

DRAFT
Copart Palmdale Project
Initial Study/Mitigated Negative Declaration
City of Palmdale, Los Angeles County, California

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Report Date: November 27, 2019

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
AB	Assembly Bill
AF	acre-feet
ADT	average daily traffic
ANSI/ANAB	American National Standards Institute National Accreditation Board
APN	Assessor’s Parcel Number
ARB	California Air Resources Board
AVAQMD	Antelope Valley Air Quality Management District
AVWM	Antelope Valley Watermaster
BMP	Best Management Practice
BRA	Biological Resources Assessment
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CMP	Congestion Management Plan
CNEL	Community Noise Equivalent Level
CO ₂ e	carbon dioxide equivalent
CREC	Controlled Recognized Environmental Condition
dB	decibel
dba	A-weighted decibel
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FCS	FirstCarbon Solutions
FMMP	California Farmland Mapping and Monitoring Program

Acronyms and Abbreviations

FTA	Federal Transit Administration
GHG	greenhouse gas
GWP	global warming potential
HREC	Historic Recognized Environmental Condition
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
kBTU	kilo-British Thermal Unit
kWh	kilowatt hours
LACoFD	Los Angeles County Fire Department
LESA	Land Evaluation and Site Assessment
LUST	leaking underground storage tank
mgd	million gallons per day
MOU	memorandum of understanding
MRE	Mineral Resource Extraction
MRE	mineral resources extraction
MRZ	Mineral Resources Zone
MT	Metric Tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO _x	Nitrogen oxide
NPDES	National Pollutant Discharge Eliminate System
PCE	passenger car equivalent
PM	particulate matter
PM ₁₀	particulate matter, including dust, 10 micrometers or less in diameter
PM _{2.5}	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PWD	Palmdale Water District
Qa	Quaternary alluvial (deposits)
REC	Recognized Environmental Condition
rms	root mean square
RPS	renewables portfolio standard
SB	Senate Bill
SCCIC	South Central Coastal Information Center
SEA	Significant Ecological Area
SIP	State Implementation Plan
SoCalGas	Southern California Gas
SR	State Route

SRA	State Responsibility Area
SWPPP	Storm Water Pollution Prevention Plan
State Water Board	California State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
USAF	United States Air Force
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled
VOC	volatile organic compounds
ZEV	zero emission vehicle

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SECTION 1: INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify the potential environmental impacts that could result from the implementation of the Copart Palmdale Project (project) in the City of Palmdale, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Palmdale (City) has discretionary authority over the proposed project and is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. The intended use of this document is to determine the level of environmental analysis required pursuant to the requirements of CEQA and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the proposed project. Section 2 includes an environmental checklist that provides an overview of the potential impacts that may result from project implementation. Section 3 elaborates on the information contained in the environmental checklist and provides a justification for the environmental checklist responses.

1.1 - Project Location

The proposed project is located in the City of Palmdale, Los Angeles County, California (Exhibit 1). The 81.98-acre project site is located at the northwest corner of 40th Street and Avenue L-8, on Assessor's Parcel Number (APN) 3170-015-007] (Exhibit 2). The project is located on the Lancaster East, California, United States Geological Survey 7.5-minute topographic quadrangle map, in the south half of the northeast quarter of Section 32, Township 7 North, Range 11 West, San Bernardino Base & Meridian (34°39'18.68"N, 118° 3'48.05"W). The project is at an elevation of 2,462 feet above mean sea level.

1.2 - Environmental Setting

The project site is vacant and undeveloped, and consists of a rectangular-shaped parcel totaling 81.98 acres. The project is located in a relatively flat area within an agricultural portion of the City. Review of historic aerials indicate that the site was previously used for agricultural purposes. The surrounding area consists of vacant lands.

1. North: Vacant Land
2. South: Vacant Land across a dirt road
3. East: 40th Street East
4. West: Vacant Land

1.3 - Project Description

The project consists of the construction of a vehicle storage facility and associated office building for an online automobile auction business located on a vacant 81.98-acre lot in the City of Palmdale.

The purpose of this facility is to serve as an outlet/overflow lot for the Copart Martinez location¹ located approximately 363 miles from the project site. Project operation consists of the short-term storage and sale of used, damaged, or undamaged vehicles, including automobiles, watercrafts, trailers, and industrial and construction equipment. Sale of on-site vehicles would occur through an online auction website and associated mobile applications for registered members.

On-site facilities would include a 2,448-square-foot office/sales building, vehicle storage lot, customer and employee parking lot, and vehicle loading and unloading area (Exhibit 3). The vehicle storage lot would have the capacity to store up to 11,000 vehicles, and would consist of a cement treated base course with an impervious chip seal. The customer and employee parking lot and loading and unloading area would consist of a paved asphalt surface. Vehicles for sale would be transported from the loading/unloading area to the storage yard by Caterpillar wheel loaders. When inventory is fully stocked, Copart would operate up to six wheel loaders during business operations. The duration of short-term storage for stored vehicles is 5 to 60 days, on average. The vehicle storage area would be shielded from onlookers and adjacent properties by an 8-foot-high opaque vinyl fence. No nighttime lighting is proposed within the storage lot. Laser scanners would provide nighttime security.

Parking for the project's customer/employee parking lot would consist of 48 stalls, including 44 standard parking stalls, two handicap stalls, and two van stalls. The 81.98-acre site would be broken up into a 1.99-acre building and parking lot area, a 61.07-acre storage yard, 7.18 acres of off-site street dedications, and 11.74 acres of perimeter interceptor flood channels (including landscaping setbacks). The office building would include a 2,448-square-foot office/sales building on-site and an 8-foot-high opaque vinyl fence surrounding the parking area. Copart employees would have access to the storage lot, and occasionally a customer may be escorted by an employee to view a vehicle before purchase. Vehicles are stored and sold intact. Dismantling, fluid draining, crushing, or parts sales are not proposed.

The project would connect to an off-site gravity sewer collection system 3,000 feet from the project site within Avenue L, west of 35th Street (Exhibit 4, Exhibit 5, and Exhibit 6). The development would include an on-site holding tank and private lift station to transport sewer effluent from the office building on the east side of the project to the off-site sewer connection point on the northwest side of the project. Implementation of water quality/retention basins around the site perimeter is included in development of the project. Domestic and irrigation water for the site would be provided by drilling a new well and installing a storage tank and associated pumps.

The existing and proposed General Plan land use designation for the site is industrial (IND) (Exhibit 7 and Exhibit 8) and the existing and proposed zoning designation is General Industrial (M-2) (Exhibit 9 and Exhibit 10). The project does not propose a general plan land use designation change or zoning change. The site has been zoned for industrial uses since 1993.

¹ Copart Martinez operation is located at 2701 Waterfront Road Building 1, Martinez, CA 94553.

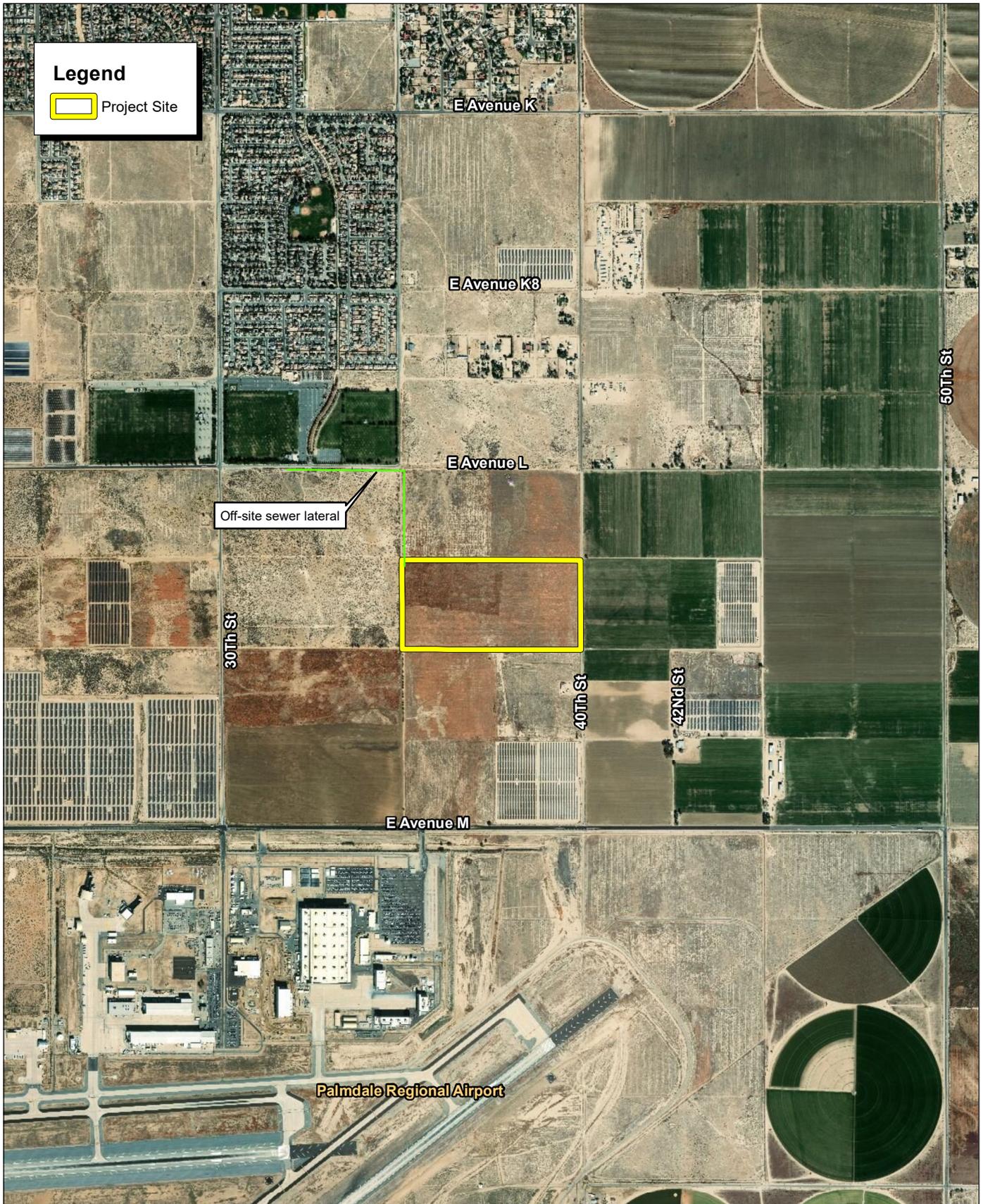


Source: Census 2000 Data, The CaSIL



Exhibit 1 Regional Location Map

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Source: ESRI Aerial Imagery

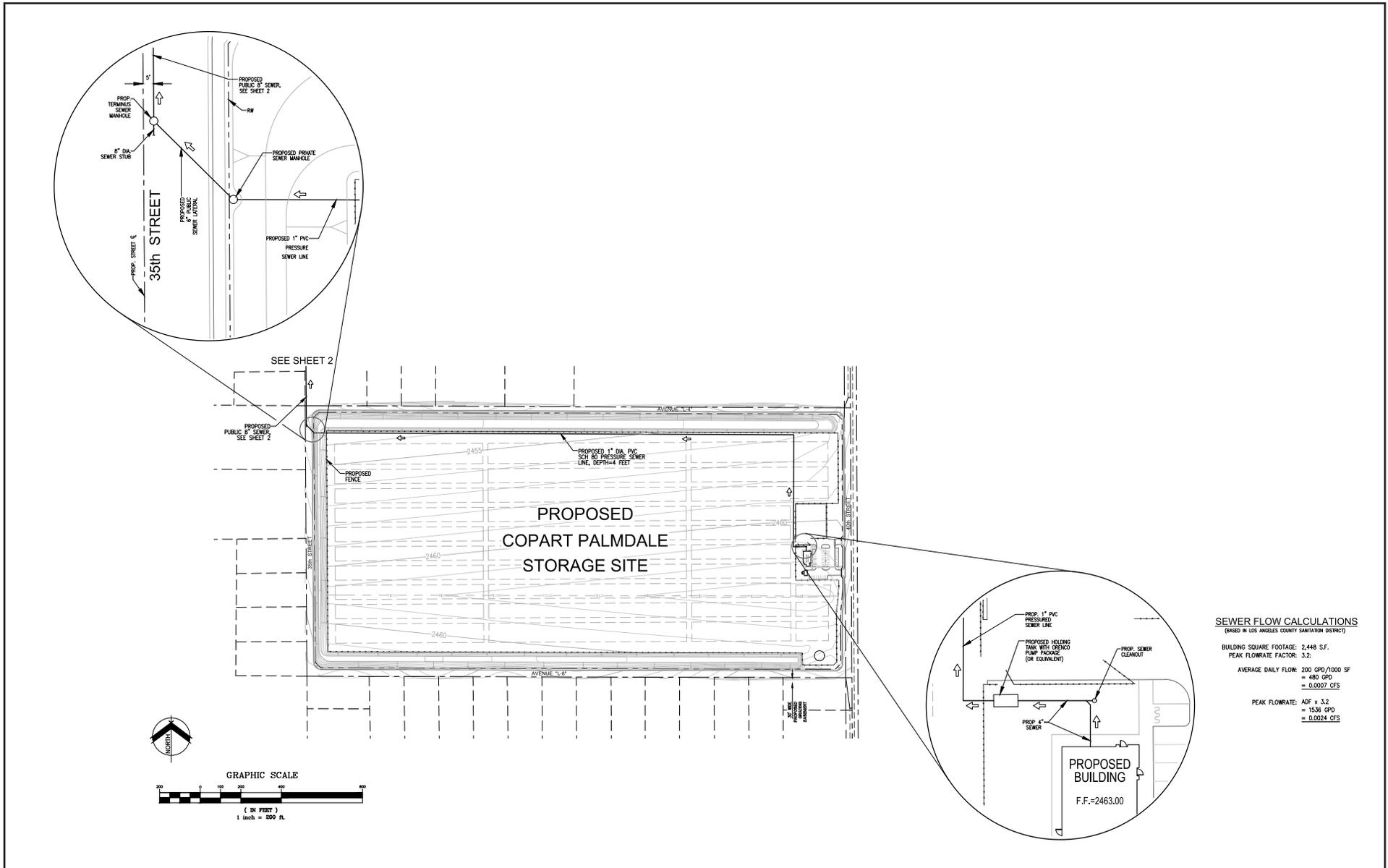
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Exhibit 2
Local Vicinity Map
Aerial Base

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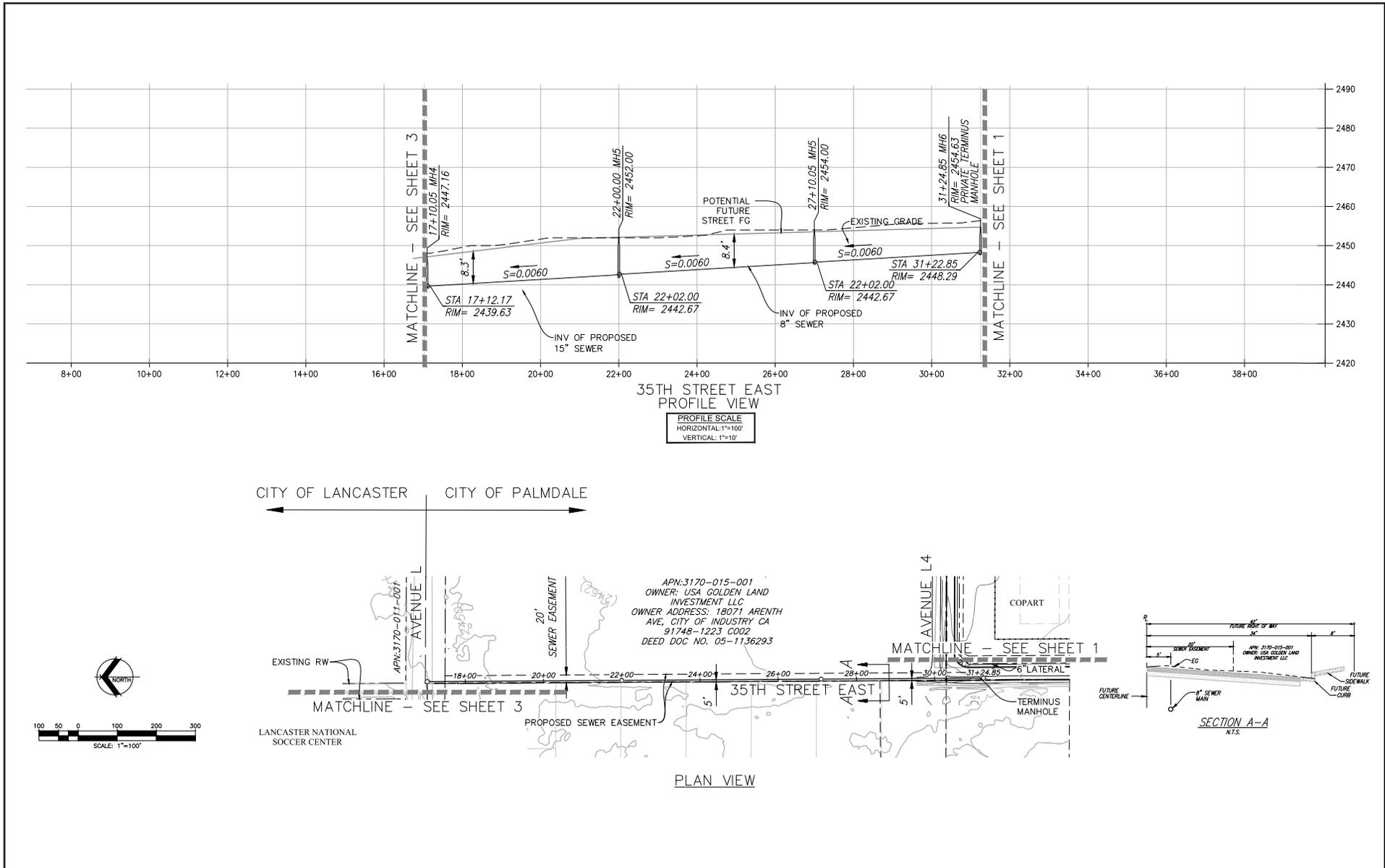
SEWER FLOW CALCULATIONS
 (BASED IN LOS ANGELES COUNTY SANITATION DISTRICT)

BUILDING SQUARE FOOTAGE: 2,448 S.F.
 PEAK FLOWRATE FACTOR: 3.2
 AVERAGE DAILY FLOW: 200 GPD/1000 SF
 = 480 GPD
 = 0.0007 CFS

PEAK FLOWRATE: ADF x 3.2
 = 1536 GPD
 = 0.0024 CFS

Source: Stantec, June 2019.

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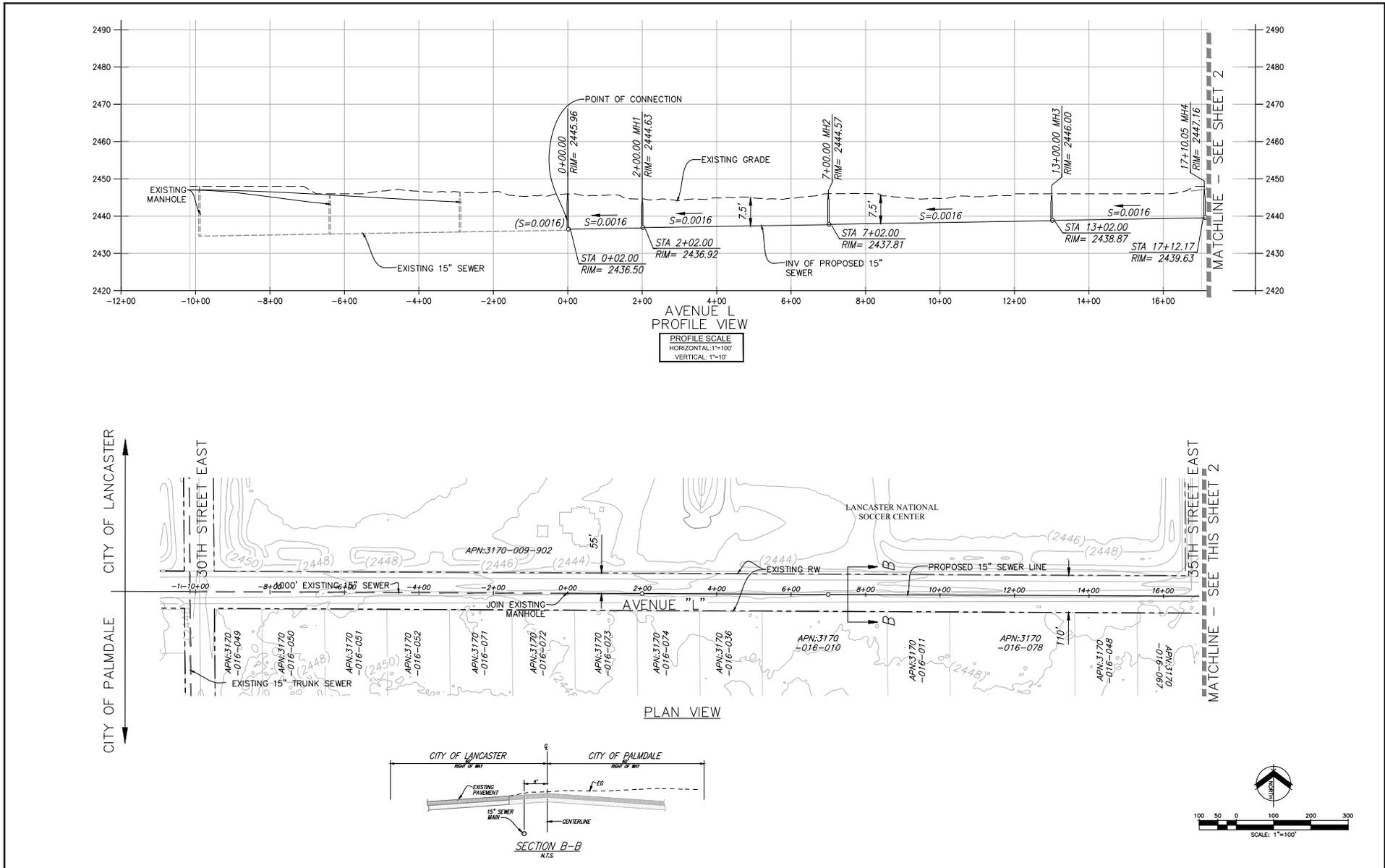


Source: Stantec, June 2019.



