PALMDALE

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NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

Pursuant to Title 14 of the California Code of Regulations, Sections 15072 and 15073, as amended to date, this is to advise that the City of Palmdale, which is the lead agency overseeing this project, has completed a Mitigated Negative Declaration for the proposed project described below.

Project No.: Tentative Parcel Map 82361, Variance 19-001 and Site Plan Review 19-008

Project Location: One parcel totaling approximately 16 acres located on the southeast corner of Avenue Q and Corporate Court (APN: 3004-001-040), City of Palmdale, County of Los Angeles

Project Description: A proposal to subdivide one parcel into 4 lots for the purpose of constructing a hotel.

Public Review Period: The Mitigated Negative Declaration is available for public review and comment pursuant to California Code of Regulations, Title 14, Sections 15072 and 15073 (California Environmental Quality Act). All comments must be submitted in writing to the address below. Please refer to this project by the file/index number listed above. If you have no comment, no reply is necessary. The review period has not been shortened pursuant to Section 15105 of the California Environmental Quality Act (CEQA) Guidelines. The comment period during which the City will receive comments on the Mitigated Negative Declaration is:

Starting Date: November 25, 2019 **Ending Date: December 15, 2019**

Public Hearing: The City of Palmdale Planning Commission is tentatively scheduled to make a decision regarding this project and the associated Mitigated Negative Declaration on January 9, 2020, in the City Hall Council Chamber at 38300 Sierra Highway, Suite B, Palmdale, California, at 7:00 p.m.

Responses and Comments: Please send your written comments to:

Justin Sauder, Assistant Planner
City of Palmdale, Economic and Community Development Department
38250 Sierra Highway
Palmdale, California 93550
Phone (661) 267-5200, FAX (661) 267-5233
Email: jsauder@cityofpalmdale.org

Document Availability: Copies of the application, maps, plans, environmental documents, and other pertinent materials related to this application are available for public review at the Planning Division (38250 Sierra Highway) from 7:30 am to 6:00 pm Monday through Thursday. In addition, environmental documents are available for review at the Palmdale City Library (700 East Palmdale Boulevard, Palmdale, CA 93550). Additional information is also available on the City website at www.cityofpalmdale.org.

Rob Bruce
Planning Manager

11-25-19
Date

CITY OF PALMDALE

WoodSpring Suites Hotel
Tentative Tract Map (TTM) 082361
Variance 19-001, Site Plan Review 19-008

INITIAL STUDY /
MITIGATED NEGATIVE DECLARATION

Prepared for:

Mr. Preet S Bhathal
P.O. Box 70253
Calababas, CA 91302

Prepared by:

Christopher Aune

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1. INTRODUCTION

A. Purpose and Background of the Initial Study

Pursuant to Section 15063 of the *California Environmental Quality Act (CEQA) Guidelines* (Title 14, California Code of Regulations, Section 15000 et seq.), this Initial Study is a preliminary environmental analysis prepared by Christopher Aune for use by the lead agency (City of Palmdale) as a basis for determining whether an Environmental Impact Report (EIR), a Negative Declaration (ND), or a Mitigated Negative Declaration (MND) is required for the project. The *State* CEQA Guidelines require that an Initial Study contain a project description of environmental setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

Based on the analysis contained in this Initial Study, it has been determined that the proposed project would not result in any significant impacts that cannot be mitigated to less than significant levels. Therefore, preparation of a Mitigated Negative Declaration is appropriate for the project.

B. Lead Agency

City of Palmdale
Economic and Community Development Department
Planning Division
38250 Sierra Highway
Palmdale, CA 93550

C. Technical Studies

- *Acoustical Analysis Woodspring Suites Hotel and Remaining Parcels of Tentative Parcel Map No. 082361 City of Palmdale*, by Christopher Jean & Associates, Inc., March 6, 2019.

- *Biological Resource Assessment of APN 3004-001-040 Palmdale, California*, prepared by Mark Hagan, April 8, 2019.

- *Phase 1 Cultural Resource Investigation For Approximately 15 Acres Southwest of the Intersection of Interstate 14 and Avenue Q Palmdale, Los Angeles County, California*, prepared by RTFactfinders, February 2019.

- *Geotechnical Engineering Investigation Proposed Woodspring Suites Palmdale SWQ West Avenue Q & Corporate Court Lancaster, California*, prepared by Krazen & Associates, Inc., January 2, 2019.

- *Woodspring Suites Hotel Project Air Quality and Greenhouse Gas Emission Study*, prepared by Rincon Consultants, Inc., February 2019.

2. PROJECT DESCRIPTION

A. Project Location

The project site consists of approximately 15 acres of land between West Avenue Q to the north and West Park Drive to the south, adjacent to State Route 14 (SR 14) to the east (APN 3004-001-040).

The location of the project site is shown in **Figure 1**.

B. Project Setting

The project site consists of vacant land characteristic of a highly disturbed field that has been subject to prior grading and vehicle disturbance. Very little remains of natural contours and native vegetation has been largely removed. Two paved roads crosscut the property, Corporate Court and West Park Drive. There are no buildings or other structures on the project site. There is a graded drainage ditch across the southeast portion of the project site. A concrete drainage channel lies along the eastern boundary adjacent to SR 14.

An aerial photograph depicting the project site and surrounding area is presented in **Figure 2**.

C. Project Characteristics

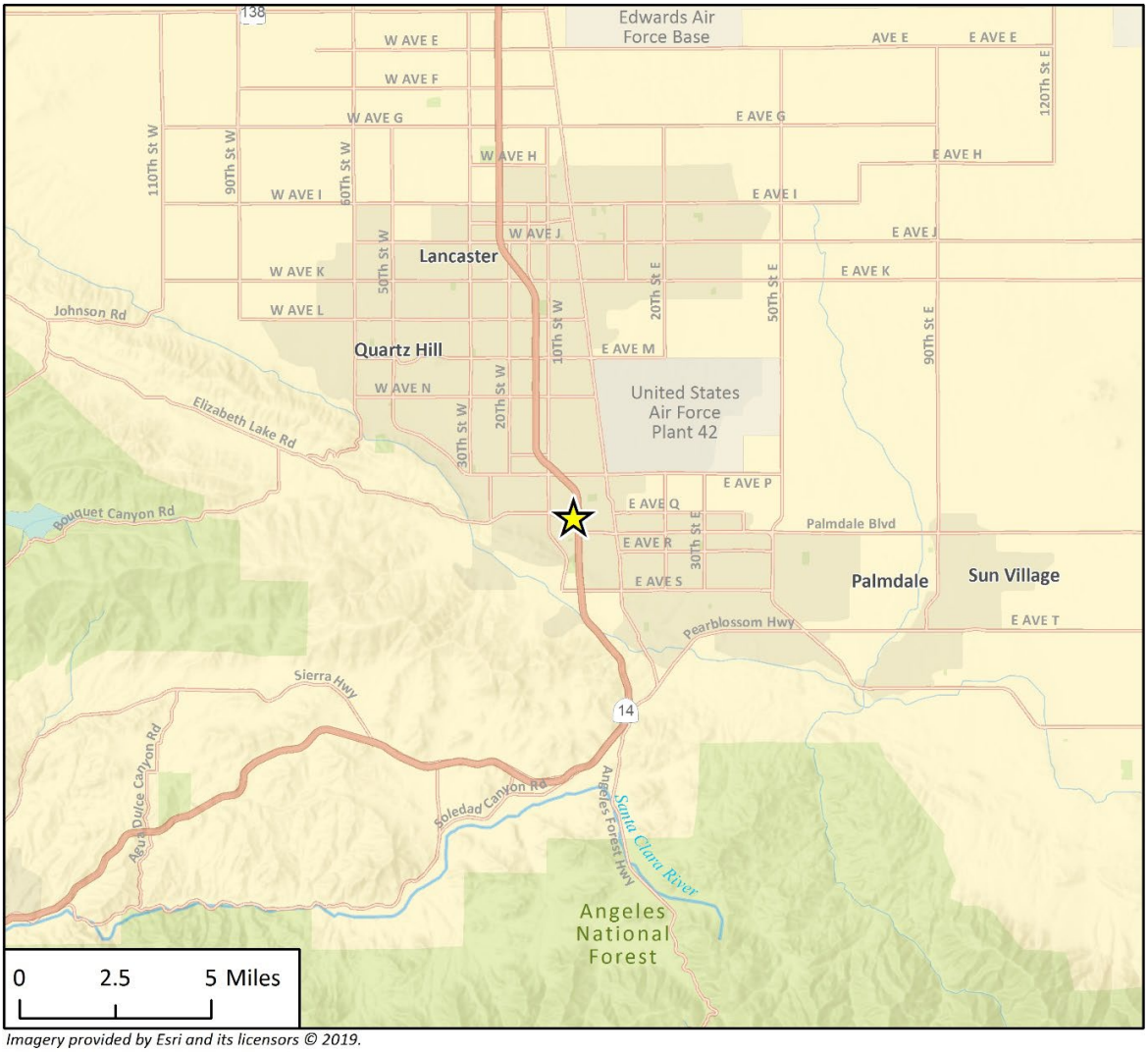
The proposed project consists of the subdivision of approximately 15 acres for the purpose of constructing a four-story, 123 room hotel with 125 vehicular parking spaces located at the ground-level. Of the 125 vehicular parking spaces, five space would be reserved per the requirements of the Americans with Disabilities Act (ADA), and a minimum of five spaces would be set aside for electric vehicle (EV) charging stations. Additional parking spaces would be provided for loading. One canopy tree would be provided for every four parking stalls, and at least five percent of the parking lot area would be landscaped and. Landscaping to screen the southwest corner of the project site from public views to the south and west would also be provided.

