2020-2045 RTP/SCS*, shows the project's consistency with these five strategies found within the 2020-2045 RTP/SCS. As shown therein, the proposed project would be consistent with the GHG emission reduction strategies contained in the 2020-2045 RTP/SCS.

Table 4.8-2
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Focus Growth Near Destinations and Mobility Options		
• Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Consistent.** Transit Priority Areas (TPAs) are defined in the 0.5-mile radius around an existing or planned major transit stop or an existing stop along a High-Quality Transit Corridor (HQTC). A HQTC is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours. The project is located within an HQTC. The project is not located within a TPA or a HQTE. As discussed in Section 4.14, *Population and Housing*, the project is expected to generate approximately 2,000 employees. As such, the project may provide jobs for the local workforce and reduce commutes to jobs outside the project area, which is primarily remote residential uses. Additionally, the project includes bicycle parking spaces and electric vehicle parking spaces in accordance with CALGreen Code to promote mobility options in the area. As such, the project would be consistent with the strategy.

Table 4.8-2 [cont'd]
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
• **Promote Diverse Housing Choices**		
• Preserve and rehabilitate affordable housing and prevent displacement • Identify funding opportunities for new workforce and affordable housing development • Create incentives and reduce regulatory barriers for building context sensitive accessory dwelling units to increase housing supply • Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions	**PGA, Job Centers, HQTAs, NMA, TPAs, Livable Corridors, Green Region, Urban Greening.**	**Not Applicable.** The project does not involve residential development.
Leverage Technology Innovations		
• Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**HQTA, TPAs, NMA, Livable Corridors.**	**Consistent.** In compliance with sustainable practices included in the most current Title 24 standards and CALGreen Code, the project includes EV parking spaces and installing end-of-trip facilities for bicycles. Further, the project would provide more short-term and long-term bicycle parking spaces than required, utilize water-efficiency irrigation, and install drought-tolerant landscape. The project would also provide solar-ready production and be LEED-certified. Therefore, the proposed project would leverage technology innovations to promote alternative modes of transportation and help the City, County, and State meet its GHG reduction goals. The project would be consistent with this reduction strategy.

Table 4.8-2 [cont'd]
Consistency with the 2020-2045 RTP/SCS

Reduction Strategy	Applicable Land Use Tools	Project Consistency Analysis
Support Implementation of Sustainability Policies		
• Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Center Focused Placemaking, Priority Growth Areas (PGA), Job Centers, High Quality Transit Areas (HQTAs), Transit Priority Areas (TPA), Neighborhood Mobility Areas (NMAs), Livable Corridors, Spheres of Influence (SOIs), Green Region, Urban Greening.**	**Not Applicable.** This reduction strategy applies to local jurisdictions/communities, not private development projects. Nonetheless, the project would provide solar production and be LEED-certified; as such, it would be considered a sustainable development.
Promote a Green Region		
• Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling and reclamation • Preserve, enhance and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	**Green Region, Urban Greening, Greenbelts and Community Separators.**	**Not Applicable.** This reduction strategy applies to local jurisdictions/communities and/or projects involving renewable energy production, food production, conservation, or open land, not private development projects. Nonetheless, the proposed project is not anticipated to interfere with regional wildlife connectivity or reduce agricultural land; refer to Section 4.4, *Biological Resources*, and Section 4.2, *Agriculture and Forestry Resources*. The project would be required to comply with the most current Title 24 standards and CALGreen Code and would include solar production and be LEED-certified. As such, the proposed warehouse would include project features that help reduce energy consumption and reduce GHG emissions.

Source: Southern California Association of Governments, *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy – Connect SoCal*, September 3, 2020.

Consistency With The 2022 Scoping Plan

The 2022 Scoping Plan identifies reduction measures necessary to achieve the goal of carbon neutrality by 2045 or earlier. Actions that reduce GHG emissions are identified for each AB 32 inventory sector. Provided in Table 4.8-3, *Consistency with the 2022 Scoping Plan: AB 32 GHG Inventory Sectors*, 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 2022 Scoping Plan.

Table 4.8-3
Consistency with the 2022 Scoping Plan: AB 32 Inventory Sectors

Actions and Strategies	Project Consistency Analysis
Smart Growth / Vehicles Miles Traveled (VMT)	
Reduce VMT per capita to 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	**Consistent**. Refer to Section 4.17, *Transportation*, for a detailed discussion regarding potential project impacts on VMT. As indicated in Table 4.17-4, *Project VMT Summary*, projects which do not exceed 15.8 VMT per employee are considered to result in a less than significant transportation impact regarding VMT in accordance with the *Los Angeles County Public Works Transportation Impact Guidelines*, dated July 23, 2020. The proposed project would result in 15 VMT per employee which would not exceed the County's impact criteria for North County. As such, it is concluded that the project would be assumed to have a less than significant impact in this regard. Additionally, the project would provide more bicycle parking spaces than required and provide EV parking spaces, which would promote alternative mode of transportation to reduce VMT. As such, the project would be consistent with this action.
New Residential and Commercial Buildings	
All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	**Consistent**. The project does not include any natural gas appliances or equipment. As such, the project would be consistent with this action.
Non-combustion Methane Emissions	
Divert 75% of organic waste from landfills by 2025	**Consistent**. SB 1383 establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. The project would comply with local and regional regulations and recycle or compost 75 percent of waste by 2025 pursuant to SB 1383. As such, the project would be consistent with this action.

Source: California Air Resources Board, *2022 Scoping Plan*, November 16, 2022.

Consistency With 2045 Climate Action Plan

For this analysis, consistency with the 2045 CAP Checklist would be utilized to demonstrate project consistent with the 2045 CAP; refer to Appendix A. To demonstrate consistency with the 2045 CAP Checklist, a proposed project must incorporate all applicable Tier 1 measures to the satisfaction of the applicable County departments. Incorporating these actions would ensure that the project would reduce its fair share of GHG emissions and support the achievement of the County's overall GHG emissions reduction goals.

Provided in Table 4.8-4, *Consistency with 2045 CAP Checklist*, is an evaluation of applicable 2045 CAP Checklist items to determine project consistency with reduction measures and actions outlined in the 2045 CAP. The project would be consistent with land use designation/zoning for the site. The project would also provide end-of-trip bicycle facilities (i.e., more short-term and long-term bicycle storage than required; shower and changing rooms) and meet the requirement for electric vehicle parking spaces. The project would provide roadway improvements that would increase pedestrian connectivity in the region.

Table 4.8-4
Consistency with 2045 CAP Checklist

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
Step 1: Demonstrate Consistency with the Los Angeles County General Plan 2035		
1. The Project is Consistent with the General Plan Land Use Element and Housing Element The growth projections included in the General Plan and the 2021–2029 Housing Element were used in the 2045 CAP to estimate unincorporated Los Angeles County GHG emissions over time. Therefore, projects must be consistent with the General Plan to be consistent with the 2045 CAP. To determine a project's consistency with the General Plan, please answer the following question and provide an explanation with supporting documentation. **Is the proposed project consistent with the existing land use designation of the Land Use Element and the 2021 Housing Element Update?**	The project is consistent with land use designation and zoning for the site; refer to Section 4.11, *Land Use and Planning*, for a detailed analysis in this regard.	**Yes, the project complies**
Step 2: : Determine Whether the Project Screens Out of Using the 2045 CAP Checklist		
Certain projects may screen out of the 2045 CAP Checklist if they meet the following screening criteria. **Does the project achieve zero GHG emissions compared to the existing on-site development at the project site?** The project must conduct a comprehensive project-specific analysis of all GHG emissions, consistent with all CEQA guidelines and standard practice for modeling GHG emissions for projects, to demonstrate that the project achieves net-zero.	The project site is currently vacant and does not generate existing emissions.	**No, the project does not comply.**
Step 3: 2045 CAP Measure and Action Consistency Requirements		
Energy Supply		
2. TIER 1: Utilize 100% Zero-Carbon Electricity The project must utilize 100% zero-carbon electricity on-site. The project must comply with one of the following options: A) Install on-site renewable energy systems or participate in a community solar program to supply 100% of the project's estimated energy demand to the maximum extent feasible.	The project would install solar panels onsite to partially meet electricity demand (Option A). The remaining demand would be met by participating in SCE Green Rate level plan for all electricity accounts (Option B) or the Clean Power Alliance (Option C) such that 100% of the project's electricity consumption is supplied by zero-GHG emission sources. Refer to Section 4.6, *Energy*,	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
B) Participate in Southern California Edison at the Green Rate level (i.e., 100% carbon-free electricity) for all electricity accounts associated with the project until SCE provides 100% carbon-free electricity for all accounts by default. C) Participate in Clean Power Alliance at the Clean Rate level (i.e., 100% carbon-free electricity) for all electricity accounts associated with the project until CPA provides 100% carbon-free electricity for all accounts by default. D) A combination of #A, #B, and #C above such that 100% of the project's electricity consumption is supplied by zero-GHG emission sources of power generation, whether by utilities or by on-site electricity generation or both.	for the project's anticipated electricity demand, and discussions in this regard.	
Transportation		
3. Meets Transportation Screening Criteria For development projects, does the project: A) have no retail component and generate a net increase of less than 110 daily vehicle trips? B) have a retail component and contains retail uses that do not exceed 50,000 square feet of gross floor area? C) have a residential component and 100% of the units, excluding manager's units, are set aside for lower income households? D) Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor and: i. has a Floor Area Ratio greater than 0.75? ii. provides less parking than required by the Los Angeles County Code? iii. is consistent with the Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)? iv. does not replace residential units set aside for lower income households with a smaller number of market-rate residential units?	The project does not consist of retail or residential uses and would general more than 110 daily vehicle trips and exceed 50,000 square feet of gross floor area. The project is not located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor. The project is not a transportation project. The project is approximately 2.8 miles from the nearest HQTA within the City of Lancaster. Nonetheless, The proposed warehousing project is reasonably sited in a remote area, away from sensitive receptors.	**Not Applicable**
4. TIER 1: Increase Density Near High-Quality Transit Areas If the project is located within a High Quality Transit Area (HQTA), it must achieve a minimum of 20 dwelling units (DU) per acre, consistent with the Housing Element Update Rezoning Program. If the project is not located within an HQTA, it must locate residential and employment centers within 1 mile of an HQTA.	The project is not considered an employment center.	**Not Applicable**
5. TIER 1: Incorporate Bicycle and Pedestrian Infrastructure The project must incorporate pedestrian and bicycle infrastructure into its design: A) Provide pedestrian facilities and connections to public transportation consistent with the Pedestrian Action Plan, Active Transportation	Long- and short-term bicycle parking and storage is also proposed on-site with short- and long-term spaces for each building. Bicycle racks would be distributed evenly at all employee entrances to each building. Overall, the proposed vehicular and bicycle parking would meet or exceed the Los Angeles County's parking requirements as noted in Chapter 22.112 of the County Code.	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
Plans, and Vision Zero Action Plan, and any other relevant governing plan. B) Provide bicycle facilities consistent with the Bicycle Master Plan, Active Transportation Plans, and Vision Zero Action Plan, and any other relevant governing plan, and meet or exceed minimum standards for bicycle facilities in the Zoning Code and CALGreen Code. C) Increase sidewalk coverage to improve pedestrian access. D) Improve degraded or substandard sidewalks. E) Incorporate best practices to ensure pedestrian infrastructure is contiguous and links externally with existing and planned pedestrian facilities; best practices include high-visibility crosswalks, pedestrian hybrid beacons, and other pedestrian signals, mid-block crossing walks, pedestrian refuge islands, speed tables, bulb-outs (curb extensions), curb ramps, signage, pavement markings, pedestrian-only connections and districts, landscaping, and other improvements to pedestrian safety. F) Minimize barriers to pedestrian access and interconnectivity, such as walls, landscaping buffers, slopes, and unprotected crossings. G) Provide bicycle facilities for new and expanded buildings, new dwelling units, change of occupancy, increase of use intensity, and added off-street vehicle parking spaces. H) Provide short and long-term (secure) bicycle parking for at least 5% of motorized vehicle capacity and nothing less than CALGreen Code requirements, whichever is more restrictive. I) Support LA County's goal to increase bikeway miles by 500 percent by 2030 (including Class I bike paths, Class II bike lanes, and Class III bike routes).	The project would also construct sidewalks along project perimeters, namely Avenue F, 20th Street West, Avenue F-8, and new proposed public road along the east property boundary; refer to Section 2.4, *Project Characteristics*, for a detailed description of these off-site roadway improvements.	
6. TIER 1: Comply with the County Transportation Demand Management (TDM) Ordinance The Project must comply with the TDM ordinance at the time of project approval. This may include preferential carpool/vanpool parking, bicycle parking, and shower facilities and locker rooms; trip reduction plans; transit-supportive infrastructure development; and similar strategies. Comply with any applicable VMT reduction target and incorporate any required monitoring mechanisms for development, subject to the ordinance.	The project would implement TDM measures and comply with TDM Ordinance.	**Yes, the project complies**
7. TIER 1: Comply with the County's Transportation Impact Guidelines The project must comply with the County's current Transportation Impact Analysis (TIA) Guidelines. Projects may screen out if they meet certain criteria, such as being located in a transit priority area or local-serving retail development less than 50,000 square feet. Projects that do not screen out must meet the VMT efficiency metrics identified by the TIA Guidelines (e.g., daily VMT per capita for residential projects that is 16.8% below the existing residential VMT per capita for the Baseline Area in which the project is located) and	According to the project's traffic study, the project would comply with TIA Guidelines.	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
quantitatively demonstrate how these metrics are achieved, pursuant to the TIA Guidelines requirements.		
8. TIER 1: Incorporate Electric Vehicle Charging Infrastructure The project must incorporate zero-emission vehicle (ZEV) infrastructure and incentives into its design as follows: A) Comply with any CALGreen Code requirement, County ordinance, building code, or condition of approval that requires a certain amount of electric vehicle (EV) charging infrastructure (EVCSs) and readiness. This may include minimum requirements for EV charging stations, EV-capable parking spaces, and EV-ready parking spaces. B) Comply with any provisions and requirements in the forthcoming Zero Emission Vehicle Master Plan. C) Include electric options for promoting active transportation, such as electric scooters and e-bikes. D) Provide education and outreach to tenants and occupants about the benefits of ZEVs and the project's EV infrastructure.	The project would comply with all applicable regulations regarding EV charging.	**Yes, the project complies**
9. TIER 1: Decarbonize Trucks For projects that include goods movement facilities and/or warehouses, the project must incorporate freight decarbonization technologies and infrastructure, including: A) Comply with any CALGreen Code requirement, County ordinance, building code, or condition of approval that requires a certain amount of EV charging infrastructure and readiness for goods movement facilities and trucks. B) Provide EVCSs at all new warehouse loading docks. B) Comply with any provisions and requirements in the forthcoming Zero Emission Vehicle Master Plan related to goods movement. C) Implement freight decarbonization technologies along highway corridors D) For all goods movement facilities, install alternative fueling infrastructure such as EVCSs, green hydrogen fueling stations, and/or biomethane fueling stations. E) Comply with any established zero-emission delivery zones.	The project would comply applicable CALGreen Code and County Code requirements.	**Yes, the project complies**
10. TIER 1: Incorporate Zero-Emission Technologies for Off-Road Vehicles & Equipment The project must: A) Prohibit the use of small equipment powered by gasoline, diesel, propane, or other fossil fuels, including lawn and garden equipment and outdoor power equipment, for all tenants and owners. B) Provide educational materials to tenants regarding the SCAQMD Electric Lawn and Garden Equipment Incentive and Exchange Program, Commercial Lawn & Garden Battery	The project Applicant would either Option A or Option B, or a combination thereof. The project may also use CARB Tier 4 Final engine construction equipment (Option C) as it is commercially available or feasible. Option D is not applicable as the project does not involve agriculture or manufacturing activities.	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
Buy-Down Rebate Program, the Residential Lawn Mower Rebate Program, the new requirements of AB 1346, and any other available options and incentives for purchasing zero-emission equipment, including rebates and subsidies offered by CARB, the County, or other agencies and entities. C) Use electric and zero-emission construction equipment during project construction to the maximum extent feasible. Such equipment shall include forklifts, manlifts, loaders, welders, saws, pumps, fixed cranes, air compressors, sweepers, aerial lifts, pressure washers, and other small equipment. At minimum, the project must use off-road construction equipment that meet CARB Tier 4 Final engine emission standards. D) Use electric and zero-emission agriculture and manufacturing equipment to the maximum extent feasible. These requirements must be stipulated in the contract specifications for the project's construction and for the project's future tenants and any landscaping contracts for the property or tenants.		
18. TIER 1: Implement Water Use Efficiency and Water Conservation The project must comply with the current water conservation ordinance in place, including any requirements for LEED or Sustainable SITES standards. The project must also incorporate water use efficiency and conservation measures, including: A) High-efficiency appliances/fixtures to reduce water use, and/or include water-efficient landscape design B) CALGreen Code Tier 1 and Tier 2 voluntary water conservation measures C) Low-flow or high-efficiency water fixtures D) Water-efficient landscapes with lower water demands than required by the DWR 2015 Model Water Efficient Landscape Ordinance E) Drought-tolerant and native plant species only F) A comprehensive water conservation strategy G) Educational materials provided to future tenants and building occupants about water-saving behaviors and water-conserving landscaping	The project would incorporate drought tolerant landscaping and include water-efficient irrigation. Landscaping would be provided along the site and building perimeters as well as throughout the parking areas.	**Yes, the project complies**
Waste		
22. TIER 1: Compost Organic Materials The project must comply with all state and local requirements for composting and organic waste collection, including but not limited to, Chapter 20.91 – Mandatory Organic Waste Disposal Reduction Ordinance Of the Los Angeles County Code, including all County requirements pursuant to AB 1826 and SB 1383. The project must also: A) Provide proper storage, collection, and loading of organics in a manner that is convenient and safe for all users of the building. Ensure there are sufficient sizes of collection containers for	Refer to Section 4.19, *Utilities and Service Systems*, for a discussion on project compliance with applicable regulations regarding waste management. Further, based on CalEEMod modeling (Appendix A), the project is anticipated to generate approximately 30.1 tons per year for warehouse use, and 18.6 tons of waste per year for the proposed office space. The project would be required to comply with the latest composting regulations.	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
organics. Containers must be kept clean, be clearly labeled, and are co-located next to any other solid waste receptacles. Ensure sufficient pick-up of collection containers to meet the needs of the occupants. B) Include space for multi-stream collection containers for both recycling and organics in any location where a solid waste container is traditionally housed. This includes both outdoor collection containers serviced by a waste hauler or indoor collection containers utilized by occupants. Provide educational material and training to occupants and tenants in how to properly separate organics from all other solid waste and place organics in a separate container designated for organics. C) Ensure that all project occupants and tenants will separate compostables from all other refuse and place compostables in a separate container designated for composting. D) Require that all single-use food service ware (plates, bowls, cups) and accessories (straws, utensils, condiment cups) used by tenants at the project site must be BPI certified compostable fiber, except where certain materials may be deemed medically necessary or necessary to ensure equal access for persons with disabilities. E) Require that any single-use accessories (straws, utensils, condiment cups) be only available on demand. F) Ensure that containers are audited annually to ensure proper service levels and to check for contamination. Report findings back to occupants within 30 days and to the County as requested. G) Work with the waste hauler to provide educational materials to tenants on at least an annual basis. H) Provide compliance data to the County as required for any current auditing program.		
23. TIER 1: Recycle Recyclable Materials The project must comply with all state and local requirements for recycling, also including but not limited to, Section 20.72.170 - Recyclable Materials Collection Program of the Los Angeles County Code and all County requirements pursuant to AB 341 and AB 1826. The project must also: A) Comply with any zero waste ordinance in place at the time of project approval. B) Comply with all Mandatory Construction & Demolition (C&D) Recycling Program Requirements, including Chapter 20.87 (Construction and Demolition Debris Recycling and Reuse). C) Provide substantial storage, collection, and loading of recyclables in a manner that is convenient and safe for all users of the building. Ensure there are sufficient sizes and amount of	The project would be required to comply with the latest recycling regulations.	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
collection containers for recyclables. Containers must be kept clean, be clearly labeled, and are co-located next to any other solid waste receptacles. Ensure sufficient pick-up of collection containers to meet the needs of the occupants. D) Include space for multi-stream collection containers in any location where a solid waste container is traditionally housed. This includes both outdoor collection containers serviced by a waste hauler or indoor collection containers utilized by occupants. Provide educational materials and training to occupants and tenants in how to properly separate recyclables from all other solid waste and place recyclables in a separate container designated for recycling. E) Ensure that all project occupants and tenants separate recyclables from all other refuse and place recyclables in a separate container designated for recycling. F) Require that all single-use food service ware (plates, bowls, cups) and accessories (straws, utensils, condiment cups) used by tenants at the project site be BPI certified compostable fiber, except where certain materials may be deemed medically necessary or necessary to ensure equal access for persons with disabilities. G) Require that any single-use accessories (straws, utensils, condiment cups) be only available on demand. H) Ensure that containers are audited annually to ensure proper service levels and to check for contamination. Report findings back to occupants within 30 days and to the County as requested. I) Work with the waste hauler to provide educational materials to tenants on at least an annual basis. J) Provide compliance data to the County as required for any current auditing program.		
Agriculture, Forestry, and Other Land Use (AFOLU)		
25. TIER 1: Incorporate Tree Plantings and Expand Urban Forest Cover The Project must: A) Enhance and expand urban forest cover and vegetation by planting trees and other vegetation. All trees and vegetation planted must be drought-tolerant or California native trees & plants. B) Comply with LA County's Urban Forest Management Plan C) To the extent feasible, incorporate equitable urban forest practices and prioritize: v. Tree- and park-poor communities vi. Climate and watershed-appropriate and drought/pest-resistant vegetation vii. Appropriate watering, maintenance, and disposal practices viii. Shading	The project would incorporate drought-resistant vegetation (landscaping) along the site and building perimeters as well as throughout the parking areas. Proposed landscaping consists of trees, shrubs, ground cover, mulch, and decorative rock; refer to Exhibit 2-6, *Conceptual Landscape Plan*.	**Yes, the project complies**

2045 CAP Consistency Requirement/Measure	Description of Project Measure(S) / Documentation of Compliance / Explanation of Non-Compliance	Project Consistency
ix. Biodiversity		
Source: Los Angeles County, *Los Angeles County 2045 Climate Action Plan, Appendix F, 2045 Climate Action Plan Consistency Review Checklist, Table F-1, General Plan and 2045 CAP Greenhouse Gas Emissions Reduction Measure and Action Consistency Checklist*, March 2023.		

Conclusion

In summary, the consistency analysis provided above demonstrate that the project would comply with the plans, policies, regulations and GHG reduction actions/strategies identified in the 2020-2045 RTP/SCS, the 2022 Scoping Plan, and the 2045 CAP Consistency Checklist, and subsequently, be consistent with the 2045 CAP. Additionally, it should be noted that in addition to compliance, the proposed warehouses would be Leadership in Energy and Environmental Design (LEED) certified. Therefore, impacts regarding GHG emissions would be less than significant.