Exhibit 5 On-site/Off-site Sewer Lateral - 35th Street East

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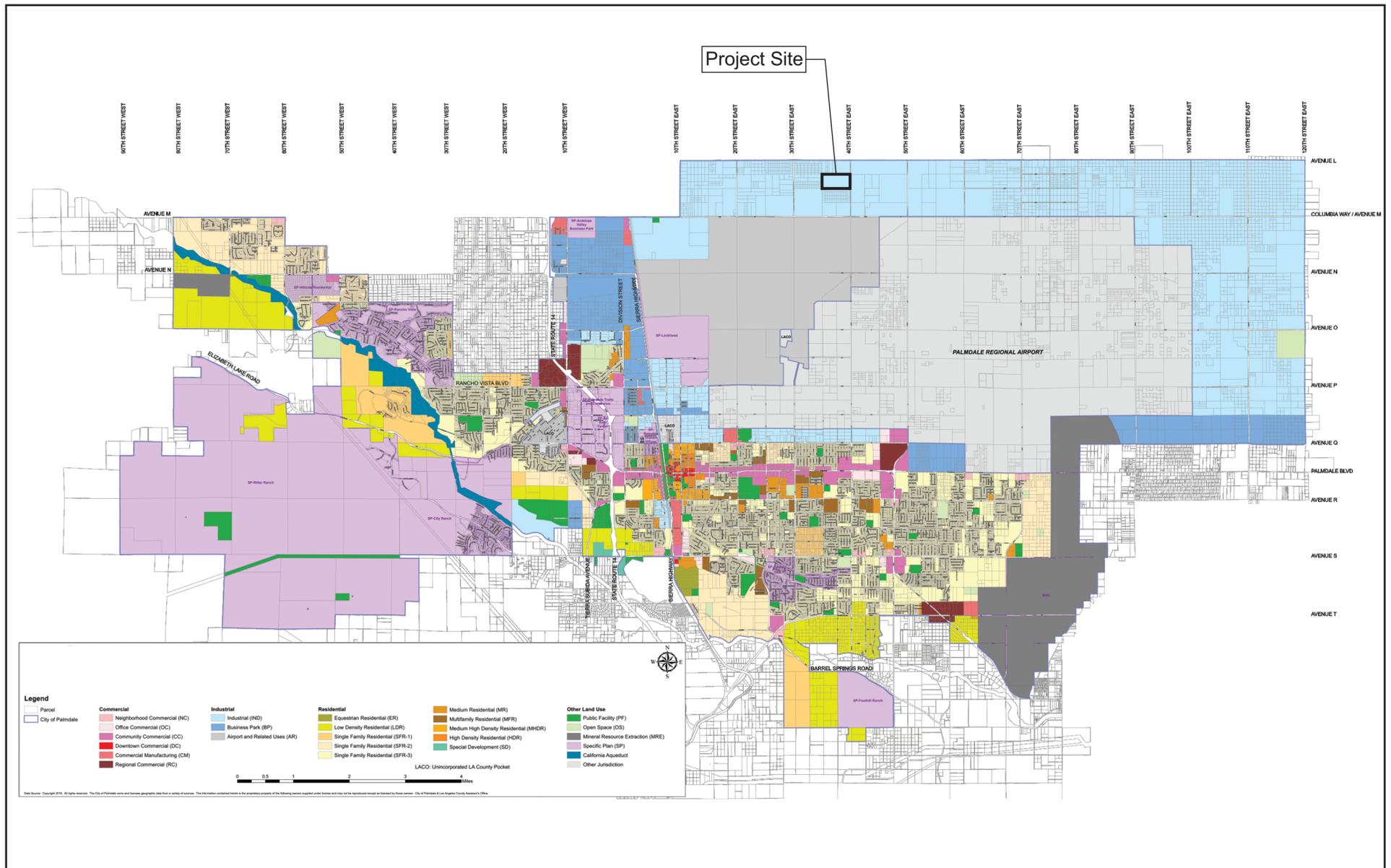


Source: Stantec, June 2019.

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Exhibit 6
On-site/Off-site Sewer Lateral - Avenue L

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Source: City of Palmdale

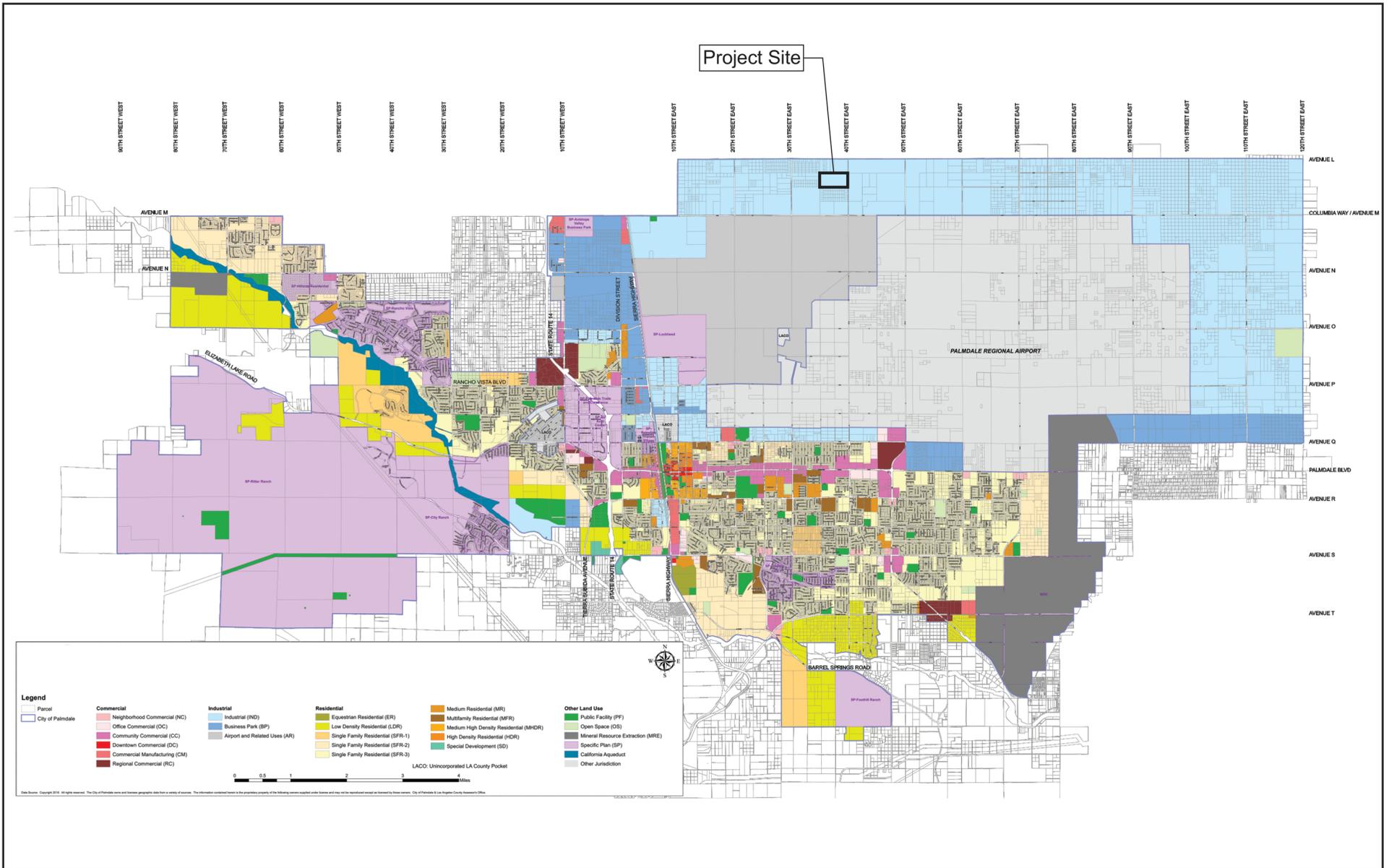
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Exhibit 7 Current General Plan Land Use

COPART, INC • COPART PALMDALE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Source: City of Palmdale

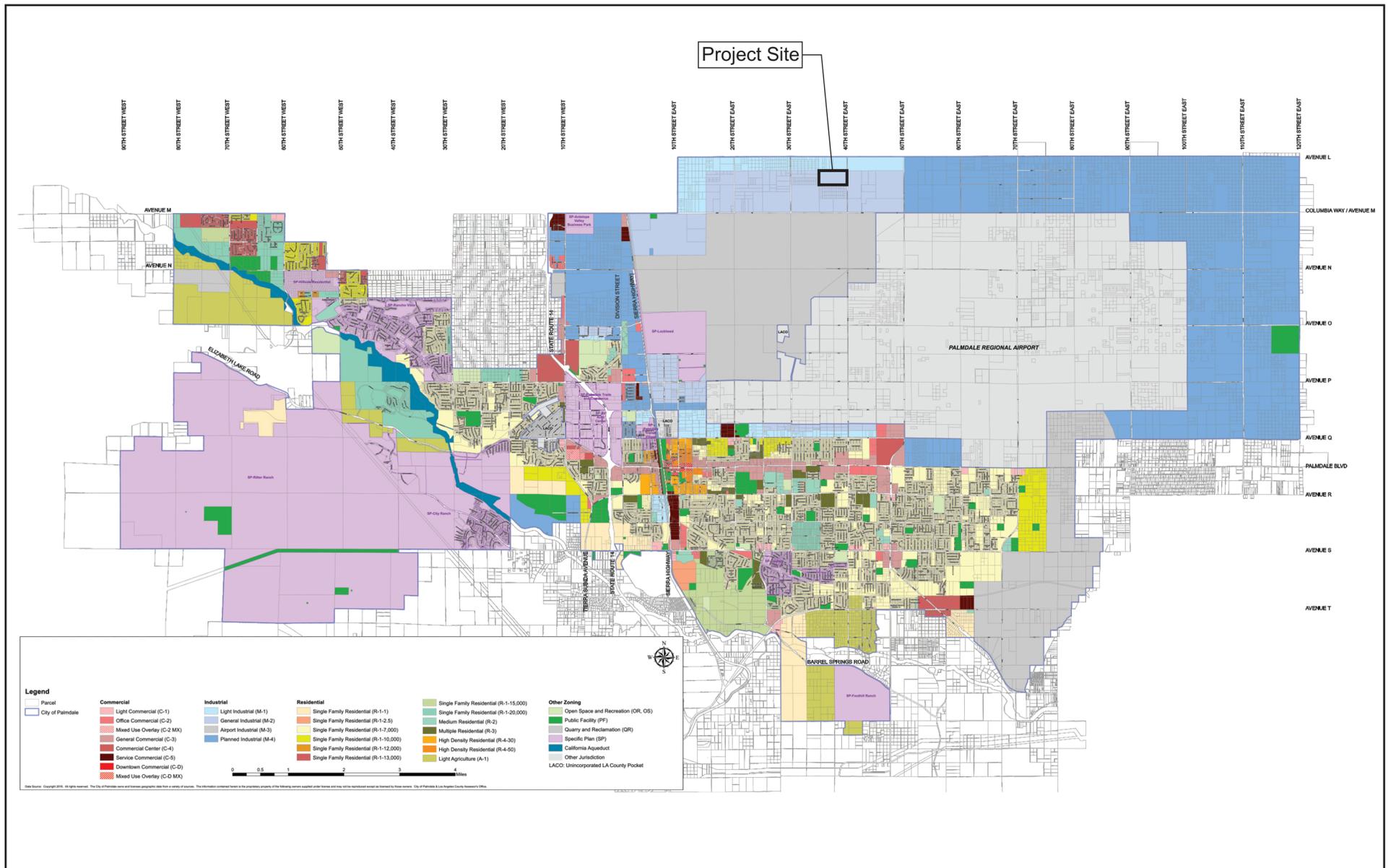
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Exhibit 8 Proposed General Plan Land Use

COPART, INC • COPART PALMDALE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Source: City of Palmdale

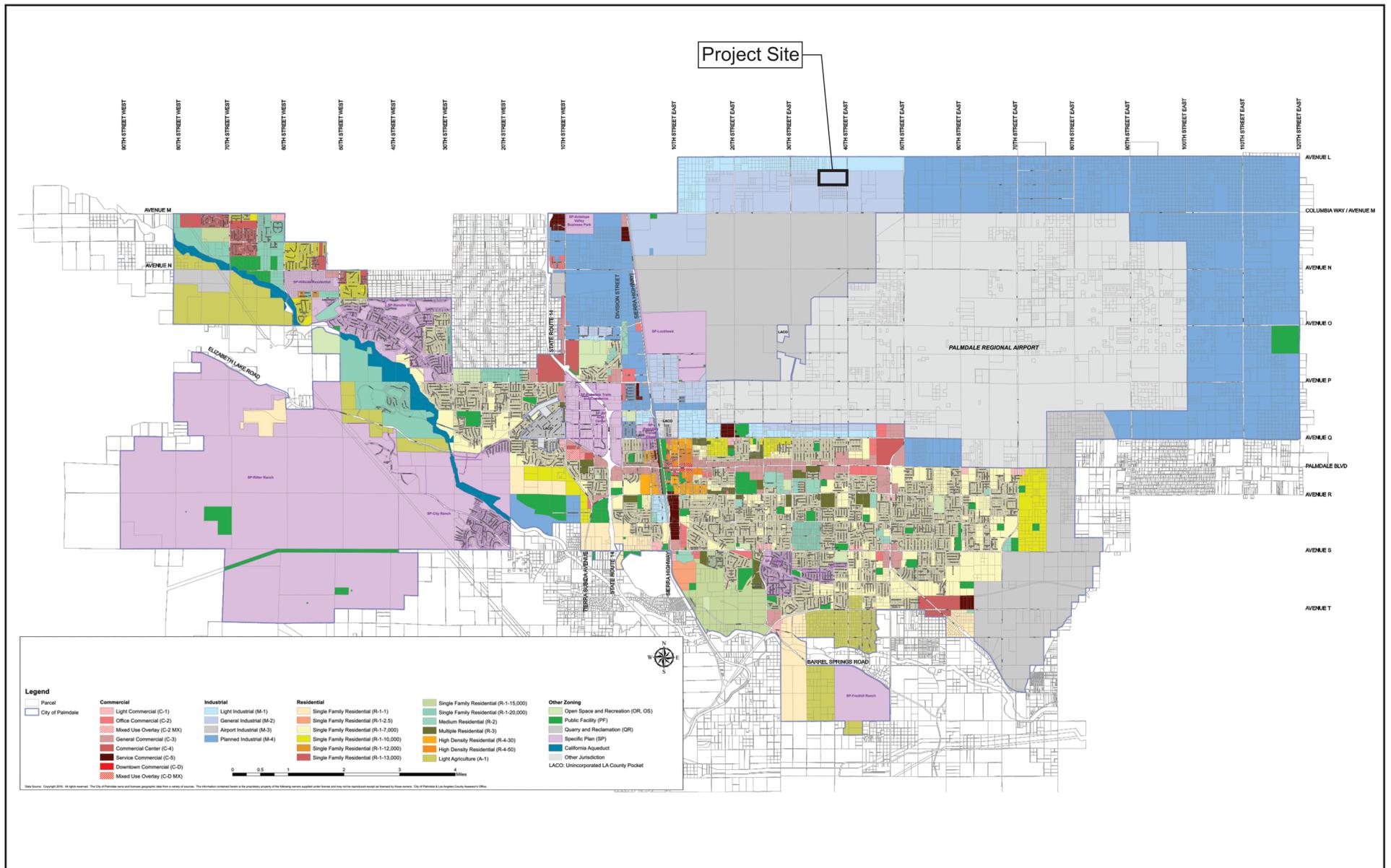
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Exhibit 9 Current Zoning

COPART, INC • COPART PALMDALE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Source: City of Palmdale

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Exhibit 10 Proposed Zoning

COPART, INC • COPART PALMDALE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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The following public services are available to the project:

- Fire Protection Services (Los Angeles County Fire Department);
- Police Protection Services (Los Angeles County Sherriff’s Department);
- School Services (Antelope Valley Union High School District);
- Library Services (Palmdale City Library); and
- City Administrative Services (City of Palmdale).

The following utilities/infrastructure systems and services are available to the project:

- Solid Waste;
- Streets Infrastructure (City of Palmdale Public Works);
- Electricity (Southern California Edison); and
- Natural Gas (Southern California Gas Company).

1.3.1 - Construction

Project construction is expected to last 6 to 7 months, with construction starting in February 2020.

1.3.2 - Operation

Hours of operation are Monday through Friday, 8:00 a.m. to 5:00 p.m. A maximum of 25 full-time employees would work at the facility.

1.4 - Required Discretionary Approvals

The proposed project requires the following discretionary approvals:

- City of Palmdale Planning Department and Public hearing with the Hearing Officer approval of the IS/MND and Site Plan Review #19-012;
- Grading and Building Permits to grade and construct the project through the City of Palmdale;
- Well permit through Antelope Valley Watermaster (AVWM) and the Los Angeles County Health Department; and
- On-site private holding tank and lift station permit through the City of Palmdale.

1.5 - Intended Uses of this Document

This IS/MND has been prepared to determine the appropriate scope and level of detail required in the environmental documentation for purposes of CEQA. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the project. The Draft IS/MND will be circulated for a minimum of 20 days, during which period comments concerning the analysis contained in the IS/MND should be sent to:

Perry Banner, Senior Planner
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550
Phone: 661.267.5200
Email: pbanner@cityofpalmdale.org

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

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.			
<input type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Air Quality	
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources/Tribal Cultural Resources	<input checked="" type="checkbox"/> Geology/Soils	
<input type="checkbox"/> Greenhouse Gas Emissions/Energy	<input type="checkbox"/> Hazards/Hazardous Materials	<input type="checkbox"/> Hydrology/Water Quality	
<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Noise	
<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services	<input type="checkbox"/> Recreation	
<input checked="" type="checkbox"/> Transportation	<input type="checkbox"/> Utilities/Services Systems	<input type="checkbox"/> Wildfire	
<input checked="" type="checkbox"/> Mandatory Findings of Significance			

Environmental Determination

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 11/27/19 Signed: *Rob Seuce*

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Aesthetics <i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

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

Less than significant impact. Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). The project is located in the high desert plains of the Antelope Valley and in an area with a flat topographic gradient. Scenic vistas within the project area consist of distant mountain views, including the Bissell Hills to the north, Portal Ridge Mountains to the west, San Gabriel Mountains to the south, and the Sierra Pelona Range to the southwest. Scenic areas within the City of Palmdale include the Lamont Odett Vista Point, Godde Hills Road, Bouquet Canyon Road, Juniper Hills Drive, and the Los Angeles National Forest.² There are also numerous buttes within the City. However, none of these views are within the immediate vicinity of the site, and the project would not obstruct such views. Development of the project would not significantly impact views of the mountains surrounding the project area. As such, impacts related to scenic vistas would be less than significant.

² City of Palmdale. 1993. City of Palmdale General Plan. Scenic Areas. Website: http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/general_plan.pdf

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

Less than significant impact. According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System, there are no officially designated scenic highways near the project. State Route (SR) 2 is the only officially designated scenic highway near the project, which is over 10 miles away. There are several City designated scenic highways within the City. The City of Palmdale General Plan establishes Policy ER1.2.2, which requires special design standards for projects adjacent to these highways.³ However, all listed highways are at least 7.5 miles away from the project. There are no established scenic resources near the project. Therefore, the project would have no impact regarding the damage of scenic resources 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?