The Tentative Tract Map and Site Plan are presented in **Figures 3 and 4**, respectively.

D. Regulatory Requirements, Permits, and Approvals

- A Tentative Parcel Map (TPM) to subdivide the project site;
- Site Plan Review (SPR);
- Variance (VAR) as the frontage is not 150 feet wide;
- Grading Permit; and
- Building Permit

Figure 1: Project Location



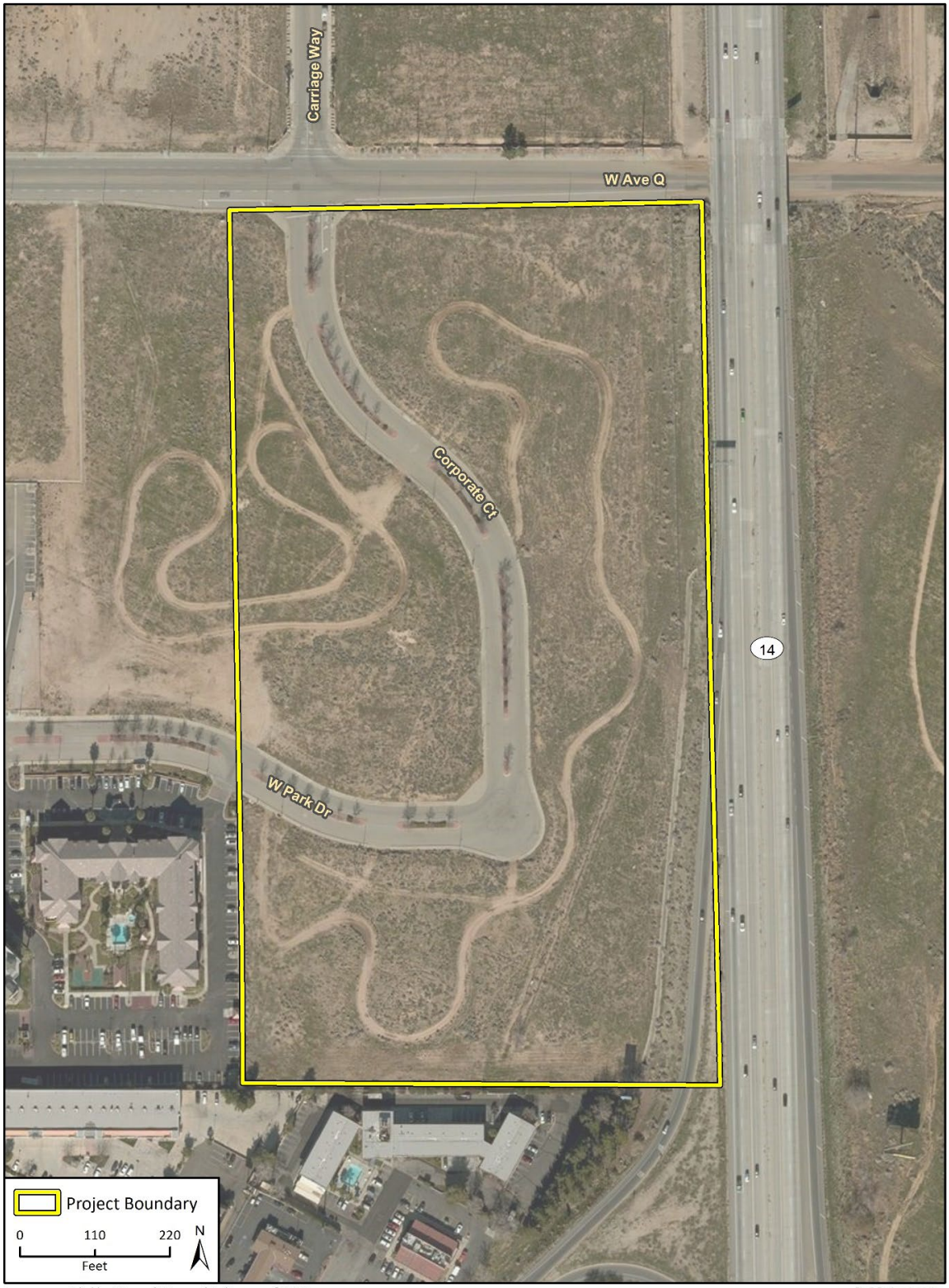
Imagery provided by Esri and its licensors © 2019.

Project Location

N

Fig 1 Regional Location

Figure 2: Project Site and Surrounding Area



Imagery provided by Microsoft Bing and its licensors © 2019.

Fig 2 Project Location

Figure 3 Tentative Parcel Map

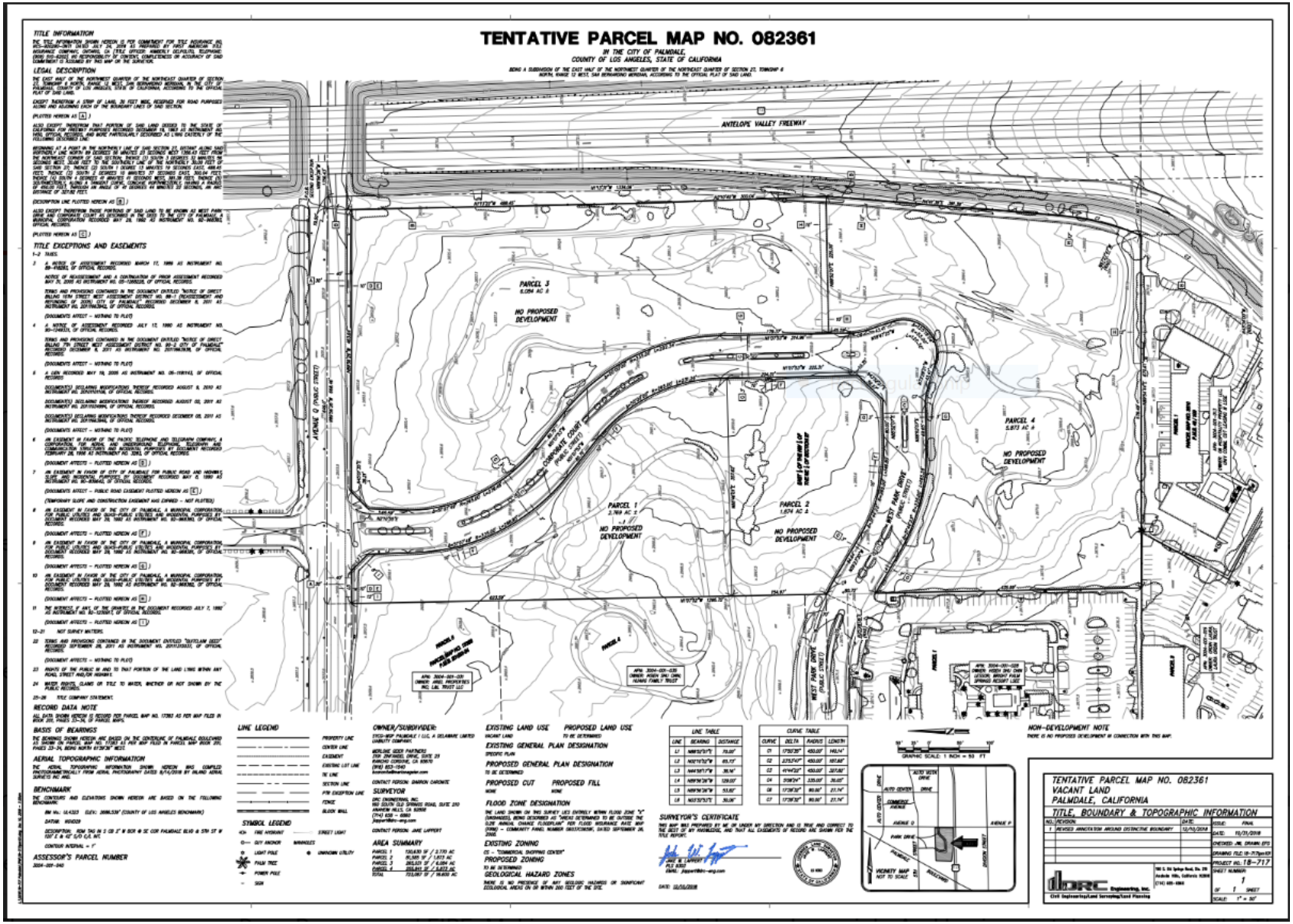
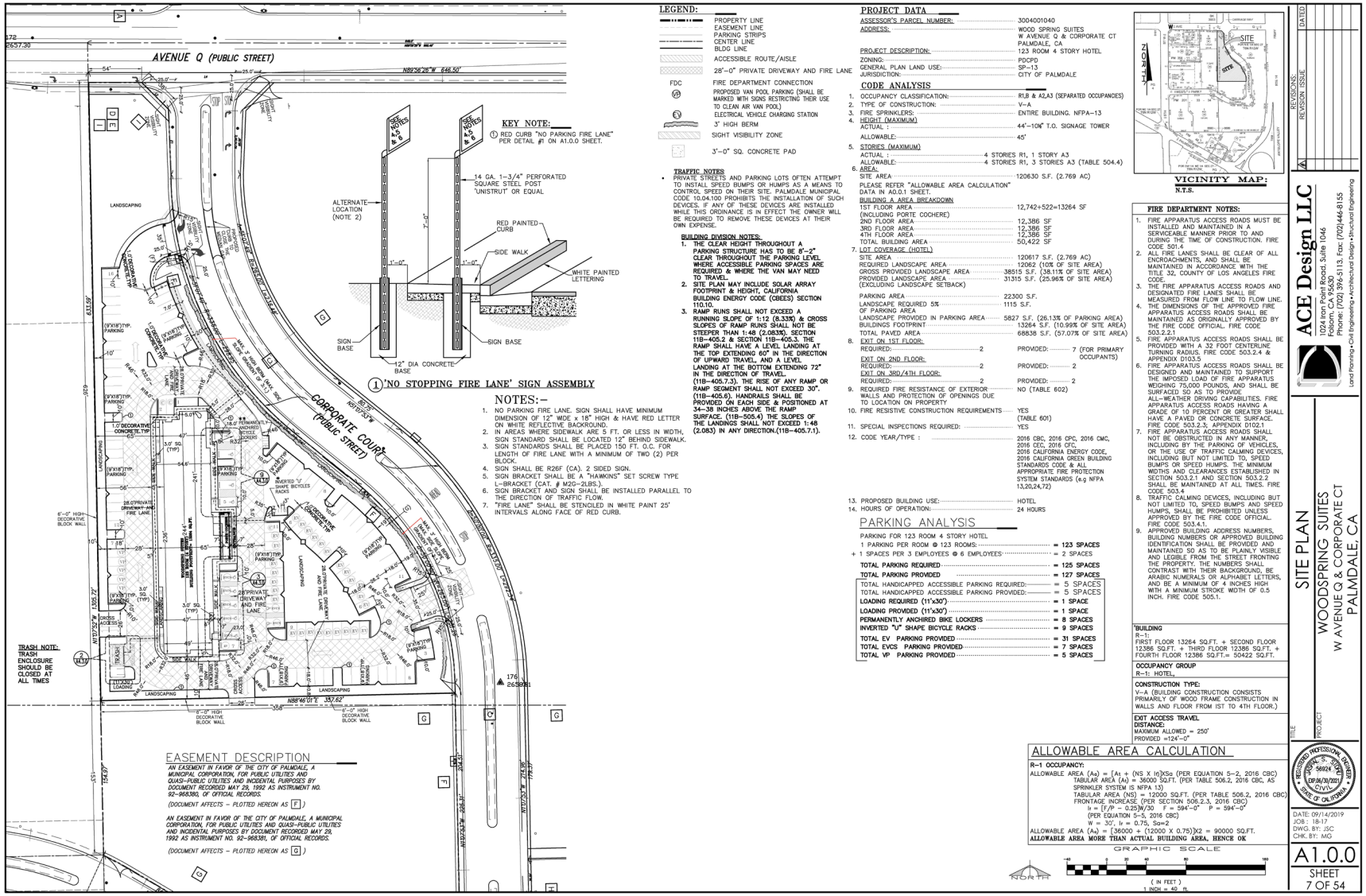