Mitigation Measures: No mitigation is required.

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4.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		✓		
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?				✓
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			✓	
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?			✓	
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:				✓
1) within a high fire hazard area with adequate access?				✓
2) within an area with inadequate water and pressure to meet fire flow standards?				✓
3) within proximity to land uses that have the potential for dangerous fire hazard?				✓
h. Does the proposed use constitute a potentially dangerous fire hazard?				✓

The information presented in this analysis is primarily based on the following technical studies (refer to Appendix E, *Phase I ESA and Haz Mat Memo*):

- *Phase I Environmental Site Assessment, Assessor's Parcel Numbers 3118-015-001, -003, -004, and -005, Los Angeles County, California* (Phase I ESA), prepared by Rincon Consultants, Inc., dated June 8, 2022; and

- *Antelope Valley Logistics Center – West (AVLC - West) Project – Hazardous Materials Conditions Memorandum* (Haz Mat Memo), prepared by Michael Baker International, dated August 8, 2023.

For the purpose of this analysis, the term "hazardous material" refers to both hazardous substances and hazardous waste. A material is defined as "hazardous" if it appears on a list of hazardous materials prepared by a Federal, tribal, State, or local regulatory agency, or if it possesses characteristics defined as "hazardous" by such an agency. A "hazardous waste" is a solid waste that exhibits toxic or hazardous characteristics (i.e., ignitability, corrosivity, reactivity, and/or toxicity).

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Exposure of the public or the environment to hazardous materials could occur through improper handling or use of hazardous materials or hazardous wastes particularly by untrained personnel, a transportation accident, environmentally unsound disposal methods, or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

CONSTRUCTION

Project construction could expose construction workers and the public to temporary hazards related to the transport, use, and maintenance of construction materials (i.e., oil, diesel fuel, transmission fluid, etc.). However, these activities would be short-term, and the materials used would not be in such quantities, or stored in such a manner, as to pose a significant safety hazard. All project construction activities would be required to demonstrate compliance with the applicable laws and regulations governing the use, storage, and transportation of hazardous materials, ensuring that all potentially hazardous materials are used and handled in an appropriate manner. Impacts concerning the routine transport, use, or disposal of hazardous materials during project construction would be less than significant.

OPERATIONS

The proposed project would include construction of two speculative industrial short-term storage warehouse buildings. Although the end user of the warehouse buildings is not known at this time, long-term operation of the project may involve the routine transport, use, or disposal of hazardous materials. The types and quantities of hazardous substances utilized by the various types of potential future users at the project site would vary and, as a result, the nature of potential hazards would vary.

The proposed project would be subject to compliance with existing regulations, standards, and guidelines established by the U.S. Environmental Protection Agency (EPA), State, and the County of Los Angeles related to the transport, use, and disposal of hazardous materials. The project is subject to compliance with the existing hazardous materials regulations, which are codified in California Code of Regulations Titles 8, 22, and 26, and their enabling legislations set forth in Health and Safety Code Chapter 6.95 as well as California Code of Regulations Title 49. Both the Federal and State governments require any business, where the transport, use, or disposal of a regulated substance exceeds the specified threshold quantity, to register with the County and prepare a Risk Management Plan. The Risk Management Plan must contain an off-site consequence analysis, a five-year accident history, an accident prevention program, an emergency response program, and a certification of the truth and accuracy of the submitted information. These businesses would be required to submit their plans to the Certified Unified Program Agency (CUPA) (Los

Angeles County Fire Department, or LACoFD), which would make the plans available to emergency response personnel.

While the risk of exposure to hazardous materials cannot be eliminated, best management practices (BMPs) can be implemented to reduce risk to acceptable levels. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Impacts regarding the routine transport, use, or disposal of hazardous materials during project operations would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact With Mitigation Incorporated. One of the means through which human exposure to hazardous substance could occur is through accidental release. Incidents that result in an accidental release of hazardous substance into the environment can cause contamination of soil, surface water, and groundwater, in addition to any toxic fumes that might be generated. If not cleaned up immediately and completely, the hazardous substances can migrate into the soil or enter a local stream or channel causing contamination of soil and water. Human exposure of contaminated soil, soil vapor, or water can have potential health effects on a variety of factors, including the nature of the contaminant and the degree of exposure.

SHORT-TERM CONSTRUCTION IMPACTS

Construction Equipment

During project construction, there is a possibility of accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. The level of risk associated with the accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction. The construction contractor would be required to use standard construction controls and safety procedures that would avoid and minimize the potential for accidental release of such substances into the environment. Standard construction practices would be observed such that any materials released are appropriately contained and remediated as required by local, State, and federal law. Impacts would be less than significant in this regard.

Construction Activities

Construction activities could also result in accidental conditions involving existing on-site contamination. The following analysis considers current and past uses of the project site and its vicinity, which may have resulted in existing on-site soil, soil vapor, and/or groundwater, of which could cause accidental conditions during site disturbance activities.

Current Uses

As the Phase I ESA was prepared for a 314-acre property (study area) where the project site is located within, a hazardous materials conditions memorandum has been prepared to characterize the existing hazardous materials conditions focusing on the project site based on the findings presented in the Phase I ESA.

Based on the Haz Mat Memo, the project site is currently undeveloped with an unpaved road. Areas of dumped trash and debris are observed on the project site. Although not considered a recognized environmental condition that may have resulted in existing on-site soil, soil vapor, and/or groundwater, this miscellaneous debris would be required to be removed prior to grading activities in accordance with all applicable laws and regulations. If hazardous materials are discovered during removal, proper handling and disposal of such materials would be required to be conducted in

accordance with existing laws and regulations pertaining to hazardous waste. Overall, as the areas of dumped trash and debris would not result in existing on-site soil, soil vapor, and/or groundwater contamination, of which could cause accidental conditions during site disturbance activities. Less than significant impacts would occur in this regard.

Historical Uses

Based on the Phase I ESA, the project site appears to be undeveloped land from at least 1928 to present day, with the addition of the on-site north-south oriented unpaved road from before 1968. As such, impacts from potential accidental conditions related to historical uses of the site would not occur.

Adjacent Sites

The Phase I ESA identified one approximately two-foot by two-foot area of stained soil with a petroleum odor along 10 Street West, close to the 10 Street West and West Avenue F intersection; refer to the Phase I ESA Figure 2, *Subject Property*. It should be acknowledged that the study area in the Phase I ESA encompasses an area larger than the subject site as shown on the Phase I ESA Figure 2. Therefore, this identified area of stained soil is located on a property adjacent to the project site despite noted as "on-site" on the Phase I ESA.

Potential Vapor Migration

The Phase I ESA included a search of nearby known or suspect contaminated site within 528 feet for petroleum hydrocarbons, and 1,760 feet for other contaminants of concern, to determine if contaminated soil vapors from a nearby site would have the potential to be migrating beneath the project site. The Phase I ESA concluded that there are no potential threats to the project site posed by the potential migration of vapors from petroleum hydrocarbons or other contaminants of concern. No impacts would occur in this regard.

LONG-TERM OPERATIONAL IMPACTS

Refer to Response 4.9(a) for a description of impacts related to proposed operations at the project site. Upon adherence to existing regulations related to chemical safety, impacts pertaining to the potential for accidental conditions during project operations would be less than significant.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is not located within one-quarter mile of a school. The nearest schools to the project site are Mariposa Computer Science Magnet School (737 West Avenue H-6 in the City of Lancaster) and Desert View Elementary School (1555 West Avenue H-10 in the City of Lancaster), located approximately two miles to the south of the project site. Additionally, project truck routes would include SR-14 and Sierra Highway, both of which are located over 0.25-mile from any existing schools. Therefore, the project would not emit hazardous emissions or the handle hazardous or acutely hazardous materials, substances, or wastes within 0.25-mile of an existing or proposed school. No impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Government Code Section 65962.5 requires the Department of Toxic Substance Control and State Water

Resources Control Board (SWRCB) to compile and update a regulatory sites list (pursuant to the criteria of the Section). The California Department of Health Services is also required to compile and update, as appropriate, a list of all public drinking water wells that contain detectable levels of organic contaminants and that are subject to water analysis pursuant to Health and Safety Code Section 116395. Government Code Section 65962.5 requires the local enforcement agency, as designated pursuant to Section 18051 of Title 14 of the California Code of Regulations, to compile, as appropriate, a list of all solid waste disposal facilities from which there is a known migration of hazardous waste.

The project site is not listed pursuant to Government Code Section 65962.5.[1] Thus, no impact would result in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. The nearest airport to the project site is the General William J. Fox Airfield, located approximately 2.2 miles to the west of the project site. According to the Los Angeles County Airport Land Use Commission (Los Angeles County ALUC), the project site is located within General William J. Fox Airfield Area of Influence Compatibility Zone D.[2] According to the *General William J. Fox Airfield Land Use Compatibility Plan*, projects within Compatibility Zones D and E, proposed nonresidential development consist of 40,000 square feet or more would be considered a major land use action by the Los Angeles County ALUC and would be subject to mandatory or advisory Los Angeles County ALUC review depending upon the status of local general plan consistency. The project proposes warehousing uses and not a land use of specific safety concerns. Further, the project would be employing up to approximately 2,000 on-site employees on the 121-acre site and would not exceed the established usage intensity of new nonresidential development for Zone D (a maximum of 300 people per any individual acre) in accordance with *General William J. Fox Airfield Land Use Compatibility Plan* Policy 2.3.5. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. In recent years, local hazard mitigation planning has been driven by the federal Disaster Mitigation Act (DMA) of 2000. To meet the requirements of the DMA, the Los Angeles County Chief Executive Office – Office of Emergency Management (OEM) has prepared an All-Hazards Mitigation Plan (AHMP) to assess risks posed by natural hazards and to develop a mitigation action plan for reducing the risks in Los Angeles County. The County developed and updated the *2020 County of Los Angeles All-Hazards Mitigation Plan* (2020 AHMP) on May 18, 2020.

As indicated in Section 4.17, *Transportation*, the project does not propose changes to the City's circulation system, such as sharp curves or dangerous intersections, and would not introduce incompatible uses to area roadways (e.g., farm equipment). As indicated in Section 2.4, *Project Characteristics*, roadway improvements are proposed as follows:

1 California Environmental Protection Agency, *Cortese Listing*, https://calepa.ca.gov/sitecleanup/corteselist/, accessed March 3, 2023.

2 Los Angeles County Airport Land Use Commission, *General William J. Fox Airfield Land Use Compatibility Plan*, revised December 1, 2004, https://planning.lacounty.gov/long-range-planning/general-william-j-fox-airfield-land-use-compatibility-plan/, accessed May 1, 2023.

- **Avenue F**: The project site includes half street improvements along the south side of existing Avenue F for ±2,200 linear feet, from the intersection of 20th Street West to a new proposed Interior Street "A" (along the eastern project boundary). Avenue F is currently improved with ±20-foot wide asphalt surface with drainage ditches on both sides. The project proposes to widen the roadway to ±36 feet by adding one additional lane to provide a total of two lanes of traffic with curb and gutter, sidewalk, and right-of-way dedication on the south side. The proposed improvements would not require right-of-way acquisition from adjacent property owners.

- **20th Street West**: The project also proposes half street improvements along the east side of 20th Street West for ±2,650 linear feet, extending from the intersection of Avenue F south to Avenue F-8. This corridor is currently unimproved as a dirt road. The project proposes to widen the roadway to ±36 feet by adding a center turn lane to provide a total of two lanes of traffic with curb and gutter, sidewalk, and right-of-way dedication on the east side. The proposed improvements would not require right-of-way acquisition from adjacent property owners.

- **Avenue F-8**: The project also includes half street construction of the north side of Avenue F-8 for ±2,200 linear feet, extending from 20th Street West to a proposed public road along the eastern project boundary. The corridor is currently unimproved as a dirt road. The improvements would provide for two lanes of traffic with curb and gutter, sidewalk, and right-of-way dedication on the east side. The proposed improvements would not require right-of-way acquisition from adjacent property owners.

- **New Proposed Interior Street "A" (along the east property boundary)**: The project also includes full street construction of a new proposed north-south Interior Street "A" from Avenue F to Avenue F-8 along the eastern project boundary. There is currently no existing roadway in this location. The proposed improvements would provide the ultimate width for the road consisting of two lanes of traffic with curb and gutter and sidewalk on both sides of the road and full right-of-way dedication.

Overall, project construction activities could result in short-term temporary impacts to street traffic along Avenue F (the only paved roadway in the vicinity). While temporary lane closures may be required, travel along surrounding roadways would remain open and would not interfere with emergency access in the site vicinity. These improvements would provide site access (along all sides of the development) and circulation. Access to the individual buildings would be provided via private on-site roads that connect to the existing and proposed public roads. Three site access points are proposed along 20th Street West and along the new proposed Interior Street "A" along the eastern project boundary for a total of six access points. These access points would serve both inbound and outbound tractor trailers and passenger vehicles. Circulation of tractor trailers and passenger vehicles would be separated once on-site from each other. Tractor trailers would access the docks and trailer parking areas on the north and south side of the buildings and passenger vehicles would access the parking lots on the east and west sides of each building. Emergency vehicles would have access to both buildings via the truck court with designated fire access points and along the first bay of parking. These emergency access points are designed and designated for fire access in compliance with the Los Angeles County Fire Department regulations and would not result in inadequate emergency access. As such, project implementation is not anticipated to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Conversely, proposed roadway improvements may assist in emergency access in the general project area. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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:

1) within a high fire hazard area with inadequate access?

2) within an area with inadequate water and pressure to meet fire flow standards?

3) within proximity to land uses that have the potential for dangerous fire hazard?

No Impact. According to the California Department of Forestry and Fire Protection's *Los Angeles County State Responsibility Area Fire Hazard Severity Zones*, the project site is not designated as a fire hazard severity zone for either local or State or federal responsibility.[3] The project site is generally surrounded by vacant, undeveloped land with minimal residences and structures in the project vicinity. Further, as discussed in Section 2.2.1, *Proposed Warehouse Buildings*, each warehouse building would include a fire sprinkler suppression system and a fire alarm system to meet County Code requirements. Therefore, project implementation would not constitute a potentially dangerous fire hazard, and less than significant impacts would occur in this regard. Therefore, project implementation would not expose people or structures to a significant risk involving wildland fires, and no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. Refer to Response 4.9(g).

Mitigation Measures: No mitigation is required.

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

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4.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			✓	
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of 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:				
1) Result in substantial erosion or siltation on- or off-site?			✓	
2) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?			✓	
3) 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?			✓	
4) 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 of loss or damage involving flooding?			✓	
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?			✓	
e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?			✓	
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)?				✓

Would the project:	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?				✓
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

The information presented in this analysis is primarily based on the *Hydrology Study Northpoint AVLC West Avenue F and 20th Street West*, prepared by Duke Engineering, and dated April 18, 2024; refer to Appendix J, Hydrology Study.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) has established regulations under the National Pollutant Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the State Water Regional Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the nine Regional Water Quality Control Boards (RWQCBs) to preserve, protect, enhance, and restore water quality. The project site is within the jurisdiction of the Lahontan RWQCB.

Impacts related to water quality typically occur during three phases of a project: 1) during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest; 2) following construction, prior to the establishment of ground cover, when the erosion potential may remain relatively high; and 3) following completion of the project, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

CONSTRUCTION

Project construction could result in short-term impacts to water quality due to the handling, storage, and disposal of construction materials, maintenance and operation of construction equipment, and earthmoving activities. Potential pollutants associated with these activities could damage downstream waterbodies. The proposed project would include construction of two speculative industrial short-term storage warehouse buildings on approximately 121 acres. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the SWRCB's *General Permit for Discharges of Stormwater Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ* (Construction General Permit). The Construction General Permit requires the project Applicant to prepare and implement a stormwater pollution prevention plan (SWPPP). The SWPPP would specify best management practices (BMPs) to be used during construction of the project. These BMPs would include measures to contain runoff from vehicle washing at the construction site, prevent sediment from disturbed areas from entering the storm drain system using structural controls (i.e., sandbags at inlets), and cover and contain stockpiled materials to prevent sediment and pollutant transport. Implementation of the BMPs would ensure runoff and discharges during the project's construction phase would not violate any water quality standards. Upon completion of the project, the Applicant would be required to submit a Notice of Termination to the SWRCB to indicate that construction has been completed.

Further the project is required to comply with applicable regulations from County Code Chapter 12.80, *Stormwater and Runoff Pollution Control*. To further minimize the potential for accidental release of hazardous pollutant during project construction, the transport, use, and disposal of construction materials would be required to adhere to applicable State and local standards and regulations for handling, storage, and disposal of hazardous substances; refer to Section 4.9, *Hazards and Hazardous Materials*. Compliance with such measures would prevent such substances from entering downstream water bodies via stormwater runoff and adversely affect existing water quality.

Accordingly, compliance with the Construction General Permit, County Code regulations, and implementation of BMPs, the project's short-term impacts to water quality and waste discharge requirements would be less than significant.

OPERATIONS

The proposed project is subject to the Los Angeles County Department of Public Works requirements in the *2014 Low Impact Development (LID) Standards Manual* under the "development projects equal to one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area" category. Further, County Code Chapter 12.80 contains the County's Stormwater and Runoff Pollution Control Ordinance and includes conditions and requirements established to control urban pollutant runoff into the County's stormwater system. Pursuant to County Code Section 12.80.520, *Best management practice for industrial and commercial facilities*, the proposed project would be required to implement soil erosion control, directing of stormwater runoff away from operating, processing, fueling, cleaning and storage areas, and exercising general good housekeeping practices in order to minimize operational impacts to water quality. To satisfy County requirements, BMPs from the *California Stormwater Quality Association (CASQA) Stormwater Best Management Practice Handbook* would be implemented.

The site would be divided into three drainage areas in the post-development condition. Each drainage area would contain its own storm drain and detention system (i.e., three detention basins located in the northern, middle, and southern portion of the site) which would be hydraulically connected for infiltration purposes and discharge water in compliance with hydromodification requirements. Based on the County's *Low Impact Development Manual* (LID Manual) requirements, project-specific system stormwater quality control measures and structural source measures are also required to be implemented on-site, and may include storm drain message and signage, outdoor trash storage/waste handling areas, outdoor loading/unloading dock areas, and landscaping irrigation practices. Further, none of the following are proposed: outdoor material storage areas; outdoor vehicle/equipment repair/maintenance areas; outdoor vehicle/equipment/accessory areas; fuel and maintenance areas; animal care and handling facilities; or outdoor horticultural areas. The project would also comply with BMPs outlined in the LID Manual for parking lots which includes properly designed parking areas and limiting the total amount of oil contamination. Following compliance with the conditions and requirements identified in the LID Manual and County Code, long-term operational impacts to water quality would be reduced to less than significant levels.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. As detailed in Section 4.19, *Utilities and Service Systems*, the project's estimated water demand would be adequately accommodated by Los Angeles County Waterworks District 40's water supply, which includes imported and groundwater sources. Further, the project site is not currently used for groundwater extraction or groundwater recharge purposes. As a result, the project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

1) Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river. As discussed in Response 4.10(a), the project would be required to comply with the Construction General Permit requirements, which would reduce erosion and associated water quality impacts during construction to less than significant levels.

During project operations, the site would not include large areas of exposed soils that would be subject to runoff. Any unpaved areas would be improved with landscaping to minimize the potential for erosion or siltation on- or off-site; refer to Exhibit 2-6, *Conceptual Landscape Plan*. Additionally, as stormwater generated on-site would remain on-site, and the project site would not accept any upstream off-site flows, sedimentation on-site would be insignificant. As mentioned above, erosion of pervious portions of the site other than the stormwater basins would be mitigated by landscaping, and the basins would be designed to County standards to minimize potential erosion. Off-site erosion and sedimentation outside of the disturbed areas would be insignificant; areas upstream and downstream of the project would not experience increased erosion or sedimentation due to the project. Erosion and sedimentation in the new earthen channel at the south and east of the site would be mitigated by designing it to County standards to reduce erosion, and observations after major storm events would determine if any maintenance of the channel is necessary to maintain design capacity.

Further, the proposed on-site detention basins would control the discharge of treated flows. The project is required to fully mitigate offsite drainage impacts caused by hydromodification and changes in water quality, flow velocity, flow volume, and depth/width of flow. The project is required to analyze for hydromodification impacts and must conduct hydrology and hydraulic frequency analyses for the LID 2-, 5-, 10-, 25-, and 50-year storm events to demonstrate compliance. Given the nature of proposed use and the substantial increase in paved and landscaped areas, long-term operation of the project would not have the potential to result in substantial erosion or siltation. As stated in Response 4.10(a), the proposed project would also include stormwater quality control measures, structural source measures, detention basins in conformance with the LID requirements and Municipal Code Chapter 12.80 requirements in order to reduce long-term water quality impacts to less than significant levels. Thus, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

2) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. Under existing conditions, on-site surface runoff currently flows off-site. As discussed above, while the project would increase impervious surfaces on-site compared to existing conditions, the project would install on-site filtration systems and detention basins to collect, treat, and discharge runoff. Specifically, as noted in Section 2.4, *Project Characteristics*, and Response 4.10(a) above, the project would install storm drains throughout the site to convey stormwater to be treated and stored in detention basins located in the northern, middle, and southern portions of the site. The proposed stormwater improvements would be designed to comply with the Los Angeles County Hydrology Manual by demonstrating the capital flood level of protection and ensuring hydromodification requirements are met. As such, the project would not increase surface flow volumes in a manner that would result in flooding on- or off-site. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

3) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed in Response 4.10(c)(2), the proposed stormwater improvements, including stormwater quality control measures, structural source measures, detention basins would ensure treated stormwater discharges do not have an adverse effect on the Amargosa Creek natural drainage system by demonstrating compliance via a HEC-RAS frequency analysis for LID 2-, 5-, 10-, 25-, and 50-year storm events per the Los Angeles County Department of Public Works Hydrology Manuals. Therefore, the proposed project is not anticipated to exceed the capacity of an existing or planned stormwater drainage system.

Further, as stated in Response 4.10(a), operations of the proposed project would adhere to existing NPDES requirements and would implement stormwater quality control measures and structural source measures per the LID requirements in order to reduce long-term water quality impacts to less than significant levels. Therefore, project implementation is not anticipated to create or contribute to increased stormwater runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

4) 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 of loss or damage involving flooding?

Less Than Significant Impact. Refer to Responses 4.10(c)(2) and 4.10(d).

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. A Special Flood Hazard Area (SFHA) is an area within a floodplain having a one percent or greater chance of flood occurrence within any given year (commonly referred to as the 100-year flood zone). SFHAs are delineated on flood hazard boundary maps issued by the Federal Emergency Management Agency (FEMA). The Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 1994 make flood insurance mandatory for most properties in SFHAs.