Less than significant impact. The project is located in a non-urbanized area of Palmdale. Development of the project could result in a significant impact if it resulted in substantial degradation of the existing visual character or quality of the site and its surroundings. Degradation of visual character or quality is defined by substantial changes to the existing site appearance through construction of structures such that they are poorly designed or conflict with the site's existing surroundings. The project would develop a vehicle storage facility for an online automobile auction business on vacant land; the project would include an office building surrounded by 8-foot-high opaque vinyl fencing.

Vacant land uses currently surround the project site. As shown in Exhibit 11, proposed landscaping would incorporate several tree species, including podless sweet acacia (*Acacia sarnesiana* "Sierra sweet"), thornless vommnon honeylocust (*Gleditsia triacanthos inermis*), Desert Museum palo verde (*Parkinsonia X "Desert Museum"*), thornless Chilean mequite (*Prosopis chilensis "thornless"*), and Texas mountain laurel (*Sophora secundiflora*). There are also several low water shrubs including agave havards century plant (*Agave havardiana*), whales tongue agave (*Agave ovatifolia*), rubber rabbitbrush (*Chrysothamnus nauseosus*), desert lavender (*Hyptis emoryi*), ocotillo (*Fouquieria spendens*) beavertail pricklypear (*Opuntia basilaris*), desert sage (*salvia dorrii*), desert globemallow (*Sphaeralcea ambigua*), and Joshua tree (*Yucca brevifolia*). Bioinfiltration sod is also proposed around the project perimeter. Landscaping would provide an aesthetically pleasing design element as part of the project. In addition, potential degradation of existing character or visual quality would be shielded by the proposed vinyl fencing, which would also shield views of the vehicles stored on-site.

The project and surrounding land is designated for industrial land uses and the site is zoned M-2 for General Industrial use. Therefore, the proposed project would be consistent with the general plan land use and zoning designations. While the project would result in short-term aesthetic impacts during construction, these impacts are expected to be less than significant because they are limited

³ City of Palmdale. 1993. City of Palmdale General Plan. Scenic Roadway Designations. Website: http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/general_plan.pdf

only to the construction phase of the project. As such, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Impacts would be less than significant.

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

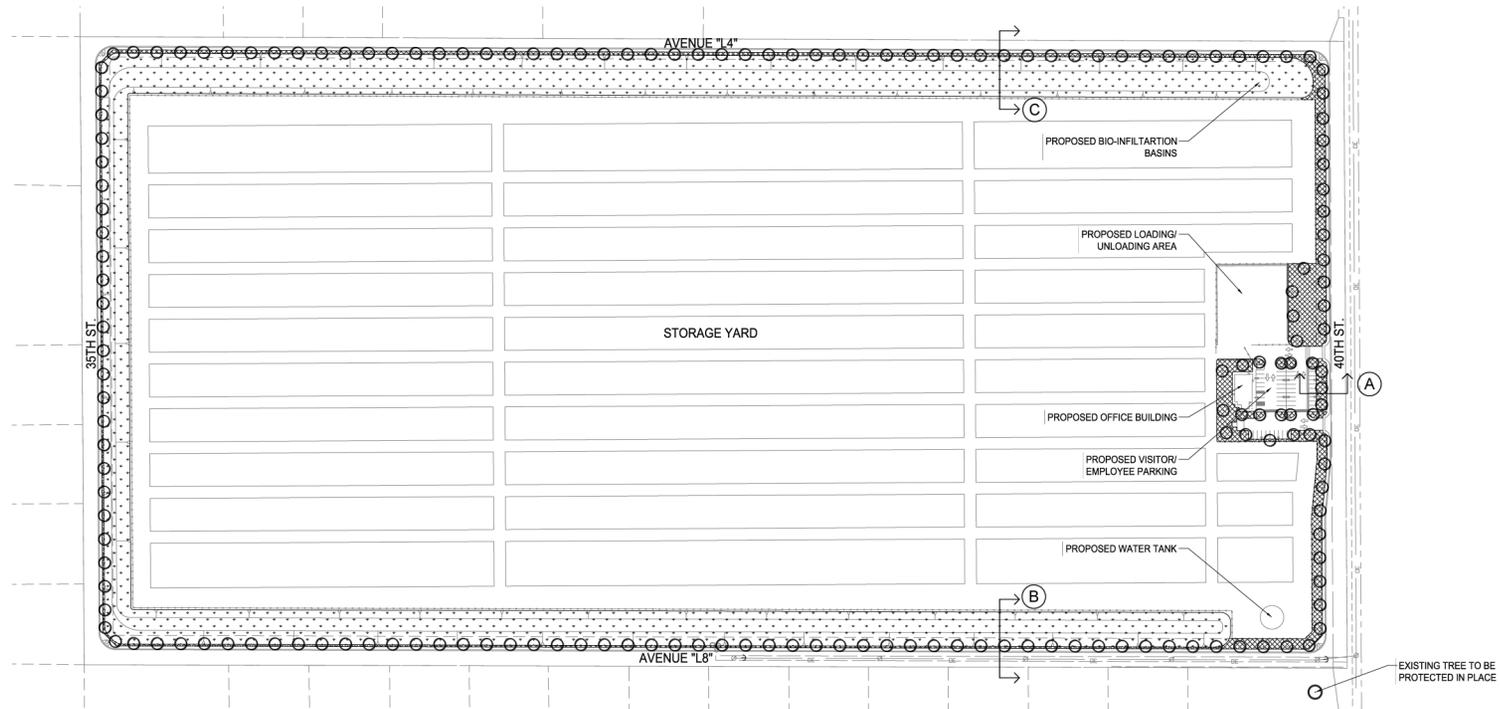
Less than significant impact. Excessive or inappropriately directed lighting can adversely impact nighttime views by reducing the ability to see the night sky and stars. Daytime views can also be adversely impacted by sources of glare. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

Sources of light and glare in Palmdale include building lights (interior and exterior), security lights, sign illumination, and parking-area lighting. Other sources of nighttime light and glare include street lights and vehicular traffic along roadways. Palmdale's night skies benefit from being surrounded by uses that emit little or no light: open space lands, vacant land, farmland, and rural residential development. In addition, land uses that generate significant amounts of light pollution, such as shopping centers, are limited and are concentrated in specific areas in the City.

The proposed project consists of a vehicle storage facility and associated office building for an online automobile auction business. Vehicles would be parked and stored on the project site prior to their sale. While the parked cars could result in sources of daytime glare in the project area, the project design incorporates 8-foot-high opaque vinyl fencing, which would shield potential glare from stored vehicles on the property. Furthermore, no nighttime lighting is proposed within the storage lot, in order to preserve dark skies. Laser scanners would provide nighttime security. Impacts are therefore considered less than significant.

Mitigation Measures

None required.



CONCEPT PLANT LEGEND

SYMBOL	BOTANICAL NAME / COMMON NAME	QTY.	CONT. SIZE
●	TREES	174	
	ACACIA FARNESIANA "SIERRA SWEET" TM / PODLESS SWEET ACACIA		24"BOX
	GLEDITSIA TRIACANTHOS INERMIS / THORNLESS COMMON HONEYLOCUST		24"BOX
	PARKINSONIA X "DESERT MUSEUM" / DESERT MUSEUM PALO VERDE		24"BOX
	PROSOPIS CHILENSIS "THORNLESS" / THORNLESS CHILEAN MESQUITE		24"BOX
	SOPHORA SECUNDFLORA / TEXAS MOUNTAIN LAUREL		24"BOX
●	EXISTING TREE	1	
EXISTING TO REMAIN		EXIST.	
■	LOW WATER SHRUBS AND SUCCULENTS	86,074 SF	
	AGAVE HAVARDIANA / HAVARD'S CENTURY PLANT		5 GAL
	AGAVE OVATIFOLIA / WHALE'S TONGUE AGAVE		5 GAL
	CHRYSOTHAMNUS NAUSEOSUS / RUBBER RABBITBRUSH		1 GAL
	FOUQUIERIA SPLENDENS / Ocotillo		5 GAL
	HYPTIS EMORYI / DESERT LAVENDER		5 GAL
	OPUNTIA BASILARIS / BEAVERTAIL PRICKLYPEAR		5 GAL
	SALVIA DORRII / DESERT SAGE		1 GAL
	SPHAERALCEA AMBIGUA / DESERT GLOBEMALLOW		5 GAL
YUCCA BREVIFOLIA / JOSHUA TREE		15 GAL	
■	BIO-INFILTRATION MIX	453,200 SF	
	BIOFILTRATION SOD / AS PROVIDED BY DELTA BLUEGRASS CO.		1 GAL

SITE INFORMATION:

TOTAL SITE AREA:	3,528,080 SF
LANDSCAPE AREA REQUIRED:	352,808 SF (10%)
LANDSCAPE AREA PROVIDED:	539,274 SF
LANDSCAPE AREA IN REQUIRED SETBACKS:	125,297 SF
% OF TOTAL SITE AREA:	15.3%
% OF TOTAL (EXCLUDING REQUIRED SETBACK AREAS):	12.2%

NOTES:

ALL LANDSCAPE AND IRRIGATION SHALL CONFORM TO THE STANDARDS SET FORTH BY THE CITY OF PALMDALE MUNICIPAL CODE.

SITE IRRIGATION SHALL BE PROVIDED AS REQUIRED FOR PROPER IRRIGATION, DEVELOPMENT, AND MAINTENANCE OF ALL VEGETATION. ALL PLANTING AREAS WILL BE ADEQUATELY WATERED BY MEANS OF DRIP IRRIGATION AND/OR TREE-BUBBLER SYSTEMS. THE SYSTEM WILL BE CIRCUITED ACCORDING TO PLANT TYPE, WATER DEMANDS, EXPOSURE, SOIL TYPES, AND SLOPE GRADIENT. THE IRRIGATION SYSTEM, INCLUDING ALL BACKFLOW PREVENTION DEVICES, PIPING, AND INSTALLATION, SHALL CONFORM WITH ALL CITY AND WATER ALLOWANCE STANDARDS.

Source: Stantec, March 2019.

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Exhibit 11
Conceptual Landscape Plan

COPART, INC • COPART PALMDALE PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>2. Agriculture and Forestry Resources <i>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 Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i></p>				
<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP) was established by the State Legislature in 1982 to assess the location, quality, and quantity of agricultural lands and conversion of these lands over time. The FMMP has established five farmland categories:

- Prime Farmland is farmland with the best combination of physical and chemical features able to sustain long-term agricultural production. This land must have been used for irrigated agricultural production at some time during the last 4 years before the mapping date, and it has the ability to store moisture in soil well.

- Farmland of Statewide Importance is similar to Prime Farmland but contains greater slopes and a lesser ability to store soil moisture.
- Unique Farmland is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climate zones in California. This land must still have been cropped some time during four years prior to the mapping date.
- Farmland of Local Importance is important to the local agricultural economy as determined by each county's board of supervisors and local advisory committee.
- Grazing Land is land on which the existing vegetation is suited to the grazing livestock. This category was developed in cooperation with the California Cattlemen's Association, University of California Cooperative Extension, and other groups interested in the extent of grazing activities.

The Williamson Act, codified in 1965 as the California Land Conservation Act, allows local governments to enter into contracts with private landowners, offering tax incentives in exchange for an agreement that the land will remain agricultural or related open space use only for a period of 10 years. According to the Williamson Act map for Los Angeles County, the project is not under a Williamson Act contract and there are no Williamson Act lands in the project vicinity.

In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (ARB).

Would the project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

Less than significant impact with mitigation incorporated. According to the FMMP, the project site is categorized as Prime Farmland. According to the FMMP, prime farmland designation for the site is described as irrigated land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land type has the soil quality, growing season, and moisture supply needed to produce sustained high yields. This designation of Prime Farmland signifies a historic use for the production of irrigated crops at some time in the past.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment (LESA) Model (1997)⁴ prepared by the California Department of Conservation as an optional model to use in

⁴ California Department of Conservation. 1997. California Agricultural Land Evaluation and Site Assessment (LESA) Model Instruction Manual. Website: <https://www.conservation.ca.gov/dlrr/Documents/lesamodl.pdf>.

assessing impacts on agriculture and farmland. Based on historic aerials, the site was last used for agricultural purposes in 2016. However, the project site was zoned and designated by the General Plan as industrial in 1993. Consequently, the project is located within an industrial area according to General Plan Figure S-58, Wildfire Hazard Zones.

The Draft General Plan EIR considered the conversion of agricultural land to non-agricultural uses, including the project site, concluding in its Land Use section that the loss of agricultural land would not be considered a significant land use impact because the dry, desert environment in the Palmdale area is not suitable for commercial farming (City of Palmdale 1992). Consequently, at the time of the General Plan adoption and certification of the General Plan EIR, vacant and agricultural land is discussed in the EIR as planned for conversion to urban development and other uses at buildout.⁵

The General Plan Environmental Resources Element states that the area between the airport and Avenue L, where the project site is located, is not classified as prime agricultural land by the State, and that agricultural production from that area is not considered to be regionally significant.⁶ Consequently, it is not the City's goal to preserve the area for permanent agricultural production (City of Palmdale 2004).⁷

The project site was converted to non-agricultural uses in 1993 when the General Plan zoned and designated it as Industrial. The potential impacts of the zoning were addressed in a certified EIR at that time. Therefore, because the proposed project is consistent with the established zoning for the site, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. However, implementation of Mitigation Measure (MM) AG-1 would bring impacts to a less than significant level.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No impact. The project is designated by the City of Palmdale General Plan for industrial (IND) and is zoned as General Industrial (M-2). The site is not zoned for agricultural use or located within a Williamson Act Contract,⁸ and therefore the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. No impact would occur.

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

No impact. Forest land does not exist on the project site, and the site is not zoned for forest or timberland use. The project would not conflict with existing zoning or cause rezoning of forest land, timberland, or timberland zone Timberland Production. The project is consistent with existing

⁵ City of Palmdale. 1992. Draft General Plan Environmental Impact Report. Land Use.

⁶ City of Palmdale. General Plan. 1993. Environmental Resources Element. Website: http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/general_plan.pdf. Accessed April 17, 2019.

⁷ City of Palmdale. General Plan. 1993, as amended April 14, 2004. Environmental Resources Element. Website: http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/general_plan.pdf. Accessed April 17, 2019.

⁸ California Department of Conservation Division of Land Resource Protection Conservation Program Support. 2016. Accessed April 17, 2019. Website: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.

general industrial land use designations and is surrounded by vacant land uses. Therefore, no impact would occur.

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

No impact. The project site is located within a former agricultural area in the City of Palmdale that was zoned and designated for industrial uses in 1993. Forest land does not exist in the project site, and therefore the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No impact. The site is in a general industrial zone and is designated as industrial. While the site is mapped as Prime Farmland and was used for agricultural purposes in the past, the site was zoned for industrial uses by the City in its 1993 General Plan and is currently vacant. The site has not been used for agricultural uses since 2016. Surrounding vacant parcels are also zoned as industrial, and the site is not zoned or used for forest use. Additionally, the General Plan Environmental Resources Element states that the area between the airport and Avenue L, adjacent to the project site, is not classified as prime agricultural land by the State, and that agricultural production from that area is not considered to be regionally significant.⁹ Consequently, it is not the City's goal to preserve the area for permanent agricultural production and the development of the project would not impact agricultural resources (City of Palmdale 2004).¹⁰ Therefore, the project is consistent with the General Plan and would not result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. No impact would occur.

Mitigation Measures

MM AG-1 Topsoil Salvage

The site owner shall consult with an agricultural soils expert (pedologist) regarding the feasibility (soil aggregation including composition of minerals, air, water, and organic matter) and likely success of topsoil salvage for agricultural use prior to any disturbance of the site. If salvage is deemed to be feasible, then the site owner shall advertise a minimum of 60 days the available topsoil to be salvaged for agricultural use prior to direct or indirect disturbance of the site. In doing so, the site owner shall propose a plan of how to salvage suitable topsoil including sampling ahead of topsoil salvage to ensure that all suitable topsoil is salvageable; training of equipment operations in topsoil salvage procedure; and monitoring of activities in the field by qualified personnel. If after 60 days of advertisement no interest or offer for sale occurs, the site owner could then move forward with preconstruction activities.

⁹ City of Palmdale. General Plan. 1993. Environmental Resources Element. Website: http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/general_plan.pdf. Accessed April 17, 2019.

¹⁰ City of Palmdale. General Plan. 1993, as amended April 14, 2004. Environmental Resources Element. Website: http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/general_plan.pdf. Accessed April 17, 2019.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Analysis for this section is based on air quality modeling provided by FirstCarbon Solutions (FCS). The air quality California Emissions Estimator Model (CalEEMod) output is appended to this document (see Appendix A).

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?

Less than significant impact. A potentially significant impact to air quality would occur if the project would conflict with or obstruct implementation of the applicable air quality plan. The project is located within the jurisdiction of Antelope Valley Air Quality Management District (AVAQMD). The AVAQMD is responsible for preparing air quality attainment plans to be transmitted to the ARB and the United States Environmental Protection Agency (EPA) for incorporation into the State Implementation Plan (SIP). To address National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), the AVAQMD adopted the Ozone Attainment Plan

in 2004 and the Federal 8-Hour Ozone Attainment Plan in 2008. The AVAQMD adopted the CEQA and Federal Conformity Guidelines (AVAQMD Guidelines) in August 2016.¹¹

The development of emission burdens used in air quality plans to demonstrate compliance with ambient air quality standards is based, in part, on land use patterns contained within local general plans. Therefore, it is reasonable to conclude that if a project is consistent with the applicable general plan land use designation, and if the general plan was adopted prior to the applicable air quality plans, then the growth of vehicle miles traveled (VMT) and/or population generated by said project would be consistent with the growth in VMT and population assumed within the air quality plans.

The project proposes to construct a vehicle storage facility and associated office building for an online automobile auction business. The applicable General Plan for the project is the City of Palmdale General Plan. The project site is designated industrial (IND) by the City's General Plan, and the site is zoned General Industrial (M-2). The proposed project is consistent with the current General Plan and zoning designation. As discussed in Section 13, Population and Housing, housing is not proposed as part of the project, therefore, the project would not include or induce unplanned population growth in the area. The project would employ up to 25 full-time employees who are anticipated to come from the existing workforce in the area and which would not have a significant impact on population growth. Therefore, project implementation would be consistent with the goals and policies provided within the City's General Plan.

In summary, the project would not exceed the growth assumptions in the air quality plans. The project would not result in a regional exceedance of criteria air pollutants. Furthermore, the project would comply with all applicable AVAQMD rules and regulations. Accordingly, the project would not conflict with or obstruct implementation of the applicable air quality plans, and therefore, this impact would be less than significant.

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

Less than significant impact. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. As described above, the region is currently nonattainment for federal and State ozone and particulate matter, including dust, 10 micrometers or less in diameter (PM₁₀), and particulate matter, including dust, 2.5 micrometers or less in diameter (PM_{2.5}). By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the air basin, and this regional impact is a cumulative impact. In other words, new development projects (such as the proposed project) within the air basin would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects. All new development that would result in an increase in air pollutant emissions above those assumed in regional air quality plans would contribute to cumulative air quality impacts.

¹¹ Antelope Valley Air Quality Management District (AVAQMD) 2016. CEQA and Federal Conformity Guidelines. Website: <https://avaqmd.ca.gov/files/818bd8682/AVCEQA2016+Updated+Contact+Info.pdf>

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines, the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project’s incremental effects would be cumulatively considerable.

The project’s regional construction and operational emissions, which include both on- and off-site emissions, are evaluated separately below. Construction and operational emissions from the project were estimated using the CalEEMod version 2016.3.2. A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix A.

Construction Emissions

Construction emissions are described as “short-term” or temporary in duration; however, they have the potential to represent a significant impact with respect to air quality. Construction of the project would result in the temporary generation of emissions from construction activities such as site preparation, sewer pipeline work, grading, building construction, architectural coating, and asphalt paving. Fugitive dust emissions are primarily associated with earth disturbance and grading activities, and vary as a function of soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles on-site and off-site. Construction-related Nitrogen oxide (NO_x) emissions are primarily generated by exhaust emissions from heavy-duty construction equipment, material and haul trucks, and construction worker vehicles. Volatile Organic Compound (VOC) emissions are mainly generated by exhaust emissions from construction vehicles, off-gas emissions associated with architectural coatings, and asphalt paving.

The project is anticipated to begin construction in February 2020 and construction would last for approximately 7 months. The anticipated construction schedule reflects the construction start date and the construction phase durations estimated by the project applicant. The project building construction, paving and architectural coating phases would overlap construction schedules; therefore, the daily construction emissions would be the total emissions from the three phases. The project site is currently vacant, thus there is no demolition phase. In addition, the project would cut 120,000 cubic yards and fill 100,000 cubic yards of materials during grading. The project would balance on-site after subsidence and excavation are formed.

Table 1, below, presents the project’s maximum daily construction emissions for each construction activity and during the entire construction period using the worst-case summer or winter daily construction-related criteria pollutant emissions for each phase of construction. Complete CalEEMod output files are included as part of Appendix A.