Figure 4 Site Plan



3. ENVIRONMENTAL CHECKLIST

A. Background

1. Project Title:

WoodSpring Suites Hotel, Tentative Tract Map 082361

2. Lead Agency Name and Address:

City of Palmdale
Economic and Community Development Department
Planning Division
38250 Sierra Highway
Palmdale, CA 93550

3. Contact Person and Phone Number:

Justin Sauder, Assistant Planner
City of Palmdale
Economic and Community Development Department
Planning Division
38250 Sierra Highway
Palmdale, CA 93550
(661) 267-5200

4. Project Location:

The project site consists of approximately 15.6-acre of vacant land between West Avenue Q to the north and West Park Drive to the south, adjacent to State Route 14 (SR 14) to the east (APN 3004-001-040).

5. Project Applicant's Name and Address:

Phillip Terry
Keller Williams
23975 Park Sorrento, Suite 110
Calababas, CA 91302

6. Existing Land Use / Zoning / General Plan:

The project site has a General Plan Land Use designation of Palmdale Trade and Commerce Center Specific Plan (SP-13) and is designated Planned Development (PD) within the Specific Plan. A hotel is an allowed use subject to approval of a Site Plan Review (SPR) application. A Tentative Parcel Map to subdivide the property is necessary. In addition, a variance is necessary because the lot frontage of parcel one is not wide enough as SP-13 requires the lot frontage to be 150 feet wide at the front setback line (30 feet).

7. **Description of Project:**

The proposed project consists of the subdivision of approximately 15 acres for the purpose of constructing a four-story, 123 room hotel with125 vehicular parking spaces. Refer Section 2.0 Project Description.

8. **Surrounding Land Uses and Setting:**

The project site is bordered by SR 14 to the east, West Avenue Q and a vacant lot to the north, West Park Drive and hotels, motels, and commercial uses, such as a real-estate agent's office and gas station, to the south, and commercial uses, as well as vacant land, to the west. California State Route 138 (SR 138), which transitions to West Palmdale Boulevard, is located approximately 0.15 miles south of the project site.

9. **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, has consultation begun?**

On September 25, 2014, Governor Brown signed Assembly Bill No. 52 ("AB 52") into law. AB 52 establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

In accordance with AB 52, consultation letters for the project were sent to the tribes that have requested to be included in the process.

B. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact", as indicated by the checklist on the following pages. Potentially significant impacts that are mitigated to "Less Than Significant" are not shown here.

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

C. Determination

On the basis of this initial evaluation: (Select one)

☐ 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 the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a significant effect(s) 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, if the effect is a "potentially significant impact" or "potentially significant unless mitigated". 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, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

11-20-19
Date

Rob Bruce, Planning Manager

D. Evaluation of Environmental Impacts

Each of the responses in the following environmental checklist considers the whole action involved, including project-level, cumulative, on-site, off-site, indirect, construction, and operational impacts. A brief explanation is provided for all answers and supported by the information sources cited.

1. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone).

2. A “Less Than Significant Impact” applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.

3. A “Less Than Significant Impact With Mitigation Incorporated” applies when the proposed project would not result in a substantial and adverse change in the environment after additional mitigation measures are applied.

4. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant” entries when the determination is made, an EIR is required.

4. ENVIRONMENTAL ANALYSIS

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

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. Scenic vistas and view corridors in the City of Palmdale are identified in the Community Design Element and Environmental Resources Element of the City's General Plan. The General Plan identifies the following Scenic Routes: Barrel Springs Road, Tierra Subida Avenue, Sierra Highway south of Avenue S, Elizabeth Lake Road, Pearblossom Highway, Bouquet Canyon Road, Godde Hill Road, and the Antelope Valley Freeway south of Rayburn Road (Exhibit ER-1). The location of the project site adjacent to SR 14 to the east between West Avenue Q to the north and West Park Drive to the south has not been identified as a scenic vista or view corridor in the City's General Plan. Views of the open mountains surrounding the Antelope Valley are available from the project site and roadways in the vicinity. However, these views would generally continue to be available following construction of the proposed project. Furthermore, the proposed project would be subject to City review to ensure conformance with existing design regulations (building setbacks, height, scale, landscaping, etc.) and compatibility with surrounding land uses. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **No Impact**: The project site does not contain any rock outcroppings, trees or buildings (historic or otherwise) and is not located along a scenic highway. The project site characteristic of a highly disturbed field that has been subject to prior grading and vehicle disturbance. Very little remains of natural contours and native vegetation has been largely removed. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. Refer to responses I(a), Development of the project site as proposed would change the visual character of the project site in that it would replace a vacant, highly disturbed field with a four-story, 123-room hotel with surface parking and landscaping. However, as discussed above, the proposed project would be subject to City review to ensure conformance with existing design regulations (building setbacks, height, scale, landscaping, etc.) and compatibility with surrounding land uses. The project site has a General Plan Land Use designation of Palmdale Trade and Commerce Center Specific Plan (SP-13) and is designated Planned Development (PD) within the Specific Plan. Hotel use are an allowed use subject to approval of a Site Plan Review (SPR) application. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

d) **Less than Significant Impact**. Currently, there is no lighting generated by the project site. Following construction of the proposed project, light and glare would be generated from the project site in the form of hotel lighting, streetlights, and motor vehicles. However, lighting would be shielded and directed onto the project site, and the hotel would not introduce substantial amounts of glare as it would be constructed primarily from non-reflective materials. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. *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. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland 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 nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) **No impact**. The California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP), tracks and categorizes land with respect to agricultural resources. Land is designated as one of the following and each has a specific definition: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land.