According to FEMA Flood Insurance Rate Map (FIRM) No. 06037C0410F and as depicted in Exhibit 4.10-1, *Existing Floodplain Map*, a portion of the project site is located within a FEMA-mapped special flood hazard area.[1] Specifically, the site is classified as Zone AO, which is a special flood hazard area with base flood elevation (depth of one foot) and Zone X, which is an area with a reduced risk of flooding. Per the National Flood Improvement Program Floodplain Management Requirements Guide and Title 44 Code of Federal Regulations (CFR) Sections 60.3(c)(7) and (c)(11), all new construction in AO zones must have the structure lowest floor elevated above the highest adjacent grade. Adequate drainage paths are required around the proposed warehouses to guide floodwater around and away from the warehouses. Following compliance with the conditions and requirements identified in the National Flood Improvement Program Floodplain Management Requirements Guide and Title 44 CFR Sections 60.3(c)(7) and (c)(11), project implementation is not anticipated to increase the risk of pollutant release due to project inundation within a flood hazard zone and impacts would be reduced to less than significant levels.

[1] Federal Emergency Management Agency, *FEMA Flood Map Service Center; Search By Address*, https://msc.fema.gov/portal/search?#searchresultsanchor, accessed February 17, 2023.

Further, the Applicant is required to obtain approval of a Letter of Map Revision (LOMR) and Conditional Letter of Map Revision (CLOMR) from FEMA to revise the existing floodplain map to reflect the proposed project and associated hydrology changes; refer to Exhibit 4.10-2, *Proposed Floodplain Map*. The revised floodplain map is anticipated to only revise FEMA-mapped special flood hazard areas on-site. In the unlikely event the revised floodplain map expands onto an adjacent property or results in a rise in base flood elevation on an adjacent property, the proposed project would comply with CLOMR requirements, including notification of the proposed floodplain map revisions affecting adjacent property owners. Additionally, as part of the CLOMR and Los Angeles County requirements, the Applicant would be required to obtain drainage clearance letters from the affected property owners indicating their consent for increased flood hazards on their properties. As part of the CLOMR application, "Community Concurrence" will be required from the Los Angeles County CEO, or designee and prior to issuance of any construction permits, FEMA approval of the CLOMR would be required.

According to the County's *Comprehensive Floodplain Management Plan* Appendix G, *Capital Floodplain and Floodway Maps* and General Plan Safety Element Figure 12.2b, *County Floodways and Floodplains Policy Map*, the project site is not located within a County Capital Floodplain area. Overall, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

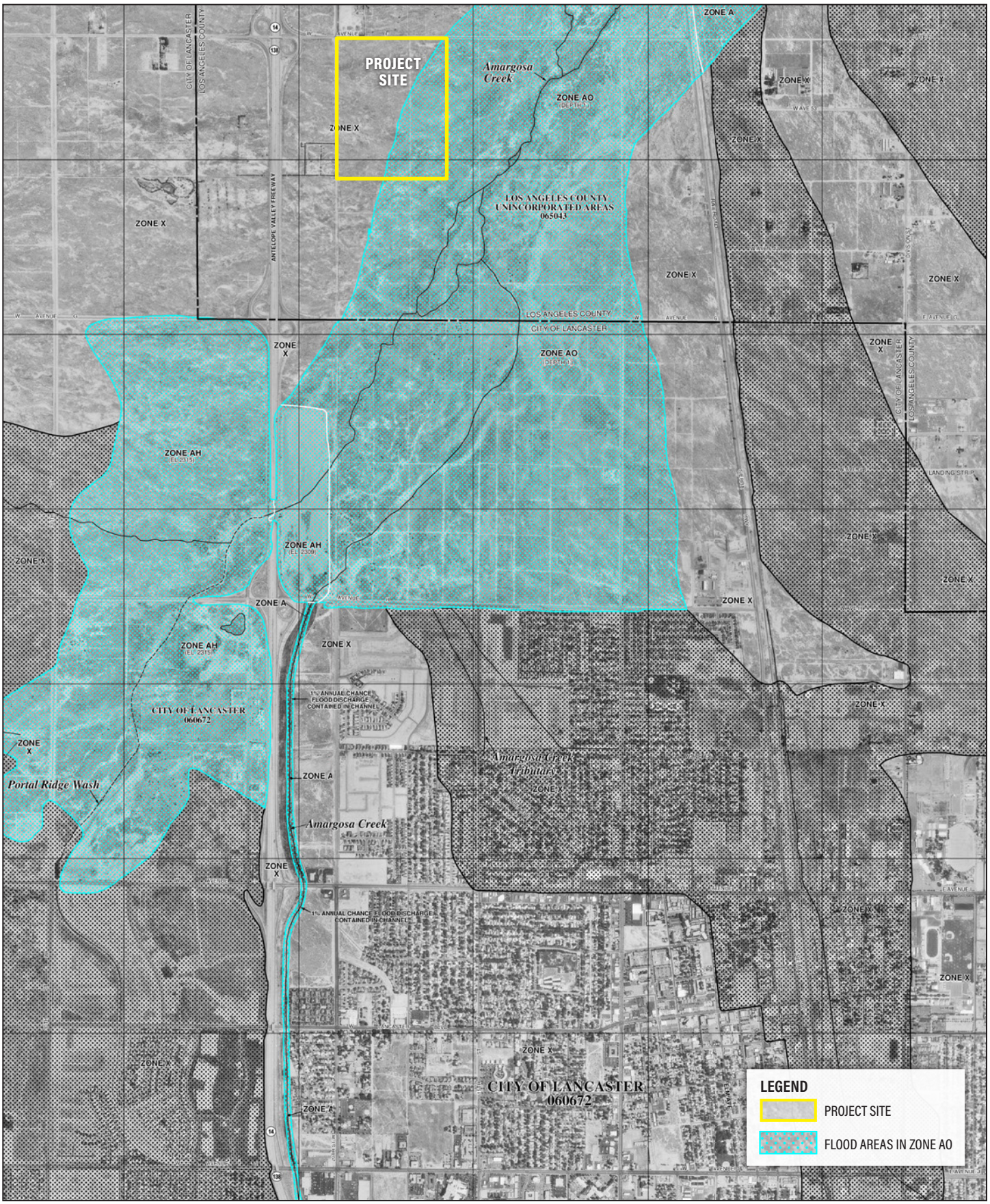
Less Than Significant Impact. The proposed project is identified as a Designed Project as defined in County Code Chapter 12.84.430, *Applicability*, and is required to ensure capital flood protection per the Los Angeles County Hydrology Manual. Additionally, a LID Plan must also be developed per the County of Los Angeles Department of Public Works *Low Impact Development Standards Manual*. All Designed Projects must retain 100 percent of the Stormwater Quality Design Volume on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless it is demonstrated that it is technically infeasible to do so. As discussed, in Response 4.10(c)(2), the project proposes to install stormwater improvements to collect, treat, and infiltrate stormwater on-site. On-site surface water would be collected at proposed storm drains located throughout the site and conveyed through new stormwater pipes to the proposed stormwater detention basins located in the northern and southern portions of the site. The project also proposes a floodplain volume mitigation pond at the southern portion of the site to detain the water during potential flood events. It is anticipated that the project would demonstrate compliance with the Los Angeles County Hydrology Manual and County of Los Angeles Department of Public Works *Low Impact Development Standards Manual* by ensuring on-site stormwater flows do not exceed pre-development conditions for the 2-year, 24-hour rainfall events. Therefore, the proposed project would also comply with the provisions of County Code Section 12.84 and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

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)?

No Impact. The proposed project would not involve the installation or use of septic tanks or on-site wastewater treatment systems. Thus, no impact would occur in this regard.

Mitigation Measures: No mitigation is required.



ANTELOPE VALLEY LOGISTICS CENTER – WEST (AVLC-WEST) PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

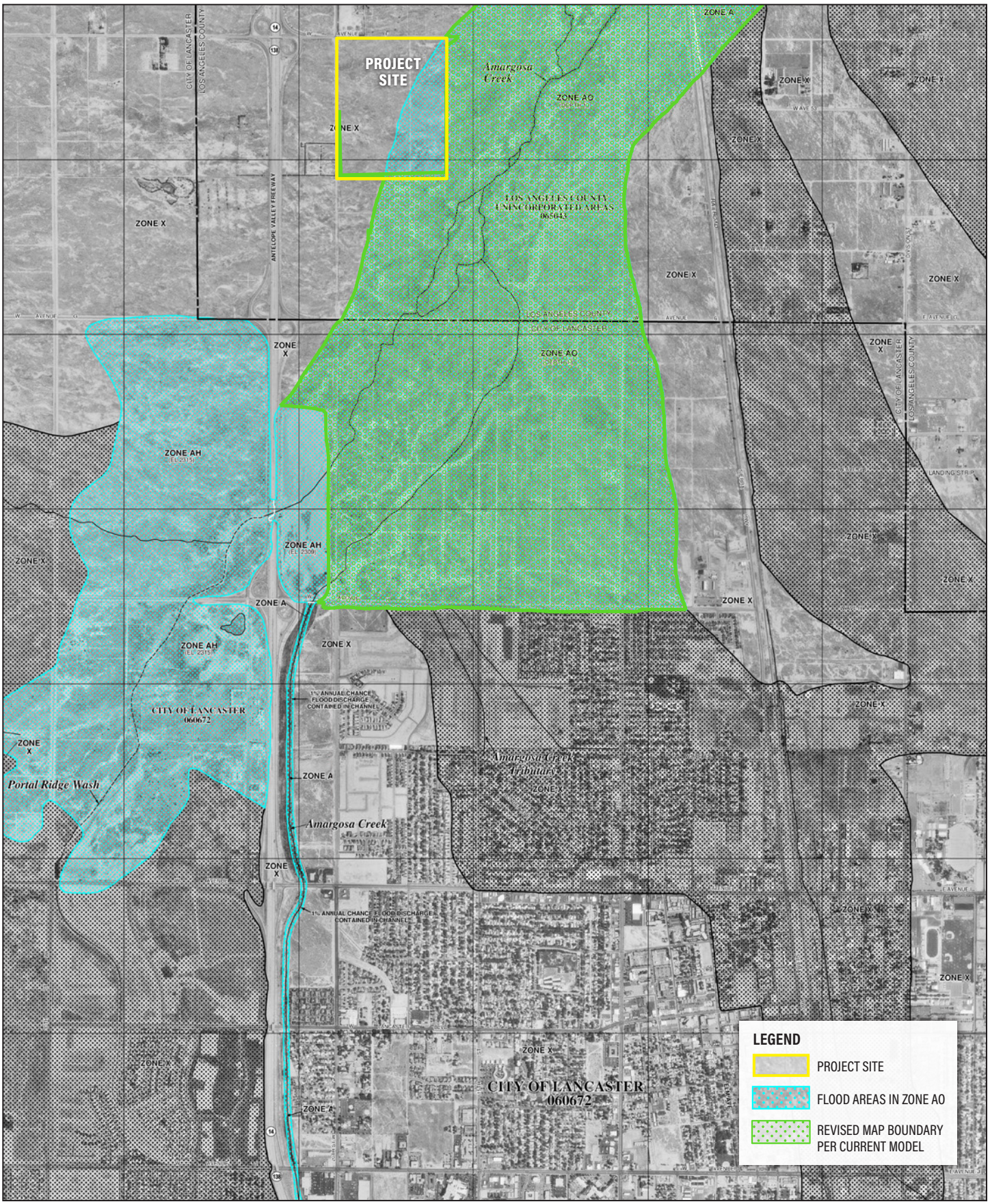
Existing Floodplain Map

Michael Baker INTERNATIONAL

NOT TO SCALE

04/2024 • JN 192691

Exhibit 4.10-1



ANTELOPE VALLEY LOGISTICS CENTER – WEST (AVLC-WEST) PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Proposed Floodplain Map

Michael Baker INTERNATIONAL

NOT TO SCALE

04/2024 • JN 192691

Exhibit 4.10-2

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Refer to Response 4.10(d) above with regards to flood hazards.

Tsunami

A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of a sea floor associated with large, shallow earthquakes. The project site is located over 53 miles inland from the Pacific Ocean and thus, is at a sufficient distance so as not to be subject to tsunami impacts. No impacts would occur in this regard.

Seiche

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The project site is not in the vicinity of a reservoir, harbor, lake, or storage tank capable of creating a seiche.[2] No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) establishes water quality standards for ground and surface waters within the South Lahontan Hydrologic region, including the Antelope Valley, and is the basis for the Lahontan RWQCB's regulatory programs. The 2014 Sustainable Groundwater Management Act requires local public agencies and groundwater sustainability agencies in high- and medium-priority basins to develop and implement groundwater sustainability plans or prepare an alternative to a groundwater sustainability plan. The project is located within the Antelope Valley Groundwater Basin, which is designated as a Very Low priority basin.[3] Therefore, there is no groundwater sustainability plan established for the basin. However, the Antelope Valley is located within the South Lahontan Hydrologic Region and is subject to the objectives and limits of the Basin Plan under the jurisdiction of the Lahontan RWQCB. Water quality standards and control measures for surface and ground waters of the Lahontan Region are contained in the Basin Plan.

According to the *Antelope Valley Watermaster Rules and Regulations* Figure 1, *Antelope Valley Adjudication Area and Management Subareas*, the project site is located within the Central Antelope Valley Subarea of the Antelope Valley Adjudicated Area.[4] According to the *Water Supply Assessment for the Antelope Valley Logistics Center – West (AVLC - West)* (Water Supply Assessment), prepared by Michael Baker, dated February 2023 (refer to Appendix I, Water Supply Assessment), the project Applicant proposes to annex the site into the Los Angeles County Waterworks District 40's (LACWD) service area through the County of Los Angeles Local Agency Formation Commission (LAFCO) annexation process. The project Applicant proposes off-site water utility improvements to connect to an existing LACWD public water main to the south at the intersection of Avenue H and 20th Street West and extend the water main north along 20th Street West to the site. The proposed domestic water connection for each building would occur along 20th Street West. The proposed domestic water line would extend east into the project site and branch off to the north and south to each of the industrial short-term storage warehouse buildings and connect at the center of each building. Additionally, a fire water line would extend around the perimeter of each building per Los Angeles County Fire

2 California Department of Water Resources, Division of Safety of Dams, *Dam Breach Inundation Map Web Publisher*, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed August 20, 2023.

3 California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed February 15, 2023.

4 California Department of Water Resources, *Adjudicated Basin Annual Reporting*, https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin, accessed April 19, 2024.

Department regulations. Further, upon annexation and payment of standard LACWD water connection fees and ongoing user fees, project impacts on existing LACWD water facilities would be adequately offset.

Overall, the proposed project would be required to comply with existing regulations for water quality standards that ensure pollutant runoff generated by the proposed project does not exceed water quality standards of the Basin Plan, approval of a well application by the Antelope Valley Watermaster (if necessary), and water quality requirements would be ensured as part of the County's plan review process. As a result, the proposed project would not conflict with the water quality control plan and impacts would be less than significant.

Mitigation Measures: No mitigation is required.

4.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✓	
c. Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?				✓

a) Physically divide an established community?

No Impact. Factors that could physically divide a community include, but are not limited to:

- Construction of major highways or roadways;
- Construction of storm channels;
- Closing bridges or roadways; and
- Construction of utility transmission lines.

The key factor with respect to this threshold is the potential to create physical barriers that change the connectivity between areas of a community to the extent that persons are separated from other areas of the community. The proposed project would not physically divide an established community, as the project site is currently vacant and undeveloped and has not had any disturbance to date. The surrounding areas are similarly vacant and undeveloped with no established communities in the immediate vicinity; refer to Exhibits 2-2, *Site Vicinity*, and 2-3, *Existing Site Photos*.

While project development involves construction of new roadways along the eastern and southern project boundary and on- and off-site roadway and utility improvements to support the two proposed warehouse buildings, the improvements would not physically divide any established communities as there are no established communities on-site or in the immediate vicinity. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact.

Los Angeles County General Plan Consistency

The *Los Angeles County General Plan* (General Plan) provides the policy framework and establishes the long-range vision for how and where the unincorporated County areas grow, and establishes goals, policies, and programs to

foster healthy, livable, and sustainable communities. The General Plan Land Use Element designates land uses and provides strategies and planning tools to facilitate and guide future development and revitalization efforts. Overall, the General Plan Land Use Policy Map and Land Use Legend serve as the blueprint for how land is used to accommodate growth and change in the unincorporated areas.

Table 4.11-1, *Project Consistency with Applicable General Plan Land Use Element Policies*, analyzes the project's consistency with applicable land use goals and policies in the General Plan Land Use Element.

Table 4.11-1
Project Consistency with Applicable General Plan Land Use Element Policies

Applicable General Plan Land Use Element Policies	Project Consistency Analysis
Goal LU 3: A development pattern that discourages sprawl and protects and conserves areas with natural resources and SEAs.	
Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.	Consistent. As detailed in Section 4.4, *Biological Resources*, the project site is not located within a Significant Ecological Area. Additionally, as analyzed throughout this Initial Study, natural resources (e.g., visual, biological, cultural, geological, mineral resources, etc.) would not be adversely impacted upon implementation of applicable regulatory requirements and project-specific mitigation measures.
Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.	Consistent. As analyzed throughout this Initial Study, upon implementation of applicable regulatory requirements and project-specific mitigation measures, the proposed development would not adversely impact any environmental resources or exacerbate any safety hazards in the project area.
Policy LU 3.3: Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned, such as State and/or federal highways.	Consistent. While the immediate project area is primarily vacant and undeveloped area, the site is located just north of the City of Lancaster and near State Route 14 and Sierra Highway. Existing roadways and public services are also provided within the project area. The project Applicant proposes several roadway and utility improvements to connect to existing services.
Goal LU 5: Vibrant, livable and healthy communities with a mix of land uses, services and amenities.	
Policy LU 5.9: Preserve key industrially designated land for intensive, employment-based uses.	Consistent. The site is designated for industrial uses and the proposed warehousing development is a permitted industrial use that would provide local employment opportunities.
Policy LU 5.10: Encourage employment opportunities and housing to be developed in proximity to one another.	Consistent. While there are no existing residences in the immediate site vicinity, residences and communities are located in the surrounding areas to the north, east, and south of the project site. Thus, the proposed project would provide local employment opportunities to these areas by generating up to 1,000 jobs per warehouse building (total of 2,000 jobs for both warehouse buildings) for residents in the Antelope Valley. Further, as analyzed in Section 4.17, *Transportation*, the project would result in 13.0 vehicle miles traveled (VMT) per employee, which would not exceed the North County VMT threshold. Thus, it can be inferred that the project would contribute towards less VMT in the North County area by providing jobs near housing.
Goal LU 7: Compatible land uses that complement neighborhood character and the natural environment.	
Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers, appropriate technology, building enclosure, and other design techniques.	Consistent. The project site is located in an area primarily designated and zoned for industrial uses. Thus, no incompatible land use issues would arise.

Table 4.11-1 [cont'd]
Project Consistency with Applicable General Plan Land Use Element Policies

Applicable General Plan Land Use Element Policies	Project Consistency Analysis
Goal LU 10: Well-designed and healthy places that support a diversity of built environments.	
Policy LU 10.2: Design development adjacent to natural features in a sensitive manner to complement the natural environment.	Consistent. The proposed buildings would be constructed of tilt-up concrete panels painted earth tone colors to complement the existing desert environment. Landscaping is also proposed to include a mixture of street and parking lot trees, shrubs, and groundcovers to provide screening of the proposed buildings and complement existing habitat and vegetation in the area. Proposed architectural features, signage, lighting, fences/walls, and landscaping would also comply with the applicable County Code sections for development in the Light Manufacturing (M-1) zone and would be verified by the County during the plan check review process..
Policy LU 10.4: Promote environmentally sensitive and sustainable design.	Consistent. As analyzed in Section 4.6, *Energy*, the project would be required to comply with all applicable energy efficiency standards (Title 24) and green building standards (CALGreen) related to environmental and sustainable design.
Goal LU 11: Development that utilize sustainable design techniques.	
Policy LU 11.1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.	Consistent. Refer to response to Policy LU 10.4. Additionally, shading would be provided by proposed shade trees scattered throughout the parking areas.
Policy LU 11.2: Support the design of developments that provide substantial tree canopy cover and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.	Consistent. Refer to response to Policies LU 10.4 and LU 11.1. Further, the warehouse buildings would be painted with a variety of earth tone colors that reduce the urban heat island effect.
Source: County of Los Angeles, *County of Los Angeles General Plan Land Use Element*, updated July 14, 2022.	

Antelope Valley Area Plan Consistency

The General Plan is the foundational document for all community-based plans that serve the unincorporated County areas. More specifically, the General Plan's Planning Areas Framework provides a mechanism for local communities to work with the County to develop plans that respond to their unique and diverse character. There are a total of 11 Planning Areas, of which the project site is located within the Antelope Valley Planning Area. The *Antelope Valley Town and Country Area Plan* (Area Plan), adopted in June 2015, is a blueprint for future development and conservation in the Antelope Valley that informs decision-making to help ensure that individual activities are consistent with, and supportive of, the communities' vision. As a component of the General Plan, the Area Plan refines the Countywide goals and policies in the General Plan by addressing specific issues relevant to the Antelope Valley, such as community maintenance and appearance, and provides more specific guidance on elements already found in the General Plan.

Based on Area Plan Map 2.1, *Los Angeles County Antelope Valley East Portion (Sheet 2 of 3) Land Use Policy*, the project site is designated Light Industrial (IL). The IL designation allows for light industrial uses, including light manufacturing, assembly, warehousing, and distribution, and allows a maximum 1.0 FAR. The proposed warehousing development is a permitted use under the IL designation. The two warehouses would encompass approximately 2,015,072 square feet on the approximately 5,283,828-square foot site and thus would have an FAR of 0.38. As such, the project would comply with the maximum 1.0 FAR associated with the IL designation.

The Area Plan also identifies Economic Opportunity Areas (EOAs) where major infrastructure projects are being planned by State and regional agencies, which would bring tremendous opportunities for growth and economic development in the vicinity of these projects. Three EOAs (East, Central, and West EOAs) are identified within the Area Plan. The project site is located within the Central EOA.

Table 4.11-2, *Project Consistency with Applicable Area Plan Land Use Element Policies*, analyzes the project's consistency with applicable land use goals and policies in the Area Plan Land Use Element.