Table 1: Regional Construction Emissions by Construction Activity (Unmitigated)

Activity	Mass Daily Emissions (tons/year)					
	VOCs	NO _x	CO	SO _x	PM ₁₀ ²	PM _{2.5} ²
Site Preparation	4.19	42.50	22.67	0.04	10.56	6.55
Sewer Pipeline Work	4.19	42.50	22.67	0.04	10.56	6.55
Grading	4.58	50.29	33.24	0.06	8.22	3.89

Table 1 (cont.): Regional Construction Emissions by Construction Activity (Unmitigated)

Activity	Mass Daily Emissions (tons/year)					
	VOCs	NO _x	CO	SO _x	PM ₁₀ ²	PM _{2.5} ²
Building Construction	13.74	92.21	127.24	0.41	24.38	7.59
Paving	2.65	14.13	15.62	0.02	0.95	0.74
Architectural Coating	25.12	3.05	21.17	0.05	3.99	1.16
Paving (vehicle storage)	2.41	14.13	15.62	0.02	0.95	0.74
Maximum Daily Construction Emissions¹	43.91	123.53	179.64	0.50	30.26	10.24
Maximum Daily Emission Threshold (pounds/day)³	137	137	548	137	82	65
Exceed Threshold?	No	No	No	No	No	No
<p>Notes: NO_x = nitrogen oxides SO_x = sulfur oxides VOCs = Volatile Organic Compounds CO = carbon monoxide PM₁₀ = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM_{2.5} = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers ¹ Maximum daily construction emissions is the sum emission of Building construction, Paving and Architectural coating (vehicle storage) phases. ² AVAQMD Rule 403 Fugitive Dust measures are applied. ³ Recommended by AVAQMD staff, the construction emissions should be compared with daily emission thresholds if the construction is less than a year. Source of thresholds: AVAQMD 2016. Source of emissions: FCS 2019, see Appendix A.</p>						

As shown above, the project’s construction emissions would not exceed the applicable significance thresholds. In addition, all construction activities would comply with applicable AVAQMD rules and regulations, including Rule 403, to reduce fugitive PM dust emissions. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. The impact from construction of the project would be less than significant.

Cumulative Operational Emissions

Operational emissions for land use development projects are typically distinguished as mobile, area, and energy-source emissions. Mobile-source emissions are those associated with automobiles that would travel to and from the project site. Assumptions used to estimate mobile-source emissions were provided by the applicant. The project was estimated to generate 272 daily trips during the operational period, with 200 of those trips being from passenger vehicles, and 72 trips being from delivery trucks. In addition, the project is expected to operate up to six wheel loaders during business operations. Area-source emissions are those associated with landscape maintenance activities and periodic architectural coatings. Energy-source emissions are those associated with natural gas combustion for space and water heating and electricity consumption. Table 2 presents the project’s maximum daily operational emissions.

Table 2: Operational Regional Pollutants

Category	Mass Daily Emissions (tons/year)					
	VOCs	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area	0.46	<0.01	0.14	<0.01	<0.01	<0.01
Energy	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Mobile	0.15	2.85	1.42	0.01	0.49	0.14
Off road equipment	0.15	1.48	1.76	<0.01	0.09	0.08
Total	0.75	4.33	3.32	0.01	0.58	0.22
AVAQMD Air Quality Annual Emission Significance Thresholds	25	25	100	25	15	15
Exceeding Threshold?	No	No	No	No	No	No
Total Daily Operation Emissions ¹ (pounds/day)	4.92	32.38	26.56	0.11	4.51	1.75
AVAQMD Air Quality Daily Emission Significance Thresholds (pounds/day)	137	137	548	137	82	65
Exceeding Thresholds?	No	No	No	No	No	No
Notes: NO _x = nitrogen oxides SO _x = sulfur oxides VOCs = Volatile Organic Compounds CO = carbon monoxide PM ₁₀ = particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; PM _{2.5} = particulate matter with an aerodynamic resistance diameter of 2.5 micrometers ¹ Total daily operation emissions are obtained from the CalEEMod summer run, see Appendix A. Source of emissions: FCS 2019. Source of thresholds: AVAQMD 2016.						

As shown above, the project’s operational emissions would not exceed any of the AVAQMD thresholds of significance. Considering that the project’s long-term operational emissions would not exceed any significance thresholds, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard. The impact from long-term operation of the project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. This impact evaluates the potential for the project’s construction and operational emissions to expose sensitive receptors to substantial pollutant concentration. The AVAQMD Guidelines define residences, schools, daycare centers, playgrounds and medical facilities as sensitive receptors. The AVAQMD Guidelines specifies that the following project types within the specific distance to an existing or planned sensitive receptor land use must be evaluated quantitatively to determine their potential to expose sensitive receptors to substantial pollutant

concentrations that could result in an exceedance of the applicable cancer risk or hazard index thresholds of significance:

- Any industrial project within 1,000 feet;
- A distribution center (40 or more trucks per day) within 1,000 feet;
- A major transportation project (50,000 or more vehicles per day) within 1,000 feet;
- A dry cleaner using perchloroethylene within 500 feet;
- A gasoline dispensing facility within 300 feet.

The project is located within an agricultural portion of the City of Palmdale. There are no sensitive receptors located within 1,000 feet of the project site boundary; therefore, based on the guidelines described above, the project would not expose sensitive receptors to substantial pollutant concentrations from toxic air contaminants (TACs) generated from operation of the project. In addition, the project is proposing to construct a vehicle storage facility and associated office building; thus, the project would not be considered as sensitive receptor land use. Considering the distance to sensitive receptors, the project’s construction and operation would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

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

Less than significant impact. Odors can cause a variety of responses. The impact of an odor is dependent on interacting factors such as frequency (how often), intensity (strength), duration (in time), offensiveness (unpleasantness), location, and sensory perception. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies.

The AVAQMD does not provide a suggested screening distance for a variety of odor-generating land uses and operations. However, the San Joaquin Valley Air Pollution Control District (Valley Air District) does have a screening distance for odor sources. Those distances are used as a guide to assess whether nearby facilities could be sources of significant odors. Projects that would site a new receptor farther than the applicable screening distances from an existing odor source would not likely to have a significant impact. These screening distances by type of odor generator are listed in Table 3.

Table 3: Screening Levels for Potential Odor Sources

Odor Generator	Screening Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile

Table 3 (cont.): Screening Levels for Potential Odor Sources

Odor Generator	Screening Distance
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Source: Valley Air District 2015.	

Construction-Related Odors

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project site. The project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Impacts would be less than significant.

Operational-Related Odors

The project includes the construction and development of an office building, parking spaces, and associated landscaping. Land uses that are typically identified as sources of objectionable odors include landfills, transfer stations, sewage treatment plants, wastewater pump stations (the project would include a small on-site private sewer lift station), composting facilities, feedlots, coffee roasters, asphalt batch plants, and rendering plants. The project would not engage in any of these activities and would not be considered an odor generator as identified in Table 3. Therefore, the project would not be a generator of objectionable odors during operations. Minor sources of odors, such as exhaust from mobile sources, are not typically associated with numerous odor complaints, but are known to have temporary and less concentrated odors. In summary, the project’s long-term operational activities would not have any substantial odor sources that would expose nearby receptors. Considering the low intensity of potential odor emissions, the project’s operational activities would not expose receptors to objectionable odor emissions. Impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Analysis for this section is based on the Biological Resources Assessment (BRA) prepared by FCS (2019). The BRA is included in this document as Appendix B.

Environmental Evaluation

Would the project:

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

Less than significant with mitigation incorporated. The project is disturbed due to past agricultural use. It supports vegetation dominated by Russian thistle (*Salsola iberica*), fourwing saltbush (*Atriplex canescens*), red stemmed filaree (*Erodium cicutarium*), and bur clover (*Medicago polymorpha*). A biological site assessment was completed on January 24, 2019, by FCS Biologist, Robert Carroll. Existing biological conditions were documented, and an analysis of the habitats with potential to sustain special-status species was conducted. There are no special-status plant communities within the project boundaries. No special-status plant species were found to occur on-site and it was determined that the site does not support any special-status plant species.

The potential for special-status wildlife species was also evaluated. Trees located on adjacent lots and vegetation within the project may serve as marginal nesting and foraging habitat for burrowing owl (*Athene cunicularia*), loggerhead shrike (*Lanius ludovicianus*), ferruginous hawk (*Buteo regalis*), mountain plover (*Charadrius montanus*), Swainson's hawk (*Buteo swainsoni*), and Mohave ground squirrel (*Xerospermophilus mohavensis*). No other special-status wildlife species are expected to be found on-site due to lack of suitable habitat. Implementation of MM BIO-1, MM BIO-2, and MM BIO-3 would bring impacts to these species to a less than significant level.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

No impact. No riparian or sensitive natural communities were identified in local or regional plans, policies, or regulations, or by the United States Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife (CDFW) within the boundaries of the project. In addition, there are no waterways, riparian areas, or other sensitive natural communities within the project. The project is disturbed, and consists primarily of species commonly found at ruderal and disturbed sites, including invasive and non-invasive vegetation, which are not considered to be a sensitive natural community. Therefore, the project would not have a substantial adverse effect on any riparian habitat or natural community. No impact would occur.

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

No impact. The project is vacant and supports vegetation dominated by Russian thistle, in addition to fourwing saltbush, red stemmed filaree, and bur clover. There is one unidentifiable tree trunk on-site in the southeast corner of the project site, the trunk of which is in poor condition; and there are a number of Joshua trees located on a lot adjacent to the project site. The project does not propose

the removal of trees outside of or adjacent to the site; thus, the project would not impact the Joshua trees on the adjacent lot. In addition, there are no waterways, marshes, seasonal wetlands, or other jurisdictional features within the project. Therefore, no impact would occur.

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 wildlife nursery sites?

No impact. It is unlikely that the project would be used as a wildlife movement corridor due to the variety of land uses surrounding the site, including primarily vacant and agricultural land. The site does not contain any prominent features expected to convey wildlife movement. While Amargosa Creek and Little Rock Wash have the potential to convey wildlife movement, these are well outside of the project vicinity, and therefore the project would not interfere with wildlife movement occurring at these locations. No impact would occur.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No impact. The City of Palmdale has policies and guidelines related to the preservation of Joshua trees and native vegetation in the Palmdale Municipal Code.¹² However, as previously discussed, there is only one tree trunk on-site in poor condition, which was not identified as a Joshua tree, and will remain protected in place as shown in Exhibit 3. The remainder of the site is primarily made up of ruderal plants. Therefore, the project would not conflict with such policies or ordinances protecting biological resources. No impact would occur.

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?

No impact. The project site is not located within a habitat conservation plan. While there are a number of areas within Los Angeles County that are designated as Significant Ecological Areas (SEAs), the project site is not within a SEA. The nearest SEA to the site is about 2 miles away. Therefore, the project would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No impact would occur.

Mitigation Measures

MM BIO-1 Burrowing Owl

No more than 30 days prior to the first ground-disturbing activities, the project applicant shall retain a qualified biologist to conduct a preconstruction survey on the project site. The survey shall establish the presence or absence of western burrowing owl and/or habitat features, and evaluate use by owls in accordance with CDFW survey guidelines.

¹² City of Palmdale Municipal Code. Joshua Tree and Native Desert Vegetation Preservation. Website: <https://www.codepublishing.com/CA/Palmdale/#!/Palmdale14/Palmdale1404.html#14.04>

On the parcel where the activity is proposed, the biologist shall survey the proposed disturbance footprint and a 500-foot radius from the perimeter of the proposed footprint to identify burrows and owls. The survey shall take place near the sunrise or sunset in accordance with CDFW guidelines. All burrows or burrowing owls shall be identified and mapped. During the breeding season (February 1–August 31), surveys shall document whether burrowing owls are nesting on or directly adjacent to disturbance areas. During the non-breeding season (September 1–January 31), surveys shall document whether burrowing owls are using habitat on or directly adjacent to any disturbance area. Survey results will be valid only for the season during which the survey is conducted.

If burrowing owls are not discovered, further mitigation is not required. If burrowing owls are observed during the pre-construction surveys, the applicant shall implement the following measures to limit the impact on the burrowing owls:

1. Avoidance shall include establishment of a 160-foot non-disturbance buffer zone. Construction may occur during the breeding season if a qualified biologist monitors the nest and determines that the birds have not begun egg laying and incubation, or that the juveniles from the occupied burrows have fledged. During the non-breeding season (September 1-January 31), the project proponent shall avoid the owls and the burrows they are using, if possible. Avoidance shall include the establishment of a 160-foot non-disturbance buffer zone.
2. If it is not possible to avoid occupied burrows, passive relocation by a qualified biologist shall be implemented. Owls shall be excluded from burrows in the immediate impact zone and within a 160-foot buffer zone by installing one-way doors in burrow entrances. These doors shall be in place for 48 hours prior to excavation. The project area shall be monitored by a qualified biologist daily for 1 week to confirm that the owl has abandoned the burrow. Whenever possible, burrows should be excavated using hand tools and refilled to prevent re-occupation. Plastic tubing or a similar structure shall be inserted in the tunnels during excavation to maintain an escape route for any owls inside the burrow.

MM BIO-2 Nesting Birds

Prior to any ground-disturbing activities, the applicant shall have a qualified biologist conduct a pre-construction spring/summer active season reconnaissance survey for nesting/roosting special-status mobile bird and bat species, and other nesting birds within 300 feet (500 feet for raptors) of the construction limits of each project element to determine and map the location and extent of special status species occurrence(s) that could be affected by the project.

The applicant shall avoid direct impacts on any nesting birds located within the limits of construction. This could be accomplished by establishing the construction right of way and removal of plant material outside of the typical breeding season (February 1 through August 31).

If construction and vegetation removal is proposed for the bird nesting period February 1 through August 31, then preconstruction surveys for nesting bird species shall begin 30 days prior to construction disturbance with subsequent weekly surveys, the last one being no more than 3 days prior to work initiation. The surveys shall include habitat within 300 feet (500 feet for raptors) of the construction limits. Active nest sites located during the pre-construction surveys shall be avoided and a non-disturbance buffer zone established dependent on the species and in consultation with the USFWS and CDFW. This buffer zone shall be delineated in the field with flagging, stakes or construction fencing. Nest sites shall be avoided with approved non-disturbance buffer zones until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist. For species with high site fidelity, such as Swainson's hawk, if direct take of nests outside of the breeding seasons is required, the implementing agency shall contact CDFW to determine appropriate mitigation measures.

MM BIO-3 Mohave Ground Squirrel

Prior to the first ground-disturbing activities, the applicant shall retain a qualified biologist to conduct a focused habitat assessment to determine the potential for the Mohave ground squirrel to occur within the project site. If it is determined that potential habitat is present in or within 300-feet of the project site, the applicant shall perform the following measures to limit the impact on the Mohave ground squirrel:

- Implement necessary actions to avoid potential direct or indirect impacts to the Mohave ground squirrel
- Coordinate with a qualified biologist with the necessary permits to set up a trapping program in accordance with trapping protocol set forth by the CDFW to determine the presence or absence of the Mohave ground squirrel. If it is assumed or determined that the Mohave ground squirrel is present, a CDFW incidental take permit shall be obtained by implementing agencies pursuant to Section 2081 of the California Fish and Game Code and provide compensation determined by CDFW.

Mohave ground squirrel survey guidelines set forth by the CDFW are as follows:

1. Studies that include trapping for the Mohave ground squirrel shall be authorized by a Memorandum of Understanding (MOU) or Letter Permit issued by the Wildlife Branch of the Department, or by other permit as determined by the Department, and shall be undertaken only by a qualified biologist. A qualified biologist is a biologist who has demonstrated pertinent field experience in capturing and handling ground squirrels or other small mammals in desert/arid communities and who has been permitted by the Department to work without supervision. Each biologist setting traps, opening traps containing captured animals, or handling captured animals must be named in the MOU or Letter Permit as an authorized person, whether qualified or not to work without supervision.

2. Visual surveys to determine Mohave ground squirrel activity and habitat quality shall be undertaken during the period of 15 March through 15 April. All potential habitat on a project site shall be visually surveyed during daylight hours by a biologist who can readily identify the Mohave ground squirrel.
3. If visual surveys do not reveal presence of the Mohave ground squirrel on the project site, standard small-mammal trapping grids shall be established in potential Mohave ground squirrel habitat. The number of grids will depend on the amount of potential habitat on the project site, as determined by the guidelines presented in measures 4 and 5 below.
4. For linear projects (for example, highways, pipelines, or electric transmission lines), each sampling grid shall consist of 100 Sherman live-traps (or equivalent; the minimum length of any trap is 12 inches) arranged in a rectangular pattern, 4 traps wide by 25 traps long, with traps spaced 35 meters apart along each of the four trap lines. At a minimum, one sampling grid of this type shall be established in each linear mile, or fraction thereof, of potential Mohave ground squirrel habitat along the project corridor.
5. For all other types of projects, one sampling grid consisting of 100 Sherman live-traps (or equivalent; the minimum length of any trap is 12 inches) shall be established for each 80 acres, or fraction thereof, of potential Mohave ground squirrel habitat on the project site. The traps shall be arranged in a 10 x 10 grid, with 35-meter spacing between traps.
6. Each sampling grid shall be trapped for a minimum 5 consecutive days, unless a Mohave ground squirrel is captured before the end of the 5-day term on the grid or on another grid on the project site. If no Mohave ground squirrel is captured on a sampling grid on the project site in the first 5-consecutive-day term, each sampling grid shall be sampled for a SECOND 5-consecutive-day term. Trapping may be stopped before the end of the second term if a Mohave ground squirrel is captured on any sampling grid on the project site. If no Mohave ground squirrel is captured during the second 5-consecutive-day term, each sampling grid shall be sampled for a THIRD 5-consecutive-day term. The FIRST trapping term shall begin and be completed in the period of 15 March through 30 April. If a SECOND term is required, it shall begin at least 2 weeks after the end of the first term, but shall begin no earlier than 01 May, and shall be completed by 31 May. If a THIRD term is required, it shall begin at least 2 weeks after the end of the second term, but shall begin no earlier than 15 June, and shall be completed by 15 July. All trapping shall be conducted during appropriate weather conditions, avoiding periods of high wind, precipitation, and low temperatures (<50 degrees Fahrenheit (°F) or 10 degrees Celsius (°C)).
7. For projects requiring two or more sampling grids, capture of a Mohave ground squirrel on any grid will establish presence of the species on the project site. Trapping may be stopped on all grids on the project site at that time. For linear projects, very large project sites, project sites characterized by fragmented or highly-heterogeneous habitats, or in other special circumstances, continued projects, very large project sites, project sites characterized by fragmented or

highly-heterogeneous habitats, or in other special circumstances, continued trapping may be necessary.

8. A maximum 100 traps shall be operated by each qualified biologist. Each trap shall be covered with a cardboard A-frame or equivalent non-metal shelter to provide shade. Trap and shelter orientation shall be on a north-south axis. All traps shall be opened within one hour of sunrise and may be closed beginning one hour before sunset. Traps shall be checked at least once every 4 hours to minimize heat stress to captured animals. When traps are open, temperature shall be measured at a location within the sampling grid, in the shade, and one foot (approx. 0.3 meters) above the ground at least once every hour. Traps shall be closed when the ambient air temperature at 1 foot above the ground in the shade exceeds 90°F (32°C). Trapping shall resume on the same day after the ambient temperature at one foot (approx. 0.3 meters) above the ground in the shade falls to 90°F (32°C) and shall continue until 1 hour before sunset. Suggested baits are mixed grains, rolled oats, or bird seed, with a small amount of peanut butter.
9. A qualified biologist shall complete the Survey and Trapping Form, which is found on the last page of these guidelines. This biologist, or the lead agency for the project, shall submit the completed form to the appropriate Department office with the biological report on the project site.
10. The Department may allow variation on these guidelines, with the advance written approval of the appropriate regional habitat conservation planning office (see page 4). Such variations could include biologically-appropriate modification of the trapping dates or changes in grid configuration that would enhance the probability of detecting Mohave ground squirrels. Any variation which concerns trapping or marking methods must be incorporated into the MOU or permit that authorizes the work.
11. If a survey conducted according to these guidelines results in no capture or observation of the Mohave ground squirrel on a project site, this is not necessarily evidence that the Mohave ground squirrel does not exist on the site or that the site is not actual or potential habitat of the species. However, in the circumstance of such a negative result, the Department will stipulate that the project site harbors no Mohave ground squirrels. This stipulation will expire one year from the ending date of the last trapping on the project site conducted according to these guidelines.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural Resources and Tribal Cultural Resources				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>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:</i>				
d) 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis in this section is based on the Phase I Cultural Resources Assessment (CRA) prepared by FCS on March 13, 2019. The CRA is included in this document as Appendix C.

Environmental Evaluation

Cultural Resources

Would the project:

- a) **Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?**

No impact. Historical resources are defined as buildings, structures, objects, sites, and districts of significance in history, archaeology, architecture, and culture. These resources include intact

structures of any type that are 50 years or more of age. These resources are sometimes called the “built environment” and can include, in addition to houses, other structures such as irrigation works and engineering features. Historical resources are preserved because they provide a link to a region’s past as well as a frame of reference for a community.