According to the Los Angeles County Farmland Map, which was last updated in 2016, the project site is designated as “Other Land”. This designation is defined as “land not included in any other mapping category, common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. Therefore, proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

b) **No Impact**. The project site has a General Plan Land Use designation of Palmdale Trade and Commerce Center Specific Plan (SP-13) and is designated Planned Development (PD) within the Specific Plan. The project site is not zoned for agricultural related uses, and no agricultural uses are present on the project site or within the vicinity. In addition, neither the project site nor property in the vicinity of the site is under a Williamson Act contract. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

c-d) **No Impact**. There are no forests or timberlands located within the City of Palmdale. The proposed project would not result in the rezoning of forest or timberland and would not cause the loss of forest land or the conversion of forest land to non-forest land. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

e) **No Impact.** Refer to responses II(b) through II(c-d), above.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is 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?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. An Air Quality and Greenhouse Gas (GHG) Emissions study was prepared for the proposed project by Rincon Consultants, Inc. According to the study, the project site is located in the Antelope Valley portion of the Mojave Desert Air Basin (MDAB). Air quality management in the Antelope Valley is under jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD).

In the AVAQMD, a project would be consistent with the Air Quality Management Plan (AQMP) 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 forecast in the applicable plans (AVAQMD 2016). Per the AVAQMD CEQA and Federal Conformity Guidelines, conformity with growth forecasts can be established by demonstrating that a project is consistent with the land use plan that was used to generate growth forecasts. The proposed project involves the construction of a hotel, which would not cause a direct increase in the City's housing and population. Therefore, because the project would not cause a direct increase in the City's housing and population, and emissions would be less than the established significance thresholds, the project would not conflict with or obstruct implementation of the attainment plan.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. As indicated in the air quality study, the project's construction and operational emissions were calculated using the CalEEMod software. Operational emissions include mobile source emissions, energy emissions, and area source emissions. Mobile source emissions are generated by the increase in motor vehicle trips to and from the project site.

Construction Impacts

Table 1 summarizes maximum daily emissions of pollutants associated with buildout of the proposed project. Maximum daily estimates account for compliance with AVAQMD requirements, but do not include any additional mitigation. Emissions of CO, PM_{10}, $PM_{2.5}$, NO_X, and ROG would not exceed AVAQMD regional thresholds, assuming adherence to the conditions listed above required by AVAQMD Rule 403.

Table 1: Estimated Construction Emissions

Construction Year	Total Emissions (lbs /day)					
	ROG	**NO_x**	**So_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
2019	1.5	19.2	24.7	<0.1	8.5	4.9
2020	58.7	31.3	44.9	0.1	3.5	2.1
Maximum tons per year	58.7	31.3	44.9	0.1	8.5	4.9
AVAQMD Thresholds	137	137	137	548	82	65
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod

Operational Air Pollutant Emissions

Table 2 summarizes estimated emissions associated with operation of the proposed project. The majority of project-related operational emissions would be due to vehicle trips to and from the site. Emissions would not exceed AVAQMD thresholds for any criteria pollutant.

Table 2: Estimated Operational Emissions

Emission Source	Daily Emissions (lbs/day)					
	ROG	**NO_x**	**So_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Area	5.0	<0.1	<0.1	<0.1	<0.1	<0.1
Energy	0.1	1.2	<0.1	1.9	0.1	<0.1
Mobile	2.3	17.6	0.1	19.4	4.4	1.2
Project Total	7.5	18.8	0.1	20.4	4.5	1.3
AVAQMD Thresholds	137	137	137	548	82	65
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. The proposed project would comply with all applicable regulatory standards, including 2016 CALGreen Code, AVAQMD Rules 403, Fugitive Dust, and 1113, Architectural Coatings. AVAQMD Rule 403 identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located in the Mojave Desert Air Quality Basin. The mitigation measures related to Rule 403 are listed below. Therefore, substantial pollutant concentrations would not occur, and impacts would be less than significant, with compliance with AVAQMD Rule 403, *Fugitive Dust* which is described

below.

The project will be required to reduce fugitive dust in compliance with AVAQMD Rule 403, including the following conditions: 1) Minimization of Disturbance, to prevent excessive amounts of dust; 2) Soil Treatment, including but not limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate; 3) Soil Stabilization, including monitoring of all graded areas, and use of soil stabilization methods, such as water and roll compaction. For inactive areas, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants; 4) No Grading During High Winds (20 miles per hour or greater, as measured continuously over a one-hour period); and 5) Street Sweeping of visible soil materials carried over to adjacent streets and roads.

d) **Less than Significant Impact**. Construction equipment emissions may generate some odors; however, these odors would be similar to those produced by vehicles traveling in the project vicinity. In addition, construction equipment would only be used for a portion of each day, and there would be days when very little equipment is used. Most objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products and other strong smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. These types of uses are not part of the proposed project. Therefore, impacts associated with odors would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nesting sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) **Less than Significant with Mitigation Incorporated**. A Biological Resource Assessment was prepared for the proposed project by Mark Hagan, Wildlife Biologist, dated April 8, 2019. According to the assessment, the project site is characteristic of a highly disturbed field that has been subject to prior grading and vehicle disturbance as two paved roads crosscut the property, Corporate Court and West Park Drive. A total of twenty-five plant species and sixteen wildlife species, or their sign, were observed during the survey of the project site. No desert tortoises (*Gopherus agassizii*) or their sign were observed during the field survey, and the habitat within the project site did not appear suitable to support desert tortoises. No minimization measures for desert tortoise are recommended. In addition, while the project site was located within the geographic range of the Mohave ground squirrel (*Xerospermophilus mohavensis*), the habitat within the project site did not appear suitable to support Mohave ground squirrel. No minimization measures for Mohave ground squirrel are recommended. Likewise, no desert kit foxes (*Vulpes macrotis*) or their sign were observed within the project site, and no minimization measures for desert kit foxes is recommended.

California ground squirrel burrows (*Citellus beecheyi*) were observed within the project site. Prairie falcons (Falco mexicanus) and other raptors may fly over the site, but there are no nesting or roosting opportunities available within the project site. Vegetation within the project site provides nesting opportunities for smaller migratory birds; however, no other state or federally listed species are expected to occur within the project site, and no wetlands or ephemeral washes were observed within the project site.

No burrowing owls (*Athene cunicularia*) or their sign were observed during the field survey. Nonetheless, even though the project site does not currently contain any active burrowing owl burrows, construction disturbances during the nesting season (February to July) has the potential to impact nesting burrowing owls. As such, the following mitigation measure is required to reduce potential impacts to less than significant.

Mitigation Measure:

BIO-1: A burrowing owl survey shall be conducted within 30 days prior to construction activities to ensure burrowing owls are not present during construction activities. If burrowing owls are discovered, the guidance outlined in the California Department of Fish and Wildlife 2012 "Staff Report on Burrowing Owl Mitigation" will be used for addressing burrowing owl issues on the study site.

b) **No Impact**. As indicated within the Biological Resource Assessment prepared for the proposed project, the project site does not contain any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

c) **No Impact**. As indicated in the Biological Resource Assessment prepared for the proposed project, no blue line streams were documented on the USGS Quadrangle for the project site, and no ephemeral washes were observed within the project site. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

d) **Less Than Significant with Mitigation Incorporated**. The project site is not part of an established migratory wildlife corridor; however, vegetation within the project site could provide nesting habitat for migratory birds. Therefore, removal of vegetation should occur outside the breeding season for migratory birds. Nesting generally lasts from February to July but may extend beyond this time frame. As such, the following mitigation measure is required to reduce potential impacts to less than significant.

Mitigation Measure:

BIO-2: If vegetation removal will occur during or close to the nesting season, a qualified biologist will survey all areas to be disturbed as close as possible but no more than one week prior to removal. If active bird nests are found, impacts to nests will be avoided by either delaying work or establishing initial buffer areas of a minimum of 500 feet for active nesting raptors and 50 feet around other active migratory bird species nests. The project biologist will determine if the buffer areas should be increased or decreased based on the

nesting bird response to disturbances.

e) **No Impact**. As indicated in the Biological Resource Assessment prepared for the proposed project, the proposed project does not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

f) **No impact**. As indicated within the Biological Resource Assessment, the project site is not located within or near any land area that is governed by a habitat conservation plan. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the Project:				
a) Cause a substantial adverse change in the significance of a historical pursuant to Section 15064.5, respectively?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. A Cultural Resources Survey was conducted for the project site by RTFactfinders in February 2019. The investigation included an on-foot inspection of the project site, a review of the literature and records, preparation and filing of record forms as specified by the Office of Historic Preservation Guidelines, a search of the Native American Heritage Commission sacred lands file, and preparation of a Phase I report. According to the survey, no Native American or historic period sites or artifacts were discovered on the project site. The only items of man-made origin observed consisted of recent period refuse including paper, plastic and abundant landscaping waste. Since no prehistoric or historic period resources were identified through the survey, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact with Mitigation Incorporated**. Refer to response V(a), above. Since no known archaeological resources exist on the site and the site has been previously disturbed, there is very low likelihood of impacting archeological resources. Nonetheless, during excavation and grading activities, a remote possibility exists that cultural resources may be discovered. If that should occur, the project applicant will be required to comply with existing regulations, including California Public Resources Code Section 21083.2 that specifies the protocol if archaeological resources are discovered during excavation, grading, or construction activities. If standard procedures are followed in the event cultural/historical resources are uncovered at the project site, the project's impact would be less than significant. In the event that cultural resources are encountered during the course of construction activities, all work must cease until a qualified archaeologist determines the proper disposition of the resource. With implementation of the mitigation measure listed below, impacts would be less than significant.