Table 4.11-2
Project Consistency with Applicable Area Plan Land Use Element Policies

Applicable Area Plan Land Use Element Policies	Project Consistency Analysis
Goal LU 1: A land use pattern that maintains and enhances the rural character of the unincorporated Antelope Valley.	
Policy LU 1.1: Direct the majority of the unincorporated Antelope Valley's future growth to rural town center areas and identified economic opportunity areas, through appropriate land use designations, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.	Consistent. The project site is located within the Central EOA of the Area Plan and thus, would contribute towards more growth and economic development in the EOA by developing an employment-generating industrial use.
Policy LU 1.4: Ensure that there are appropriate lands for commercial and industrial services throughout the unincorporated Antelope Valley sufficient to serve the daily needs of rural residents and to provide local employment opportunities.	Consistent. The project is designated and zoned industrial and the proposed warehouses would provide local employment opportunities for residents in Antelope Valley.
Goal LU 4: A land use pattern that promotes the efficient use of existing and/or planned infrastructure and public facilities.	
Policy LU 4.1: Direct the majority of the unincorporated Antelope Valley's future growth to the economic opportunity areas and areas that are served by existing or planned infrastructure, public facilities, and public water systems, as indicated in the Land Use designations shown on the Land Use Policy Map (Map 2.1) of this Area Plan.	Consistent. As stated, the proposed project would place new industrial development within the Central EOA and provide local economic growth. While the project proposes on- and off-site roadway and utility improvements, the project would connect to existing water, sewer, and electric infrastructure in the project area. Additionally, the project proposes annexation into the local water and sewer district service areas through the County of Los Angeles Local Agency Formation Commission process.
Goal LU 5: A land use pattern that decreases greenhouse gas emissions.	
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 Southern California Association of Governments updated the 2012 Sustainable Communities Strategy by adopting the *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020-2045 RTP/SCS) in September 2020. The population, housing, and employment forecasts within the 2020-2045 RTP/SCS are based on local general plans as well as input from local governments, such as the County. The project proposes to construct a short-term warehouse storage development which is a permitted use under the site's land use designation and zoning. No General Plan Amendment or Zone Change would be required and thus, the project would be consistent with the development assumptions in the 2020-2045 RTP/SCS.
Source: County of Los Angeles, *Antelope Valley Town and Country Area Plan*, June 2015.	

As analyzed in Tables 4.11-1 and 4.11-2, the proposed project would be consistent with applicable policies in the General Plan and Area Plan Land Use Elements. As such, impacts in this regard would be less than significant.

Zoning Code Consistency

According to the Los Angeles County Department of Regional Planning Z-NET, the project site is zoned Light Manufacturing (M-1). Based on County Code Chapter 22.22, *Industrial Zones*, the M-1 zone allows for light industry, repair, wholesale, and packaging, including the manufacture, assembly, distribution, and storage of goods that have low nuisance impacts, but excluding raw-materials production, processing or bulk handling. The M-1 zone also accommodates retail and service commercial uses to serve local employees and visitors.

The proposed buildings are speculative industrial short-term storage warehouse buildings. According to County Code Table 22.22.030-B, *Principal Use Regulations for Industrial Zones*, "Warehouses, including Storage Warehouses" require Ministerial Site Plan Review (SPR).

Table 4.11-3, *County Code Industrial Zone Development Standards Consistency Analysis*, analyzes the project's consistency with applicable industrial zone development standards.

Table 4.11-3
County Code Industrial Zone Development Standards Consistency Analysis

Development Standard	Zoning Requirement	Proposed Project	Does Project Satisfy Requirement?
Maximum Floor Area Ratio	1.0	0.38	Yes
Building Height	The height of buildings, except where otherwise provided, shall be determined by the total floor area in all the buildings on any one lot shall not exceed 13 times the buildable area of such lot.	The maximum building height of each warehouse building is 49 feet. However, as stated in the County Code section, building height is determined by the total floor area in all buildings on a lot. Specifically, the code requires the total floor area of all buildings on one lot to not exceed 13 times the buildable area of a lot. The net site area (building area of the lot) is approximately 113.83 acres or approximately 4,958,435 square feet. As such, the project would be required to not exceed 64,459,652 square feet. The project proposes 2,015,072 square feet of total floor area through two warehouse structures. Therefore, the proposed project would not exceed the allowed building area on-site and would comply with the building height requirement.	Yes
Required Vehicular Parking Spaces	Warehouse: 1 space per 1,000 square feet used for warehousing and 1 space per 400 square feet used for office	Each warehouse building is required to provide 968 vehicular parking spaces for warehousing use and 100 parking spaces for office use. Thus, the project is required to provide a total of 2,136 spaces to accommodate parking for both warehouse buildings. The project proposes to provide 222 trailer stalls and 849 vehicular parking spaces for each warehouse building. In total, the project would provide 2,142 spaces (444 trailer stalls and 1,698 vehicular parking spaces).	Yes

Table 4.11-3 [cont'd]
County Code Industrial Zone Development Standards Consistency Analysis

Development Standard	Zoning Requirement	Proposed Project	Does Project Satisfy Requirement?
Required Bicycle Parking Spaces and Facilities	Short-Term: 1 space per 20,000 square feet; Long-Term: 1 space per 10,000 square feet	Each warehouse building is required to provide 51 short-term and 101 long-term bicycle parking spaces. Thus, the project is required to provide a total of 102 short-term and 202 long-term bicycle parking spaces for both warehouse buildings. The project proposes to provide 60 short-term and 108 long-term bicycle parking spaces for each warehouse building. In total, the project would provide 120 short-term and 216 long-term bicycle parking spaces.	Yes
Tree Planting Requirements	3 trees per 10,000 square feet of developed lot area; Shade plan meeting the specifications set forth in the Tree Planting Guide with a minimum of 50 percent shade coverage of the uncovered parking area within 15 years of planting the required trees	Based on the project site area of 121 acres, the project is required to provide 1,582 trees. As shown on Exhibit 2-6, the conceptual landscape plan proposes to plant 1,582 trees. Additionally, a shade plan is included as part of the project application to ensure a minimum of 50 percent shade coverage in the parking areas.	Yes

Source: County of Los Angeles, *Los Angeles County Code, Title 22, Planning and Zoning*, codified through Ordinance No. 2022-0050, passed October 18, 2022.

Based on the analysis above, the proposed project would comply with applicable industrial development standards under the County Code. A less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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

No Impact. The project site is not located within any designated wildlife corridor or Significant Ecological Area (SEA) identified in the General Plan, Area Plan, or *City of Lancaster General Plan 2030*; refer to Response 4.4(f) and Response 4.11(b). The General Plan Land Use Element classifies Hillside Management Areas (HMAs) as mountainous or foothill terrain with a natural slope of 25 percent of greater. The project site is generally flat, with a gentle downward slope towards the north-east. As such, the project site is not located within an SEA or HMA. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

4.12 MINERAL RESOURCES

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

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?

No Impact. According to *Los Angeles County General Plan* Conservation and Natural Resources Element Figure 9.6, *Mineral Resources* and the California Department of Conservation, no areas within the project site have been identified as containing significant mineral aggregate resources.[1,2] As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.12(a).

Mitigation Measures: No mitigation is required.

1 California Department of Conservation, *Special Report 143: Part IV Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, Saugus-Newhall Production-Consumption Region and Palmdale Production-Consumption Region*, 1987.

2 California Department of Conservation, *Open File Report 94-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California*, Part II-Los Angeles County, 1994.

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4.13 NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?			✓	
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			✓	

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air, and is characterized by both its amplitude and frequency (or pitch). The human ear does not hear all frequencies equally. In particular, the ear de-emphasizes low and very high frequencies. To better approximate the sensitivity of human hearing, the A-weighted decibel scale (dBA) has been developed. On this scale, the human range of hearing extends from approximately 3 dBA to around 140 dBA.

Noise is generally defined as unwanted or excessive sound, which can vary in intensity by over one million times within the range of human hearing; therefore, a logarithmic scale, known as the decibel scale (dB), is used to quantify sound intensity. Noise can be generated by several sources, including mobile sources such as automobiles, trucks, and airplanes, and stationary sources such as construction sites, machinery, and industrial operations. Noise generated by mobile sources typically attenuates (is reduced) at a rate between 3 dBA and 4.5 dBA per doubling of distance. The rate depends on the ground surface and the number or type of objects between the noise source and the receiver. Hard and flat surfaces, such as concrete or asphalt, have an attenuation rate of 3 dBA per doubling of distance. Soft surfaces, such as uneven or vegetated terrain, have an attenuation rate of about 4.5 dBA per doubling of distance. Noise generated by stationary sources typically attenuates at a rate between 6 dBA and about 7.5 dBA per doubling of distance.

There are several metrics used to characterize community noise exposure, which fluctuate constantly over time. One such metric, the equivalent sound level (L_{eq}), represents a constant sound that, over the specified period, has the same sound energy as the time-varying sound. Noise exposure over a longer period is often evaluated based on the Day-Night Sound Level (L_{dn}). This is a measure of 24-hour noise levels that incorporates a 10 dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. The penalty is intended to reflect the increased human sensitivity to noises occurring during nighttime hours, particularly at times when people are sleeping and there are lower ambient noise conditions. Typical L_{dn} noise levels for light and medium density residential areas range from 55 dBA to 65 dBA. Similarly, Community Noise Equivalent Level (CNEL) is a measure of 24-hour noise levels that incorporates a 5-dBA penalty for sounds occurring between 7:00 p.m. and 10:00 p.m. and a 10-dBA penalty for sounds occurring between 10:00 p.m. and 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

REGULATORY FRAMEWORK

Local

County of Los Angeles General Plan

The General Plan Noise Element provides policy direction for minimizing noise impacts on the community and for coordinating with surrounding jurisdictions and other entities regarding noise control. The Noise Element sets various goals and policies that would apply to projects within unincorporated areas of Los Angeles County. The following goals are applicable to the project:

Goal N 1: The reduction of excessive noise impacts.

Policy N 1.3: Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (BAT).

Policy N 1.4: Enhance and promote noise abatement programs in an effort to maintain acceptable levels of noise as defined by the Los Angeles County Exterior Noise Standards and other applicable noise standards.

Policy N 1.6: Ensure cumulative impacts related to noise do not exceed health-based safety margins.

The Noise Regulations provide noise standards within the County. Section 12.08.390 sets forth maximum exterior noise levels for various land uses and are presented in Table 4.13-1, *Exterior Noise Standards*.

Table 4.13-1
Exterior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dB)
I	Noise Sensitive Area	Anytime	45
II	Residential Properties	10:00 p.m. – 7:00 a.m. (nighttime)	45
		7:00 a.m. – 10:00 p.m. (daytime)	50
III	Commercial Properties	10:00 p.m. – 7:00 a.m. (nighttime)	55
		7:00 a.m. – 10:00 p.m. (daytime)	60
IV	Industrial Properties	Anytime	70

Notes:
1. Noise sensitive areas are areas where conspicuous signs are displayed indicating the presence of the zone.

Source: County of Los Angeles, *Los Angeles County General Plan 2035*, October 6, 2015.

Los Angeles County Code

Construction Noise Standards

Section 12.08.440, *Construction Noise*, prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of 7:00 p.m. and 7:00 a.m., or any time on Sundays or holidays.

The maximum noise allowed during the permitted construction hours at affected buildings shall not exceed the levels listed in Table 4.13-2, *Construction Noise Standards*.

Table 4.13-2
Construction Noise Standards

Time Interval	Single-Family Residential	Multi-Family Residential	Semi-Residential/ Commercial
Mobile Equipment[1]			
7:00 a.m. – 8:00 p.m. (daytime)	75 dBA	80 dBA	85 dBA
8:00 p.m. – 7:00 a.m. (nighttime)	60 dBA	64 dBA	70 dBA
Stationary Equipment[2]			
7:00 a.m. – 8:00 p.m. (daytime)	60 dBA	65 dBA	70 dBA
8:00 p.m. – 7:00 a.m. (nighttime)	50 dBA	55 dBA	60 dBA

Notes:
1. Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment.
2. Maximum noise level for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment.

Source: County of Los Angeles, *Los Angeles County Code*.

Vibration Standards

The County regulates vibration in Section 12.08.560, *Vibration*, of the Los Angeles County Code. This section prohibits the operation of any device that creates a vibration that is above the vibration perception threshold of any individual at or beyond the property line of private property. The perception threshold shall be a motion velocity of 0.01 inches per second over the range of 1 to 100 Hertz.

EXISTING CONDITIONS

Stationary Sources

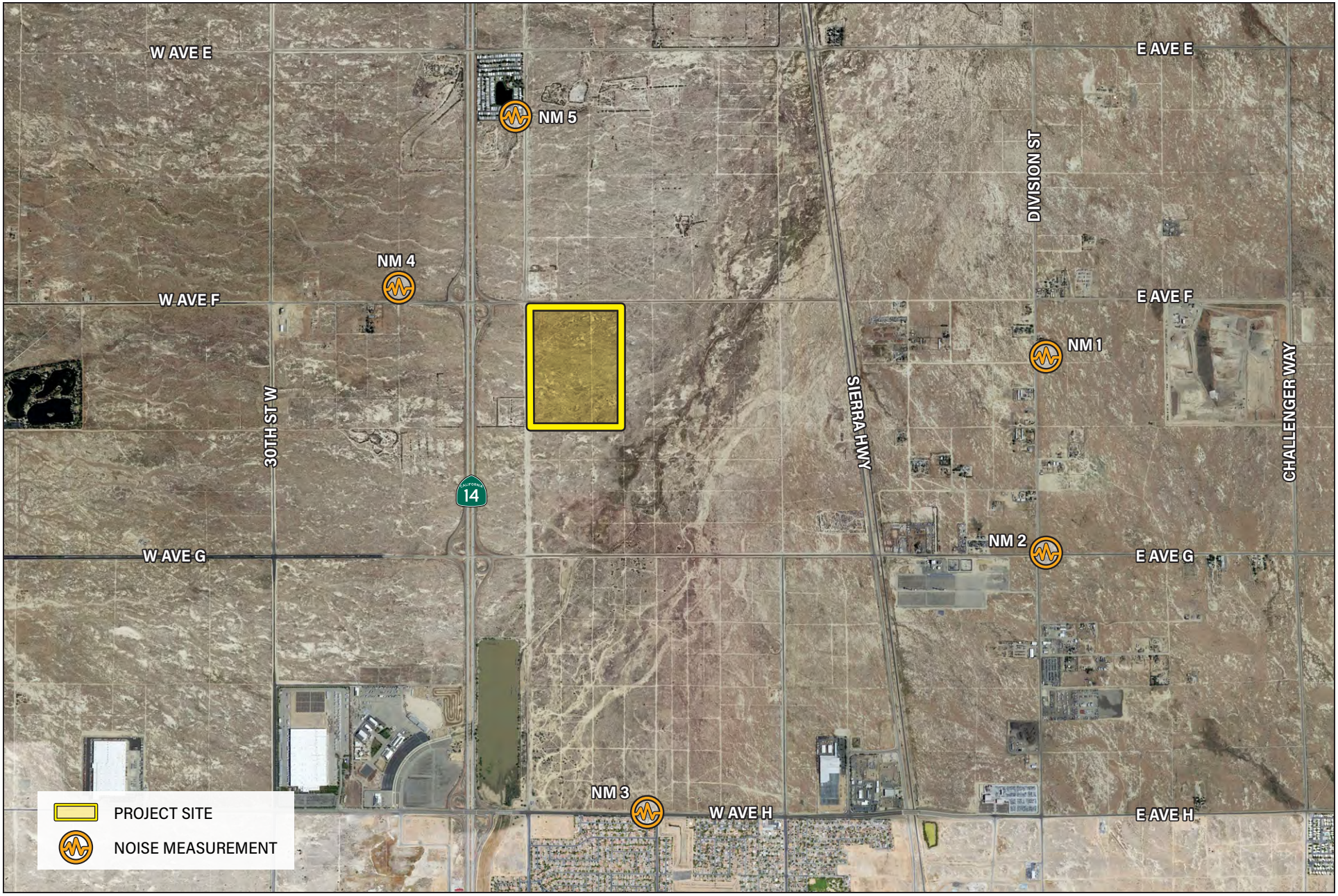
The project site is currently vacant and there are no stationary noise sources in the project vicinity.

Mobile Sources

The majority of the existing noise in the project area is generated from vehicle sources along State Route 14 (SR-14), West Avenue F, and Sierra Highway.

Noise Measurements

To quantify existing ambient noise levels in the project area, Michael Baker International (Michael Baker) conducted five short-term noise measurements on January 11, 2023; refer to Exhibit 4.13-1, *Noise Measurement Locations*. The noise measurement sites are representative of typical existing noise exposure within and immediately adjacent to the project site. The five, ten-minute measurements were taken between 10:15 a.m. and 12:15 p.m. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day and relate closely with the noise standards for the project area. Refer to Table 4.13-3, *Noise Measurements*.



Source: Google Earth Pro, March 2023

Michael Baker INTERNATIONAL

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03/2023 • JN 192691

ANTELOPE VALLEY LOGISTICS CENTER – WEST (AVLC-WEST) PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Noise Measurements

Exhibit 4.13-1

Table 4.13-3
Noise Measurements

Site No.	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Peak (dBA)	Time
1	Along the sidewalk of Division Street	68.0	39.0	87.6	103.4	10:17 a.m.
2	On the southeast corner of Division Street and East Avenue G intersection	68.1	37.9	90.9	110.2	10:36 a.m.
3	On the sidewalk in front of 45920 Regents Street residence	50.9	42.6	69.3	84.0	10:55 a.m.
4	On the northwest corner of 25th Street West and West Avenue F intersection	64.1	35.1	83.3	103.1	11:32 a.m.
5	Along the sidewalk of 20th Street West, near Leisure Lake Mobile Estates	58.8	42.9	76.5	92.2	11:53 a.m.

Source: Michael Baker International, January 11, 2023.

Meteorological conditions were cloudy, cool temperatures, with light wind speeds (0 to 5 miles per hour), and low humidity. Measured noise levels during the daytime measurements ranged from 50.9 to 68.1 dBA L_{eq}. The sources of peak noise are traffic along West Avenue F and SR-14. Noise monitoring equipment used for the ambient noise survey consisted of a Brüel & Kjær Hand-held Analyzer Type 2250 equipped with a Type 4189 pre-polarized microphone. The monitoring equipment complies with applicable requirements of the American National Standards Institute (ANSI) for sound level meters. The results of the field measurements are included in Appendix F, *Noise Data*.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as parks, historic sites, cemeteries, and recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

It should be noted that there are no noise sensitive receptors located within 1,000 feet of the project site. The nearest sensitive receptors are single-family residential uses located approximately 3,200 feet to the west of the project site.

c) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County general plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?

Less Than Significant Impact. It is difficult to specify noise levels that are generally acceptable to everyone; noise that is considered a nuisance to one person may be unnoticed by another. Standards may be based on documented complaints in response to documented noise levels or based on studies of the ability of people to sleep, talk, or work under various noise conditions. Potential noise-reducing measures can include limiting construction hours, staging construction equipment away from sensitive receptors, installing sound walls or noise barriers, and substituting construction equipment, where feasible, among other measures.

CONSTRUCTION

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., grading, building construction, paving, and architectural coatings). Noise generated by construction equipment, including graders and excavators, can reach high levels. During construction, high noise levels could affect sensitive

receptors in the vicinity of the project site. As noted above, the nearest sensitive receptors are single-family residential uses located approximately 3,200 feet to the west of the project site. The project construction activities involve grading, building construction, paving, and architectural coatings.

Construction noise is difficult to quantify because of the many variables involved, including the specific equipment types, size of equipment used, percentage of time each piece is in operation, condition of each piece of equipment, and number of pieces that would operate on the site. Construction equipment produce maximum noise levels when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on construction sites typically operates under less than full power conditions, or part power. To characterize construction-period noise levels more accurately, the average (L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage. These noise levels are typically associated with multiple pieces of equipment simultaneously operating on part power. The estimated construction noise levels at the nearest noise-sensitive receptors are presented in Table 4.13-4, *Construction Noise Levels at the Nearest Receptors*. The modeling results are included in Appendix F. To present a conservative impact analysis, the estimated noise levels were calculated for a scenario in which all heavy construction equipment (e.g., graders, excavators, and scrapers) were assumed to operate simultaneously and be located at the construction area nearest to the affected receptors.

Table 4.13-4
Construction Noise Levels at Adjacent Residential Receptors

Nearest Sensitive Receptor to Project Site	Construction Phase	Estimated Construction Noise Level (dBA L_{eq})[1]	Mobile / Stationary Construction Noise Standard (dBA L_{eq})[2]	Exceeds Standards?	Lowest Existing Noise Measured in Project Vicinity (dBA L_{eq})[3]	Difference Between Estimated Construction Noise Level and Existing Noise Level (dBA L_{eq})
Single-Family Residences (approximately 3,200 feet west)	Grading	52.1	75 / 60	**No**	50.9	+1.2
	Building Construction	50.2		**No**		-0.7
	Paving	45.5		**No**		-5.4
	Architectural Coating	37.6		**No**		-13.3

Notes:
1. These noise levels conservatively assume the simultaneous operation of all heavy construction equipment (e.g., graders, excavators, and scrapers) at the same precise location.
2. Construction noise daytime standards from mobile and stationary sources are based on the *Los Angeles County Code*.
3. Michael Baker International conducted five short-term noise measurements on January 11, 2023. Short-term (L_{eq}) measurements are considered representative of the noise levels throughout the day and relate closely with the noise standards for the project area. Refer to Table 4.13-3, *Noise Measurements*.

Source: Federal Highway Administration, *Roadway Construction Noise Model (RCNM)*, 2006; refer to Appendix F.

As previously noted, noise levels presented in Table 4.13-4 are conservative, as these noise levels assume the simultaneous operation of all heavy construction equipment (e.g., graders, excavators, and scrapers) at the same precise location. Construction equipment would be used throughout the project site and would not be concentrated at the point closest to the sensitive receptors (i.e., along the west project boundary). Project construction activities would comply with Section 12.08.440 of the County Code which prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between the hours of 7:00 p.m. and 7:00 a.m., or any time on Sundays or holidays.

The project would require short-term nighttime construction in order to pour concrete during the building construction phase. As outlined in Municipal Code Section 12.08.440 – Construction noise, any nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment between the hours of 8:00 p.m. and 7:00 a.m. or anytime on Sunday or holidays shall comply to the maximum noise threshold based on the nearest affected sensitive receptors. The threshold for single-family residential uses for nonscheduled, intermittent, short-term operation of mobile equipment is 60 dBA. The nighttime construction would not utilize construction equipment that exceeds the noise levels of the equipment modeled in Table 4.13-4 and as such, the project would not exceed the noise threshold outlined above; refer to Appendix F.

Additionally, the County's construction noise thresholds (refer to Table 4.13-2) are imposed for mobile and stationary equipment used during project construction. The closest sensitive receptors to the project site are single-family residences located approximately 3,200 feet to the west of the project site. As such, for the purposes of this analysis, a construction noise impact is identified for the single-family residences if construction noise generated from mobile construction equipment exceeds 75 dBA, and construction noise generated from stationary construction equipment exceeds 60 dBA. At the distance of 3,200 feet, construction noise levels could range between approximately 37.6 dBA and 52.1 dBA; refer to Table 4.13-4. As such, project construction noise would not exceed the County's construction noise thresholds of 75 dBA for mobile construction equipment and 60 dBA for stationary construction equipment. Further, according to the California Department of Transportation (Caltrans), an increase of 3 dBA is barely perceptible and an increase of 5 dBA is readily perceptible.[1] As shown in Table 4.13-4, project construction would not result in a noise level increase of more than 3 dBA. Less than significant impacts would occur in this regard.