CEQA Guidelines Section 15064.5 defines “historic resources” as resources listed in the California Register of Historical Resources (CRHR), or determined to be eligible by the California Historical Resources Commission for listing in the CRHR. The National Register of Historic Places (NRHP) recognizes properties that are significant at the national, State and local levels. In accordance with CEQA Guidelines Section 15064.5, a site or structure may be considered a historical resource if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of Public Resources Code Section 5020.1(j), or if it meets the criteria for listing in either the NRHP or the CRHR (14 Code of Federal Regulations [CFR] § 4850). CEQA allows local historic resource guidelines to serve as the CRHR criteria if enacted by local legislation to act as the equivalent of the State criteria.

No cultural resources of historic origin were observed within the project boundaries during the field survey on February 12, 2019. Results of the records search conducted by staff at the South Central Coastal Information Center (SCCIC) indicated that there have been at least 10 cultural resources investigations conducted within a 0.5-mile radius of the project. None of these included the project, and none of the studies resulted in the identification or recordation of historic or prehistoric site within the search radius or project boundaries. As such, the project would not cause an adverse change in the significance of a historical resource.

A 1,300-foot sewer alignment, extending north from the northwest corner of the parcel to the intersection of Avenue L and 35th Street, was added to the project in June 2019. On June 20, 2019, the FCS Project Archaeologist surveyed the alignment. The results of the survey were negative for historic or archaeological resources.

FCS sent a letter on January 8, 2019, to the Native American Heritage Commission (NAHC) to determine whether any saved sites are listed on its Sacred Lands File for the project site. A response was received on January 11, 2019, indicating that the NAHC had no files containing information regarding Sacred Lands or other cultural resources in the area. A list of Native American tribal members who may have additional knowledge of the general project area were included with the results. Letters were mailed to the tribes on January 11, 2019, requesting any additional information they might have concerning the project site. No responses have been received to date. Therefore, no impact would occur.

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

Less than significant impact with mitigation incorporated. The project proposes to construct a vehicle storage facility and associated office building for an online automobile auction business on a vacant site. Given the level of disturbance on-site from past agricultural use, the potential for development of the project to impact an unidentified archaeological resource is considered low.

Additionally, an archaeological records search was conducted by FCS on November 9, 2018, and showed that no previously identified cultural resources have been recorded within the project boundaries. As previously mentioned, a pedestrian survey was conducted on February 12, 2019, and June 20, 2019, both with negative results.

However, while highly unlikely, the presence of subsurface archaeological resources on the project site remains possible. As such, these resources could be affected by ground-disturbing activities associated with grading and construction at the site. It is possible that subsurface disturbance might occur at levels not previously disturbed (e.g., deeper excavation than previously performed) or may uncover undiscovered archeological resources at the site. Therefore, potential impacts to archeological resources could occur as a result of project-related construction activities. Implementation of standard cultural resource construction mitigation (MM CUL-1) would reduce impacts to a level of less than significant.

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

Less than significant impact with mitigation incorporated. While highly unlikely that the presence of human remains exist within or near the project site, there is always the possibility that subsurface construction activities associated with the project, such as grading or trenching, could potentially damage or destroy previously undiscovered human remains. If human remains are encountered during excavations associated with the project, implementation of MM CUL-1 and MM CUL-2 would be required to reduce impacts to a less than significant level.

Tribal Cultural Resources

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource 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:

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

d–e) Less than significant impact with mitigation incorporated. FCS conducted a project-specific CRA for the project site that included archaeological and historic records searches and a pedestrian survey (Appendix C). The records search for the CRA included a 0.5-mile buffer around the project area and results revealed that at least 10 cultural investigations were conducted within a 0.5-mile radius of the project. None of these investigations was within the project site. The records search did not identify any cultural resources on or near the project site.

A pedestrian survey of the project site was conducted on February 12, 2019, by FCS archaeologists. No historic or prehistoric sites or isolated occurrences of artifacts were observed during the survey.

Assembly Bill (AB) 52 specifies that a project that may cause a substantial adverse change to a defined Tribal Cultural Resources (TCRs) may result in a significant effect on the environment. AB 52 requires tribes interested in development projects within a traditionally and culturally affiliated geographic area to notify a lead agency of such interest and to request notification of future projects subject to CEQA prior to determining if a negative declaration, mitigated negative declaration, or environmental impact report is required for a project. The lead agency is then required to notify the tribe within 14 days of deeming a development application subject to CEQA complete to notify the requesting tribe as an invitation to consult on the project. AB 52 identifies examples of mitigation measures that would avoid or minimize impacts to TCRs. The Bill makes the above provisions applicable to projects that have a notice of preparation or a notice of intent to adopt a negative declaration/mitigated negative declaration circulated on or after July 1, 2015. AB 52 amends Public Resource Code Section 5097.94 and adds Public Resource Code Sections 21073, 21074, 2108.3.1., 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3, relating to Native Americans.

The sacred lands record search identified no Native American cultural resources within the project area, but recommended that local Native American groups be contacted for further information. For that purpose, the NAHC provided a list of potential contact within the region. Upon receiving NAHC's response, FCS sent written requests on January 11, 2019, to eight individuals on the referral list and the organizations that they represent. A complete list of the tribal contacts is included in the CRA. No responses have been received to date. In addition, an archaeological survey of the property did not reveal any evidence of cultural deposits or locate evidence of Native American religious, ritual, or other special activities within project boundaries. If TCRs are discovered during construction, implementation of MM CUL-2 will be required. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

- MM CUL-1** If cultural resources are encountered during ground-disturbing activities, work in the immediate area would be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) would be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work such as data recovery excavation may be warranted to exhaust the data potential of the resource thereby reducing any impact to a less-than-significant level.
- MM CUL-2** If human remains are encountered during excavations associated with this project, all work shall stop within 50 feet of the find, and the County Coroner shall be notified (California Health and Safety Code § 7050.5). If the Coroner determines that the remains are of Native American origin, he or she shall contact the NAHC.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Geology and Soils				
<i>Would the project:</i>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Analysis for this section is based on the Geotechnical Investigation Report provided by Stantec Consulting Ltd. (Stantec) on February 28, 2019. The Geotechnical Investigation Report is included in this document as Appendix D.

Materials encountered during investigational boring consisted of Quaternary Alluvial (Qa) deposits. Groundwater was not encountered during the investigation. However, groundwater levels may fluctuate seasonally or in the future due to irrigation, rainfall, broken pipes, or changes in site drainage.

The Geotechnical Investigation Report identified that there are no active faults known to underlie or extend towards the project site. The probability of surface fault rupture from an active fault is low. Additionally, the site is not located within a California Geological Survey Liquefaction Hazard Zone, and the likelihood of liquefaction induced lateral spreading is low. Conventional shallow foundations appear to be a suitable option for support of the proposed office building.

Would the project:

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

Less than significant impact. Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to an earthquake's seismic waves. Ground rupture is most likely to occur along active faults and typically occurs during earthquakes of magnitude 5.0 or higher. Ground rupture only affects the area immediately adjacent to a fault.

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo (AP) Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet).

Southern California is known for having seismically active regions that may be susceptible to seismic activity at any point in time. This is due to active faults that traverse the seismically active areas. Active faults are defined as those that have experienced surface displacement within Holocene time (approximately the last 11,000 years) and/or are in a State-designated AP Earthquake Fault Zone.

According to the Geotechnical Investigation Report provided by Stantec (Stantec 2019a), the project is located within a portion of the Mojave Desert Geomorphic Province, wedged between the San Andreas and Garlock faults. The site is located in a seismically active area. While a structure is proposed as part of the project design, the project is not within an AP Fault Zone and not within the seismic shaking zone, as outlined in the Palmdale General Plan Safety Element, Exhibit S-3 (City of Palmdale 1993d). The nearest fault zone is the San Andreas Fault, located approximately 7.7 miles from the project site. No active faults are known to underlie or extend towards the site and the

probability of surface fault rupture at the project site from an unknown active fault is low. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less than significant impact with mitigation incorporated. As discussed above, the San Andreas Fault is approximately 7.7 miles from the site. The project would construct and operate a vehicle storage facility and associated office building for an online automobile auction business. The project would be required to comply with seismic safety provisions of the California Building Code (CBC) (California Code of Regulations [CCR] Title 24, Part 2) and have a geotechnical investigation conducted for the affected project. As such, the project-specific Geotechnical Investigation determined that ground shaking is likely to affect the project as a result of movement along an active fault zone in the project vicinity. With adherence to CBC requirements and foundation and structural guidelines outlined in the Geotechnical Investigation Report and implementation of MM GEO-1 and GEO-2, hazards to people and structures from strong seismic ground shaking would be reduced. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. Liquefaction is the transformation of a deposit of soil from a solid state to a liquefied state as a consequence of increased pore pressure and reduced effective stress. Often, this transformation results from the cyclic loading of an earthquake and the soil acquires “mobility” sufficient to permit both horizontal and vertical movements. Soils that are most susceptible to liquefaction are clean, loose, saturated (below groundwater), and uniformly graded sands. The vast majority of liquefaction hazards are associated with sandy soils in looser state and silty soils of low plasticity. Cohesive soils are generally not considered susceptible to soil liquefaction, although they can be subject to cyclic softening if they are soft enough, and if the seismic demand is relatively high. Presence of predominately cohesive or fine-grained materials and/or absence of saturated conditions can preclude liquefaction. Liquefaction hazards are usually manifested in the form of buoyancy forces expected on structures during liquefaction, increase in lateral earth pressures due to liquefaction, horizontal and vertical movements of structures resulting from lateral spreading, and post-earthquake settlement of the liquefied materials.

According to the City of Palmdale General Plan, Exhibit S-10, Soil Expansion Potential, the project is not located within an area of high soil expansion potential, and according to Exhibit S-12, Soil Infiltration Capacity, the project is not within a high area of infiltration capacity. The project-specific Geotechnical Investigation Report concluded that the site is not located in a California Geological Survey Liquefaction Hazard Zone. This zone is defined as areas where historical occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation would be required. Consequently, the potential for liquefaction induced lateral spreading is considered low. Therefore, it is unlikely that the project site would result in seismic related ground failure including liquefaction. Impacts would be less than significant.

iv) **Landslides?**

Less than significant impact. According to the General Plan Safety Element, Exhibit S-9, Slope Categories, the project is characterized by flat relief and within an area containing slopes of 15 percent or less. The project would comply with the City's grading code and CBC regulations. Due to the relatively flat terrain of the site and compliance with existing grading and building code regulations, impacts resulting from landslides would be less than significant.

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

Less than significant impact. Implementation of the project would require ground-disturbing activities such as grading that could potentially result in soil erosion or loss of topsoil. Implementation of the conceptual grading plan (see Exhibit 12) would ensure that the proposed earthwork and stormwater structures are designed to avoid soil erosion. Construction of the project would be required to comply with the Construction General Permit, through preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP). While the General Plan Safety Element, Exhibit S-11, indicates that the site is located within an area with moderate potential for soil erosion, Best Management Practices (BMPs) included in the SWPPP would minimize soil erosion during construction. The project would also be required to comply with the City's Municipal Code. Impacts related to soil erosion or the loss of topsoil would be less than significant.

c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

Less than significant impact. As mentioned above, the site has slopes of less than 15 percent. In addition, according to the General Plan Safety Element, Exhibit S-14, Subsidence, the project is located in a low-moderate susceptibility area. Consequently, project engineering and construction would be in compliance with the CBC and the City's Municipal Code. As previously mentioned, the likelihood of liquefaction and lateral spreading is low. Impacts would be less than significant.

d) **Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Less than significant impact. Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them. This shrink/swell movement can adversely affect building foundations, often causing them to crack or shift, with resulting damage to the buildings they support.

The General Plan Safety Element, Exhibit S-10, Soil Expansion Potential, indicates that the site is located in an area of low potential for expansion. Consequently, the Geotechnical Investigation Report determined that the near surface soil samples were granular with low-plasticity fines. It was concluded that the site is suitable for construction from a geotechnical engineering and engineering geology standpoint. Therefore, impacts would be less than significant and no mitigation is required.

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However, if imported soils are used for earthwork, it is recommended that the proposed soils be tested for expansion potential prior to importing. Imported soils should be approved by the Geotechnical Engineer prior to being imported.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

Less than significant impact. The proposed project would use an on-site private holding tank and lift station to transport wastewater from the proposed office building on the east side of the project site to off-site sewer connection point on the northwest portion of the project site, where it would discharge into the existing off-site public gravity sewer collection system within Avenue L, west of 35th Street. Therefore, the project would not include the use of septic tanks or alternative wastewater disposal systems on-site. Impacts would be less than significant.

- f) **Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Less than significant impact with mitigation incorporated. According to the paleontological records search response received on January 22, 2019, there are no vertebrate fossil localities within the project boundaries. However, there are localities nearby from the same sedimentary units that occur within the project site either at the surface or depth. With implementation of MM GEO-3, impacts to paleontological resources or unique geologic features would be brought to a less than significant level.

Mitigation Measures

- MM GEO-1 Construction Methods and Earthwork Construction.** The project applicant shall implement all methods and practices outlined in the Geotechnical Investigation Report related to earthwork, construction, foundations, corrosivity, pavement, and percolation testing prior to obtaining a grading permit.
- MM GEO-2 Post Investigation Services.** The project applicant shall retain a California-registered Geotechnical Engineer to conduct during and post investigation services for necessary continuation of the geotechnical investigation. Final plans including project grading and foundation plans, foundation details and specifications shall be reviewed and approved by a California-registered Geotechnical Engineer prior to construction. Following the review of plans and specifications, observation during construction shall be performed by a California-registered Geotechnical Engineer to correlate findings of the investigations with the actual subsurface conditions exposed.
- MM GEO-3 Inadvertent Paleontological Discovery.** Even relatively shallow excavations in the project area may well uncover significant fossil vertebrate remains. Any substantial excavations below the very uppermost layers in the project area, therefore, shall be monitored closely during construction by a paleontologist and professionally recover any fossil remains discovered while not impeding development. In addition, sediment samples shall be collected and processed to determine the small fossil potential in the project area. Any fossils recovered shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Greenhouse Gas Emissions and Energy <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Analysis for this section is based on air quality modeling provided by FCS (2019). The air quality (CalEEMod) output is provided in Appendix A.

Greenhouse Gas Emissions

Would the project:

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

Less than significant impact. The AVAQMD provides greenhouse gas (GHG) emission significance thresholds for use when determining a project’s potential GHG emissions generation impacts.¹⁴

Construction

The project would generate GHG emissions during construction activities, resulting from emission sources such as construction equipment, haul trucks, and construction worker vehicles. Although these emissions would be temporary and short-term in nature, they could represent a substantial contribution of GHG emissions. Construction emissions were modeled using CalEEMod version 2016.3.2. Table 4, below, shows the annual construction GHG emissions.

¹⁴ Antelope Valley Air Quality Management District (AVAQMD). 2016. California Environmental Quality Act (CEQA) and Federal Conformity Guidelines. Website: <https://avaqmd.ca.gov/files/818bd8682/AVCEQA2016+Updated+Contact+Info.pdf>.

Table 4: Proposed Project Construction GHG Emissions

Construction Activity	Emissions (MT CO ₂ e)
Site Preparation	107
Sewer Pipeline Work	45
Grading	172
Building Construction	885
Paving	22
Architectural Coating	37
Paving (vehicle storage)	27
Total¹	1,296
AVAPCD GHG Annual Emission Threshold	100,000
Exceed Threshold?	No
Note: MT CO ₂ e = metric tons of carbon dioxide equivalent. ¹ Figures may not appear to add exactly due to rounding. Source: CalEEMod Output (see Appendix A) Source of threshold: AVAQMD 2016.	

As shown above, the project would generate approximately 1,296 metric ton (MT) carbon dioxide equivalent (CO₂e) during construction. The project’s construction GHG emissions would not exceed the significance threshold.

Operation

Operational or long-term emissions occur over the life of a project. Major sources for operational emissions are summarized below. Sources for operational emissions include:

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses could include heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- **Off-road equipment:** The project site would have up to six wheel loaders during business operation. The emissions refer to GHG emissions from the loaders that travel on site.
- **Water:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.

- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

Operational GHG emissions by source are shown in Table 5.

Table 5: Proposed Project Operational GHG Emissions

Emissions Source	Emissions (MT CO ₂ e)
Area	<1
Energy	16
Mobile	1,141
Waste	1
Water	3
Off road	215
Total Project Emissions ¹	1,376
AVAPCD GHG Annual Emission Threshold	100,000
Exceed Threshold?	No
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent ¹ Totals may not appear to add exactly due to rounding. Source of emissions: CalEEMod Output (see Appendix A). Source of thresholds: AVAQMD 2016.	

As shown above, the project’s operational GHG emissions would not exceed the significance threshold. The total GHG emissions generated from construction and operation would not exceed the significance threshold. Therefore, impacts would be less than significant.

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

Less than significant impact. The project is assessed for its consistency with ARB’s adopted AB 32 Scoping Plan and ARB’s adopted 2017 Climate Change Scoping Plan Update. This would be achieved with an assessment of the project’s compliance with applicable Scoping Plan measures as addressed in Table 6.

Assembly Bill 32 Scoping Plan

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHG emissions to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, the ARB adopted the Climate Change Scoping Plan (Scoping Plan) in 2008, which outlines actions recommended to obtain that goal. The Scoping Plan calls for an “ambitious but achievable” reduction in California’s GHG emissions, cutting approximately 30 percent from business-as-usual emission levels projected for 2020, or about 10 percent from 2008 levels. The Scoping Plan contains a variety of strategies to

reduce the State’s emissions. As shown in Table 6 below, the project is consistent with most of the strategies, while others are not applicable to the project.

Table 6: Scoping Plan Measures Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
<p>1. California Cap-and-Trade Program Linked to Western Climate Initiative. Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California Cap-and-Trade Program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California’s program meets all applicable AB 32 requirements for market-based mechanisms.</p>	<p>Not applicable. Although the cap-and-trade system has begun, the project is not one targeted by the cap-and-trade system regulations and therefore this measure does not apply to the project.</p>
<p>2. California Light-Duty Vehicle GHG Standards. Implement adopted standards and planned second phase of the program. Align zero-emission vehicle (ZEV), alternative and renewable fuel and vehicle technology programs with long-term climate change goals.</p>	<p>Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. The project does not involve the manufacturing or sales of new vehicles; however, the standards would be applicable to the light-duty vehicles that access the project site.</p>
<p>3. Energy Efficiency. Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.</p>	<p>Consistent. This is a measure for the State to increase its energy efficiency standards in new buildings. The project is required to build to the new standards and would increase its energy efficiency through compliance.</p>
<p>4. Renewable Portfolio Standard. Achieve 33 percent renewable energy mix Statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.</p>	<p>Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. Southern California Edison is required to increase its percent of power supply from renewable sources to 33 percent by the year 2020 pursuant to various regulations. The project would purchase power that comprises a greater amount of renewable sources and could install renewable solar power systems that will assist the utility in achieving the mandate.</p>
<p>5. Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.</p>	<p>Not applicable. This is a Statewide measure that applies to transportation fuels utilized by vehicles in California and cannot be implemented by a project applicant or lead agency. All fuel consumption associated with the project’s construction and operational activities would use fuel that meets these standards.</p>
<p>6. Regional Transportation-Related GHG Targets. Develop regional GHG emissions reduction targets for passenger vehicles. This measure refers to SB 375.</p>	<p>Not applicable. The project is not related to developing GHG emission reduction targets.</p>
<p>7. Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.</p>	<p>Not applicable. The standards would be applicable to the light-duty vehicles that would access the project site.</p>

Table 6 (cont.): Scoping Plan Measures Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
8. Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	Not applicable. The project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
9. Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California’s existing solar programs.	Not applicable. The project would be developed as a car storage site. The project would not install solar panels.
10. Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency.
11. Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce GHG emissions and provide other pollution reduction co-benefits. Reduce GHG emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive CH ₄ emissions and reduce flaring at refineries.	Not applicable. This measure would apply to the direct GHG emissions at major industrial facilities emitting more than 500,000 MT CO ₂ e per year. The project would be a car storage land use development project that would generate less than 2,000 MT CO ₂ e per year.
12. High Speed Rail. Support implementation of a high-speed rail system.	Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. The proposed project would not preclude the implementation of this strategy.
13. Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California’s new and existing inventory of buildings.	Consistent. The project would comply with the California Energy Code and thus incorporate applicable energy efficiency features designed to reduce project energy consumption.
14. High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	Consistent. This measure is applicable to the high global warming potential (GWP) gases that would be used by sources with large equipment (such as in air conditioning and commercial refrigerators). It is not anticipated that the proposed car storage would include systems with high GWP gases. If the project were to install large air conditioning equipment subject to the refrigerant management regulations adopted by the ARB, the project would be required to comply with all ARB requirements for the Stationary Equipment Refrigerant Management Program.
15. Recycling and Waste. Reduce CH ₄ emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero waste.	Consistent. The project would not conflict with implementation of this measure. The project is required to achieve the recycling mandates via compliance with the California Green Building Standards Code (CALGreen) code. The project would utilize City of Palmdale recycling services. Public Services provides solid waste disposal services, including recycling services, for the City of Palmdale.