Mitigation Measure:

CUL-1: If cultural resources are discovered during project grading by the project contractor, all work in the area of the find shall cease and a qualified archaeologist shall be retained by the project sponsor to investigate the find and to make recommendations on its disposition. If a significant archaeological resource(s) is discovered on the property, ground-disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor and representatives of the appropriate Native American Tribe(s), the project Applicant, and the City Planning Division shall confer regarding mitigation of the discovered resource(s). A

treatment plan and/or preservation plan shall be prepared by the archaeological monitor and reviewed by representatives of the appropriate Native American Tribe(s), the project Applicant, and the City Planning Division and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. The landowner shall relinquish ownership of all archaeological artifacts that are of Native American origin found on the project site to the culturally affiliated Native American Tribe(s) for proper treatment and disposition. A final report containing the significance and treatment findings shall be prepared by the archaeologist and submitted to the City Planning Division and the appropriate Native American Tribe(s).

c) **Less than Significant Impact with Mitigation Incorporated**. Refer to response V(a) and V(b), above. No human remains, including those interred outside of formal cemeteries, are known to exist on the project site. However, in the event that previously unknown human remains are discovered, implementation of Mitigation Measure **CUL-2** below would reduce impacts to unknown subsurface resources to a less than significant level.

Mitigation Measure:

CUL-2: If human remains, including those interred outside of dedicated cemeteries are discovered on-site, per California Health and Safety Code (Section 7050.5), no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98, including coordination with local Native American Tribe(s) if the remains are identified as prehistoric.

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

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. The estimated energy consumption from construction and operation of the proposed project would have a nominal effect on the local and regional energy supplies. There are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at comparable construction sites in the region or State. Therefore, construction fuel consumption would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature. In addition, the proposed project would adhere to all Federal, State, and local requirements for energy efficiency, including the Title 24 standards. Furthermore, the proposed project would not result in the need for new or expanded sources of energy supply or new or expanded energy delivery systems or infrastructure. The proposed project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. The proposed project would comply with the goals and measures identified in the City of Palmdale's adopted Energy Action Plan (EAP). The EAP contains energy efficient goals and measures in the realms of water, transportation, land use, and solid waste. The proposed project would be required to comply with all Title 24 and CALGreen standards. Compliance with Title 24 and CALGreen standards would ensure the proposed project incorporates energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures and electric vehicles charging infrastructure. Adherence to the Title 24 energy requirements will ensure conformance with the State's goal of promoting energy and lighting efficiency, and the City of Palmdale's EAP. Therefore, impacts associated with renewable energy or energy efficiency plans would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Project Impacts and Mitigation Measures

ai) **Less than Significant Impact**. A Geotechnical Engineering Investigation Report was prepared for the project proposed by Krazen & Associates, Inc. According to the investigation, the project site is not located within a Fault-Rupture Hazard Zone. The nearest fault is a portion of the San Andres Fault located approximately 1.7 miles from the project site. Therefore, the proposed project would not expose people or structures to rupture of a known earthquake fault, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

ii) **Less than Significant Impact**. As discussed above, the project site is not located within a Fault-Rupture Hazard Zone, and the he nearest fault is a portion of the San Andres Fault located approximately 1.7 miles from the project site.

In accordance with the California Building Code (CBC) (California Code of Regulations, Title 24), seismic structure design requirements will be based on the Seismic Design Category (SDC) for the proposed structures which is based on the construction type and occupancy category for the structure and on the level of expected soil modified seismic ground motion. The majority of structures in Palmdale would have a SDC of D (high seismic vulnerability) or E (very high seismic vulnerability and near a major fault) based on the proximity of the City to the San Andreas Fault and soil types throughout the City.

The potential for seismic ground shaking in the project area is considered less than significant, as the project site is not located within an earthquake fault zone. The proposed development shall comply with City General Plan policies related to geologic safety and the CBC to prevent potential damage anticipated during seismic events. Compliance with the seismic design requirements specified by the CBC will reduce potential impacts due to seismic ground shaking to a less than significant level.

Mitigation Measures: No mitigation measures are necessary.

iii) **Less than Significant Impact**. According to the Geotechnical Engineering Investigation prepared by Krazen & Associates, Inc, the project site is not located in an area identified as being subject to potential liquefaction or shallow groundwater. The highest potential for liquefaction occurs in saturated, loosely consolidated sands and silts below the water table when the water table is within approximately 50 feet of the surface. According to the Geotechnical Engineering Investigation conducted for the proposed project, the soil beneath the project site consists of dense very silty poorly graded sand with varying silt content. Groundwater is not expected to affect the proposed development and was not encountered during the field investigation, and the potential for liquefaction is considered to be low.

Mitigation Measures: No mitigation measures are necessary.

iv) **No Impact**. Due to the low topographic relief to be created by proposed project grading, it is considered that the potential for earthquake-induced landslides is low. Adjacent properties are also relatively flat and are not susceptible to landslides because there are no slopes that have sufficient height or slope ratio that would cause a landslide to occur. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. Construction of the proposed project would require grading and excavation, which would expose soil to erosion. As such, there remains a potential for water and wind erosion during construction. As the proposed project would disturb more than one acre, coverage under the state's National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity would be required and a site-specific Storm Water Pollution Prevention Plan (SWPPP) would need to be developed and implemented. The SWPPP is required to include Best Management Practices (BMPs) to control on-site erosion and off-site sedimentation, and to keep construction pollutants from coming into contact with storm water. The SWPPP would require that if any spills of materials known to be water pollutants or hazardous materials occur, the proper agencies would be contacted immediately (if necessary) and appropriate cleanup of the spill would take place as soon as possible. The City of Palmdale would have oversight responsibility and would have the authority to shut down construction in the event the SWPPP is improperly implemented.

In addition to the NPDES and SWPPP requirements, the project would be required to implement City grading permit regulations that include compliance with erosion control measures, including grading and dust control measures. Specifically, construction associated with future development projects would be required to have erosion control plans approved by the City of Palmdale Engineering and Transportation Division, as well as a SWPPP. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. Lateral spreading is a phenomenon in which large blocks of intact, non-liquefied soil move down slope on a liquefied soil layer. Lateral spreading is often a regional event. For lateral spreading to occur, the liquefiable soil zone must be unconstrained laterally and free to move along sloping ground. Since the project site does not have the potential for liquefaction, the potential for lateral spreading at the site is low. The potential for landslides, ground lurching, subsidence and shallow ground rupture are also unlikely. Refer also to Responses 4.VII(a) and 4.VII(b). A less than significant impact would occur.

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. Expansive soils are those that undergo volume changes as moisture content fluctuates, swelling substantially when wet or shrinking when dry. Soil expansion can damage structures by cracking foundations, causing settlement and distorting structural elements. According to the geotechnical report, the subsurface conditions encountered at the project site consist of dense to very dense silty sand to depths of up to 29 feet below existing site grades. Below the near surface silty sands, very dense poorly graded sands were encountered from depts of approximately 29 feet below site grade to the maximum depth explored, 50 feet below site grades. The proposed project would be subject to conformance with the CBC, which outlines design elements to address expansive soils. With implementation of relevant CBC and site design measures, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

e) **No Impact**. The proposed project does not include the use of septic tanks or alternative wastewater disposal systems. Public wastewater service for the Project would be provided by the Palmdale Sewer Maintenance District (PSMD) which owns, maintains, and operates the City's Wastewater Collection System. Therefore, no impact would occur in this regard.

Mitigation Measures: No mitigation measures are necessary.

f) **Less than Significant Impact with Mitigation Incorporated**. As discussed in Responses V(a) and V(b), above. No known paleontological resources exist on the site, and there are no unique geological features on or near the site; thus, no impact to geological features is anticipated. Implementation of Mitigation Measure **CUL-1** listed above would reduce impacts to unknown subsurface resources to a less than significant level.

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

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. An Air Quality Study and Greenhouse Gas Study was completed for the proposed project by Rincon Consultants, Inc. As indicated in the study, the proposed project would generate air emissions during construction activities, some of which may be greenhouse gases. Based upon the CalEEMod results, the proposed project will generate 386 tons of CO_2e in 2021 as shown in **Table 3, Estimated Construction Emissions of Greenhouse Gases**.

Table 3: Estimated Construction Emissions of Greenhouse Gases

Construction Year	Annual Emissions (tons of CO_2e)
2020	107.9
2021	386.0

Source: Rincon Consultants, February 2019.

The maximum combined 2020 construction emissions with the annual operational (stationary and mobile source) emissions associated with the proposed project to provide a conservative estimate of the emissions that would be generated during 2020, when the proposed project is both constructed and operational would total approximately 2,438 tons of CO_2e. (see **Table 4, Combined Annual Emission Tons of CO2e, per year**). The construction and operational greenhouse gas emissions are well below the AVAQMD-recommended significance threshold of 100,000 tons of CO2e per year and therefore would not prevent the State from reaching its greenhouse gas reduction targets. Therefore, impacts would be less than significant.