OPERATIONS

Off-Site Mobile Noise

Future development generated by the proposed project would result in some additional traffic on adjacent roadways, thereby potentially increasing vehicular noise in the vicinity of existing and proposed land uses. The most prominent source of mobile traffic noise in the project vicinity is along Avenue F and SR-14. According to Caltrans, a doubling of traffic (100 percent increase) on a roadway would result in a perceptible increase in traffic noise levels (3 dBA).[2] The project would result in a significant operational mobile noise impact if the project's anticipated traffic increases the existing traffic noise levels by more than 3 dBA and if the generated noise levels exceed the County's noise standards at sensitive receptors along the roadways. According to the VMT Analysis (refer to Appendix G, *VMT Analysis*), the proposed two warehouses with offices would generate approximately 3,388 total daily trips. Vehicles would access the project site via Avenue F and 20th Street between Avenue G and Avenue F. Since there are no sensitive receptors near the project vicinity along the vehicle access roads, the proposed project would not exceed the County's noise standards for sensitive receptors. Project-related traffic noise impacts would be less than significant.

On-Site Operational Noise

Each proposed warehouse building is being designed and built on a speculative basis with the intended function as a short-term storage warehouse, operating up to 24 hours a day, seven days a week. Mechanical equipment, slow-moving trucks, back-up alarms for trucks, and parking lot activities would generate noise during on-site operations. The operations would be typical of a distribution/warehousing facility.

Mechanical Equipment

HVAC units would be installed on the roof of the proposed warehouse buildings. Specifically, approximately 20 to 40 rooftop HVAC units are proposed for each warehouse building. Typically, mechanical equipment, such as HVAC units,

1 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, September 2013.
2 Ibid.

generate noise levels of 60 dBA at 20 feet from the source.[3] Noise generated by stationary sources typically attenuates at a rate of 6 dBA per doubling of distance from the source. The closest HVAC units would be located approximately 3,200 feet from the nearest residences to the west of the project site. As such, noise levels from the HVAC units could reach approximately 16 dBA at the nearest residences to the west. Therefore, operation of the HVAC units would not exceed the County's daytime (50 dBA) and nighttime (45 dBA) exterior noise standards for residential uses. Additionally, noise levels from operation of HVAC units would not result in a noise level increase of more than 3 dBA when compared to the lowest existing noise measured at the nearest sensitive receptors in the project vicinity (50.9 dBA L_{eq}; refer to Table 4.13-3). Impacts would be less than significant in this regard.

Slow-Moving Trucks

The predominant noise source during on-site operations would be from on-site truck movements and idling. Typically, slow movements from these trucks can generate a maximum noise level of approximately 79 dBA at 50 feet.[4] The closest receptors would be located approximately 3,200 feet to the west of the project site. At this distance, on-site noise levels from slow-moving trucks would be approximately 43 dBA. It should be noted that trucks would only move along the access road and therefore would not generate noise for an extended period. As a result, anticipated noise levels from slow-moving trucks (43 dBA) would not exceed the County's daytime (50 dBA) and nighttime (45 dBA) exterior noise standards for residential uses. Further, noise levels from slow-moving trucks would not result in a noise level increase of more than 3 dBA when compared to the lowest existing noise measured at the nearest sensitive receptors in the project vicinity (50.9 dBA L_{eq}; refer to Table 4.13-3). In addition, traffic noise along SR-14 (located between the project site and the nearest sensitive receptors) would partially mask noise from slow-moving trucks. Therefore, a less than significant impact would occur in this regard.

Back-Up Alarms

A total of 164 truck loading docks and 444 trailer parking stalls are proposed on-site. Specifically, each warehouse building would have 82 truck loading docks and 222 trailer parking stalls on the northern and southern sides of the building. Medium- and heavy-duty trucks reversing into truck loading docks would produce noise from back-up alarms (also known as back-up beepers). Back-up beepers produce a typical volume of 97 dBA at one meter (i.e., 3.28 feet) from the source.[5] The nearest receptors would be located approximately 3,200 feet west of the project site where trucks would be reversing/parking. At this distance, noise levels from back-up beepers would be approximately 37.2 dBA. Therefore, the anticipated noise levels from back-up beepers would not exceed the County's daytime (50 dBA) and nighttime (45 dBA) exterior noise standards for residential uses. Further, noise levels from back-up beepers would not result in a noise level increase of more than 3 dBA when compared to the lowest existing noise measured at the nearest sensitive receptors in the project vicinity (50.9 dBA L_{eq}; refer to Table 4.13-3). Thus, noise impacts from back-up beepers associated with the project would be less than significant.

Parking Areas

A total of 1,698 surface parking spaces would be provided for employees and visitors. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. However, the instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-byes may be an annoyance to nearby noise-sensitive receptors. Estimates of the

3 Elliot H. Berger, Rick Neitzel, and Cynthia A. Kladden, *Noise Navigator Sound Level Database with Over 1700 Measurement Values*, July 26, 2015.

4 Ibid.

5 Environmental Health Perspectives, *Vehicle Motion Alarms: Necessity, Noise Pollution, or Both?* https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3018517/, accessed February 22, 2023.

maximum noise levels associated with some parking lot activities are presented in Table 4.13-5, *Typical Maximum Noise Levels Generated by Parking Lots*.

Table 4.13-5
Typical Maximum Noise Levels Generated by Parking Lots

Noise Source	Maximum Noise Levels at 50 Feet from Source
Car door slamming	61 dBA L_{eq}
Car starting	36 dBA L_{eq}
Car idling	53 dBA L_{eq}
Source: Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.	

As shown in Table 4.13-5, parking lot activities can result in noise levels up to 61 dBA at a distance of 50 feet. It is noted that parking lot noise are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower than the ambient noise levels identified in Table 4.13-5. The proposed parking lot would have intermittent parking lot noise due to the movement of vehicles. The nearest sensitive receptors (single-family residences) would be located approximately 3,200 feet to the west of the project site. At the distance of 3,200 feet, noise from parking activities would not be audible to the single-family residences and are not anticipated to exceed County's residential exterior daytime and nighttime standards of 50 dBA and 45 dBA, respectively or result in a noise level increase of more than 3 dBA when compared to the lowest existing noise measured at the nearest sensitive receptors in the project vicinity (50.9 dBA L_{eq}; refer to Table 4.13-3). Therefore, noise associated with parking activities would not be audible to nearest sensitive receptors. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Project construction can generate varying degrees of groundborne vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

The Caltrans *Transportation and Construction Vibration Manual* identifies various vibration damage criteria for different building classes. This evaluation uses the Caltrans architectural damage criterion for continuous vibrations at new residential structures buildings of 0.5 inch-per-second (inch/second) PPV. The types of construction vibration impacts include human annoyance and building damage. Annoyance is assessed based on levels of perception, with a PPV of 0.01 inch/second being considered "barely perceptible," 0.04 inch/second as "distinctly perceptible," 0.1 inch/second as "strongly perceptible," and 0.4 inch/second as "severe." Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time.

Construction of the proposed project would occur over approximately 24 months and would include grading, paving, building construction, and architectural coatings. The highest degree of groundborne vibration would be generated due to the operation of vibratory rollers during the paving phase. As previously mentioned, there are no sensitive receptor buildings located in the immediate vicinity of the project site and the nearest sensitive receptors are located at approximately 3,200 feet to the west of the project site. Groundborne vibration decreases rapidly with distance. As a result, vibration velocities from the construction equipment would be barely precipitable at this distance. Typical

vibration produced by construction equipment is illustrated in Table 4.13-6, *Typical Vibration Levels for Construction Equipment*.

Table 4.13-6
Typical Vibration Levels for Construction Equipment

Equipment	Approximate peak particle velocity at 25 feet (inch/sec)	Approximate peak particle velocity at 3,200 feet (inch/sec)[1]
Large bulldozer	0.089	0.0001
Loaded trucks	0.076	0.0001
Small bulldozer	0.003	<0.0001
Vibratory Rollers	0.210	0.0001

Notes:
Calculated using the following formula:
$PPV_{equip} = PPV_{ref} \times (25/D)^{1.1}$
where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the FTA *Transit Noise and Vibration Impact Assessment Guidelines*
D = the distance from the equipment to the receiver

Source: California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, April 2020.

As indicated, vibration velocities from typical heavy construction equipment operation would range from 0.003 to 0.21 inch/second PPV at 25 feet from the source of activity. The nearest structures to the project site are single-family residential buildings located approximately 3,200 to the west of the project site. Vibration level during the operation of construction equipment would be approximately 0.0001 inch/second PPV or less at 3,200 feet. As a result, construction groundborne vibration would not be capable of exceeding the 0.50 inch/second PPV significance threshold for vibration to the nearest structures and a less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. The nearest airport to the project site is the General William J. Fox Airfield, located approximately 2.2 miles to the west of the project site. According to the Los Angeles County Airport Land Use Commission (Los Angeles County ALUC), the project site is located within General William J. Fox Airfield Area of Influence Compatibility Zone D.[6] According to the *General William J. Fox Airfield Land Use Compatibility Plan*, projects within Compatibility Zones D and E, proposed nonresidential development consisting of 40,000 square feet or more would be considered a major land use action by the Los Angeles County ALUC and would be subject to mandatory or advisory Los Angeles County ALUC review depending upon the status of local general plan consistency. The project proposes warehousing use and not a land use of specific safety concerns. Further, the project would be employing up to approximately 2,000 on-site employees on the 121-acre site and would not exceed the established usage intensity of new nonresidential development for Zone D (a maximum of 300 people per any individual acre) in accordance with *General William J. Fox Airfield Land Use Compatibility Plan* Policy 2.3.5. Upon review by the Los Angeles County ALUC, impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

6 Los Angeles County Airport Land Use Commission, *General William J. Fox Airfield Land Use Compatibility Plan*, revised December 1, 2004, https://planning.lacounty.gov/long-range-planning/general-william-j-fox-airfield-land-use-compatibility-plan/, accessed May 1, 2023.

4.14 POPULATION AND HOUSING

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

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A project could induce population growth in an area, either directly (for example, by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure). No residential uses would be developed as part of the project. Therefore, the project would not induce direct population growth in the County through new housing development.

As described in Section 2.0, *Project Description*, the project involves the construction of two industrial short-term storage warehouse buildings on a project site that is currently vacant and undeveloped land. The employment generated by the proposed project could result in future employees (and their families) relocating into the unincorporated County area or other nearby areas, resulting in direct population growth. Estimating the number of future employees who would choose to relocate to unincorporated Los Angeles County or other nearby areas would be speculative given that many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). However, it should be noted that future employees of the proposed industrial warehouse buildings would likely be existing residents of the Antelope Valley area (both unincorporated County areas and incorporated cities). Further, the proposed project is a permitted use under the site's land use designation and zoning per the Area Plan and thus, is also consistent with the growth projections in the Southern California Association of Governments' *2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, which are based on local general plans. The project site is also located within the Central Economic Opportunity Area (EOA) of the Area Plan and thus, would contribute towards planned growth and economic development in the EOA by developing an employment-generating industrial use. Therefore, the proposed project's direct population growth would not constitute substantial unplanned population growth within the County and specifically, the Antelope Valley area and would be consistent with the development assumptions in the Area Plan. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed project would not result in the demolition of existing residences; therefore, project implementation would not displace any existing housing or persons. No impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

4.15 PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project create the capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?			✓	
2) Sheriff protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

a) Would the project create the capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1) Fire protection?

Less Than Significant Impact. The County of Los Angeles Fire Department (LACoFD) provides fire protection services to the project site. As depicted in General Plan Figure 12.7, *Fire Department Battalions and Stations*, there are several fire stations that provide both fire and emergency services to the County. The closest fire station to the project site is Station #130, located approximately 4.0 miles to the southwest at 44558 40th Street West within the City of Lancaster.

The site is already within the existing service area of LACoFD. Project implementation would not induce significant unplanned population growth; refer to Section 4.14, *Population and Housing*. Therefore, although the proposed project is expected to increase demand for LACoFD services, the demand would not be substantial or result in the need for additional fire protection facilities, and would not adversely impact service ratios, response times, or other LACoFD performance standards. Pursuant to County Code Section 32.105.7.26.2, *Land Development Plan Review*, the project's conditional use permit and required environmental review process would involve LACoFD review and approval to ensure compliance with fire code requirements and offset potential impacts on existing public facilities or demands for new facilities, including fire protection services. The project would be required to adhere to County Code Title 32, Section 328, *Land Development and Environmental Review Fees*, which requires payment of fees as a condition of approval for any land development project, environmental document, or permit review referred or submitted to LACoFD for review. Moreover, the overall project design would be subject to compliance with the requirements set forth in the most current California Fire Code, California Building Standards Code, and the County Code, *Title 26 Building Code*,

and LACoFD requirements. Compliance with existing regulations and payment of land development and review fees would reduce potential fire hazards associated with the new development and impacts on existing LACoFD resources.

Emergency vehicles would have access to both buildings via the truck court with designated fire access points and along the first bay of parking. These emergency access points are designed and designated for fire access in compliance with the LACoFD regulations. As such, less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

2) Sheriff protection?

Less Than Significant Impact. The Los Angeles County Sheriff's Department (LASD) provides sheriff protection services to the project site. As depicted in General Plan Figure 12.8, *Sheriff's Department Service Areas*, the project site is within the service area of the LASD Lancaster Station, which provides sheriff services to the City of Lancaster and unincorporated County areas in Antelope Acres, Quartz Hill, and Lake Los Angeles, including the project site.[1] The Lancaster Station is located approximately 3.2 miles to the southeast of the site at 501 West Lancaster Boulevard in the City of Lancaster.

Implementation of the project would increase demand for police protection services provided by the LASD. As such, the project Applicant would be required to pay law enforcement facilities mitigation fees to offset project impacts on existing public facilities, including sheriff services. Specifically, the project Applicant would comply with County Code Chapter 22.266, *Law Enforcement Facilities Fee*, which requires payment of law enforcement facilities mitigation fees as a condition of approval for any development project that requires a tract map, parcel map, discretionary permit, building permit, land use permit, or other entitlement. Further, the project would be subject to LASD's Crime Prevention Through Environmental Design (CPTED) regulations prior to project approval to ensure that it meets County requirements in regard to public safety (e.g., nighttime security lighting). As such, compliance with existing CPTED regulations and payment of law enforcement facilities mitigation fees would reduce impacts in this regard to less than significant levels.

Mitigation Measures: No mitigation is required.

3) Schools?

Less Than Significant Impact. The Lancaster School District (LANCSD) provides school services for the City of Lancaster and a small portion of the County's unincorporated areas.[2,3] The project site is located within the LANCSD school boundary. The closest LANCSD schools in the project vicinity include Mariposa Computer Science Magnet School (737 Avenue H-6 in the City of Lancaster, approximately 1.9 miles southeast from the project site), Plute Middle School (425 Avenue H-6 in the City of Lancaster, approximately 1.86 miles southeast from the project site), and Lancaster High School (44701 32nd Street West, approximately 3.3 miles southeast from the project site).[4]

The project would develop two industrial short-term storage warehouse buildings, which could generate additional students in the project area because of employees and their families relocating to unincorporated County areas within the LANSCD boundary; refer to Section 4.14. According to LANCSD's *Level I Developer Fee Study for Lancaster School District*, the proposed project would be required to pay $0.66 per square foot of commercial/industrial

1 Los Angeles County Sheriff's Department, *Lancaster Sheriff's Station*, https://lasd.org/lancaster/, accessed April 18, 2024.
2 Lancaster School District, About Us, https://www.lancsd.org/Domain/152, accessed February 7, 2023.
3 Los Angeles County Office of Education, *School District Boundary Maps*, https://www.lacoe.edu/Business-Services/Business-Advisory-Services/County-Committee/School-District-Boundary-Maps, accessed February 7, 2023.
4 Ibid.

development to offset project impacts on LANCSD resources.[5] LANCSD's developer fees are allowed pursuant to Senate Bill 50. According to Section 65996 of the California Government Code, payment of statutory fees is considered full mitigation for new development projects. Thus, upon payment of required LANCSD developer fees by the project Applicant, consistent with existing State requirements, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

4) Parks?

Less Than Significant Impact. The project does not propose new or physically altered parks or recreational facilities. The nearest County park, Apollo Community Regional Park, is located at 4555 Avenue G in the City of Lancaster (approximately 1.8 miles west of the project site). Potential impacts on park services are typically associated with residential developments or projects with a residential component. It is acknowledged that future employees and their families may relocate to unincorporated County areas near the project site and thus, indirectly increase demand for existing County parks and recreational facilities. However, such impacts associated with new residents would be speculative. Overall, the proposed industrial project would not increase demand for parks or recreational facilities in a manner that would require the construction of new park facilities, the construction of which could cause significant environmental impacts. Thus, given the nature of the industrial project, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

5) Other public facilities?

Less Than Significant Impact. The nearest library facility, Lancaster Library, is located at 601 Lancaster Boulevard in the City of Lancaster (approximately 3.1 miles southeast of the project site). Potential impacts on library services are typically associated with residential developments or projects with a residential component. It is acknowledged that future employees and their families may relocate to unincorporated County areas near the project site and thus, have an indirect impact on nearby County libraries. However, such impacts associated with new residents would be speculative. Overall, the proposed industrial project would not increase demand for library facilities in a manner that would require the construction of new facilities, the construction of which could cause significant environmental impacts. Therefore, given the nature of the industrial project, impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

[5] Lancaster School District, *Level I Developer Fee Study for Lancaster School District*, https://www.lancsd.org/site/handlers/filedownload.ashx?moduleinstanceid=4694&dataid=8110&FileName=Developer%20Fee%20Study%202020.pdf, April 28, 2020, accessed February 7, 2023.

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4.16 RECREATION

Would the project:	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?			✓	
c. Would the project interfere with regional trail connectivity?				✓

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?

Less Than Significant Impact. Refer to Response 4.15(a)(4).

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. Refer to Response 4.15(a)(4).

Mitigation Measures: No mitigation is required.

c) Would the project interfere with regional trail connectivity?

No Impact. According to General Plan Parks and Recreation Element Figure 10.1, *Regional Trail System*, there are no proposed or existing regional trails (i.e., County, Pacific Crest Trail, Conservancy [i.e., Rivers and Mountains Conservancy, Santa Monica Mountains Conservancy, Coastal Conservancy, and Baldwin Hills Conservancy] or Federal/National Forest trails) within proximity to the project site. Therefore, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.17 TRANSPORTATION

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

This section is primarily based upon the *Antelope Valley Logistics Center West VMT Assessment* (VMT Assessment), prepared by Michael Baker International and dated November 30, 2023; refer to Appendix G, *VMT Analysis*.

PROJECT TRIP GENERATION

In order to accurately assess traffic conditions for the proposed project, trip generation estimates were developed for the project. Trip generation rates for the project were based on nationally recognized recommendations contained within the Institution of Transportation Engineers (ITE) *Trip Generation Manual*, 11th Edition. Traffic volumes expected to be generated by the proposed project were based upon rates per 1,000 square feet of gross floor area. The ITE Land Use Codes (LUC) 154 (High Cube Transload and Short-Term Storage Warehouse) and ITE LUC 710 (General Office Building) trip generation rates were used to forecast traffic volumes associated with the project's proposed warehouse components. The office space is ancillary to the warehouse use.

The trip generation rates, and estimated project-generated trips are presented in Table 4.17-1, *Trip Generation Rates*. No trip generation credits (i.e., existing active land use, internal trip reduction, pass-by trip reduction) are applicable for the proposed project.

Table 4.17-1
Trip Generation Rates

Land Use	ITE Code	Vehicle Type Breakdown		Daily Trips Rate[1,2]	AM Peak Hour			PM Peak Hour		
					Rate	In	Out	Rate	In	Out
High Cube Transload and Short-Term Storage Warehouse	154	Passenger Cars	69.0%[3]	0.966	0.055	77%	23%	0.069	28%	72%
		2 Axle Trucks	6.8%[4]	0.095	0.006			0.007		
		3 Axle Trucks	5.5%[4]	0.077	0.004	49%	51%	0.005	47%	53%
		4+ Axle Trucks	18.7%[4]	0.262	0.015			0.019		
		Total Trucks	31.0%[3]	0.434	0.025	-	-	0.031	-	-
		Total	-	1.40	0.080	-	-	0.100	-	-
General Office Building	710	Passenger Cars	100%	10.84	1.52	88%	12%	1.44	17%	83%

Notes:
1. Trip Rates – Institute of Transportation Engineer's (ITE) *Trip Generation Manual*, 11th Edition.
2. Daily Trip Rates are in KSF; KSF = Thousand square feet.
3. Passenger Car/Truck Breakdown: ITE-South Coast Air Quality Management District's (SCAQMD) High-Cube Warehouse Vehicle Trip Generation Analysis (October 2016) (https://www.ite.org/pub/?id=a3e6679a%2De3a8%2Dbf38%2D7f29%2D2961becdd498).
4. Truck Type Breakdown: ITE-South Coast Air Quality Management District's (SCAQMD) Stakeholder Working Group presentation July 17, 2014 (https://www.aqmd.gov/docs/default-source/ceqa/handbook/high-cube-warehouse-trip-rate-study-for-air-qualityanalysis/finalswg071714backup.pdf?sfvrsn=2).

Source: Michael Baker International, *Antelope Valley Logistics Center West VMT Assessment*, November 30, 2023; refer to Appendix G.

Office space is a typical component of a modern warehouse. Modern warehouse building office space generally consists of common areas including but not limited to reception space, breakrooms, conference rooms, warehouse bathrooms, shipping and receiving centers, employee health and wellness rooms, and learning centers. The *ITE Trip Generation Manual* indicates that the office or employee wellness areas are typically insignificant in proportion to the total building area. As outlined in the project description, the anticipated office space is 40,000 square-feet per building. It is anticipated that the office space for this project will include common areas that would likely account for 25 to 50 percent of the 40,000 square feet of office area and are directly related to general warehouse operations. Furthermore, the office space is purely ancillary to the warehousing operation and would not be an additional use separate from the warehouse tenant.

A separate level of service and traffic operations report was also prepared for this project. To prepare a conservative traffic operations analysis, the trip generation for the project separated the office use for those additional office portions of the proposed buildings. The *ITE Trip Generation Manual* warehouse data has been reported for studies that include up to 10% of their square footage as office space. In the case of this project, that would result in approximately 10,000 square feet per building. Each building contains 40,000 square-feet of proposed office space. Since ITE Land Use Code 154 accounts for office space of approximately 1% of gross floor area, or approximately 10,000 square-feet, trips associated with remaining 30,000 square-feet of proposed office space were estimated using ITE Land Use Code 710.

