Palmdale TOD Framework Plan
Program Environmental Impact Report

PRIMARY FUNDING FROM:
Metro

PREPARED FOR:
City of Palmdale

PREPARED BY:
Michael Baker International
FINAL
PROGRAM ENVIRONMENTAL IMPACT REPORT

PALMDALE TOD FRAMEWORK PLAN

SCH NO. 2017011057

LEAD AGENCY:
CITY OF PALMDALE
38250 Sierra Highway
Palmdale, California 93550
Contact: Ms. Carlene Saxton
661.267.5200

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Santa Ana, California 92707
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December 2017

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This document is designed for double-sided printing to conserve natural resources.
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SECTION 1.0
Introduction
1.0 INTRODUCTION

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Palmdale, as the lead agency, has evaluated the comments received on the Palmdale TOD Framework Plan Program Environmental Impact Report (Draft EIR).

The Draft EIR for the proposed Palmdale TOD Framework Plan (herein referenced as the project or TOD Framework) was distributed to potential responsible and trustee agencies, interested groups, and organizations. The Draft EIR was made available for public review and comment for a period of 45 days. The public review period for the Draft EIR established by the CEQA Guidelines commenced on September 25, 2017 and ended on November 8, 2017.

The Final EIR consists of the following components:

- Section 1.0 – Introduction
- Section 2.0 – Responses to Comments
- Section 3.0 – Mitigation Monitoring and Reporting Program
- Section 4.0 – Errata

Due to its length, the text of the Draft EIR is not included with this document; however, it is included by reference in this Final EIR. None of the corrections or clarifications to the Draft EIR identified in this document constitutes “significant new information” pursuant to Section 15088.5 of the CEQA Guidelines. As a result, a recirculation of the Draft EIR is not required.
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SECTION 2.0
Response to Comments
2.0 RESPONSE TO COMMENTS

In accordance with the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15088, the City of Palmdale, as the lead agency, evaluated the written comments received on the Draft Environmental Impact Report (DEIR) (State Clearinghouse No. 2017011057) for the Palmdale TOD Framework Plan (herein referenced as the project or TOD Framework) and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

A list of public agencies and individuals that provided comments on the Draft EIR is presented in Table 2-1, and all correspondence from those agencies or individuals is reproduced on the following pages. Each comment has been assigned a letter. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following each comment letter are responses to each numbered comment. A response is provided for each comment raising significant environmental issues. Added or modified text is underlined (example), while deleted text will have a strike out (example) through the text, and is included in a box, as the example below shows.

"Text from EIR" “Text from EIR"

<table>
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<td>Gayle Totton, Associate Governmental Project Analyst</td>
<td>Native American Heritage Commission</td>
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<td>B</td>
<td>10/12/17</td>
<td>Michael Y. Takeshita, Acting Chief, Forestry Division Prevention Services Bureau</td>
<td>County of Los Angeles Fire Department</td>
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<tr>
<td>C</td>
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<td>Alex Briskin, Chief of Acquisition Environmental and Industrial Facilities Division</td>
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<td>D</td>
<td>11/3/17</td>
<td>Tiffany Steinert, Engineering Geologist</td>
<td>Lahontan Regional Water Quality Control Board</td>
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<td>E</td>
<td>11/13/17</td>
<td>Adriana Raza, Customer Service Specialist</td>
<td>County Sanitation Districts of Los Angeles County</td>
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<td>F</td>
<td>11/18/17</td>
<td>Scott Morgan, Director</td>
<td>Governor’s Office of Planning and Research State Clearinghouse and Planning Unit</td>
</tr>
</tbody>
</table>
October 10, 2017

Carlene Saxton  
City of Palmdale  
38250 Sierra Highway  
Palmdale, CA 93550

Sent via e-mail: csaxton@cityofpalmdale.org

Re: SCH# 2017011057, Palmdale Transit Oriented Development Framework Plan Project, City of Palmdale; Los Angeles County, California

Dear Ms. Saxton:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Executive Summary, the Introduction and Project Description, the Effects Found Not to be Significant section 8.5 Cultural Resources, and the Environmental Analysis section 5.4 Cultural Resources and Tribal Cultural Resources, prepared by Michael Baker International for the City of Palmdale. We have the following concerns:

1. There are no mitigation measures specifically addressing Tribal Cultural Resources separately and distinctly from Archaeological Resources. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, with or without consultation occurring. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources. For sample mitigation measures, please refer to California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf

2. The Native American Heritage Commission does not determine individuals or companies that conduct monitoring activities as referenced in Mitigation Measure CUL-1. Monitoring is a contractual agreement between the lead agency and the monitor/monitoring firm they hire. The NAHC does not maintain a list of monitors.