Table 4: Combined Annual Emissions Tons of CO_2e/year

Emission Source	Project Emissions CO2
2021 Construction Emissions	386.0
Operational	
Area	<0.1
Energy	631.1
Solid Waste	28
Water	16.6
Mobile	
CO_2, and CH_4	1,333.0
N_2O	43.8
Total	2,438.4
AVAQMD Threshold	100,000
Exceeds Threshold?	No

Source: CalEEMod

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. Refer to response VII(a), above. The proposed project would not result in GHG emissions above the thresholds established by AVAQMD to identify projects that require additional mitigation measures to achieve statewide GHG targets contained in Assembly Bill (AB) 32.

The City of Palmdale General Plan contains policies which require projects to promote attainment of state and federal air quality standards and all projects must comply with the City's Green Building Ordinance and Palmdale Energy Action Plan. The proposed project is consistent with the General Plan and would be required to implement City, regional, and State policies adopted for the purpose of reducing GHGs. Therefore, impacts with respect to conflicts with an agency's plans, policies and regulations would be less than significant

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, emission or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, result in a safety hazard 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 to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a-b) **Less than Significant Impact**. The proposed project involves the construction of a four-story, 123-room hotel with surface parking and landscaping. Construction activities would not involve the demolition of any structures and therefore, would not expose individuals or the environment to asbestos containing materials or lead based paint. Typical construction materials would be utilized during construction. During operations, employees and guests of the hotel would utilize typical household cleaners (e.g., cleanser, bleach, etc.), fertilizer, and potentially limited use of common pesticides. These uses would be similar to other commercial uses in the area. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c) **No Impact**. Refer to response VIII(a-b), above. The project site is not located within a quarter mile of an existing school and is not a source of toxic air emissions. The nearest school is the Yucca Elementary School, located at 38440 2nd St E approximately one mile west of the project site across SR 14. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

d) **No Impact**. A search of the Department of Toxic Substances Control (DTSC) Envirostor database, which is DTSC's data management system for tracking our cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites, the project site is not included on a list of hazardous materials sites as specified within Government Code Section 65962.5. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

d) **No Impact**. The Palmdale Regional Airport is located approximately five miles northeast of the project site. Therefore, the no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

f) **Less than Significant Impact**. Although the proposed project would generate additional traffic, the project will be conditioned to provide the necessary improvements to accommodate the anticipated volume of traffic to be generated by the proposed project. As a result, the traffic generated by the proposed project is not expected to block the roadways, and the proposed project would not impair or physically block any identified evacuation routes and would not interfere with any adopted emergency response plan. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

g) **No Impact**. The proposed project is not located in a wildland area. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

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

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. The proposed project consists of the construction four-story, 123-room hotel with surface parking and landscaping, which is not a use that would normally generate wastewater that would violate water quality standards or exceed waste discharge requirements. According to the Sanitation Districts of Los Angeles County (Districts), the expected wastewater flow from the proposed project would be 15,375 gallons per day. The wastewater generated by the proposed project would be treated at the Palmdale Water Reclamation Plant, which has a capacity of l2 million gallons per day (MGD) and currently processes an average flow of 9.6 rngd.

There would be no discharge into a water body or the aquifer as a result of surface runoff from the project. Additionally, the proposed project would comply with all water quality and wastewater discharge requirements of the City, including compliance with the National Pollutant Discharge Elimination System (NPDES) program and Best Management Practices (BMPs) to control erosion and release of sediment and other pollutants from the site. Therefore, with payment of the Districts connection fee, the proposed project would be permitted to discharge to the Districts' Sewerage System, and impacts would be less than

significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. The proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The project site is located within the boundaries of Los Angeles Waterworks jurisdiction. Construction, and would obtain water service from Los Angeles County Waterworks, which has not indicated that water supplies are unavailable to serve the proposed project. Furthermore, measures associated with minimizing water usage will be applied to the proposed project, including water efficient landscape requirements and compliance with Title 24 Building Code requirements for efficient appliances and fixtures. This is consistent with current City Ordinances, including the Water Efficient Landscape Ordinance (PMC Section 14.05). While implementation of the proposed project would increase impervious surfaces at the site, compliance with current City Ordinances and regulations would ensure that impacts related to groundwater would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

ci-iiv) **Less than Significant Impact**. The proposed project will not substantially alter the existing drainage pattern of the project site, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site. Due to existing storm drain infrastructure within the surrounding streets, the proposed project does not require an on-site basin, but rather runoff would be treated on-site and connect to the existing downstream drainage facilities located on the southwest corner of Avenue Q and Corporate Court. Nonetheless, the Palmdale Municipal Code requires development projects to mitigate the impacts of the development on the City's drainage facilities through the construction of drainage facilities in accordance with the City of Palmdale Master Plan of Drainage or payment of drainage fees that will be used to construct future drainage facilities.

The project site does not contain any streams, rivers, or ephemeral drainage features. Development of the project site would result in an increase in the amount of impervious surface, and conditions resulting from this change could degrade existing water quality due to increased runoff volumes and velocity; reduce infiltration; increased flow frequency, duration, and peak; and result in faster time to reach peak flow. However, the proposed project would be required to accommodate the existing storm flows and reduce the post development storm flows to 85 percent of the existing condition. Furthermore, implementation of the proposed project would include the implementation of BMPs that would remove pollutants from runoff coming from the project site. Therefore, with implementation of BMPs and requirements specified by standard engineering practices, impacts would be less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

d) **No Impact.** The project site is located outside the 100-year flood zone. As a result, proposed project would not place housing or structures within an area at risk of flooding. No flooding impacts would occur as a result of the proposed project. In addition, the project site is not located within a coastal zone. Therefore, tsunamis are not a potential hazard. According to City's General Plan (Exhibit S-6 Inundation Areas), the project site is not located within an inundation area of Lake Palmdale. The project site is relatively flat, does not contain any

enclosed bodies of water and is not located in close proximity to any other large bodies of water. Therefore, the proposed project would not be subject to inundation by seiches or mudflows, and there would be no impact.

Mitigation Measures: No mitigation measures are necessary.

e) **Less than Significant Impact**. Refer to response X(a-ciii), above. The proposed project will not otherwise substantially degrade water quality, resulting in a less than significant impact to drainage. No mitigation is required.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the Project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) **No Impact**. The proposed project consists of the construction of a four-story, 123-room hotel. The proposed project would not block a public street, trail or other access route or result in a physical barrier that would divide the community. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. The project site has a General Plan Land Use designation of Palmdale Trade and Commerce Center Specific Plan (SP-13) and is designated Planned Development (PD) within the Specific Plan. A hotel is an allowed use subject to approval of a Site Plan Review (SPR) application. The proposed project is also subject to applicable provisions of the City's General Plan, Land Use Element, and Municipal Code and has been designed consistent with zoning regulations for adequate building setbacks, landscaping requirements, and building placement to ensure overall compatibility with existing development within the surrounding area. Therefore, the proposed project would not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a-b) **No Impact**. The project site does not contain any mining or recovery operations for mineral resources and no such activities have occurred on the project site in the past. According to the City's General Plan, the project site is not within an area containing significant mineral resources, nor is site is not designated or any extractive use. Such a use would be incompatible with existing adjacent land uses. Therefore, no impact to mineral resources would occur.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the Project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive 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?	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a) **Less than Significant Impact with Mitigation Incorporated**. An Acoustical Analysis was conducted for the project proposed by Christopher Jean & Associates, Inc .The City of Palmdale requires hotel projects to conform to the following applicable noise criteria: Exterior, 65 dBA CNEL; Interior, 45 dbA CNEL; and Unit-to-Unit, STC 50/IIC 50. The expected future roadway noise impact was projected using the Federal Highway Administration's Highway Noise Prediction Model (FHWA RD-77-108) together with several roadway and site parameters that determine the projected impact of vehicular traffic noise. Based on traffic input data listed in the noise study calculations yield 50-foot design noise levels of 65 dBA Leq and 67 dBA CNEL for Corporate Court/Park Drive, 73 dBA Leq and 74 dBA CNEL for Avenue Q, 74 dBA Leq and 75 dBA CNEL for Palmdale Boulevard, and 82 dBA Leq and 86 dBA CNEL for the SR 14 Freeway.

The project site is bordered by SR 14 to the east, West Avenue Q and a vacant lot to the north, West Park Drive and hotels, motels, and commercial uses, such as a real-estate agent's office and gas station, to the south, and commercial uses, as well as vacant land, to the west. Operational noise from the proposed project is not anticipated to impact any sensitive receptors in the vicinity. Therefore, with implementation of Mitigation Measures **NOI-1**, combined with project conformance with City Municipal Code restrictions on construction activities, impacts from construction noise would be less than significant.

Mitigation Measures:

NOI-1: For all construction related activities, noise attenuation techniques shall be employed as needed to ensure that noise remains as low as possible during construction. The following noise attenuation techniques shall be incorporated into contract specifications to reduce the impact of construction noise:

- Ensure that construction equipment will be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.