Table 4.17-2, *Project Trip Generation*, shows the trip generation calculations for the project. The total estimated project trips include 3,388 daily trips, 248 AM Peak Hour trips (192 inbound / 56 outbound), and 282 PM Peak Hour trips (78 inbound / 204 outbound).

Table 4.17-2
Project Trip Generation

Land Use	ITE Code	Intensity[1]	Vehicle Type Breakdown		Daily Trips[2]	AM Peak Hour			PM Peak Hour		
						Volume	In	Out	Volume	In	Out
BUILDING 1[3]											
High Cube Transload and Short-Term Storage Warehouse	154	977.536	Passenger Cars	69.0%	944	54	42	12	67	19	48
			2 Axle Trucks	6.8%	93	6	5	1	7	2	5
			3 Axle Trucks	5.5%	75	4	2	2	5	2	3
			4+ Axle Trucks	18.7%	257	14	7	7	19	9	10
			Total Trucks	31.0%	425	24	14	10	31	13	18
			Total	-	1,369	78	56	22	98	32	66
General Office Building	710	30.000	Passenger Cars	100%	325	46	40	6	43	7	36
Subtotal (Building 1)	***-***	***1,007.536***	***-***	***-***	***1,694***	***124***	***96***	***28***	***141***	***39***	***102***
BUILDING 2[3]											
High Cube Transload and Short-Term Storage Warehouse	154	977.536	Passenger Cars	69.0%	944	54	42	12	67	19	48
			2 Axle Trucks	6.8%	93	6	5	1	7	2	5
			3 Axle Trucks	5.5%	75	4	2	2	5	2	3
			4+ Axle Trucks	18.7%	257	14	7	7	19	9	10
			Total Trucks	31.0%	425	24	14	10	31	13	18
			Total	-	1,369	78	56	22	98	32	66
General Office Building	710	30.000	Passenger Cars	100%	325	46	40	6	43	7	36
Subtotal (Building 1)	***-***	***1,007.536***	***-***	***-***	***1,694***	***124***	***96***	***28***	***141***	***39***	***102***
Total (Both Buildings; 2,015,072 square feet)					**3,388**	**248**	**192**	**56**	**282**	**78**	**204**

Notes:
1. Daily Trip Rates are in KSF; KSF = Thousand square feet.
2. Values may vary slightly due to rounding after rate calculation.
3. Each building contains 40 KSF of proposed office space. ITE Land Use Code 154 accounts for office space of approximately 1% of GFA, or approximately 10 KSF. Trips associated with remaining 30 KSF of proposed office space estimated using ITE Land Use Code 710.

Source: Michael Baker International, *Antelope Valley Logistics Center West VMT Assessment*, November 30, 2023; refer to Appendix G.

a) Conflict with an applicable program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less Than Significant Impact.

Roadway Facilities

Refer to Response 4.17(b) for an analysis of project impacts to roadway capacities.

Transit, Bicycle, and Pedestrian Facilities

The project site is located near existing transit facilities. Specifically, the closest transit facility to the project site is the MetroLink rail station located along Sierra Highway, east of the Sierra Highway and Milling Street West intersection, approximately 3.3-miles southeast of the project site. No bus services or pedestrian facilities are located within proximity to the project site.[1] Further, no bicycle facilities occur within the project vicinity; however, based on the Los Angeles County Bicycle Master Plan Figure 3-7, *Antelope Valley Planning Area Proposed Bicycle Facilities*, future bicycle facilities (i.e., Class II Bike Lanes) are planned along Sierra Highway and Avenue G.[2]

The Southern California Regional Rail Authority operates the 416-mile MetroLink commuter rail system, which has its hub in Downtown Los Angeles at Union Station and extends to Ventura, San Bernardino, Riverside, Orange, and San Diego counties, and serves some of the unincorporated County.

Given that the project area is primarily vacant and undeveloped, implementation of the proposed project would not impair existing pedestrian sidewalks or transit services in the project vicinity. Rather, the project would provide new multimodal amenities and facilities for future use. Specifically, the project proposes long- and short-term bicycle parking and storage on-site, including 108 long-term bicycle spaces and 60 short-term spaces for each building. In total, 216 long-term bicycle spaces and 120 short-term spaces would be provided on-site. Bicycle racks would be distributed along the building perimeters. Additionally, the project proposes 8- and 10-foot wide sidewalks along Avenue F, 20th Street West, Avenue F-8, and interior Street A. Therefore, the proposed bicycle and pedestrian improvements would encourage multimodal transportation. As such, the project would not conflict with any program plan, ordinance, or policy addressing the circulation system. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. The VMT Assessment follows the CEQA guidance for determining transportation impacts in accordance with Senate Bill (SB) 743. The VMT Assessment is based on the Los Angeles County Public Works *Transportation Impact Analysis Guidelines* (County Guidelines).[3]

VMT Screening Criteria

The County Guidelines provide screening thresholds that can be used to identify when a proposed land use project is anticipated to result in a less than significant impact without conducting a more detailed level analysis. Table 4.17-3,

1 County of Los Angeles, *Bicycle Master Plan, Public Review Draft Figure 3-7, Antelope Valley Planning Area Proposed Bicycle Facilities*, February 2011.
2 Ibid.
3 Los Angeles County Public Works, *Los Angeles County Public Works Transportation Impact Analysis Guidelines*, July 23, 2020.

Screening Criteria for Land Use Projects Exempt from VMT Calculations, shows the proposed project's screening results for vehicle miles traveled (VMT) based on the County Guidelines.

Table 4.17-3
Screening Criteria for Land Use Projects Exempt from VMT Calculations

Screening Criteria		Project Evaluation	Results
3.1.2.1 – Non-Retail Project Trip Generation Screening Criteria	Does the development project generate a net increase of 110 or more daily vehicle trips?	The project is anticipated to generate more than 3,000 daily trips.	Does Not Meet Screening Criteria
3.1.2.2 – Retail Project Site Plan Screening Criteria	Does the project contain retail uses that exceed 50,000 square feet of gross floor area?	The project includes industrial (warehouse) uses only.	Does Not Meet Screening Criteria
3.1.2.3 – Proximity to Transit Based Screening Criteria	Is the project located within a one-half mile radius of a major transit stop or an existing stop along a high-quality transit corridor?	The project is not located with a Transit Priority Area; refer to VMT Assessment Exhibit 4, *SCAG 2016 Transit Priority Area*.	Does Not Meet Screening Criteria
3.1.2.4 – Residential Land Use Based Screening Criteria	Are 100% of the units, excluding manager's units, set aside for lower income households?	The project does not include any residential housing.	Does Not Meet Screening Criteria

Source: Michael Baker International, *Antelope Valley Logistics Center West VMT Assessment*, November 30, 2023; refer to Appendix G.

A land use project needs to only meet one of the above screening thresholds to be presumed to not result in a significant impact under CEQA pursuant to SB 743. However, the project does not meet any of the criteria outlined above that would qualify it to be less than significant based on the County Guidelines; therefore, a VMT analysis was conducted to further analyze VMT impacts.

VMT Thresholds of Significance

Based on the County Guidelines, a project would result in a significant project generated VMT impact if either of the following conditions are satisfied.

- Residential Projects. The project's residential VMT per capita would not be 16.8 percent below the existing residential VMT per capita for the Baseline Area in which the project is located.
- Office Project. The project's employment VMT per employee exceeding would not be 16.8 percent below the existing employment VMT per employee for the Baseline Area in which the project is located.
- Regional Serving Retail Projects. The project would result in a net increase in existing total VMT.
- Land Use Plans. The plan total VMT per service population (residents and employees) would not be 16.8 percent below the existing VMT per service population for the Baseline Area in which the plan is located.

- Other Land Use Types. Contact Public Works to determine which of the above area an appropriate threshold of significance to be utilized.

For other land uses such as warehouse and distribution centers, the County Guidelines recommends using one of the above thresholds. For this project, VMT per employee was used to evaluate the project's VMT impacts. Accordingly, the project would result in a significant project impact if the project's VMT per employee is not 16.8 percent below the existing area (i.e., north Los Angeles County) VMT per employee (15.6 VMT per employee); refer to VMT Assessment Table 5, *VMT Metrics and Impact Thresholds by Project Type*.

Project Level VMT Analysis

Project VMT was derived using the most current version of the Southern California Association of Governments (SCAG) regional Travel Demand Model (TDM). The SCAG model is a trip-based model and considers interaction between different land uses based on socio-economic data such as population, households, and employment. Adjustments in socio-economic data (employment) were made to the appropriate traffic analysis zone (TAZ) within the SCAG model to reflect the project's proposed land use.

Michael Baker utilized the County's VMT Tool to conduct the project-specific analysis. The project land use type is consistent with the project description since the proposed office space is ancillary to the warehouse operations and is not an additional separate use. Coordination was conducted with the County to confirm consistency of this data input with the County's VMT Tool requirements. The VMT evaluation was based on the North County region thresholds given the project's location; therefore, the VMT impact threshold is 13.0 VMT per employee, or 16.8% of the North County Work VMT Baseline of 15.6 VMT per employee. Based on the project's location, the evaluation was based on the North County region. As shown in Table 4.17-4, *Project VMT Summary*, the proposed project is estimated to generate 11.4 VMT per employee.

Table 4.17-4
Project VMT Summary

Category		Proposed Project
Year 2023	North County Work VMT Baseline	15.6
	North County Work VMT Impact Threshold (16.8% below Baseline)	13.0
	Project Work VMT Per Employee	11.4 (12.3 percent the County Impact Criteria)

Source: Michael Baker International, *Antelope Valley Logistics Center West VMT Assessment*, November 30, 2023; refer to Appendix G.

The VMT evaluation of the Antelope Valley Logistics Center West Project proposed in unincorporated Los Angeles County shows that the project does not meet the screening criteria and thus a VMT assessment was required to determine whether the project will result in a transportation impact under CEQA. Evaluation of the project demonstrated that the project VMT per employee does not exceed the County's threshold for North County VMT per employee. As such, the project is not projected to result in a significant transportation impact; therefore, mitigation measures are not required.

Cumulative Analysis

As noted previously, the proposed warehouse land use is consistent with the land use type identified in the Area Plan and the project impact level analysis indicates no significant impact. Given these factors, the project is presumed to have a less-than-significant cumulative impact.

Mitigation Measures: No mitigation is required.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Project access would be provided along all sides of the development. Access to the individual buildings would be provided via private on-site roads that connect to the existing and proposed public roads. Three site access points are proposed along 20th Street West and along the new proposed public road for a total of six access points. These access points would serve both inbound and outbound tractor trailers and passenger vehicles. On-site circulation of tractor trailers and passenger vehicles would be separated from each other. Tractor trailers would access the docks and trailer parking areas on the north and south side of the buildings and passenger vehicles would access the parking lots on the east and west sides of each building. Emergency vehicles would have access to both buildings via the truck court with designated fire access points and along the first bay of parking. These emergency access points are designed and designated for fire access in compliance with Los Angeles County Fire Department regulations. As such, the project would not increase hazards due to geometric design features or incompatible uses and impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

d) Result in inadequate emergency access?

Less Than Significant Impact. As detailed above in Response 4.17(c), the project would provide access along all sides of the development. Specifically, three site access points are proposed along 20th Street West and along the new proposed public road for a total of six access points. The proposed access points and public road would be required to comply with City design standards and emergency access standards. Further, should partial or full lane closures be required during construction activities, a Traffic Management Plan (TMP) would be required as a Condition of Approval to minimize congestion and ensure safe travel, including emergency access in the project vicinity. As a result, project implementation would not result in inadequate emergency access. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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4.18 TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				✓
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision © of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				✓

As of July 1, 2015, California Assembly Bill 52 (AB 52) was enacted and expanded CEQA by establishing a formal consultation process for California tribes within the CEQA process. The bill specifies that any project may affect or cause a substantial adverse change in the significance of a tribal cultural resource would require a lead agency to "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Section 21074 of AB 52 also defines a new category of resources under CEQA called "tribal cultural resources." Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is either listed on or eligible for the California Register of Historical Resources (CRHR) or a local historic register, or if the lead agency chooses to treat the resource as a tribal cultural resource.

On February 19, 2016, the California Natural Resources Agency proposed to adopt and amend regulations as part of AB 52 implementing Title 14, Division 6, Chapter 3 of the California Code of Regulations, CEQA Guidelines, to include consideration of impacts to tribal cultural resources pursuant to Government Code Section 11346.6. On September 27, 2016, the California Office of Administrative Law approved the amendments to Appendix G of the CEQA Guidelines, and these amendments are addressed within this Initial Study.

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. As detailed in Response 4.5(a), no historic resources listed or eligible for listing in a State or local register of historic resources are located on the project site. Therefore, no impacts related to historic tribal cultural resources defined in Public Resources Code Section 5020.1(k) would occur.

Mitigation Measures: No mitigation is required.

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

No Impact. In compliance with AB 52, the County of Los Angeles distributed letters on April 6, 2023 to the Fernandeño Tataviam Band of Mission Indians, San Gabriel Band of Mission Indians (Gabrieleno Tongva), and San Manuel Band of Mission Indians, notifying them of the opportunity to consult with the County regarding the proposed project. The tribes were identified based on a list provided by the Native American Heritage Commission (NAHC) or were tribes that had previously requested to be notified of future projects proposed by the County. The tribes had 30 days to respond to the County's request for consultation pursuant to AB 52. The County did not receive any request for consultation within the 30-day response period. As such, consultation efforts pursuant to AB 52 concluded. No potential impacts would occur to known tribal cultural resources in this regard.

Mitigation Measures: No mitigation is required.

4.19 UTILITIES AND SERVICE SYSTEMS

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

The information presented in this analysis is based on the *Water Supply Assessment for the Antelope Valley Logistics Center – West (AVLC – West)* (Water Supply Assessment), prepared by Michael Baker International and dated October 2023; refer to Appendix I, *Water Supply Assessment*.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

According to the Water Supply Assessment, the project site is not currently serviced by a public water system but is located approximately 0.6-mile from the Los Angeles County Waterworks District 40 (District 40) service boundary and approximately 1.5 miles from the nearest District 40 infrastructure. Therefore, the project would require a separate Local Agency Formation Commission (LAFCO) process to annex the project site into the District 40 service area.

District 40's water supply is sourced from a combination of purchased imported water and groundwater. District 40 purchases its imported water from the Antelope Valley-East Kern Water Agency (AVEK). AVEK is a regional water wholesaler that supplies surface water to portions of Los Angeles, Kern, and Ventura County. The majority of AVEK's water is received as imported water from the State Water Project. AVEK has estimated that it receives 58 percent of

its total water supplies from the State Water Project, through the Department of Water Resources, in an average year, with the remaining 42 percent consisting of recoverable imported water and native groundwater resources.[1] Specifically, AVEK's total allotment from the State Water Project is 144,844 acre-feet per year (AFY).

District 40's groundwater is drawn from the underlying Antelope Valley Groundwater Basin (AVGB). Although it is not a major source, groundwater from the AVGB is an important source and has historically been District 40's secondary supply source.

Overall, District 40's existing water supply consists of 31,552 AFY of purchased water from AVEK, 14,266 AFY of groundwater from AVGB, and 361 AFY of recycled water. In total, District 40 has an existing water supply of 46,179 AFY. To meet the demands associated with future growth in the County, District 40 has identified methods to meet future demands with increased water conservation reduction actions through District 40's *District Water Shortage Contingency Plan* in the event of severe drought scenarios. District 40's projected water supply is depicted in Table 4.19-1, *Los Angeles County Waterworks District 40 Projected Water Supply*.

Table 4.19-1
Los Angeles County Waterworks District 40 Projected Water Supply

Water Supply	Additional Detail on Water Supply	2025 Reasonably Available Volume	2030 Reasonably Available Volume	2035 Reasonably Available Volume	2040 Reasonably Available Volume	2045 Reasonably Available Volume
Purchased Water or Imported Water	-	57,300	55,800	54,200	52,700	52,700
Groundwater	-	23,298	23,298	23,298	23,298	23,298
Purchased Water or Imported Water	New Supply from the Antelope Valley-East Kern Water Agency	1,733	1,733	1,733	1,733	1,733
Recycled Water	-	764	902	1,102	1,302	1,302
	Total	**83,095**	**81,773**	**80,033**	**79,033**	**79,033**

Notes:
1. A normal year is assumed. Does not include rights to carry over water. Imported water return flows are calculated based on 2020 imported water use. As of 2020, the groundwater adjudication judgment provides non-overlying production rights of 6,789 acre-feet and approximately 3,500 acre-feet of unused Federal Reserve Rights. Return flows of 39 percent is based on District 40's use of State Water Project water supply (10,400 acre-feet). District 40 also leases approximately 2,600 acre-feet of groundwater rights from Antelope Valley-East Kern Agency for a total of 23,298 acre-feet.
2. Groundwater does not include return flows from new supply. It is expected that new supply will generate return flows for District 40but are not shown for simplicity.
3. Return flows from new supply are not included for clarity in interpreting Supply and Demand Assessment DWR Tables 7-2, 7-3, and 7-4 of District 40's *2020 Urban Water Management Plan*.
4. Antelope Valley-East Kern Agency Table A State Water Project Allocation is 144,844 acre-feet, and Antelope Valley-East Kern Agency indicated that the long-term average is 58 percent of their Table A allocation which is 84,010 acre-feet. District 40typically purchases about 70 percent of that volume, which is 58,800 acre-feet.
5. Recycled water supplies are shown to equate to recycled water demands, but there is greater reasonably available volume of recycled water. However, there are no additional uses for the recycled water.

Source: Michael Baker International, *Water Supply Assessment for the Antelope Valley Logistics Center - West (AVLC-West),* October 2023.

[1] Antelope Valley – East Kern Water Agency, *GM Report: Meeting Water Demands Under Varied Scenarios - AVEK's Long and Short-Term Water Supply Goals*, https://www.avek.org/gm-report-meeting-water-demands-under-varied-scenarios-avek-s-long-and-short-term-water-supply-goals, accessed May 3, 2023.

The project's water demand consists of warehouse, office, and irrigation uses. Water demand was calculated based on demand factors for each land use. To conserve potable water use, the project would utilize recycled water for non-drinking construction activities such as dust control and soil compaction. The project would consist of 2,015,072 square feet of warehouse uses; 80,000 square feet of office uses; and 566,712 square feet of irrigation. Based on a water demand factor of 25 gallons per 1,000 square feet of warehouse use; 64 gallons per 1,000 square feet of office use; and 74.6 gallons per 1,000 square feet for irrigation, the proposed development would result in a water demand of approximately 97,746 gpd, or approximately 109 AFY.

As stated, the project Applicant proposes to annex the site into District 40's service area through the County's LAFCO annexation process. The project Applicant proposes off-site water utility improvements to connect to an existing District 40 public water main to the south at the intersection of Avenue H and 20th Street West and extend the water main north along 20th Street West to the site. The proposed domestic water connection for each building would occur along 20th Street West. The proposed domestic water line would extend east into the project site and branch off to the north and south to each of the industrial short-term storage warehouse buildings and connect at the center of each building. Additionally, a fire water line would extend around the perimeter of each building per Los Angeles County Fire Department regulations. The environmental impacts of the proposed water connections are analyzed as part of the whole project throughout this Initial Study. Additionally, upon annexation and payment of standard District 40 water connection fees and ongoing user fees, project impacts on existing District 40 water facilities would be adequately offset. As such, less than significant impacts would occur in this regard.

Wastewater

Based on the General Plan, in unincorporated areas, the Los Angeles County Sanitation Districts (LACSD), Consolidated Sewer Maintenance District, and municipal septic or wastewater systems all contribute to ensuring that the sanitary sewage system operates properly to protect public health. The LACSD, which are a confederation of 24 independent districts, serve the wastewater and solid waste management needs of approximately 5.2 million people, cover over 800 square miles and service 78 cities and the unincorporated areas of the County. As of 2005, the LACSD owned, operated, and maintained 1,340 miles of sewers that conveyed 510 million gallons per day of wastewater, 200 million gallons per day of which is recycled, to 11 wastewater treatment plants. The service areas for the County's sewer systems include the Joint Outfall System, which is a partnership of 17 of the 24 independent sanitation districts, the Santa Clarita Valley, and the Antelope Valley. The project site is outside of the jurisdictional boundaries of LACSD's service area and will require annexation into LACSD District 14 before wastewater service can be provided to the proposed development; refer to Appendix H, *Utilities Correspondence*. As such, the project proposes to annex the site into LACSD District 14's service area through the LAFCO annexation process.

According to LACSD, wastewater flow originating from the project site would discharge directly to the Rosamond Outfall Trunk Sewer, located in 20th Street West north of West Avenue F-8. The existing 78-inch Rosamond Outfall Trunk Sewer main is located within existing easements along 20th Street West. The Rosamond Outfall Trunk Sewer has a capacity of 66.9 million gallons per day (mgd) and conveyed a peak flow of 19.4 mgd when last measured in 2021.

LACSD estimates the project's average wastewater flow to be approximately 70,000 gallons per day. It should be noted that average wastewater flow from the project site was derived from a larger original square-foot value from LACSD (i.e., 2,800,000-square foot warehouse development compared to the proposed 2,015,072-square foot warehouse development). As such, average wastewater flow anticipated by LACSD's "will serve" letter, dated February 9, 2023, is conservatively utilized. The project proposes to construct new sanitary sewer connections along the northern project boundary along Avenue F to connect each building to the existing sanitary sewer main. The environmental impacts of the proposed sewer connections are analyzed as part of the whole project throughout this Initial Study. Additionally, LACSD charges a fee for connecting to LACSD's sewerage system to mitigate the impact of individual projects on the existing sewerage system. Annexation of the project site into LACSD's service area and payment of standard sewer connection fees and ongoing user fees, and adherence to LACSD connection requirements would ensure that sufficient

wastewater services are available to the proposed development. Therefore, impacts would be less than significant in this regard.

Additionally, wastewater generated by the proposed project would be treated at the Lancaster Water Reclamation Plant, which has a capacity of 18 mgd and currently processes an average recycled flow of 13.9 mgd. As such, the Lancaster Water Reclamation Plant would be able to treat the project's anticipated 70,000 gallons per day of wastewater in addition to existing wastewater flows.