Table 6 (cont.): Scoping Plan Measures Consistency Analysis

Scoping Plan Reduction Measure	Project Consistency
16. Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	Not applicable. No forested lands exist on-site; therefore, no on-site preservation is possible.
17. Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The project would comply with the California Energy Code and the California Updated Model Landscape Ordinance.
18. Agriculture. In the near-term, encourage investment in manure digesters and at the 5-year Scoping Plan update determine if the program should be made mandatory by 2020.	Not applicable. The project site is not currently designated or in use for agriculture purposes. No grazing, feedlot, or other agricultural activities that generate manure occur on-site or are proposed to be implemented by the project.

Source of ARB Scoping Plan Reduction Measures: ARB 2008 (includes edits made in 2009). Climate Change Scoping Plan, a framework for change. Website: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.

As shown above, the project is consistent with the applicable strategies and would not conflict with the recommendations of AB 32 in achieving a Statewide reduction in GHG emissions. Considering this information, the project would not significantly hinder or delay the State’s ability to meet the reduction targets contained in AB 32 or conflict with implementation of the Scoping Plan.

Senate Bill 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the Senate Bill (SB) 32 targets was adopted on December 14, 2017. Table 7 provides an analysis of the project’s consistency with the 2017 Scoping Plan Update measures. As shown in Table 7, many of the measures are not applicable to the project, while the project is consistent with strategies that are applicable.

Table 7: Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
SB 350 50 percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33percent in 2020 to 50 percent in 2030.	Not applicable. This measure would apply to utilities and not to individual development projects. The project would purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	Not applicable. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the project site would benefit from the standards.

Table 7 (cont.): Consistency with SB 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Project Consistency
<p>Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.</p>	<p>Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. The project is car storage facility and would support truck and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including trips that would be coming to and from the project site.</p>
<p>Sustainable Freight Action Plan The plan’s target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</p>	<p>Not applicable. This measure applies to owners and operators of trucks and freight operations. The project is car storage facility and would support truck and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including deliveries that would be made to and from the proposed logistical center.</p>
<p>SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita VMT.</p>	<p>Not applicable. The project does not include the development of a Regional Transportation Plan.</p>
<p>Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.</p>	<p>Not applicable. The project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project.</p>
<p>Source of ARB Scoping Plan Reduction Measures: ARB 2017. California’s 2017 Climate Change Scoping Plan, the strategy for achieving California’s 2030 GHG target. Website: https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.</p>	

In summary, the project is consistent with applicable strategies and would not conflict with the recommendations of AB 32 in achieving a Statewide reduction in GHG emissions. Furthermore, the project would not conflict with the reduction measures outlined in the 2017 Scoping Plan addressing the SB 32 targets. Considering this information, the project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of GHGs. The impact would be less than significant.

Energy

Would the project:

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

Less than significant impact.

Construction

During construction, the project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, paving, and building construction. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Based on CalEEMod estimations within the modeling output files used to estimate GHG emissions associated with the project, construction-related vehicle trips would result in approximately 1,617,420 VMT, and consume an estimated 64,395 gallons of gasoline and diesel combined during the construction phase (Appendix A).¹⁵

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California regulations (CCR Title 13, §§ 2449(d)(2) and 2485) limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. As on-site construction activities would likely occur during daytime hours, it is anticipated that the use of construction lighting would be minimal. Single-wide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 5,908 kilowatt hours (kWh) during the approximately 7-month construction phase (Appendix A). Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the project would not result in wasteful, inefficient, and unnecessary consumption of energy.

Operation

Electricity and Natural Gas

The operational phase of the project would consume energy as part of building operations and transportation activities. Building operations for the project would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics. Based on CalEEMod estimations within the modeling output files used to estimate GHG emissions associated with the project, general office building operations would consume approximately 61,225 kWh of electricity per year and an estimated 25,484 kilo-British thermal units (kBtu) of natural gas per year (Appendix A). The parking lot would consume approximately 29,425 kWh of electricity per year. The lift station would consume approximately 3,300 kWh of electricity per year (Appendix A). The project's building would be designed and constructed in accordance with the City's latest adopted energy efficiency standards, which are based on the State's Title 24 energy

¹⁵ Construction VMT were calculated based on CalEEMod estimations of worker, vendor, and hauling trip days and trip length per construction phase. Fuel economy values were calculated based on output data from the EMFAC database for worker, vendor, and hauling vehicle categories (ARB 2019). Complete CalEEMod output files and fuel calculations are included in Appendix A.

efficiency standards. These are widely regarded as the most advanced energy efficiency standards and compliance would ensure that building energy consumption would not result in the use of energy in a wasteful manner or inefficient manner.

Fuel

Operational energy would also be consumed during vehicle trips associated with the project. Fuel consumption would be primarily related to vehicle use by visitors and employees associated with the project. Based on the estimates contained in the CalEEMod output files, project-related vehicle trips would result in approximately 1,142,997 VMT, and consume an estimated 47,707 gallons of gasoline and diesel combined on an annual basis.¹⁶ Complete CalEEMod output files are included in Appendix A. The project site is located approximately 5 miles east of the SR 14 West Avenue L interchange. As such, it would be in proximity to a regional route of travel. For this reason, transportation fuel consumption would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during long-term project operations.

The City of Palmdale further supports energy conservation through voluntary policies, measures, and recommendations contained within the City's General Plan and Energy Action Plan. In the Environmental Resources Element of the City's General Plan, Policy ER5.5.1 encourages energy conservation from all sectors of the community by promoting the use of energy efficient appliances, processes and equipment, and promoting energy audits of existing structures (City of Palmdale 1993). The Environmental Resources Element also includes the Alternate Energy Sources Implementation Program, which states that the City shall support programs designed to reduce energy consumption and to utilize alternative energy sources. The City's Energy Action Plan contains the following measures relevant to the proposed project (City of Palmdale 2011):

- Measure 1.3 encourages new development to exceed Title 24 energy use requirements by 15 percent. Action steps to achieve this measure include installing smart grids in all new development, with 95 percent monitoring program participation by 2020.
- Measure 1.4 aims to reduce the urban heat island effect to cool the local climate and reduce energy consumption by increased shading on private property, high albedo surfaces in sidewalks and parking lots, and cool surfaces. Action steps to achieve this measure include new standards to require the use of high "albedo" material for new and renovated parking lot and sidewalk surfaces adopted by 2020.
- Measure 1.8 promotes energy efficiency in commercial and industrial uses through partnerships and programs. Action steps to achieve this measure include equipping 100 percent of businesses with smart meters by 2020, with 80 percent monitoring program participation and 4 percent of customers with integrated appliances by 2035, and enrolling approximately four industrial or manufacturing firms to participate as Certified Partners in the American National Standards Institute National Accreditation Board (ANSI/ANAB) accredited Superior Energy Performance program or similar program by 2020, to demonstrate energy performance improvement of 15 percent by 2020.

¹⁶ Based on the 394,190 annual VMT consistent with CalEEMod output (Appendix A) and an average fuel consumption determined using EMFAC2014 factors for AVAQMD in the 2021 calendar. Website: <https://www.arb.ca.gov/emfac/2014/>.

- Measure 1.9 seeks to establish Palmdale as a model for energy-efficient and innovative industrial, manufacturing, and commercial businesses. Action steps to achieve this measure include implementing outreach and energy efficiency education to result in 1,400 businesses, with average energy reductions of 20 percent per business.
- Measure 1.10 seeks to continue participation in regional initiatives to meet energy efficiency targets.
- Measure 3.2 encourages the commercial and industrial sectors to meet energy needs through on-site renewable energy sources. Action steps to achieve this measure include reaching approximately 86.7 kWh of business electricity use supplied through on-site renewable sources by 2020.
- Measure 4.6 aims to reduce transportation emissions from the commercial and industrial sectors. Action steps to achieve this measure include updating the Transportation Demand Ordinance to support higher participation in commuting programs, and achieve a 20 percent increase in commuting program participation by 2020, or approximately 5,200 single occupant trips shifted to commute programs.

These voluntary measures at the City level further support the required State standards, which ensure that the project would not result in an inefficient, wasteful, or unnecessary use of energy. Operational energy impacts would be less than significant.

d) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than significant impact.

Construction

As described above, the project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for, lighting, and other sources. California regulations (CCR Title 13 §§ 2449(d)(3) and 2485) limit idling from both on-road and off-road diesel-powered equipment. The project would be required to comply with these regulations, which are enforced by ARB. The State's Title 24 energy efficiency standards establish mandatory measures for non-residential buildings, including material conservation and efficiency. The project would also be required to comply with these mandatory measures. The City's local planning documents contain no policies or measures directly applicable to construction-related energy consumption. Therefore, it is anticipated that the construction phase of the project would not conflict with or obstruct State or local plans for renewable energy or energy efficiency. Construction-related energy impacts would be less than significant.

Operation

The operational phase of the project would consume energy as part of building operations and transportation activities. Building operations for the project would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, lighting, and electronics. The State's Title 24 energy efficiency standards are widely regarded as the most advanced energy efficiency standards. These standards help reduce the amount of energy required

for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. The project would be required to comply with these standards.

Policies contained in the Environmental Resources Element of the City's General Plan reinforce the promotion of solar energy systems. Policy ER9.1.1 permits small-scale solar energy systems as a right within any zone as mandated by State law and policy ER5.5.3 requires that new construction promote the use of solar energy systems by providing maximum solar access.

The City's General Plan and Energy Action Plan contain multiple voluntary measures supporting renewable energy and energy efficiency. As noted above in Impact 7(c), the project would not conflict with or obstruct any of these local voluntary measures.

California's Renewables Portfolio Standard (RPS) requires that 33 percent of electricity retail sales be served by renewable energy sources by 2020. The proposed project would be served with gas provided by Southern California Gas (SoCalGas). SoCalGas offers renewable natural gas captured from sources like dairies, wastewater treatment plants and landfills (SoCalGas 2019). The project would be served with electricity provided by Southern California Edison (SCE 2019). Southern California Edison's 2017 power mix included 32 percent eligible renewable (geothermal, eligible hydroelectric, solar, and wind), 34 percent unspecified sources of power, 20 percent natural gas, 8 percent large hydroelectric, and 6 percent nuclear. Southern California Edison also offers a Green Rate 50 percent option that sources 66 percent of its power mix from eligible renewable energy sources, and a Green Rate 100 percent option that sources 100 percent of its power mix from eligible renewable energy sources (CEC 2018). Southern California Edison is on track to meet the California RPS of 33 percent by 2020 mandate.

The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Operational energy impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Hazards and Hazardous Materials <i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis in this section is based on information provided in the Phase I Environmental Site Assessment (ESA) prepared by Partner Engineering and Science, Inc. (Partner). The Phase I ESA is provided in Appendix E. Partner concluded the following:

The project site was used for agricultural purposes from 1928 through 2016. There is potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers may have been used and stored on-site, and there is potential that concentrations remain in the soil. An in-ground cement vault of unknown use is present along the southern boundary of the site. No additional general site characteristics were observed during the site assessment.

The Phase I ESA did not find any recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or historical recognized environmental conditions (HRECs).

Environmental Evaluation

Would the project:

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

Less than significant impact. The project could result in a significant hazard to the public if the project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility that routinely transports, uses, or disposes of hazardous materials. The project proposes to construct a vehicle storage facility and associated office building for an online automobile auction business and is located in primarily near surrounding vacant and agricultural uses. While there may be some short-term transport of hazardous materials, the project would not include the routine transport, use, or disposal of hazardous materials on or near the project site. Therefore, impacts would be less than significant.

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

Less than significant impact. As mentioned above, the project would not involve the routine transport of hazardous materials. While there may be some short-term transport of such materials during the construction phase, the project would be required to comply with all federal, State, and local standards and regulations related to hazardous materials transport, storage, and disposal. Compliance with such standards would ensure that project impacts would be less than significant. As such, impacts are considered less than significant.

- c) **Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less than significant impact. There are no schools within a 0.25-mile radius of the project site. The nearest school to the project is Jack Northrop School, which is approximately 3.04 miles northwest. New Vista Elementary School is located approximately 3.12 miles northwest of the project site, and La Petite Academy is approximately 3.22 miles northwest. As there are no schools within 0.25 mile of the project site, impacts related to emissions of hazardous materials substances, or waste within 0.25 mile of an existing school would be less than significant.

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

Less than significant. According to the Geotracker website,¹⁷ the project is not listed as having a release of hazardous materials affecting the soil or groundwater. The nearest hazardous materials

¹⁷ California State Water Resources Control Board (State Water Board). 2015. GeoTracker. Website: <https://geotracker.waterboards.ca.gov/>.

site, Northrop Corporation, located at 3500 Avenue M E is approximately 0.65 mile southwest of the project site. This site is listed as having a leaking underground storage tank (LUST) that impacted the soil only. Cleanup action was taken and regulatory case closure was granted on April 29, 1991. Therefore, impacts related to hazardous materials near the site would be less than significant.

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

Less than significant impact. The nearest airport to the project site is Palmdale Regional Airport (also known as United States Air Force [USAF] Plant 42), located approximately 0.8 mile southwest of the site. According to the Los Angeles Department of Regional Planning Airport Land Use Commission, Palmdale Regional Airport website, the project is within the Palmdale Regional Airport influence area. As discussed in Section 12, below, although aircraft noise is audible at the project site from aircraft flyovers, the project is located outside of the airport's 70 A-weighted sound level (dBA) Community Noise Equivalent Level (CNEL) noise contours. Additionally, there are no other major noise sources within the project vicinity.

While there would be up to 25 employees on-site during project operation, the project would not result in a safety hazard for people residing or working in the project area due to the project's location outside of airport noise contours. Therefore, impacts would be less than significant.

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

Less than significant impact. The City of Palmdale implemented an Emergency Operations Plan (EOP) in 2012¹⁸ outlining operations and procedures in the case of an emergency or disaster. In addition, the General Plan Safety Element outlines policies and objectives to ensure that the City of Palmdale is prepared and self-sufficient for such events. The project does not include any characteristics or propose any changes to roads surrounding the project that would physically impair or otherwise interfere with emergency response or evacuation plans in the project vicinity. Therefore, impacts would be less than significant.

- g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

Less than significant impact. The project is located in a predominantly vacant, industrial zoned area within the City. The General Plan Safety Element identifies brush areas within Palmdale as susceptible to fire hazards. Because the project site is within the designated industrial area, fire hazards are not likely according to the General Plan. Impacts related to wildland fires (including wildland-urban interface fires) would be less than significant.

¹⁸ City of Palmdale. 2012. Emergency Operations Plan. Website:
<https://www.cityofpalmdale.org/Portals/0/Documents/Residents/COP%20EOP%20Executive%20Summary.pdf>.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hydrology and Water Quality <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Analysis in this section is based on the Preliminary Hydrology Report prepared by Stantec (Stantec 2019). The Preliminary Hydrology Report is included in this document as Appendix F.

The Preliminary Hydrology report determined that the proposed project is within the lower third of the Pearland Watershed. The watershed contains no known interceptor channels, storm drain conduits, or other engineered hardened and maintained structures and present on-site slope is less than 1.0 percent.

On-site soils consist of loamy sand, loamy fine, fine sandy loam, and loam. These are characterized as Type B soils, allowing for moderate water transmission and moderate infiltration.

Peak runoff Flow rate and storm volumes were calculated for the 25-year, 24-hour and 50-year 24-hour storm events. Results of post-project hydrology are used to address the on-site and off-site project impacts.

Pre-Project Condition

For the purposes of the preliminary analysis, the project site was analyzed as a single watershed. The area within the Pearland Watershed is void of development, with the exception of the solar field to the south. The watershed contains no known interceptor channels, storm drain conduits, or other engineered hardened and maintain structures and the present on-site ground slope is less than 1.0 percent.

The calculated 25-year peak flow for the watershed is 20 cubic feet per second (cfs) and the 25-year 24-hour volume is 6.3 acre-feet for the use in preliminary sizing of infiltration basins, the 5-year storm event was also evaluated, resulting in a 5-year peak flow rate of 22 cfs and a 50-year 24 hour volume of 7.2 acre-feet (AF). Peak flow analyses are included in Appendix III of the Preliminary Hydrology Report.

Post-Project Condition

Consistent with the pre-project analysis, the post-project watershed is analyzed as a single subarea with a single discharge point.

For planning purposes, the infiltration basins are designed to infiltrate 100 percent of a 50-year Capital Storm. Excepting the flows conveyed, south to north, via 40th Street East, all flows impacting the site are routed into the Infiltration Basins and total storm flow reaching the basins is calculated to form a post-project tributary area of 247 acres. Subarea Bypass flow not captured in the infiltration basins totals 52 acres. A Post Project Hydrology Map in Appendix II of the Preliminary Hydrology Report delineates the tributary areas.

The 299-acre watershed generates an unmitigated 50-year peak runoff of 63 cfs, and a 50-year, 24-hour storm volume 20.2 acre-feet, which is an increase of 13.0 acre-feet over the pre-project condition.

The following is a summary of hydrologic results from the Preliminary Hydrology Report:

Table 8: Hydrology Summary

Storm Event	Pre-project Condition (cfs)	Post-project Unmitigated Runoff (cfs)	Pre-project Volume (acre-feet)	Post-project Unmitigated Volume (acre-feet)
25-year 24-hour	20	55	6.3	17.8
50-year 24-hour	22	63	7.2	20.2

The two planned infiltration basins are designed according to the guidelines of the Stormwater Best Management Practice-Design and Maintenance Manual published by the County of Los Angeles Department of Public Works (August 2010). Design infiltration is 1.30 inch/hour. This rate includes an

appropriate safety factor and is based on the most conservative pit testing location. From the calculations and examination of design criteria, the constraining parameter for the infiltration basin is determined to be the 72-hour draw down time.

Calculations based on a 72-hour draw down time set the maximum ponding depth at 3 feet. Consequentially, the minimum surface area required for proper infiltration is 850,000 square feet. At a depth of 3 feet, this surface area is adequate for 100 percent infiltration of the 50-year 24-hour post-project storm event. Total surface area excludes infiltration of Bypass flow, as described above.

The following are recommended sizes for the on-site infiltration basins. Where total tributary area is 247 acres, design storm is 50-year 24-hour, and maximum pond depth is 3 feet:

Table 9: Infiltration Basin Summary

Infiltration Basin	Minimum Surface Areas (square feet)
L-4	150,000
L-8	120,000

Results of the Preliminary Hydrology Report exceed the minimum design criteria of no more than 85 percent of redeveloped peak flow discharge rates for the 25-year storm event.

Environmental Evaluation

Would the project:

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

Less than significant impact. The project proposes to construct a vehicle storage facility and associated office building for an online automobile auction business. A project normally would have an impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Water Code Section 13050, or if the project were to cause regulatory standards to be violated as defined in the applicable National Pollutant Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for a receiving water body. For the purpose of this specific issue, a significant impact could occur if the project would discharge water that does not meet the quality standards of the agencies, which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts could also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the California State Water Resources Control Board (State Water Board).

The project has the potential to release water pollutants during both construction and operations that may violate water quality standards. Each phase is discussed separately below.

Construction

Three general sources of potential short-term, construction-related stormwater pollution associated with the project include: (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earthmoving activities which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment.

The project would disturb approximately 81.98 acres of land and therefore would be subject to NPDES permit requirements during construction activities. Stormwater management practices would be implemented to minimize runoff and increase infiltration. The City of Palmdale Utilities Division would review and approve BMPs contained in the project applicant's submitted SWPPP to be implemented to reduce the discharge of pollutants during construction. The project applicant's SWPPP shall identify erosion control BMPs to minimize pollutant discharges during construction activities. These identified BMPs would include stabilized construction entrances, sand bagging, designated concrete washout, tire wash racks, silt fencing, and curb cut/inlet protection. Impacts would be less than significant with implementation of existing regulations.

Operation

Proposed construction of the project would increase impervious areas by replacing the vacant property with an office building and associated paving. Landscaping throughout the project site is proposed as part of the project design. Compliance with existing federal, State, and local regulations related to water quality, implementation of BMPs included in the project construction SWPPP, and design recommendations in the project's Infiltration Report the project would result in impacts to water quality being less than significant.

The project would not generate hazardous wastewater that would require any special waste discharge permits. The project would connect to an off-site gravity sewer collection system 3,000 feet from the project site within Avenue L, west of 35th Street. The development would include an on-site holding tank and private lift station to transport sewer effluent from the office building on the east side of the project to the off-site sewer connection point on the northwest side of the project. Implementation of water quality/retention basins around the site perimeter is included in development of the project. Domestic and irrigation water for the site would be provided by drilling a new well and installing a storage tank and associated pumps. Utilization of the lift station and off-site sewer connection would ensure the safe conveyance of wastewater generated from the project. As such, impacts to water quality would be less than significant.