- Place noise-generating construction equipment and locate construction staging areas away from sensitive receptors, where feasible.
- Schedule high noise-producing activities between the hours of 7:00 a.m. and 5:00 p.m. to minimize disruption to sensitive receptors.
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.
- Use electric air compressors and similar power tools rather than diesel equipment, where feasible.
- All stationary construction equipment (e.g. air compressor, generators, impact wrenches, etc.) shall be operated as far away from residential uses as possible and shall be shielded with temporary sound barriers, sound aprons or sound skins.
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes.
- During all construction activities, the job superintendent shall limit all construction-related activities to between the hours 6:30 a.m. and 8:00 p.m. Monday through Saturday.
- Clearly post construction hours, allowable workdays, and the phone number of the job superintendent at all construction entrances to allow the surrounding property owners/occupants to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective actions and report the actions to the complainant.

b) **No Impact**. It is not anticipated that construction of the proposed project would require the use of machinery that generates ground-borne vibration as no major subsurface construction (e.g., parking garage) is planned. No ground mounted industrial-type equipment that generates ground vibration would be utilized during occupancy of the proposed residences. Construction is anticipated to be temporary, intermittent and of short duration, and may involve the use of a grader, scraper, or other equipment and vehicles with rubber tires. Therefore, no impacts associated with ground-borne vibration/noise are anticipated.

Mitigation Measures: No mitigation measures are necessary.

c) **No Impact.** The closest airport is the Palmdale Regional Airport, which is located approximately six miles northeast of the project site. Therefore, impacts on the project from an off-site noise source do not constitute the potential for a significant impact on the environment and no mitigation is required.

Mitigation Measures: No mitigation measures are necessary.

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

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. The proposed project consists of the construction of a 123-room hotel. There is no housing proposed as part of the project. The proposed project would create a number of jobs; however, it is unlikely that the project would induce the relocation of population from elsewhere to the project vicinity. The proposed project is adjacent to major arterial streets that have the capacity to accommodate added traffic volume. Therefore, the proposed project would not accelerate development in an undeveloped area, nor would build-out result in an adverse physical change in the environment or introduce unplanned infrastructure not previously evaluated by the City's General Plan. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **No Impact**. The project site is currently vacant. No housing or people would be displaced necessitating the construction of replacement housing elsewhere. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. The Los Angeles County Fire Department provides fire, rescue, and emergency medical (paramedic) services, as well as fire prevention functions to the City of Palmdale. Los Angeles County Fire Station No. 24, located at 1050 West Avenue P, approximately two miles northwest of the project site, would serve as the first responder in the event of an emergency. The proposed project could potentially increase the demand for Fire Department services; however, this increase in people would be within regional growth projections for the City, and therefore, would not substantially affect provision of fire protection given the location of the project site and its close proximity to existing fire stations. Furthermore, compliance with more current applicable fire code and building code provisions determines a project's impact on fire services, and the proposed project would be required to meet all current code provisions to the satisfaction of the City and Fire Department. As a result, the proposed project would not necessitate the provision of new or physically altered governmental facilities, and the overall need for fire protection services is not expected to substantially increase. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. The Los Angeles Sheriff's Department provides police protection services to the project site from its station at 750 East Avenue Q, approximately two miles to the east. The proposed project could potentially increase the demand for police protection services; however, this increase of people would be within regional growth projections for the City and thus, would not substantially affect provision of police protection given the location of the proposed project and its proximity to existing police protection services and patrol routes. As such, the proposed project would not result in a need for new or physically altered governmental facilities. The overall need for police protection services would not increase substantially as a result of the proposed project. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. The project site is currently served by Palmdale School District and Antelope Valley Union High School District and the following nearby schools: Summerwind Elementary, David G. Millen Intermediate, and Highland High School.

However, the proposed project would not induce substantial population growth or provide any residential units. Therefore, the proposed project would not generate a demand for school facilities that would exceed the capacity of the school district. Nonetheless, pursuant to Section 65995 of the Government Code, the project applicant would be charged school impact fees to construct or reconstruct school facilities, potentially increasing the school district's capacity. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

d) **Less than Significant Impact**. The proposed project would not induce substantial population growth or provide any residential units. However, it is reasonable to assume that guests of the hotel would utilize recreation and park facilities in the surrounding area. Nonetheless, any additional demand would be met through payment of the City's park fees in accordance with the City's Municipal Code to provide funding for park and recreation facilities. Therefore, recreation facility impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

e) **Less than Significant Impact.** The proposed project would not create any significant increase in demand for library services. In accordance with the requirements of the City's Municipal Code, the project applicant would be required to pay the City's public facilities fee to finance the City's public facilities, including libraries. Payment of the impact fee would result in a less than significant impact to library facilities.

Mitigation Measures: No mitigation measures are necessary.

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

Project Impacts and Mitigation Measures

a-b) **Less than Significant Impact**. The proposed project consists of the construction of a four-story, 123-room hotel. While it is reasonable to assume that guests of the hotel would utilize recreation and park facilities in the surrounding area, any additional demand would be met through payment of the City's park fees in accordance with the City's Municipal Code to provide funding for park and recreation facilities. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRANSPORTATION. **Would the Project:**				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a design feature (e.g., sharp curve or dangerous intersections) or incompatible uses (e.g. farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. Traffic volumes expected to be generated by the proposed project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using rates published in the 10th edition of the ITE *Trip Generation Manual*. The trip rates and the associated traffic generation forecast for the proposed project are provided in **Table 5**. As shown, the proposed project would generate approximately 1,045 daily trips and less than 100 peak hour trips, which is below the City of Palmdale's threshold for preparing a traffic impact assessment.

Table 5. Project Trip Generation

Land Use (ITE Code)	Size	Trip Generation Rates						Trip Generation							
		AM Peak Hour			PM Peak Hour			Daily	AM Peak Hour			PM Peak Hour			Daily
		In	Out	Total	In	Out	Total		In	Out	Total	In	Out	Total	
Proposed Project Hotel (310)	125	59%	41%	0.47	515	49%	0.60	8.36	35	24	59	38	37	75	1.045
								Total	**35**	**24**	**59**	**38**	**37**	**75**	**1.045**
SOURCE: Institute of Transportation Engineers, Trip Generation Manual, 10th Edition, 2017															

The proposed project would be accessed via Corporate Court, and the applicant will be required to comply with the City of Palmdale's regulations for traffic concerns, including implementing roadway improvements to both Corporate Court and West Park Drive. The roadway improvements to be implemented as part of the proposed project would improve the circulation system and be designed and constructed to satisfy all City requirements for street widths, corner radii, intersection control, and incorporate design standards tailored specifically to site access requirements. This improved circulation would not substantially increase delays to vehicles, pedestrians, bicycles, or buses at nearby intersections. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. According to the Air Quality and Greenhouse Gas (GHG) Emissions study, the proposed project would result in 1,941,365 vehicle miles traveled

(VMT) annually. This is below the City of Palmdale's VMT impact threshold. Therefore, impacts related to CEQA Guidelines §15064.3(b) would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c) **No Impact**. The project site does not contain any aviation related uses and the proposed project would not include the development of any aviation related uses. Therefore, the proposed project would not have an impact on air traffic patterns.

Mitigation Measures: No mitigation measures are necessary.

d) **Less than Significant Impact**. The design of roadways must provide adequate sight distance and traffic control measures. This provision is normally realized through roadway design to facilitate roadway traffic flows. Future roadway improvements in and around the project site will be designed and constructed to satisfy all City requirements for street widths, corner radii, intersection control, and incorporate design standards tailored specifically to site access requirements. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II	TRIBAL CULTURAL RESOURCES. 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:				
a)	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	☐	☐	☐	☒
b)	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) to 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.	☐	☐	☐	☒

Project Impacts and Mitigation Measures

a-b) **No Impact**. Refer to responses III(a) through III(c), above. RTFactfinders conducted a Cultural Resource survey of the project site. in February 2019. No tribal cultural resources were identified by any of the Native American Tribes with cultural affiliations to the area of the project site. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the Project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the waste water 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?	☐	☐	☒	☐

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. Project wastewater would be treated at the Palmdale Water Reclamation Plant, which has a capacity of 12 million gallons per day (mgd) of wastewater. Using wastewater generation factor of 125 gallons per day, the proposed 123-room hotel is anticipated to generate approximately 15,375 gallons per day of wastewater or 0.015 mgd. Therefore, the proposed project is not expected to generate wastewater that would exceed wastewater treatment requirements. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact.** The proposed project site is located within the boundaries of County Sanitation Districts of Los Angeles County (Districts). City of Palmdale General Plan policies require that any water infrastructure necessary to serve the site be financed and constructed by the project. Sufficient water facilities are available to serve the project and the construction of new facilities or the expansion of existing facilities, except as required to support the project itself, will not be required.

The proposed project will be required to construct the necessary on-site infrastructure and sewer connections to the existing system and pay any applicable fees as required by the City of Palmdale. Therefore, given the existing capacity of the wastewater treatment plant and compliance with Palmdale Municipal Code requirements, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. Development of the proposed project will result in an increase in the amount of impermeable surfaces on the project site and, therefore, an increase in surface runoff. However, as previously stated, construction projects that disturb more than one-acre require NPDES permits. Under the NPDES permits, project proponents are required to prepare an SWPPP and WQMP. With adherence to the WQMP, post-construction flows will not exceed pre-construction flows. Therefore, the project would not result in construction or expansion of stormwater drainage facilities, and impacts would less than significant.