Stormwater

The proposed project is identified as a Designed Project as defined in County Code Chapter 12.84.430, *Applicability*, and is required to ensure capital flood protection per the Los Angeles County Hydrology Manual. Additionally, a Low Impact Development (LID) Plan must also be developed per the County of Los Angeles Department of Public Works Low Impact Development Standards Manual. All Designed Projects must retain 100 percent of the Stormwater Quality Design Volume on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof unless it is demonstrated that it is technically infeasible to do so. As discussed, in Section 4.10, *Hydrology and Water Quality*, the project proposes to install stormwater improvements to collect, treat, and infiltrate stormwater on-site. On-site surface water would be collected at proposed storm drains located throughout the site and conveyed through new stormwater pipes to the proposed stormwater detention basins located in the northern and southern portions of the site. The project also proposes a floodplain volume mitigation pond at the southern portion of the site to detain the water during potential flood events. Based on the Hydrology Study, it is anticipated that the project would demonstrate compliance with the Los Angeles County Hydrology Manual and County of Los Angeles Department of Public Works Low Impact Development Standards Manual by ensuring on-site stormwater flows do not exceed pre-development conditions for the 2-year, 24-hour rainfall events; refer to Section 4.10. Therefore, it is not anticipated that project implementation would require construction of new or the expansion of existing stormwater facilities of which would cause a substantial environmental impact. Impacts would be less than significant in this regard.

Dry Utilities

Electricity services would be provided by Southern California Edison (SCE) and telecommunication services would be provided by Frontier. Electrical connections would be extended from the existing overhead distribution lines running along 10th Street West. As shown in Table 4.6-1, *Project and Countywide Energy Consumption*, the project's energy usage would constitute an approximate 0.0037 percent increase over Los Angeles County's typical annual electricity consumption. As such, it is not anticipated that project implementation would require or result in the relocation or construction of new or expanded dry utilities. The project Applicant would continue to coordinate with SCE and provide design plans and utility maps during the final design phase of the project. Impacts would be less than significant in this regard.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. As stated in Response 4.19(a), District 40 would be capable of providing adequate water supply to the proposed development in addition to its existing and planned customers. Specifically, District 40 would have sufficient water supplies to serve the project and existing and future development during normal, single dry-year, and multiple dry-year scenarios through 2045; refer to Table 4.19-2, *Water Supply and Demand Comparison – Normal Year*, through Table 4.19-4, *Water Supply and Demand Comparison – Multiple-Dry Year (Year One through Year Five)*. Additionally, it is acknowledged that prolonged drought conditions in the last ten years have resulted in water supply shortages throughout California but the abnormally wet winter in 2022/2023 has improved drought conditions across much of the western United States as the snowpack melts in the spring and summer seasons. Winter

precipitation, combined with recent storms, wiped out exceptional and extreme drought in California for the first time since 2020, and is expected to further improve drought conditions.[2]

Table 4.19-2
Water Supply and Demand Comparison – Normal Year

Supply/Demand	2025	2030	2035	2040	2045
AVEK[1] SWP[2,3]	57,300	55,800	54,200	79,024	79,024
District 40[4] Groundwater Production Rights[3]	6,789	6,789	6,789	6,789	6,789
District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
District 40 Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
New Supply from AVEK[5]	1,733	1,733	1,733	1,733	1,733
Recycled Water[3,6]	764	902	1,102	1,302	1,302
Supply Total[3]	*83,086*	*81,724*	*80,324*	*79,024*	*79,024*
Demand Total[7]	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
Difference (Supply Minus Demand)	**27,922**	**23,722**	**19,222**	**14,622**	**11,422**

Notes: Units are in acre-feet per year.
1. AVEK = Antelope Valley-East Kern Agency.
2. SWP = State Water Project.
3. Supply from DWR Tables 6-9.
4. District 40 = Los Angeles County Waterworks District 40.
5. New supply projections are based on anticipated new water supply that will be acquired by AVEK for developers. These projections are consistent with the developer demands (Projections provided by New Water Supply and Development Services for the District).
6. Recycled water supply volumes are set equal to projected water demand.
7. Demand from DWR Table 4-3 and demand from the Project.

Source: Michael Baker International, *Water Supply Assessment for the Antelope Valley Logistics Center - West (AVLC-West),* October 2023.

[2] National Oceanic and Atmospheric Administration, *Spring Outlook: California drought cut by half with more relief to come*, March 16, 2023.

Table 4.19-3
Water Supply and Demand Comparison – Single-Dry Year

Supply/Demand	2025	2030	2035	2040	2045
AVEK[1] SWP[2]	5,000	5,000	5,000	5,000	5,000
AVEK Groundwater from Banked Supplies	24,378	27,078	29,978	33,078	36,278
District 40[3] Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
District 40 Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
New Supply from AVEK[4]	1,733	1,733	1,733	1,733	1,733
Recycled Water[5]	764	902	1,102	1,302	1,302
Supply Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
Demand Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
Difference (Supply Minus Demand)	**0**	**0**	**0**	**0**	**0**

Notes: Units are in acre-feet per year.
1. AVEK = Antelope Valley-East Kern Agency.
2. SWP = State Water Project.
3. District 40 = Los Angeles County Waterworks District 40.
4. New supply projections are based on anticipated new water supply that will be acquired by AVEK for developers. These projections are consistent with the developer demands (Projections provided by New Water Supply and Development Services for the District). Return flows from new supply are not included for clarity in interpreting Supply and Demand Assessment tables 7-2, 7-3, and 7-4.
5. Recycled water supply volumes are projected water use and not reasonably available volumes.

Source: Michael Baker International, *Water Supply Assessment for the Antelope Valley Logistics Center - West (AVLC-West),* October 2023.

Table 4.19-4
Water Supply and Demand Comparison – Multiple-Dry Year (Year One through Year Five)

Year	Supply/Demand	2025	2030	2035	2040	2045
First Year	AVEK[1] SWP[2]	12,500	12,500	12,500	12,500	12,500
	AVEK Groundwater from Banked Supplies	16,878	19,578	22,487	25,578	28,778
	District 40[3] Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
	District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
	District 40 Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
	District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
	New Supply from AVEK[4]	1,733	1,733	1,733	1,733	1,733
	Recycled Water[5]	764	902	1,102	1,302	1,302
	Supply Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Demand Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Difference (Supply Minus Demand)	**0**	**0**	**0**	**0**	**0**
Second Year	AVEK[1] SWP[2]	32,700	32,700	32,700	32,700	32,700
	AVEK Groundwater from Banked Supplies	0	0	2,278	5,378	8,578
	District 40[3] Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
	District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
	District 40 Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
	District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
	New Supply from AVEK[4]	1,733	1,733	1,733	1,733	1,733
	Recycled Water[5]	764	902	1,102	1,302	1,302
	Supply Total	*59,776*	*59,914*	*61,102*	*64,402*	*67,602*
	Demand Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Difference (Supply Minus Demand)	**4,612**	**1,912**	**0**	**0**	**0**
Third Year	AVEK[1] SWP[2]	13,500	13,500	13,500	13,500	13,500
	AVEK Groundwater from Banked Supplies	15,878	18,578	21,478	24,578	27,778
	District 40[3] Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
	District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
	District 40 Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
	District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
	New Supply from AVEK[4]	1,733	1,733	1,733	1,733	1,733
	Recycled Water[5]	764	902	1,102	1,302	1,302
	Supply Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Demand Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Difference (Supply Minus Demand)	**0**	**0**	**0**	**0**	**0**

Table 4.19-4 [cont'd]
Water Supply and Demand Comparison – Multiple-Dry Year (Year One through Year Five)

Year	Supply/Demand	2025	2030	2035	2040	2045
Fourth Year	AVEK[1] SWP[2]	25,900	25,900	25,900	25,900	25,900
	AVEK Groundwater from Banked Supplies	3,478	6,178	9,078	12,178	15,378
	District 40[3] Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
	District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
	District 40 Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
	District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
	New Supply from AVEK[4]	1,733	1,733	1,733	1,733	1,733
	Recycled Water[5]	764	902	1,102	1,302	1,302
	Supply Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Demand Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Difference (Supply Minus Demand)	**0**	**0**	**0**	**0**	**0**
Fifth Year	AVEK[1] SWP[2]	18,200	18,200	18,200	18,200	18,200
	AVEK Groundwater from Banked Supplies	11,178	13,878	16,778	19,878	23,078
	District 40[3] Groundwater Production Rights	6,789	6,789	6,789	6,789	6,789
	District 40 Unused Federal Reserve Right	3,500	3,500	3,500	3,500	3,500
	District 40Imported Water Return Flows	10,400	10,400	10,400	10,400	10,400
	District 40/AVEK Lease	2,600	2,600	2,600	2,600	2,600
	New Supply from AVEK[4]	1,733	1,733	1,733	1,733	1,733
	Recycled Water[5]	764	902	1,102	1,302	1,302
	Supply Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Demand Total	*55,164*	*58,002*	*61,102*	*64,402*	*67,602*
	Difference (Supply Minus Demand)	**0**	**0**	**0**	**0**	**0**

Notes: Units are in acre-feet per year.
1. AVEK = Antelope Valley-East Kern Agency.
2. SWP = State Water Project.
3. District 40 = Los Angeles County Waterworks District 40.
4. New supply projections are based on anticipated new water supply that will be acquired by AVEK for developers. These projections are consistent with the developer demands (Projections provided by New Water Supply and Development Services for the District). Return flows from new supply are not included for clarity in interpreting Supply and Demand Assessment tables 7-2, 7-3, and 7-4.
5. Recycled water supply volumes are projected water use and not reasonably available volumes.

Source: Michael Baker International, *Water Supply Assessment for the Antelope Valley Logistics Center - West (AVLC-West)*, October 2023.

Project implementation is anticipated to result in a water demand of approximately 97,746 gallons of water per day, or 109 AFY. The project's estimated water demand of 109 acre-feet in 2025 would represent less than one percent of District 40's projected water supply of 56,164 acre-feet for 2025, and the project's estimated water demand of 615 acre-feet in 2040 would represent less than one percent of District 40's projected water supply of 67,602 acre-feet for 2045; refer to Table 4.19-2. Based on the WSA, District 40 has sufficient supply to meet the current and projected water supply during normal, single-dry, and multiple-dry years. In single-dry and multiple-dry years, AVEK, the primary supply of District 40, can meet District 40's demand together with the project's demand by pumping groundwater from its banked supplies. The project would also be required to comply with water efficiency and water conservation standards in the 2019 California Building Energy Efficiency Standards and 2019 California Green Building Standards Code. Thus, project implementation would result in a less than significant impact in this regard.

Mitigation Measures: No mitigation is required.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. Development of the proposed project would generate additional wastewater beyond existing conditions; refer to Response 4.19(a). However, as analyzed above, there is substantial remaining capacity to treat project-generated wastewater at LACSD's Lancaster Water Reclamation Plant. Additionally, LACSD issued a "will serve" letter dated February 9, 2023, stating that LACSD would be able to provide sewerage services to the site upon annexation into LACSD's service area and payment of all connection fees; refer to Appendix H. Thus, a less than significant impact would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

Less Than Significant Impact. Los Angeles County Public Works provides commercial solid waste collection services for unincorporated County businesses, multi-family properties (of five units or more), and single-family properties needing solid waste service through three systems: the Non-Exclusive Commercial Franchise system, Garbage Disposal Districts (GDD), and the new Exclusive Commercial Franchise system.[3] The project site is located within the GDD service area which is serviced by Consolidated Disposal Service – Gardena.[4] In 2019, a total of 1,041,505 tons of solid waste were disposed in the 39 permitted landfills serving the County.[5] Among the 39 sites, Calabasas Landfill, El Sobrante Landfill, and Sunshine Canyon City/County Landfill admitted the majority of the County's solid waste; refer to Table 4.19-5, *Landfills Serving the County*.

[3] County of Los Angeles Public Works, *Solid Waste Information Management System*, https://dpw.lacounty.gov/epd/swims/Businesses/CommercialFranchiseSystem.aspx#:~:text=Los%20Angeles%20County%20Public%20Works%20provides%20commercial%20solid,%28GDD%29%2C%20and%20the%20new%20Exclusive%20Commercial%20Franchise%20system., accessed on April 18, 2024.

[4] County of Los Angeles Public Works, *Find a Waste Hauler*, https://dpw.lacounty.gov/epd/swims/Businesses/find-waste-hauler-esri.aspx, accessed April 18, 2024.

[5] CalRecycle, *Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility,* https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed March 8, 2023.

Table 4.19-5
Landfills Serving the County

Landfill/Location[1]	Amount Disposed by County in 2019 (tons per day)	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Antelope Valley Public Landfill 1200 West City Ranch Road, Palmdale, CA 93551	52,869	5,548	17,911,225	4/1/2044
Calabasas Landfill 5300 Lost Hills Road, Agoura, CA 91301	173,387	3,500	14,500,000	1/1/2029
Chiquita Canyon Sanitary Landfill 29201 Henry Mayo Drive, Castaic, CA 91384	126,227	12,000	60,408,000	1/1/2047
El Sobrante Landfill 10910 Dawson Canyon Road, Corona, CA 91719	168,321	16,054	143,977,170	1/1/2051
Frank R. Bowerman Sanitary Landfill 11002 Bee Canyon Access Road, Irvine, CA 92618	59,253	11,500	205,000,000	12/31/2053
Lost Hills Composting & Bioenergy 14045 Holloway Road, Lost Hills, CA 93249	53,098	3,753	-	12/1/2030
Mid-Valley Sanitary Landfill 2390 North Alder Avenue, Rialto, CA 92377	43,850	7,500	61,219,377	4/1/2045
Olinda Alpha Landfill 1942 North Valencia Avenue, Brea, CA 92823	61,885	8,000	17,500,000	12/31/2036
San Timoteo Sanitary Landfill San Timoteo Canyon Road, Redlands, CA 92373	12,819	2,000	12,360,396	12/1/2039
Scholl Canyon Landfill 3001 Scholl Canyon Road, Glendale, CA 91206	45,382	3,400	9,900,000	4/1/2030
Simi Valley Landfill & Recycling Center 2801 Madera Road, Simi Valley, CA 93065	53,273	1,242[2]	82,954,873	3/31/2063
Sunshine Canyon City/County Landfill 14747 San Fernando Road, Sylmar, CA 91342	169,624	12,100	77,900,000	10/31/2037

Note:
1. Avenal Regional Landfill, Azusa Land Reclamation Co. Landfill, Badlands Sanitary Landfill, Bakersfield Metropolitan (Bena) SLF, Barstow Sanitary Landfill, Boron Sanitary Landfill, Chemical Waste Management, Inc. Unit B-17, Clean Harbors Buttonwillow LLC, Cold Canyon Landfill, Inc, Covanta Stanislaus, Inc., Kettleman Hills – B18 Nonhaz Codisposal, Lamb Canyon Sanitary Landfill, Lancaster Landfill and Recycling Center, Mojave-Rosamond Sanitary Landfill, Prima Deshecha Landfill, Recology Hay Road, San Clemente Island Landfill, Savage Canyon Landfill, Southeast Resource Recovery Facility, Taft Recycling & Sanitary Landfill, Tehachapi Recycling & Sanitary Landfill, Tehachapi Sanitary Landfill, Tehachapi Road Landfill, Victorville Sanitary Landfill, and Yolo County Central Landfill are excluded from this table as these facilities accepted less than one percent of the County's solid waste in 2019 (the last available reporting year).
2. Approximate value based on conversion to tons per day (64,750 tons per week/52.143 weeks=1241.78 tons)

Sources:
CalRecycle, *SWIS Facility/Site Activity Search*, https://www2.calrecycle.ca.gov/SolidWaste/Activity, accessed April 19, 2024.
CalRecycle, *Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility, https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility*, accessed March 8, 2023.

CONSTRUCTION

The proposed project would include the construction of two speculative industrial short-term storage warehouse buildings. As existing landfills in the area accept up to 16,054 tons per day, the project's nominal disposal of materials would not result in significant impacts to the regional landfill capacity. All construction activities would be subject to conformance with relevant federal, State, and local requirements related to solid waste disposal. Specifically, the project would be required to demonstrate compliance with the California Integrated Waste Management Act of 1989 (AB 939), which requires all California cities to reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible. Specifically, AB 939 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The project would also be required to demonstrate compliance with the 2019 Green Building Code,

which includes design and construction measures that act to reduce construction-related waste though material conservation and other construction-related efficiency measures. Compliance with these programs would ensure the project's construction-related solid waste impacts would be less than significant.

OPERATIONS

Based on the project's Air Quality and Greenhouse Gas modeling, the project is expected to generate approximately 91.8 tons of waste per year, or approximately 0.25 tons per day; refer to Appendix A, *Air Quality/Greenhouse Gas/Energy Data*. This represents less than one percent of the total daily permitted throughput capacities of the landfills identified in Table 4.19-5. As such, the project is not anticipated to generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Impacts in this regard would be less than significant.

Mitigation Measures: No mitigation is required.

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

Less Than Significant Impact. Refer to Response 4.19(d), above. The proposed project would comply with all federal, State, and local statutes and regulations related to solid waste, including the California Integrated Waste Management Act and County requirements for solid waste generated during project construction and operation. Less than significant impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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4.20 WILDFIRE

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. According to the California Department of Forestry and Fire Protection's *Los Angeles County State Responsibility Area Fire Hazard Severity Zones* and *Very High Fire Hazard Severity Zones in LRA*, the project site is not designated as a fire hazard severity zone.[1,2] The nearest State responsibility area and local responsibility area are located approximately 9.4-miles and 11.0-miles to the southwest, respectively. As such, no impacts would occur in this regard.

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

1 California Department of Forestry and Fire Protection, *Los Angeles County State Responsibility Area Fire Hazard Severity Zones*, https://osfm.fire.ca.gov/fire-hazard-severity-zones-maps-2022/, updated November 21, 2022.

2 California Department of Forestry and Fire Protection, *Very High Fire Hazard Severity Zones in LRA*, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf, updated May 2012.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

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?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. Refer to Response 4.20(a).

Mitigation Measures: No mitigation is required.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	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?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?		✓		
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

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

Less Than Significant Impact With Mitigation Incorporated. As detailed in Section 4.4, *Biological Resources*, the project would result in potentially significant impacts related to special-status plant and wildlife species, sensitive natural communities, and wildlife corridors. Therefore, to ensure proper avoidance of special-status plant species, prior to construction, and during the appropriate blooming periods for special-status plant species with the potential to occur within the project site, Mitigation Measure BIO-1 would require focused rare plant surveys across the entire project site following California Department of Fish and Wildlife (CDFW) and California Native Plant Society (CNPS) guidelines to determine presence or absence of special-status plant species. For the loss of on-site habitat supporting special-status plant species, Mitigation Measure BIO-1 would also require the project proponent to coordinate with a regional conservation agency or land trust to identify off-site lands that may be acquired and held in a restrictive deed for perpetuity to compensate for the loss of 15.16 acres of on-site habitat occupied by special-status plant species at a ratio of 0.5:1. Mitigation Measure BIO-2 would require a qualified biologist present a Worker Environmental Awareness Program (WEAP) to all construction crews and contractors prior to starting any work on the project site. Mitigation Measure BIO-3 would require the contractor to cover or backfill all trenches, holes, and open water sources (e.g., water buffalos, water tanks, and slurry dumpsters) the same calendar day they are opened, where practicable. Mitigation Measure BIO-4 would require a pre-construction survey to reconfirm the absence of burrowing owls. If the pre-construction survey indicates the presence of nesting burrowing owl, an avoidance and minimization plan would be prepared and submitted to CDFW for approval prior to initiating project activities. Mitigation Measure BIO-5 would

require proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) to occur outside of the avian breeding season which generally runs from February 1 to August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys would be required to conduct weekly bird surveys beginning 30 days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. Last, Mitigation Measure BIO-6 would require preparation of a Desert Kit Fox Management Plan for County Planning and CDFW review and approval. The plan is required to incorporate pre-approval survey data of the desert kit fox population, identify pre-construction survey methods, and describe pre-construction and construction-phase biological monitoring and passive/active relocation methods. Implementation of Mitigation Measures BIO-1 through BIO-6 would minimize potential impacts to special-status species and sensitive natural communities to less than significant levels. As such, the project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal.

As indicated in Section 4.5, *Cultural Resources*, and Section 4.7, *Geology and Soils*, project construction activities would involve approximately 646,000 cubic yards of cut and approximately 649,600 cubic yards of fill. Additionally, the project site has moderate archaeological sensitivity for potentially unknown prehistoric archaeological resources. Thus, project excavation may encounter native soils that have the potential to support unknown buried archaeological resources. As such, prior to the commencement of ground-disturbing activities, Mitigation Measure CUL-1 would require a qualified archaeologist to prepare an archaeological resources monitoring and discovery plan (ARMDP) which is required to specify appropriate steps (e.g., monitoring methods, personnel, and procedures) to mitigate potential impacts to archaeological resources in the event of a discovery. Mitigation Measure CUL-2 would require archaeological monitoring during all ground-disturbing activities in all areas with potential to contain significant archeological deposits. In the event that archaeological resources are encountered during project construction, Mitigation Measure CUL-3 would require all project construction efforts to halt until the archaeologist examines the site and evaluates the significance of the find. If the archaeological resource uncovered is of archaeological significance, additional excavation may be required for a Phase II archaeological testing plan. If the resource is determined to be significant and avoidance is not feasible, a Phase III (data recovery) phase of investigation would be required prior to recommencing ground-disturbing activities that may impact the resource in accordance with Mitigation Measure CUL-4. Further, Mitigation Measure CUL-5 would require preparation of a final report documenting the findings to a level satisfactory to the U.S. Army Corp of Engineers and County. Any archaeological materials collected during project excavations must be processed and curated according to current professional repository standards unless otherwise determined by the County pursuant to Mitigation Measure CUL-6. In the event that paleontological resources are encountered during project construction, Mitigation Measures CUL-7 and CUL-8 would require all project construction activities to cease until a paleontologist, certified by the County of Los Angeles, evaluates the paleontological significance of the find and recommends a course of action. Additionally, if any human remains are found during ground-disturbing activities, Mitigation Measure CUL-9 requires all activities to stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County Coroner has been called out, and the remains have been investigated and appropriate recommendations have been made for the treatment and disposition of the remains.

As indicated in Section 4.18, *Tribal Cultural Resources*, the County of Los Angeles distributed letters on April 6, 2023 to the Fernandeño Tataviam Band of Mission Indians, San Gabriel Band of Mission Indians (Gabrieleno Tongva), and San Manuel Band of Mission Indians in compliance with AB 52. The tribes had 30 days to respond to the County's request for consultation pursuant to AB 52; however, the County did not receive any request for consultation within the 30-day response period. As such, consultation efforts pursuant to AB 52 concluded and no potential impacts would occur to known tribal cultural resources in this regard. Therefore, the proposed project would not eliminate important examples of the major periods of California history or prehistory.

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

Less Than Significant Impact With Mitigation Incorporated. A significant impact may occur if a proposed project, in conjunction with related projects, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. As concluded in Sections 4.1 through 4.20, the proposed project would not result in any significant impacts in any environmental categories with implementation of recommended mitigation measures. Implementation of mitigation measures at the project-level would reduce the potential for the incremental effects of the proposed project to be less than considerable when viewed in connection with the effects of past projects, current projects, or probable future projects.