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

Less than significant impact. If the project removes an existing groundwater recharge area or substantially reduces runoff that results in groundwater recharge such that existing wells would no longer be able to operate, a potentially significant impact could occur. The project design would include two infiltration basins parallel to East Avenue L-4 and East Avenue L-8 to route flow, resulting in a longer time of concentration value and potentially decreasing the post-project peak flow rate

and volume (Exhibit 12). Infiltration basins are designed conservatively to exceed the City's minimum mitigation criteria of no more than 85 percent redeveloped peak flow discharge rates for the 25-year storm event. The conservative preliminary sizing is intended to provide Final Engineering flexibility and ultimate protection to on-site improvements and downstream discharge. The proposed infiltration basins would capture on-site runoff to prevent potential depletion of groundwater supply. In addition, the project proposes to utilize water supplied by a groundwater well. The project is seeking a new well permit through the AVWM and Los Angeles County Health Department. The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge in a manner that would impede sustainable groundwater management of the basin. Therefore, impacts would be less than significant.

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

(i) result in substantial erosion or siltation on- or off-site;

Less than significant impact. Potentially significant impacts to the existing drainage pattern of the project could occur if development of the project results in substantial on- or off-site erosion or siltation. Implementation of the two proposed infiltration basins would reduce erosion and siltation resulting from the project. Therefore, impacts related to substantial erosion or siltation on-or off-site would be less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

Less than significant impact. The existing project site is vacant and entirely pervious. Paved areas on-site have the potential to increase runoff due to an increase in impervious surfaces on-site. During construction, the project applicant would be required to comply with drainage and runoff guidelines pursuant to the City of Palmdale guidelines. Consequently, the proposed on-site infiltration basins and bio infiltration sod would reduce the potential for runoff or flooding to occur on-or off-site. As such, impacts would be less than significant.

(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

Less than significant impact. Construction and operation of the project would increase the net area of impervious surfaces on the site, as the site is currently vacant land. Project implementation would not result in alteration of any existing drainage course. The project may be required to pay a storm drain impact fee to lessen the volume required for downstream facilities. Therefore, the increase in discharges would not impact local storm drain capacity. The project would not result in substantial pollutant loading such that treatment control BMPs would be required to protect downstream water quality. With implementation of the BMPs as noted in Impact 9(a), other impacts from polluted runoff, such as from oil and other pollutants from parking areas, would be reduced to acceptable levels. Impacts would be less than significant.

(iv) impede or redirect flood flows?

Less than significant impact. The project is located within Flood Zone X, which means that there is a less than 0.2 percent annual chance of a flood hazard. Therefore, the project would not impede or redirect flood flows. As such, impacts would be less than significant.

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

Less than significant impact. The project is located in a flat area of Palmdale. According to the City of Palmdale General Plan Safety Element Exhibit S-6, the project is not located within an inundation area. In addition, the nearest body of water is over 50 miles from the site. Release of pollutants resulting from project inundation is unlikely, and if it were to occur, the proposed infiltration basins would reduce the release of such pollutants. Therefore, the project is not subject to such hazards. Impacts would be less than significant.

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

Less than significant impact. The Lahontan RWQCB adopted a Water Quality Control Plan (Basin Plan)¹⁹ for the Lahontan Region, which has jurisdiction over the project area. The Basin Plan sets forth water quality standards for surface and ground waters of the Region, identifies general water quality issues, and establishes required or recommended control measures. The proposed infiltration basins on and around the site would mitigate any runoff from the project. Additionally, the implementation of BMPs would ensure a reduction of pollutants from construction activities. The project would not conflict with or obstruct implementation of the basin plan. Therefore, impacts related to a water quality control plan would be less than significant.

The project falls within the jurisdiction of the Antelope Valley Integrated Regional Water Management Plan,²⁰ which states that long-term groundwater recharge is expected to be stable. The project would be required to comply with measures and practices outlined within the Integrated Regional Water Management Plan. Consequently, as stated previously, on-site infiltration basins would reduce runoff and prevent groundwater depletion. Therefore, the project would not conflict with or obstruct a groundwater management plan. Impacts related to the obstruction of implementation of a water quality control plan or sustainable groundwater management plan would be less than significant.

Mitigation Measures

None required.

¹⁹ CEQA. 1995, as amended through January 14, 2016. Lahontan Regional Water Quality Control Board (RWQCB). Water Quality Control Plan for the Lahontan Region. Website: https://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

²⁰ Antelope Valley Integrated Regional Water Management Plan. 2013. Website: <http://www.avwaterplan.org/>.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Land Use and Planning <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The physical division of an already established community typically refers to the construction of a linear feature, such as an interstate highway, railroad tracks, or removal of a means of access, such as a bridge, which would impact mobility within an existing community and an outlying area. The project does not propose construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community. The project consists of the construction of a vehicle storage facility and associated office building on a vacant lot in the City of Palmdale. No impact would occur.

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?

Less than significant impact. The project is designated as Industrial by the City of Palmdale General Plan and General Industrial (M-2) by the City of Palmdale Zoning Code. The City of Palmdale Municipal Code General Industrial zone allows for a full range of manufacturing, fabrication, assembly, warehousing, and distribution uses associated with heavy industrial land uses. The project would be subject to the review by the City’s land use plan, policy, and regulations prior to obtaining building permits. The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

Noise Land Use Compatibility

The City of Palmdale has adopted the State’s recommended noise level guidelines for noise land use compatibility. These guidelines reflect the levels of noise exposure that are generally considered to be compatible with various types of land uses. These standards are shown in Table 10, reproduced from Table N-1 in the Noise Element of the City’s General Plan.²¹ For a discussion of the

²¹ City of Palmdale. 1993. Palmdale General Plan. Noise Element. January. Website: <http://www.cityofpalmdale.org/Businesses/Economic-and-Community-Dev/Planning-and-Zoning/General-Plan>. Accessed January 17, 2019.

characteristics of noise and further information regarding the applicable noise regulatory framework, refer to the Noise impact discussion in Section 12 of this document.

Table 10: State Recommended Noise Level Guidelines

Land Use Category	Community Noise Exposure in Decibels (CNEL) Day/Night Average Noise Level in Decibels (L _{dn})						
	55	60	65	70	75	80	
Residential Low Density Single-Family, Duplex, Mobile Homes							
Residential—Multi-Family							
Transient Lodging—Motels, Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Mineral Resources <i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

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?**

Less than significant impact. The project does not involve the extraction of mineral resources. The project consists of the construction of a vehicle storage facility and associated office building for an online automobile auction business. The site is classified as Mineral Resource Zone (MRZ)-3 area according to the General Plan Environmental Resources Element (City of Palmdale 1993a), indicating that significance of mineral deposits cannot be determined from available data. The General Plan Environmental Resources Element also states that there is a specific area within the City of Palmdale designated as the Mineral Resource Extraction (MRE) District, recognizing and permitting the extraction of mineral resources. The project is not located within this district. Therefore, the project would not result in the loss of availability of a known mineral resources that would be of value to the region and residents of the state. Impacts would be less than significant.

- 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?**

Less than significant impact. As discussed above, the project is located with an MRZ-3 area, where the significance of mineral deposits cannot be determined from the available data. However, areas within the designated MRE District in the City of Palmdale currently allow the extraction of mineral resources, and the project is not located within this district. Therefore, the project would not result in the loss of availability of a locally-important mineral resource recovery site. Impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Noise <i>Would the project result in:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

This Noise Impact Analysis has been prepared by FCS to determine the off-site and on-site noise impacts associated with the proposed project.

Based on the 2019 CEQA Guidelines Appendix G checklist questions, the noise land use compatibility discussion is now contained within the Land Use and Planning discussion, Section 10(b) of this document.

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change of 5 dBA is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the CNEL, both of which represent how humans are more sensitive to sound at night. In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and the L_{max} is the maximum instantaneous noise level occurring over a sample period.

Regulatory Framework

The project is located within the City of Palmdale, in the County of Los Angeles. The City of Palmdale addresses noise in the Noise Element of its General Plan (City of Palmdale 1993).

City of Palmdale General Plan

The City of Palmdale adopted its General Plan in January of 1993.²² The Plan's Noise Element serves as a guideline for compliance with the state's Noise Insulation Standards, with its objective being to minimize the exposure of community residents to excessive noise.

The City of Palmdale has adopted the State's Recommended Noise Level Guidelines, as shown in Table N-1 of its General Plan. The land use category that applies to the proposed project is industrial, manufacturing, utilities, and agriculture, because the City has designated the land use for the project site as Industrial (IND). Under this designation, noise environments with ambient noise levels up to 75 dBA CNEL are considered "normally acceptable." Noise environments with ambient noise levels from 70 dBA to 80 dBA CNEL are considered "conditionally acceptable" for this type of land use; however, under this circumstance, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirement is made and needed noise insulation features included in the design.

The City's Noise Element also establishes noise standards that require proposed stationary noise sources to be reduced to not exceed 65 dBA CNEL/ L_{eq} as measured at the exterior of a receiving noise sensitive land use, and 45 dBA CNEL as measured at the interior of a receiving residential land use. Additionally, the City's Noise Element restricts construction hours during the evening, early morning, and Sundays.

City of Palmdale Municipal Code

The City of Palmdale Municipal Code²³ has established limits on permissible hours of construction for any construction work in, or within 500 feet of, any residential, hotel, or RV park. The purpose is to limit loud construction noise which disturbs the peace and quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness sleeping or residing in the area.

²² City of Palmdale. 1993. City of Palmdale General Plan. Noise Element. January 25.

²³ City of Palmdale. 2019. Palmdale Municipal Code, Ch. 8.28 Building Construction Hours of Operation and Noise Control. Website: <https://www.codepublishing.com/CA/Palmdale/#!/Palmdale08/Palmdale0828.html>. Accessed January 8, 2019.

Would the project result in:

- 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?**

Short Term Construction Impacts

Less than significant impact. For purposes of this analysis, a significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels outside of the City's permissible hours for construction that would result in annoyance or sleep disturbance of nearby sensitive receptors. Noise impacts from construction activities associated with the project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Construction-related Traffic Noise

Noise impacts from construction activities associated with the project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. One type of short-term noise impacts that could occur during project construction would result from the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the project site.

The transport of workers and construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. Typically, a doubling of the average daily trip (ADT) hourly volumes on a roadway segment is required in order to result in an increase of 3 dBA in traffic noise levels; which, as discussed in the characteristics of noise discussion above, is the lowest change that can be perceptible to the human ear in outdoor environments. Project-related construction trips would not be expected to double the hourly traffic volumes along any roadway segment in the project vicinity. For this reason, short-term intermittent noise from construction trips would be minor when averaged over a longer time-period and would not be expected to result in a perceptible increase in hourly- or daily-average traffic noise levels in the project vicinity. Therefore, short-term construction-related noise impacts associated with the transportation of workers and equipment to the project site would be less than significant.

Construction Equipment Operational Noise

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower

power settings. Impact equipment such as pile drivers is not expected to be used during construction of this project.

The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because the noisiest construction equipment is earthmoving equipment. Earthmoving equipment includes excavating machinery and compacting equipment, such as bulldozers, draglines, backhoes, front loaders, roller compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 or 4 minutes at lower power settings.

Construction of the project is expected to require the use of scrapers, bulldozers, water trucks, haul trucks, and pickup trucks. The maximum noise level generated by each scraper is assumed to be 85 dBA L_{max} at 50 feet from this equipment. Each bulldozer would also generate 85 dBA L_{max} at 50 feet. The maximum noise level generated by graders is approximately 85 dBA L_{max} at 50 feet. A characteristic of sound is that each doubling of sound sources with equal strength increases a sound level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, a reasonable worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from the acoustic center of a construction area. This would result in a reasonable worst-case hourly average of 86 dBA L_{eq} .

The closest noise-sensitive receptors to the project site is the single-family rural residential home located in the northeast quadrant of the 40th Street and East Avenue L intersection. The façade of this residence would be located approximately 1,500 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously during site preparation of the proposed project site. At this distance, relative worst-case maximum construction noise levels would attenuate to below 60 dBA L_{max} , with relative worst-case hourly average construction noise levels attenuating to below 56 dBA L_{eq} at this receptor. The project would connect to an off-site gravity sewer collection system 3,000 feet from the project site within Avenue L, west of 35th Street and will meet the City of Palmdale's standards for wastewater collection systems. In addition, the project would construct an on-site underground holding tank and private lift station to transport sewer effluent from the office building on the east side of the project to the off-site sewer connection point on the northwest side of the project. The closest noise-sensitive receptors to the pipeline construction areas are the single-family residential homes located on the southern end of Bale Court, north of the soccer fields. The façade of these residences would be located approximately 1,450 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would operate simultaneously during construction of the sewer pipeline. At this distance, relative worst-case maximum construction noise levels would attenuate to below 61 dBA L_{max} , with relative worst-case hourly average construction noise levels attenuating to below 57 dBA L_{eq} at this receptor.

Construction noise levels would not result in annoyance or sleep disturbance of nearby sensitive receptors. Therefore, temporary construction noise impacts would be less than significant.

Operational/Stationary Source Noise Impacts

Less than significant impact. A significant impact would occur if operational noise levels generated by stationary noise sources at the proposed project site would result in a substantial permanent increase in ambient noise levels in excess of any of the noise performance thresholds established in the City's Noise Element. The City's General Plan Noise Element establishes an exterior noise limit of 65 dBA CNEL/ L_{eq} , and an interior noise limit of 45 dBA CNEL for stationary noise sources as measured at receiving noise sensitive land uses.

As noted in the characteristics of noise discussion, audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, an increase of greater than 3 dBA above the established noise performance thresholds would be considered a substantial permanent increase in ambient noise levels.

The project would generate noise from truck delivery, loading and unloading activities at commercial loading areas; parking lot activities, which includes people conversing, doors shutting, engine startup, and slow-moving vehicles; and from new exterior mechanical equipment sources, such as rooftop ventilation systems on the proposed office building.

Truck Loading Activities

Noise would also be generated by truck delivery, loading and unloading activities at the designated loading/unloading area, as designated on the site plan. The type of loading and unloading activity that would occur for this project is the loading and unloading of vehicles from car-carrier trucks. Typical noise levels from truck loading and unloading activity can range from 70 dBA to 80 dBA L_{max} as measured at 50 feet. Commercial loading and unloading activities at the project could be located as close as 1,800 feet from the property line of the nearest off-site residential receptor, which is the single-family rural residence located in the northeast quadrant of the 40th Street and East Avenue L intersection. At this distance, activities at loading and unloading areas could result in intermittent noise levels ranging up to approximately 50 dBA L_{max} . These activities are expected to occur at most 18 times throughout a typical day as deliveries are made at the proposed facility with maximum noise levels generated for a cumulative minute within any hour. As a result, noise from these activities, when averaged over minutes or hours, would not exceed the noise level standards of 65 dBA CNEL/ L_{eq} exterior or 45 dBA CNEL interior at the property line of the nearest residential unit. Therefore, impacts from operational truck loading activity noise levels would not result in a substantial permanent increase in ambient noise levels in excess of any of the noise performance thresholds, and would be less than significant.

Parking Lot Activities

The majority of the project would consist of a large parking/auto storage lot. Parking activities, including vehicles cruising at slow speeds, doors shutting, or cars starting, would generate approximately 60 dBA to 70 dBA L_{max} at 50 feet. Conversation between two persons at a distance of 3 to 5 feet apart would generate a noise level of 60 dBA L_{eq} at 5 feet, or approximately 40 dBA L_{eq} as measured at 50 feet. Parking activities could be located as close as 1,400 feet from the property line

of the nearest off-site residential receptor, which is the single-family rural residence located in the northeast quadrant of the 40th Street and East Avenue L intersection. At this distance, and with a direct line of sight, parking lot activity could result in intermittent noise levels ranging up to 41 dBA L_{max} . As a result, noise from these activities, when averaged over a period of time such as minutes or hours, would not exceed the noise level standards of 65 dBA CNEL/ L_{eq} exterior or 45 dBA CNEL interior at the property line of the nearest residential unit. Therefore, noise impacts from operational parking lot activity would not result in a substantial permanent increase in ambient noise levels in excess of any of the noise performance thresholds, and would be less than significant.

Mechanical Equipment Operations

At the time of preparation of this analysis, details were not available pertaining to proposed rooftop mechanical ventilation systems for the project; therefore, a reference noise level for typical rooftop mechanical ventilation systems was used. Noise levels from typical rooftop mechanical ventilation equipment are anticipated to range up to approximately 60 dBA L_{eq} at a distance of 25 feet. Rooftop mechanical ventilation systems could be located as close as 2,100 feet from the property line of the nearest off-site residential receptors, is the single-family rural residence located in the northeast quadrant of the 40th Street and East Avenue L intersection. At this distance, noise generated by rooftop mechanical ventilation equipment would attenuate to approximately 22 dBA L_{eq} at the property line of these residential homes.

The project would also install an underground sewer holding tank with a pump package (lift station) at the northwest corner of the proposed building. Because these systems will be installed underground, operation of the pump (lift station) would not be audible at the project property line and would not exceed the noise level standards of 65 dBA CNEL/ L_{eq} exterior or 45 dBA CNEL interior at the property line of the nearest residential unit.

Therefore, implementation of the project would not result in noise levels in excess of standards established in the local general plan, and the impact of mechanical ventilation equipment operational noise levels on sensitive off-site receptors would be less than significant.

Operational/Mobile Source Noise Impacts

Less than significant impact. A significant impact would occur if implementation of the proposed project would result in a substantial increase in traffic noise levels compared with traffic noise levels existing without the project. As noted in the characteristics of noise discussion, audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, an increase of greater than 3 dBA above existing traffic noise levels would be considered a substantial permanent increase in traffic noise levels.

Project-generated traffic would include car-carrier trucks for vehicle delivery and pick-up, as well as employee trips to and from the project site. The project would generate an average of 72 truck trips and 200 employee trips per day. The only access route to the project site is 40th Street, with the primary trip routes coming from East Avenue M, to the south. These average daily project trips would not result in a doubling of the average daily trips along East Avenue M. Furthermore, there are no

existing residential receptors within 1,000 feet of this segment of 40th Street. Therefore, the increase in traffic noise resulting from project operations would not be perceptible at residential receptors in the project vicinity. Therefore, implementation of the project would not result in a substantial increase in traffic noise levels compared with traffic noise levels existing without the project.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. A significant impact would occur if the project would generate groundborne vibration or groundborne noise levels in excess of established standards. The City of Palmdale has not adopted criteria for groundborne vibration impacts. Therefore, for purposes of this analysis, the Federal Transit Administration (FTA) vibration impact criteria are utilized. The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual.²⁴

Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects such as the shaking of a building can be notable. When assessing annoyance from groundborne vibration, vibration is typically expressed as root mean square (rms) velocity in units of decibels of 1 micro-inch per second. To distinguish these vibration levels referenced in decibels from noise levels referenced in decibels, the unit is written as “VdB.”

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. However, construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project related impacts are expressed in terms of PPV.

Short-term Construction Vibration Impacts

Of the variety of equipment that would be used during construction, small vibratory rollers would produce the greatest groundborne vibration levels. Impact equipment such as pile drivers is not expected to be used during construction of this project. Small vibratory rollers produce groundborne vibration levels ranging up to 0.101 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The off-site structure nearest to the proposed construction areas where heavy construction equipment would operate is the single-family residential home located northeast of the project on East Avenue L. The facade of this home would be located approximately 1,500 feet from the proposed construction footprint where heavy equipment would operate. At this distance, groundborne vibration levels would attenuate to less than 0.0002 PPV from the operation of a small vibratory roller. This is well below the industry standard vibration damage criteria of 0.2 PPV for this type of structure, a building of non-engineered timber construction.

The structure nearest to the proposed sewer pipeline construction areas along East Avenue L where heavy construction equipment would operate is the activity building located north of East Avenue L.

²⁴ Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual.

Pipeline construction activities could occur approximately 70 feet from the façade of this structure. At this distance, groundborne vibration levels would attenuate to less than 0.022 PPV from the operation of a small vibratory roller. This is well below the industry standard vibration damage criteria of 0.3 PPV for this type of structure, a building of engineered concrete and masonry (no plaster). Therefore, construction-related groundborne vibration impacts would be considered less than significant.

Operational Vibration Impacts

Implementation of the project would not include any new permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. Additionally, there are no active sources of groundborne vibration in the project vicinity that would produce vibration levels that would be perceptible without instruments within the project site. Therefore, there would be no impact related to operational groundborne vibration.

- 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?**

No impact. The nearest airport to the project site is the Palmdale Regional Airport/USAF Plant 42, located approximately 0.8 mile south of the project site. Because of the orientation of the airport runways, the project is located outside of the airport's 70 dBA CNEL airport noise contours shown in Noise Element of the City of Palmdale's General Plan. These noise levels are considered to be normally acceptable for this type of land use development, according to the City's Noise Element. The project site is not located within the vicinity of a private airstrip. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near the project to excessive noise levels. Therefore, implementation of the project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Population and Housing <i>Would the project:</i>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

Would the project:

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

No impact. A project could induce population growth in an area, either directly (for example, by proposing new homes and/or business) or indirectly (for example, through extension of roads and/or other infrastructure). The project consists of a vehicle storage facility and associated office building for an online automobile auction business. Housing is not proposed as part of the project, and therefore would not induce unplanned population growth in the area. Therefore, there would be no impact related to unplanned population growth.