Mitigation Measures: No mitigation measures are necessary.

d) **Less than Significant Impact**. Los Angeles County Water Works District has not indicated any problems in supplying water to the proposed project from existing facilities. No new construction of water treatment facilities or new or expanded entitlements would be required. Therefore, water impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

e) **Less than Significant Impact**. Refer to response XVIII(a), above. The project will not exceed the treatment capacity of the Palmdale Water Reclamation Plant. Therefore, impacts are less than significant.

Mitigation Measures: No mitigation measures are necessary.

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

Project Impacts and Mitigation Measures

a) **Less than Significant Impact**. Wildfires occur on grasslands, hillsides and mountainous terrain. Palmdale has wildfire areas within the southern and western portions of the City. Palmdale's General Plan Safety Element (Exhibit S-16) shows the location of Palmdale's wildfire hazard areas. The project site is not located within a wildfire hazard area, and the proposed project is not located in lands classified as very high fire severity zone. In addition, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

b) **Less than Significant Impact**. The proposed project is not located in lands classified as very high fire severity zone. The project site is not located in an area of slope, but occasionally experiences Santa Ana wind conditions. Nonetheless, the proposed project would be required to comply with federal, State and local development regulations that minimize the risk of fire hazards. Implementation of the proposed project would not exacerbate wildfire risks and would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c) **Less than Significant Impact**. The proposed project is not located in lands classified as very high fire severity zone, and the project would be required to comply with federal, State and local development regulations that minimize the risk of fire hazards. Implementation of the proposed project would not exacerbate fire risk associated with project construction. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

d) **Less than Significant Impact**. The proposed project is not located in lands classified as very high fire severity zone. The project is not located in an area of slope that could cause erosion due to wildfire destroying existing vegetation. The proposed project would not cause a situation that would expose people or structures to danger due to runoff, post-fire slope instability or drainage changes. No impact would occur.

Mitigation Measures: No mitigation measures are necessary.

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to 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, 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?	☐	☒	☐	☐

Project Impacts and Mitigation Measures

a) **Less than Significant Impact with Mitigation Incorporated**. Refer to the discussions identified in Section III, Biological Resources, and Section IV, Cultural Resources. The proposed project consists of the construction of a four-story, 123-room hotel. Although the proposed project would affect the quality of the environment with respect to the habitat of a plant or animal community, the mitigation identified in the Initial Study would reduce such impacts through the provision of adherence to the protection of burrowing owls and avian breeding, and a revegetation plan through implementation of Mitigation Measures **BIO-1-3**. The project does not impact or eliminate important examples of the major periods of California history or prehistory. Impacts to potential on-site archaeological and paleontological resources would be reduced to less than significant levels through Mitigation Measures **CUL-1** and **CUL-2**. Therefore, impacts would be less than significant with the incorporation of mitigation measures.

b) **Less than Significant Impact with Mitigation Incorporated.** Refer to the analysis provided in Section 4.0, Environmental Analysis. With implementation of the proposed mitigation measures, impacts would be less than significant.

c) **Less than Significant Impact with Mitigation Incorporated**. Future development on the project site would be required to conform to a wide variety of mandatory obligations related to human safety and the quality of their environment. Mitigation measures, and standard conditions will apply to the project and the specific mitigation measures identified in this Initial Study would reduce all impacts to a less than significant level. Therefore, impacts would be less than significant with the incorporation of mitigation measures.

5. REFERENCES

- *Acoustical Analysis Woodspring Suites Hotel and Remaining Parcels of Tentative Parcel Map No. 082361 City of Palmdale*, by Christopher Jean & Associates, Inc., April 3, 2019.
- *Biological Resource Assessment of APN 3004-001-040 Palmdale, California*, prepared by Mark Hagan, April 8, 2019.
- City of Palmdale General Plan, adopted by City Council Resolution 93-10 January 25, 1993.
- City of Palmdale, Program Environmental Impact Report for the City of Palmdale General Plan, August 1992.
- City of Palmdale Municipal Code, Ordinance 1516.
- County Sanitation District of Los Angeles County Letter, May 6, 2019.
- *Geotechnical Engineering Investigation Proposed Woodspring Suites Palmdale SWQ West Avenue Q & Corporate Court Lancaster, California*, prepared by Krazen & Associates, Inc., January 2, 2019.

- City of Palmdale General Plan, adopted by City Council Resolution 93-10 January 25, 1993.
- City of Palmdale, Program Environmental Impact Report for the City of Palmdale General Plan, August 1992.
- City of Palmdale Municipal Code, Ordinance 1516.

- Institute of Transportation Engineers, *Trip Generation Manual, 10th Edition,* 2017.
- *Phase 1 Cultural Resource Investigation for Approximately 15 Acres Southwest of the Intersection of Interstate 14 and Avenue Q Palmdale, Los Angeles County, California*, prepared by RTFactfinders, February 2019.
- *Woodspring Suites Hotel Project Air Quality and Greenhouse Gas Emission Study*, prepared by Rincon Consultants, Inc., February 2019.

6. MTIGATION MONITORING PROGRAM

The purpose of the Mitigation Monitoring Program (MMP) is to ensure that the mitigation measures identified in this IS/MND are properly carried out. The implementation of this MMP shall be carried out by the City of Palmdale and other entities (e.g., Applicant/Construction Contractor), as shown in **Table 6**.

TABLE 6: MITIGATION MONITORING PROGRAM

Mitigation Measures	Timing	Responsible Party	Enforcement/ Monitoring Party
BIOLOGICAL RESOURCES			
BIO-1 A burrowing owl survey shall be conducted within 30 days prior to construction activities to ensure burrowing owls are not present during construction activities. If burrowing owls are discovered, the guidance outlined in the California Department of Fish and Wildlife 2012 "Staff Report on Burrowing Owl Mitigation" will be used for addressing burrowing owl issues on the study site.	Prior to Construction	Applicant/ Construction Contractor	Planning Division
BIO-2: If vegetation removal will occur during or close to the nesting season, a qualified biologist will survey all areas to be disturbed as close as possible but no more than one week prior to removal. If active bird nests are found, impacts to nests will be avoided by either delaying work or establishing initial buffer areas of a minimum of 500 feet for active nesting raptors and 50 feet around other active migratory bird species nests. The project biologist will determine if the buffer areas should be increased or decreased based on the nesting bird response to disturbances.	Prior to Construction	Applicant/ Construction Contractor	Planning Division
CULTURAL RESOURCES			
CUL-1: If cultural resources are discovered during project grading by the project contractor, all work in the area of the find shall cease and a qualified archaeologist shall be retained by the project sponsor to investigate the find and to make recommendations on its disposition. If a significant archaeological resource(s) is discovered on the property, ground-disturbing activities shall be suspended 100 feet around the resource(s). The archaeological monitor and representatives of the appropriate Native American Tribe(s), the project Applicant, and the City Planning Division shall confer regarding mitigation of the discovered resource(s). A treatment plan and/or preservation plan shall be prepared by the archaeological monitor and reviewed by representatives of the appropriate Native American Tribe(s), the project Applicant, and the City Planning Division and implemented by the archaeologist to protect the identified archaeological resource(s) from damage and destruction. The landowner shall relinquish ownership of all archaeological artifacts that are of Native American origin found on the project site to the culturally affiliated Native American Tribe(s) for proper treatment and disposition. A final report containing the significance and treatment findings	During Construction	Applicant/ Construction Contractor	Building & Safety Division

TABLE 6: MITIGATION MONITORING PROGRAM			
Mitigation Measures	**Timing**	**Responsible Party**	**Enforcement/ Monitoring Party**
shall be prepared by the archaeologist and submitted to the City Planning Division and the appropriate Native American Tribe(s).			
CUL-2: f human remains, including those interred outside of dedicated cemeteries are discovered on-site, per California Health and Safety Code (Section 7050.5), no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98, including coordination with local Native American Tribe(s) if the remains are identified as prehistoric.	During Construction	Applicant/ Construction Contractor	Building & Safety Division
NOISE			
NOI-1: For all construction related activities, noise attenuation techniques shall be employed as needed to ensure that noise remains as low as possible during construction. The following noise attenuation techniques shall be incorporated into contract specifications to reduce the impact of construction noise: • Ensure that construction equipment will be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. • Place noise-generating construction equipment and locate construction staging areas away from sensitive receptors, where feasible. • Schedule high noise-producing activities between the hours of 7:00 a.m. and 5:00 p.m. to minimize disruption to sensitive receptors. • Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources. • Use electric air compressors and similar power tools rather than diesel equipment, where feasible. • All stationary construction equipment (e.g. air compressor, generators, impact wrenches, etc.) shall be operated as far away from residential uses as possible and shall be shielded with temporary sound barriers, sound aprons or sound skins. • Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes. • During all construction activities, the job superintendent shall limit all construction-related activities to between the hours 6:30 a.m. and 8:00 p.m. Monday through Saturday. • Clearly post construction hours, allowable workdays, and the phone number of the job superintendent at all construction entrances to	During Construction	Applicant/ Construction Contractor	Building & Safety Division

TABLE 6: MITIGATION MONITORING PROGRAM			
Mitigation Measures	**Timing**	**Responsible Party**	**Enforcement/ Monitoring Party**
allow the surrounding property owners/occupants to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective actions and report the actions to the complainant.			