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

Less Than Significant Impact With Mitigation Incorporated. Sections of this Initial Study reviewed the proposed project's potential impacts related to aesthetics, air quality, noise, hazards and hazardous materials, transportation, and other issues. As concluded in these discussions, the proposed project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, following conformance with the existing regulatory framework and mitigation measures. Impacts would be reduced to less than significant levels in this regard.

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4.22 REFERENCES

The following references were utilized during preparation of this Initial Study/Mitigated Negative Declaration.

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2. Antelope Valley Air Quality Management District, *California Environmental Quality Act (CEQA) and Federal Conformity Guidelines*, August 2016.

3. Antelope Valley – East Kern Water Agency, *GM Report: Meeting Water Demands Under Varied Scenarios - AVEK's Long and Short-Term Water Supply Goals*, https://www.avek.org/gm-report-meeting-water-demands-under-varied-scenarios-avek-s-long-and-short-term-water-supply-goals, accessed May 3, 2023.

4. California Air Pollution Control Officers Association, *California Emissions Estimator Model*, version 2022.1.

5. California Air Resources Board, *2022 Scoping Plan for Achieving Carbon Neutrality*, November 16, 2022.

6. California Department of Conservation, *California Important Farmland Finder*, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed April 19, 2024.

7. California Department of Conservation, *Los Angeles County Williamson Act FY 2016/2017 Map*, updated 2019.

8. California Department of Conservation, *Open File Report 94-14: Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part II-Los Angeles County*, 1994.

9. California Department of Conservation, *Special Report 143: Part IV Mineral Land Classification of the Greater Los Angeles Area: Classification of Sand and Gravel Resource Areas, Saugus-Newhall Production-Consumption Region and Palmdale Production-Consumption Region*, 1987.

10. California Department of Forestry and Fire Protection, *Los Angeles County State Responsibility Area Fire Hazard Severity Zones*, https://osfm.fire.ca.gov/fire-hazard-severity-zones-maps-2022/, updated November 21, 2022.

11. California Department of Forestry and Fire Protection, *Very High Fire Hazard Severity Zones in LRA*, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://osfm.fire.ca.gov/media/7280/losangelescounty.pdf, updated May 2012.

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13. California Department of Transportation, *California State Scenic Highway System Map*, https://www.arcgis.com/apps/webappviewer/index.html?id=2e921695c43643b1aaf7000dfcc19983, accessed February 8, 2023.

14. California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, accessed September 2013.

15. California Department of Transportation, *Transportation and Construction Vibration Guidance Manual*, April 2020.

16. California Department of Water Resources, Division of Safety of Dams, *Dam Breach Inundation Map Web Publisher*, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2, accessed August 20, 2023.

17. California Department of Water Resources, *Adjudicated Basin Annual Reporting*, https://sgma.water.ca.gov/webgis/index.jsp?appid=adjbasin, accessed April 19, 2024.

18. California Department of Water Resources, *SGMA Basin Prioritization Dashboard*, https://gis.water.ca.gov/app/bp-dashboard/p2/, accessed April 19, 2024.

19. California Energy Commission, *2022 Building Energy Efficiency Standards*, adopted August 11, 2021.

20. California Energy Commissions, *Final 2021 Integrated Energy Policy Report Volume I Building Decarbonization*, February 2022.

21. California Energy Commission, *Final 2021 Integrated Energy Policy Report Volume IV California Energy Demand Forecast*, February 2022. Annual average growth rates of electricity demand and natural gas per capita demand are shown in Figure 10 and Figure 14, respectively.

22. California Energy Commission, *Electricity Consumption by County*, http://www.ecdms.energy.ca.gov/elecbycounty.aspx, accessed February 22, 2023.

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5.0 INVENTORY OF MITIGATION MEASURES

BIOLOGICAL RESOURCES

BIO-1 To ensure proper compensatory mitigation for impacts to special-status plant species, prior to construction, and during the appropriate blooming periods for special-status plant species with the potential to occur within the project site, a qualified botanist approved by County Planning shall have conducted focused rare plant surveys across the entire project site following 2018 CDFW and/or 2001 CNPS guidelines to determine presence or absence of special-status plant species. Resumes of botanists conducting the survey shall be submitted to County Planning as part of the documentation regarding the surveys. The surveys shall be floristic in nature (i.e., identifying all plant species to the taxonomic level necessary to determine rarity) and include site visits covering early, mid, and late-blooming season species. Documentation of surveys and findings shall be submitted to County Planning and the CDFW for review within fourteen (14) days of completion of surveys.

For the loss of Mojave spineflower and alkali mariposa-lily known to occur on-site, the project proponent shall coordinate with a regional conservation agency or land trust to identify off-site lands that may be acquired and held in a restrictive deed for perpetuity to compensate for the loss of 15.16 acres of on-site habitat occupied by special-status plant species at a ratio of at least 0.5:1. It is expected that the acquired lands would be located in the Antelope Valley region of Los Angeles County and would support populations of each special-status plant species approximately equal in number to those recorded within the project site. During selection of the mitigation lands, consideration of the mitigation site's suitability to support burrowing owl, desert kit fox, and nesting birds should be taken into consideration. Acquisition of mitigation lands would be fully funded to support management and maintenance of the property by the conservation agency. The project proponent shall be fully responsible to implement this measure to the satisfaction of County Planning. Although not expected, if State- and/or Federally-listed plant species are present and avoidance is infeasible, consultation with the CDFW and/or USFWS would be required prior to initiating any on-site project activities. (*Corresponds to Biological Resources Assessment AMM BIO-3*)

BIO-2 Prior to the issuance of a grading permit and fourteen (14) days prior to the initiation of any project activities, the resume of a proposed qualified biologist shall be submitted to County Planning for review and approval. That person shall serve as the lead biological monitor and ensure that impacts to all biological resources are minimized or avoided, and shall conduct (or supervise) pre-grading field surveys for species that may be avoided, affected, or eliminated as a result of grading or any other site preparation activities. The lead biological monitor shall ensure that all surveys are conducted by qualified personnel (e.g., avian biologists for bird surveys, herpetologists for reptile surveys, etc.), the resumes of which shall be submitted to County Planning for review and approval, and that they possess all necessary permits and memoranda of understanding with the appropriate agencies for the handling of potentially-occurring special-status species. The lead biological monitor shall also ensure that daily monitoring reports (e.g., survey results, protective actions, results of protective actions, adaptive measures, etc.) are prepared, and shall make these monitoring reports available to County Planning and CDFW at their request.

A qualified biologist shall present a Worker Environmental Awareness Program (WEAP) to all construction crews and contractors prior to starting any work on the project site. The WEAP shall be submitted to County Planning for review and approval no less than fourteen (14) days prior to the initiation of any project activities. The WEAP training would include a review of the special-status species and other sensitive resources that could exist in the project area, the locations of sensitive biological resources as well as their legal status and protections, and measures to be implemented for avoidance of these

sensitive resources. A record of all personnel trained shall be maintained and submitted to County Planning upon their request.

Project limits shall be clearly delineated with fencing or other boundary markers prior to the start of construction. During construction, construction workers shall strictly limit their activities, vehicles, equipment, and construction materials to the designated construction limits and staging areas.

The biological monitor shall be present during vegetation and ground disturbance activities to inspect and enforce mitigation requirements and to relocate any species that may come into harm's way to an appropriate offsite location of similar habitat. Upon completion of vegetation and earth disturbance activities, the biological monitor shall be available to conduct as needed spot checks during construction and respond to requests from project personnel as they arise to remove wildlife, answer any questions, and generally provide as-needed support to confirm project measures are implemented. The biological monitor shall be authorized to stop specific grading or construction activities if violations of mitigation measures or any local, state, or federal laws are suspected. The biological monitor shall submit weekly reports of the monitoring activities to County Planning and CDFW. Reports shall include a description of the construction activities monitored, any compliance issues observed, how they were resolved, any avoidance and minimization measures implemented, and lists of wildlife and plant species observed within the project area. If ongoing biological monitoring of construction activities reveals the presence of any special-status wildlife within an active work area, then work shall be temporarily halted until the animals leave on their own volition or can be collected and relocated to areas outside of the designated work zones. Work areas shall be surveyed for special-status species during construction activities. Any special-status species occurring within the work area shall be collected and relocated to areas outside of the designated work zones (unless such relocation would require an Incidental Take Permit for take of a listed species, in which case the appropriate trustee agencies (CDFW or USFWS) will be consulted first).

During construction, all equipment maintenance, staging, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas within the project limits. Equipment shall be checked daily for leaks prior to operation and repaired as necessary, and secondary containment shall be implemented during equipment and vehicle staging.

During construction, the project limits shall be kept as clean of debris and trash as possible to avoid attracting predators of sensitive wildlife. Food-related trash items shall be kept in sealed containers and removed daily from the construction work zone. *(Corresponds to Biological Resources Assessment AMM BIO-1)*

BIO-3 The contractor shall cover or backfill all trenches, holes, and open water sources (e.g., water buffalos, water tanks, and slurry dumpsters) the same calendar day they are opened, where practicable. These areas shall be covered to prevent wildlife from becoming trapped or drowning.

If trenches or holes cannot be closed the same day they are made, covers shall be firmly secured at ground level in such a way that small wildlife cannot slip beneath. At sites that require the presence of a biological monitor, trench covers shall be approved by the monitor. If covers cannot be provided, escape ramps shall be placed in all trenches and holes.

Open trenches shall be inspected regularly throughout the day and prior to filling to remove any trapped wildlife (e.g., small mammals, reptiles, amphibians) and to check for the presence of protected wildlife species at project sites that require the presence of a biological monitor.

If a State or federal listed wildlife species are present in the trench, the on-site Biological Monitor shall contact the California Department of Fish and Wildlife (CDFW) or U.S Fish and Wildlife Service (USFWS) immediately, ensure the protected species is not in immediate danger, and wait for instruction by CDFW or USFWS.

Covered trenches and holes at sites where biological monitors are present shall be inspected by the monitor at the end of the work day and prior to initiating construction activities the next day.

In locating trenches or holes, disturbance to natural vegetation, including plant root systems shall be minimized. *(Corresponds to Biological Resources Assessment AMM BIO-2)*

BIO-4 A burrowing owl clearance survey shall be conducted no more than fourteen (14) days prior to any vegetation removal or ground disturbing activities to avoid impacts to burrowing owls and/or occupied burrows. The pre-construction clearance survey shall be conducted by qualified biologists approved by County Planning and in accordance with the methods outlined in the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012). The resumes of qualified biologists shall be submitted to County Planning no less than fourteen (14) days prior to the clearance survey. Documentation of surveys and findings shall be submitted to County Planning and the California Department of Fish and Wildlife (CDFW) for review within fourteen (14) days of completion of the clearance survey. If no burrowing owls or occupied burrows are detected, project activities may begin, and no additional avoidance and minimization measures shall be required.

Regardless of pre-construction survey results, to account for the presence of owls if a burrow becomes occupied after construction has commenced or is detected during pre-construction surveys, a burrowing owl avoidance and minimization plan in accordance with the *Staff Report on Burrowing Owl Mitigation* (California Department of Fish and Game 2012) shall be prepared and submitted to County Planning and CDFW for approval no less than thirty (30) days prior to the initiation of any project activities. The plan would detail implementation of "no-disturbance" buffers and burrow exclusion activities in the event an occupied burrow is detected. *(Corresponds to Biological Resources Assessment AMM BIO-4)*

BIO-5 Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) shall occur outside of the avian breeding season which generally runs from February 1 to August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill (California Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty (30) days prior to the initiation of project activities, to detect protected native birds occurring on-site and, as access to adjacent areas allows, other suitable habitats within 500 feet of the project site. The resumes for biologists conducting pre-construction surveys shall be submitted to County Planning for review and approval no less than fourteen (14) days before surveys are initiated. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of project activities. The results of each weekly survey shall be submitted to County Planning no more than seven (7) days after completion of the survey.

If a protected native bird is found, the project proponent may delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist may continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing shall be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, shall be instructed on the sensitivity of the area. The project proponent shall include the results of the

recommended protective measures described above in weekly pre-construction survey reports to document compliance with applicable State and federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she shall submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to County Planning and, upon request, the California Department of Fish and Wildlife (CDFW). Based on the submitted information, County Planning (and CDFW, if CDFW requests) shall determine whether to allow a narrower buffer.

The biological monitor shall be present on-site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to County Planning during the grubbing and clearing of vegetation and shall notify County Planning immediately if project activities damage active avian nests. *(Corresponds to Biological Resources Assessment AMM BIO-5)*

BIO-6 At least thirty (30) days prior to project ground disturbance activities, a Desert Kit Fox Management Plan shall be prepared and submitted to County Planning and the CDFW for review and approval. The plan shall (1) incorporate pre-approval survey data of the desert kit fox population; (2) identify preconstruction survey methods for kit fox; and (3) describe preconstruction and construction-phase biological monitoring and passive relocation methods or outline any identified California Department of Fish and Wildlife permit and Memorandum of Understanding requirements for active relocation of the species, if either are necessary. *(Corresponds to Biological Resources Assessment AMM BIO-6)*

CULTURAL RESOURCES

CUL-1 Archaeological Resources Monitoring and Discovery Plan. Prior to the commencement of ground-disturbing activities, the project Applicant shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738). The qualified professional archaeologist shall prepare an archaeological resource monitoring and discovery plan (ARMDP). The ARMDP shall clearly specify the steps to be taken to mitigate impacts to archaeological resources. The ARMDP shall specify monitoring methods, personnel, and procedures to be followed in the event of a discovery. The monitoring plan shall, at a minimum, include an introduction; project description; statement of archaeological sensitivity and rationale for the monitoring program; archaeological context and research design; statement of methods and identification of what activities require monitoring; description of monitoring procedures; and protocol to be followed in the event of a find. Criteria shall be outlined, and triggers identified when further consultation is required for the evaluation and treatment of a find. Key staff, including Native American representatives and other consulting parties, shall be identified, and the process of notification and consultation shall be specified in the ARMDP. A curation plan shall also be outlined in the ARMDP.

CUL-2 Archaeological Resources Monitoring. Archaeological monitoring for all ground-disturbing activities shall be conducted by a qualified archaeological monitor who is working under the guidance of the qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738). Ground-disturbing activities include, but are not limited to, geotechnical boring, boring, trenching, grading, excavating, and the demolition of building foundations, as defined in the archaeological resources monitoring and discovery plan (ARMDP) developed in compliance with Mitigation Measure CUL-1. The archaeological monitor shall observe ground-disturbing activities in all areas with potential to contain significant archaeological deposits. If discoveries are made during ground-disturbing activities, additional work may be required in accordance with the terms specified in the ARMDP in compliance with Mitigation Measures CUL-3 and CUL-4.

CUL-3 Evaluation of Unanticipated Finds; Phase II Testing. In the event an unanticipated archaeological resource is unearthed during excavation activities associated with construction of any individual development project, work shall stop immediately within 50 feet of the find and the discovery shall be evaluated by the qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology (48 Federal Register 44738), pursuant to the procedures set forth in CEQA Guidelines Section 15064.5. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II archaeological testing plan. As the lead agency, the County of Los Angeles shall make a determination of significance on the basis of the recommendations of the qualified archaeologist. The results of testing shall be presented in the final report in accordance with Mitigation Measure CUL-6 and communicated to the South Coastal Central Information Center.

If the resource is determined not to be significant, then resource-specific work is complete and construction may proceed. If the resource is determined to be significant and avoidance is not feasible, then a resource-specific archaeological resources treatment plan shall be prepared and executed prior to recommencing ground-disturbing activities that may impact the resource in accordance with Mitigation Measure CUL-4.

CUL-4 Archaeological Resources Treatment Plan and Phase III Data Recovery. If, as a result of the evaluation required by Mitigation Measure CUL-3, a significant resource is identified within the project site, then prior to the beginning of the earth-moving construction activities within the boundaries of the resource, an archaeological resources treatment plan shall be developed that will govern the treatment of the resource. Avoidance and preservation-in-place are the preferred treatment for archaeological resources, and the treatment plan shall detail plans for avoidance, if possible, such as restricting work to disturbed soil or limiting the depth of excavations to avoid archaeological deposits.

If disturbance to resources cannot be avoided, a Phase III (data recovery) phase of investigation shall be required, pursuant to CEQA Guidelines Section 15064.5. The Phase III study shall generally consist of a limited scale program of archaeological excavation, radiocarbon dating of organic materials (e.g., shell midden and faunal remains), laboratory analysis, and report writing designed to assess the importance of the resource in question. Any resources recovered shall be properly curated, as appropriate.

Ground-disturbing construction activities may commence when excavations are completed in accordance with the Phase III plan and to the satisfaction of the County of Los Angeles (County). However, the Phase III work shall not be considered complete until excavations and associated analyses are completed and a final report is prepared in accordance with Mitigation Measure CUL-5. The report shall be completed and presented to the County for comment within 18 months of the completion of Phase III excavations.

CUL-5 Reporting. Mitigation associated with discovered archaeological resources on-site shall be considered complete when documentation of findings are completed to a level satisfactory to the County of Los Angeles (County) and filed with the South Coastal Central Information Center (SCCIC) of the California Historical Resources Information System. Specific reporting requirements shall be detailed in the archaeological resources monitoring and discovery plan.

If the results of monitoring are negative, the report shall take the form of a memorandum and be submitted to the County for comment within eight weeks of the completion of project fieldwork and communicated to the SCCIC when completed to the satisfaction of the County.

If the results of monitoring are positive, the report shall be prepared in accordance with the California Office of Historic Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format." The report shall include a management summary; undertaking information; appropriate maps of both the project area and impacted resources; an environmental setting; prehistoric, ethnographic, and historic

contexts; research design; methods; a thorough report of findings; a discussion of the data obtained and the resource's significance in reference to the historic, ethnographic, and prehistoric contexts; a record of the final disposition of excavated artifacts and any intact archaeological deposits; management considerations and recommendations for future work that may impact the resource; and references. Other report sections may also be required as determined by the County with the recommendations of the qualified archaeologist. The report shall be submitted to the County for concurrent review and comment within 18 months of the completion of project fieldwork and shall be communicated to the SCCIC when completed to the satisfaction of the lead agencies.

Appropriate Department of Parks and Recreation (DPR) 523 series forms shall also be prepared for each find and submitted to the SCCIC. Minimal documentation of previously unknown isolated finds shall consist of a sufficient description of the find to prepare a DPR 523a Primary Form (including photographs) and appropriate maps. Minimum documentation of previously unknown archaeological sites shall consist of a sufficient description of the find to prepare a DPR 523a Primary Form (including photographs); a DPR 523c Archaeological Site Record; a DPR 523j Location Map; and a DPR 523k Sketch Map. Minimum documentation of known resources shall consist of a DPR 523L Update form. Additional forms may also be required to appropriately document resources at the discretion of the qualified archaeologist.

CUL-6 Curation and Final Disposition of Archaeological Materials. Archaeological materials collected during project excavations shall be processed and curated according to current professional repository standards unless otherwise determined by the lead agency as the result of consultation. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation. The tribal significance of some materials may override their scientific value, in which case reburial may be preferred for some archaeological materials of tribal significance. If artifacts are reburied, the reburial shall only occur after the County of Los Angeles is satisfied that they have been suitably studied and documented. Minimum documentation shall consist of count, weight, and basic description of all artifacts and include photographic documentation of any diagnostic artifacts and a representative sample of non-diagnostic artifacts.

CUL-7 The Applicant shall retain a Society of Vertebrate Paleontology (SVP) qualified paleontologist to provide or supervise a paleontological sensitivity training to all personnel planned to be involved with earth-moving activities prior to the beginning of ground-disturbing activities. The training session shall focus on how to identify paleontological localities such as fossils that may be encountered and the procedures to follow if identified.

CUL-8 If any paleontological resources are encountered during construction or the course of any ground-disturbance activities, all such activities shall halt immediately within a 100-foot radius of the find. At this time, the Applicant shall notify the County and consult with a qualified paleontologist to assess the significance of the find. The assessment shall follow Society of Vertebrate Paleontology (SVP) standards as delineated in the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the County shall be followed unless avoidance is determined to be infeasible by the County. If avoidance is infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted. The recommendations of the qualified paleontologist shall be implemented with respect to the evaluation and recovery of fossils, after which the on-site construction supervisor shall be notified and shall direct work to continue in the location of the fossil discovery. Any fossils recovered during mitigation shall be cleaned, identified, catalogued, and permanently curated with an accredited and permanent scientific institution with a research interest in the materials.

If no fossils have been recovered after 50 percent of excavation has been completed, full-time monitoring may be modified to weekly spot-check monitoring at the discretion of the qualified paleontologist. The qualified

paleontologist may recommend to the client to reduce paleontological monitoring based on observations of specific site conditions during initial monitoring (e.g., if the geologic setting precludes the occurrence of fossils). The recommendation to reduce or discontinue paleontological monitoring in the project area shall be based on the professional opinion of the qualified paleontologist regarding the potential for fossils to be present after a reasonable extent of the geology and stratigraphy has been evaluated.

A qualified professional paleontologist is a professional with a graduate degree in paleontology, geology, or related field, with demonstrated experience in the vertebrate, invertebrate, or botanical paleontology of California, as well as at least one year of full-time professional experience or equivalent specialized training in paleontological research (i.e., the identification of fossil deposits, application of paleontological field and laboratory procedures and techniques, and curation of fossil specimens), and at least four months of supervised field and analytic experience in general North American paleontology as defined by the SVP.

CUL-9 Treatment of Unanticipated Finds of Human Remains. If human skeletal remains are found during earth-moving activities, work in the immediate vicinity (within a 100-foot buffer of the find) shall be suspended and the Los Angeles County Coroner's Office shall be notified. Standard guidelines set by California law provide for the treatment of skeletal material of Native American origin (California Public Resources Code, Sections 5097.98 et seq.; Health and Safety Code, Section 7050.5). If the remains are found to be archaeological, then after the coroner releases the site, the qualified professional archaeologist, in consultation with the most likely descendant, shall prepare an archaeological treatment plan in accordance with Mitigation Measure CUL-4 that also incorporates the guidance in "A Professional Guide for the Preservation and Protection of Native American Remains and Associated Grave Goods," published by the California Native American Heritage Commission.

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6.0 CONSULTANT RECOMMENDATION

Based on the information and environmental analysis contained in the Initial Study/Environmental Checklist, it is recommended that the County of Los Angeles prepare a Mitigated Negative Declaration for the Antelope Valley Logistics Center – West (AVLC - West) Project. We find that the proposed project could result in potentially significant environmental impacts, but that mitigation measures have been identified that reduce such impacts to less than significant levels. We recommend that the second category be selected for the County of Los Angeles' determination (see Section 7.0, *Lead Agency Determination*).

5/1/2024
Date

Eddie Torres, Project Manager
Michael Baker International

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7.0 LEAD AGENCY DETERMINATION

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):	Richard Clough
Date:	5/1/24
Signature (Approved by):	Daniel B. Ha
Date:	5/1/24

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