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

No impact. As discussed above, the project proposes to construct a vehicle storage facility and associated office building for an online automobile auction business. The project is vacant, and does not propose any housing. Therefore, the project would not displace any existing people or housing, necessitating the construction of replacement housing elsewhere. As such, no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Public Services <i>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

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

a) Fire protection?

Less than significant impact. Fire protection services for the City of Palmdale are provided by the Los Angeles County Fire Department (LACoFD) (City of Palmdale 1993b). There are five stations within the City of Palmdale: Stations 93, 24, 37, 131, and 136. The station nearest to the project site is Station 37, which is approximately 6.13 miles southwest of the site. The USAF Plant 42 Fire Department is located near the project to the south and contains its own staff and equipment, but maintains a mutual aid agreement with the City. The City of Palmdale also has a mutual aid agreement with the U.S. Forest Service. The project consists of a vehicle storage facility and associated office building for an online automobile auction business. It is not anticipated to increase the need for fire protection services or require the construction of new facilities. The City of Palmdale General Plan Public Services Element indicates that new fire stations will be needed to accommodate new growth. However, new fire stations will be constructed in areas with the most development.

In addition, project design would be subject to compliance with the requirements set forth in the 2016 California Fire Code and Palmdale Fire Code.²⁵ The proposed project would also be subject to compliance with the fire provisions specified in the 2016 CBC and all incorporated amendments, and

²⁵ City of Palmdale. 2019. Palmdale Municipal Code, Ch. 8.04.400 Adoption of the Palmdale Fire Code. Website: <https://www.codepublishing.com/CA/Palmdale/#!/Palmdale08/Palmdale0804.html#8.04.400>. Accessed April 11, 2019.

the 2015 International Fire Code. The project plans would be reviewed and approved by the LACoFD with consultation with the City of Palmdale Building and Safety Division, which would ensure adequate emergency access, fire hydrant availability, and compliance with all applicable codes and standards. Compliance with the City's permit process and municipal code requirements would ensure that project implementation would result in a less than significant impact to fire services.

b) Police protection?

Less than significant impact. Law enforcement is provided by contract with the Los Angeles County Sherriff's Department. Unincorporated areas of the City receive law enforcement form the Sherriff's Department and traffic control from California Highway Patrol. Both agencies provide emergency backup for one another. An independent Palmdale Sherriff's station was constructed on East Avenue Q in 2004. This station is approximately 5.82 miles southwest of the project site. Project implementation is not expected to decrease response times or require the construction of new police protection facilities. Impacts would be less than significant.

c) Schools?

No impact. The proposed project consists of the construction of a vehicle storage facility and associated office building. The project would employ up to 25 employees and would not introduce a new population to the area. There would not be an increase in school enrollment or a need for school facilities as a result of the project. Therefore, the project would not result in significant impacts related to schools. No impact would occur.

d) Parks?

No impact. The project consists of the construction of a vehicle storage facility and associated office building. The City of Palmdale General Plan standards for parks is 5 acres for every 1,000 residents (City of Palmdale 1993c). The project does not include housing, and would not result in an increase in population causing an increase in the use or need for park facilities. Therefore, no impact would occur.

e) Other public facilities?

No impact. Library services in the City of Palmdale are provided by the Palmdale City Library. The project consists of the construction of a vehicle storage facility and associated office building for an online automobile auction business, and would not necessitate the use of or require any new or altered library facilities. Library facilities in the City of Palmdale would not be impacted by construction of the project. Therefore, no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
15. Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

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

No impact. Significant impacts would occur if existing facilities would suffer substantial physical deterioration due to increased use related to population increase.

The Quimby Act, California Government Code Section 66477, requires the dedication of land and/or fees for park and recreational purposes as a condition of approval of a tentative map or parcel map. The Quimby Act establishes procedures that can be used by local jurisdictions to provide neighborhood and community parks and recreational facilities and services for new residential subdivisions. New developments in Palmdale involving a tentative map or parcel map would pay fees, dedicate land, or both, to the City of Palmdale for park and recreation purposes in accord with the Quimby Act.

The project proposes to construct a vehicle storage facility and associated office building for an online automobile auction business. The project would not result in an increase in population that could negatively affect or increase the use of existing parks in the City of Palmdale. As such, no impact would occur.

- 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?**

No impact. Significant impacts would occur if new recreation facilities needed to be constructed because of an increase in population. The project consists of a vehicle storage facility and associated office building. As previously mentioned, the project does not consist of recreational facilities, and there would be no significant increase in population as a result of the project. The project would not

result in a need for the construction or expansion of current recreational facilities. Therefore, no impact would occur.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Transportation <i>Would the project:</i>				
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Analysis in this section is based on trip generation based on case studies of existing facilities by Fehr & Peers as well as data from the project applicant. The trip generation table is included as Appendix G.

Environmental Evaluation

Would the project:

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

Less than significant impact. Table 11, Land use and Trip Generation Summary, summarizes the trip generation for the proposed project. The trip generation potential of the project was estimated using empirical data based on 2016 case studies of existing facilities by Fehr and Peers as well as data from the project applicant, which is included as Appendix G. Table 11 depicts the trip generation rates used to forecast existing and proposed trips, summarizes the projects daily, AM peak-hour, and PM peak-hour trip generation potential.

Table 11: Land Use and Trip Generation Summary

Trip Generation	AM Peak-hour			PM Peak-hour			ADT
	In	Out	Total	In	Out	Total	
Employees: 25 Employees	22	4	26	10	20	30	200
Deliveries: 18 Trucks	2	2	4	2	2	4	36
<i>PCE = 2.0</i>	4	4	8	4	4	8	72

Table 11 (cont.): Land Use and Trip Generation Summary

Trip Generation	AM Peak-hour			PM Peak-hour			ADT
	In	Out	Total	In	Out	Total	
Pick-up 18 Trucks	2	2	4	2	2	4	36
PCE = 2.0	4	4	8	4	4	8	72
Total PCE Trips	30	12	42	18	28	46	344
Assumptions ¹ Employee trips based on ITE Small Office (Category 712) trip rates - AM: 1.03/employee, PM: 1.20/employee, ADT: 7.98/employee ² Delivery: 11,000 vehicles/60 days = 183 vehicles/day 183 vehicles/10-car trucks = 18 trucks/day 18 trucks/day x 2 = 36 truck trips/day 36 truck trips/day x 2.0 Passenger Care Equivalent (PCE) = 72 PCE trips/day Peak-hour deliveries = 10 percent of ADT ³ Pick-up: 11,000 vehicles/60 days = 183 vehicles/day 183 vehicles/10-car trucks = 18 trucks/day 18 trucks/day x 2 = 36 truck trips/day 36 truck trips/day x 2.0 PCE = 72 PCE trips/day Peak-hour deliveries = 10 percent of ADT							

Based on information provided by the applicant, the trip generation rates for 25 employees were utilized in addition to vehicle transportation based on an 11,000 vehicle storage capacity on 81 acres. Vehicles would be delivered and picked up on 10-car carriers with an average of 90-day turnovers. The project would generate up to 344 daily passenger car equivalent (PCE) trips, including up to 42 trips produced in the AM peak-hour and 46 trips in the PM peak-hour.

The City of Palmdale does not have their own traffic impact analysis report guidelines and defers to the County’s guidelines. According to Los Angeles County guidelines, a traffic report is generally needed if a project generates over 500 trips per day. Because the project would generate up to 344 PCE trips, which is fewer than the 500 trip threshold, a traffic impact study is not required.

The City requires developers to comply with the Congestion Management Plan (CMP) adopted by the Los Angeles County Transportation Commission. The City will comply with the goals, directives, and programs contained in the CMP as they related to City responsibilities. Consequently, the project will be required to comply with the goals and policies outlined in the Los Angeles County Bicycle Master Plan. There are no bikeways, sidewalks, or trails along or near the project site. Antelope Valley Transit Authority Routes 4, 8, and 50 are the closest routes to the site, located along Sierra Highway. The project would not conflict with a program, plan, policy, or ordinance addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less than significant impact. Section 15064.3 of the CEQA Guidelines provides specific considerations for evaluating a project's transportation impacts. Per Section 15064.3, analysis of VMT attributable to a project is the most appropriate measure of transportation impacts. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in Section 15064.3(b)(2) regarding roadway capacity, a project's effect on automobile delay does not constitute a significant environmental impact under CEQA. Currently, the provisions of Section 15064.3 and the determination of impacts based on VMT is not required Statewide until July 1, 2020. Therefore, there is no conflict with Section 15064.3.

Per Section 15064.3(b)(3), a lead agency may analyze a project's VMT qualitatively based on the availability of transit, proximity to destinations, consistency with air quality goals, etc. The project site is not located within close vicinity of any public transit stops. Given that the project would include only up to 25 employees, traffic generated by the project would not have a substantial effect on the operation of local roadways and intersections. As described above, the project would not have any significant impacts on air quality or GHGs as a result of VMT. Based on the above, the proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b), and a less-than-significant impact would occur.

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

Less than significant impact. The project would construct a vehicle storage facility and associated office building for an online automobile auction business. The project does not include any sharp curves, dangerous intersections or hazardous geometric features as part of the design. In addition, project plans would require approval by the City to ensure that ingress/egress and internal circulation are safe. This would prevent project impacts due to a design feature. The project is surrounded by vacant land and agricultural land and would not result in hazards due to incompatible uses. Impacts would be less than significant.

d) Result in inadequate emergency access?

Less than significant impact with mitigation incorporated. The project would construct a vehicle storage facility and associated office building for an online automobile auction business. Access to the site would be provided via two full access driveways on the eastern project boundary at 40th Street. The project would require compliance with the LACoFD for adequate access. The project site would provide adequate access and turning radius for emergency vehicles, consistent with LACoFD requirements.²⁶ Upon review of the project site plan, the City would ensure that the project would not result in inadequate emergency access. Additionally, MM TRANS-1, which requires the provision of a detailed construction traffic control plan prior to the issuance of any grading permits, would

²⁶ Los Angeles County. 2017. Los Angeles County Municipal Code. Title 32 Fire Code. 4811.9. Fire Department Access. Website: https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances?nodeId=TIT32FICO_4811.9FIDEAC

allow for traffic control and access during construction of the project and associated sewer lateral. Therefore, with implementation of MM TRANS-1, impacts would be less than significant.

Mitigation Measures

MM TRANS-1 Prior to issuance of any grading permits, the applicant shall provide a detailed construction traffic control plan to the City of Palmdale for approval. A construction traffic control plan shall be prepared for all aspects of project construction, including physical improvements on the site itself, as well as any off-site traffic improvements required to be completed directly by the project applicant. The construction traffic control plan shall describe in detail the location of equipment staging areas, stockpiling/storage areas, construction worker and equipment parking areas, roadways that would be potentially affected, safe detours around the project and/or roadway construction site, as well as provide temporary traffic control (e.g., flag person) and appropriate signage during construction-related truck hauling activities. The traffic control plan shall ensure adequate and uninterrupted access to all nearby residences throughout the construction period. The purpose of these measures is to safely guide motorists, cyclists, and pedestrians, minimize traffic impacts, and ensure the safe and even flow of traffic during construction, consistent with City standards and requirements. The traffic control plan must be submitted and approved before commencement of grading.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Utilities and Service Systems				
<i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Evaluation

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?**

Less than significant impact. Palmdale Water District (PWD), Los Angeles County Waterworks, and Antelope Valley East Kern Water Agency provide water services to the City of Palmdale. The primary source of water supply in Palmdale is groundwater, and supplemental water is supplied from the State Water Project (California Aqueduct). Groundwater movement is generally in a northwesterly direction, originating from the foothills of the San Gabriel Mountains towards the pumping depression in Lancaster. Water is conveyed by the State Water Project from Feather River and the Lake Oroville

Reservoir located in Northern California to areas in Southern California lacking adequate local sources. Water is conveyed through open and closed aqueducts throughout California.

Private wells are used by a number of residences and businesses in outlying areas of the City of Palmdale. In addition, private haulers buy water from the County Waterworks Districts and County of Los Angeles water companies and distribute water to households and other uses that do not have water system connections or private wells. According to Los Angeles County Waterworks District, the project would not be located within their nearest district services boundary (LA County Waterworks District No. 40-04). The nearest water service main is located nearly 7,600 linear feet from the project. The standard for the District to require a new development to connect to their main is that the property be located within 1,600 feet. According to the Los Angeles County Waterworks District, since the project is located outside of the 1,600-foot distance, the project would not be compelled to connect to their system. As such, the project would seek water supply by seeking a new well permit through AVWM and the Los Angeles County Health Department.

The project is located outside of the Los Angeles County Sanitation District and would require annexation into District No. 14 before sewage service could be provided. Due to the project's location, flow origination from the project would have to be transported to the Los Angeles County Sanitation District's trunk sewer by local sewer that are not maintained by the District. The nearest District trunk sewer is the Trunk C sewer located in 30th Street East at Avenue L. The District's 15-inch-diameter trunk sewer has a capacity of 3.4 million gallons per day (mgd) and conveyed peak flow of 0.3 mgd last measured in 2018. The project would connect to an off-site gravity sewer collection system 3,000 feet from the project site within Avenue L, west of 35th Street and will meet the City of Palmdale's standards for wastewater collection systems. In addition, the project would construct an on-site holding tank and private lift station to transport sewer effluent from the office building on the east side of the project to the off-site sewer connection point on the northwest side of the project. Therefore, no additional wastewater facilities would need to be constructed to accommodate the project.

The nearest water purveyor to the site is Los Angeles County Water Works District 40 (District 40-04). The project is not seeking domestic water supply from this district, rather would use groundwater supply through the use of a well.

The project is expected to use a minimal amount of water for the proposed small office building and irrigation of on-site landscaping. As such, there would be no need to construct new or expanded existing water or wastewater facilities. Impacts related to the need for relocation or construction of new or expanded water or wastewater facilities would be less than significant.

Storm drainage would be facilitated through two proposed infiltration basins location on and around the project site. Therefore, the project would not require or result in the construction of new stormwater drainage.

Southern California Edison and SoCalGas would provide electricity and gas services to the project. New or expanded facilities would not be required. The project does not propose housing or land uses that would require use large quantities of water or wastewater. Therefore, impacts related to

the need for relocation or construction of new or expanded water, wastewater treatment, storm drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

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

Less than significant impact. The nearest water purveyor to the site is Los Angeles County Water Works District 40 (District 40-04). The project is not seeking domestic water supply from this district, rather would use groundwater supply through the use of a well.

The project is not expected to demand a substantial amount of water, and up to 25 full-time employees would be on-site during project business hours. Current water supplies are sufficient to serve the project and reasonably foreseeable development during normal, dry, and multiple dry years. Impacts to water supply would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than significant impact. The project would connect to an off-site gravity sewer collection system within Avenue L, west of 35th Street. The development would include an on-site holding tank and private lift station to transport sewer effluent from the office building on the east side of the project to the off-site sewer connection point on the northwest side of the project. Based on the Los Angeles CEQA Thresholds Guide Sewage Generation Factor of 150 gpd/1000 square feet for an office building, the proposed project is expected to generate approximately 13,002.6 gpd of wastewater (City of Los Angeles 2006). This would not result in a significant increase to the existing capacity of 3.4 mgd of the trunk sewer along 30th Street East at Avenue L. Therefore, District No. 14 would have adequate wastewater treatment capacity to serve the proposed project. Impacts to wastewater treatment capacity would be less than significant.

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

Less than significant impact. Significant impacts could occur if the project would exceed the existing permitted landfill capacity or violates federal, State, and local statutes and regulations. The project consists of a vehicle storage facility and associated office building. Solid waste collection is provided through permits by the City to three disposal companies for commercial/industrial solid waste disposal. These three companies include Crown Disposal, Larey Rubbish Pick-up Service, and Waste Management dispose of solid waste at the Antelope Valley and Lancaster Landfills.

The Antelope Valley Landfill has a maximum capacity of 30,200,000 cubic yards per day, with a remaining capacity of 17,911,225 cubic yards (California Department of Resources Recycling and Recovery [CalRecycle] 2018a). Lancaster Landfill has a maximum capacity of 5,100 tons per day, and a remaining capacity of 14,514,648 cubic yards (CalRecycle 2018b).

Considering the current landfill capacity and nature of the project, it is not expected that the project would have a significant impact on the capacity of the City's landfill. Impacts would be less than significant.

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

No impact. According to the City of Palmdale General Plan, the City adopted a Solid Waste Management Plan to comply with AB 939, the California Integrated Waste Management Act of 1989.²⁷ The plan includes a Source Reduction and Recycling Element, and a siting section that identifies criteria for the location of solid waste, landfills, transfer stations, recycling centers, and other waste facilities.

The project is required to comply with all applicable federal, State, county, and City management and reduction statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact would occur.

Mitigation Measures

None required.

²⁷ <https://www.calrecycle.ca.gov/Igcentral/basics/stagrecy>

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
18. Wildfire <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. According to the California Department of Forestry and Fire Protection (CAL FIRE), the site is not located in a fire hazard severity zone or State Responsibility Area (SRA). The City of Palmdale implemented an EOP²⁸ in 2012 outlining operations and procedures in the case of an emergency or disaster. In addition, the General Plan Safety Element²⁹ outlines policies and objectives to ensure that the City of Palmdale is prepared and self-sufficient for such events. The project does not include any characteristics or propose any changes to roads surrounding the project that would physically impair or otherwise interfere with emergency response or evacuation plans in the project vicinity. Therefore, impacts would be less than significant.

²⁸ City of Palmdale. 2012. Emergency Operations Plan. Website: <https://www.cityofpalmdale.org/Portals/0/Documents/Residents/COP%20EOP%20Executive%20Summary.pdf>

²⁹ City of Palmdale. 1993. City of Palmdale General Plan. Safety Element. Website: <http://www.cityofpalmdale.org/Portals/0/Documents/Business/Planning/General%20Plan/07-Safety.pdf>.

- 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?**

Less than significant impact. The project is in a predominantly flat area within the City of Palmdale. According to CAL FIRE, the site is not located in a fire hazard severity zone or SRA. Additionally, because the project site is within a designated industrial area according to the General Plan, it is unlikely for fire hazards to occur. Impacts would be less than significant.

- 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?**

Less than significant impact. The project consists of a vehicle storage facility and associated office building for an online automobile auction business in the City of Palmdale. As previously mentioned, the site is not located in a fire hazard severity zone or SRA. The project is not expected to require the installation or maintenance of associated infrastructure with the potential to exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant.

- 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?**

Less than significant impact. The project consists of a vehicle storage facility and associated office building for an online automobile auction business in a relatively flat area of Palmdale. As mentioned in previous sections, the site is not located in a fire hazard severity zone or SRA and the project site is not subject to serious flooding or landslides. Impacts would be less than significant.

Mitigation Measures

None required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
19. Mandatory Findings of Significance				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Evaluation

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

Less than significant impact with mitigation incorporated. With project implementation, development would be concentrated in the 81.98-acre site. The project would result in the permanent loss of 81.98 acres of disturbed habitat type, consisting primarily of Russian thistle. The project has been designed to reflect and is consistent with current land use and zoning designations, and the operation of the project would not be considered to substantially degrade the quality of the environment. The project is not within or adjacent to—and would not conflict with—the provisions of an adopted Habitat Conservation plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. With implementation of MM BIO-1 through BIO-3, impacts to sensitive species would be less than significant. Given the potential for undiscovered cultural and TCRs on the project, implementation of MM CUL-1, MM CUL-2, and MM GEO-3 would

be required to avoid the accidental destruction or disturbance of previously undiscovered cultural resources, including paleontological, archaeological and TCRs, as well as human remains. With implementation of these measures described above, the project would not have the potential to degrade the quality of the environment and, overall, impacts would be less than significant with the implementation of mitigation. No additional mitigation measures are required.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less than significant impact with mitigation incorporated. The project would result in potentially significant impacts to agriculture and forestry resources, biological resources, cultural resources and TCRs, and geology and soils. However, all mitigation measures have been identified that reduce impacts to a less than significant level. Implementation of MM AG-1, MM BIO-1 through MM BIO-3, MM CUL-1 and MM CUL-2, and MM GEO-1, MM GEO-2, MM GEO-3, and MM TRANS-1 would bring impacts to a less than significant level. In addition, it was determined in that the project would have less than significant cumulative impacts related to air quality. Overall, in combination with past, present and reasonably foreseeable growth, the project would not result in cumulatively considerable impacts. Impacts would be less than significant with the implementation of mitigation. No additional mitigation measures are required.

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

Less than significant impact with mitigation incorporated. All potential impacts of the proposed project have been identified. Compliance with applicable existing laws and regulations and implementation of listed mitigation measures would ensure that the project would not result in substantial adverse effects on human beings either directly or indirectly. Therefore, impacts would be less than significant with implementation of mitigation. No additional mitigation measures are required.

Mitigation Measures

No additional mitigation measures are required.

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