The California Environmental Quality Act (CEQA), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52), AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. AB 52 created a separate category for "tribal cultural resources," that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. Your project may also be subject to Senate Bill 18 (SB 18) (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. Both SB 18 and AB 52 have tribal consultation requirements. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you

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1 Pub. Resources Code § 21000 et seq.  
2 Pub. Resources Code § 21084 1; Cal. Code Regs., tit. 14, § 15064.5 (h); CEQA Guidelines Section 15064.5 (h)  
4 Government Code 65352.3  
5 Pub. Resources Code § 21074  
6 Pub. Resources Code § 21084.2  
7 Pub. Resources Code § 21084.3 (a)  
8 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.
to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPA.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC’s recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3710 if you have any questions.

Sincerely,

Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse
Pertinent Statutory Information:

Under AB 52:
AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:
Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.
A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project, and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18)."

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

1. The following topics are discretionary topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects.

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.

Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b).

An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.

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9 Pub. Resources Code § 21080.3.1, subds. (d) and (e)
10 Pub. Resources Code § 21080.3.1 (b)
11 Pub. Resources Code § 21080.3.2 (a)
12 Pub. Resources Code § 21080.3.2 (a)
13 Pub. Resources Code § 21082.3 (c)(1)
14 Pub. Resources Code § 21082.3 (b)
15 Pub. Resources Code § 21082.3 (d)
16 Pub. Resources Code § 21082.3 (e)
17 Pub. Resources Code § 21082.3 (c)
18 Pub. Resources Code § 21082.3 (d)
This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:
Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5097.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to local governments and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Udpated_Guidelines_922.pdf
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.19
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research,20 the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.21
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
  - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.22

NAHC Recommendations for Cultural Resources Assessments:
- Contact the NAHC for:
  - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
    - The request form can be found at http://nahc.ca.gov/resources/forms/.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
  - If part or the entire APE has been previously surveyed for cultural resources.
  - If any known cultural resources have been already recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CI IRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
- Avoidance and preservation of the resources in place, including, but not limited to:
  - Planning and construction to avoid the resources and protect the cultural and natural context.
  - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

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19 (Gov. Code § 65352.3 (a)(2)).
20 pursuant to Gov. Code section 65040.2.
21 (Gov. Code § 65352.3 (b)).
22 (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. ²⁵
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. ²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources. ²³ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

²³ (Civ. Code § 815.3 (c)).
²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).
RESPONSE TO COMMENT LETTER A
Native American Heritage Commission
Gayle Totton, B.S., M.A., Ph.D., Associate Governmental Project Analyst
October 10, 2017

A-1 The commenter indicates that no mitigation measures specifically addressing tribal cultural resources are included in the Draft EIR and suggests incorporation of California Natural Resources Agency’s sample mitigation measures. As identified in Draft EIR Section 5.4.4.3, *Tribal Cultural Resources*, based on the General Plan, General Plan EIR (GPEIR), and consultation conducted with the Fernandeño Tataviam Band of Mission Indians, the City has determined that no tribal cultural resources are known to exist on the project site. Further, there are no National Historic Landmarks (NHL), National Register listings, California Historic Landmarks (CHL), or California Register listings located within the City of Palmdale. No evidence to support the presence of known tribal cultural resources was determined to be located on-site. Nonetheless, future development accommodated through project implementation would initiate formal Assembly Bill 52 (AB 52) consultation with the City’s AB 52-listed tribes on a project-by-project basis. If through consultation it is determined that tribal cultural resources are present, the City and tribes would identify project-specific mitigation measures to reduce and/or avoid impacts; refer to Draft EIR page 5.4-16.

A-2 This comment states that the Native American Heritage Commission (NAHC) does not determine individuals or companies to conduct monitoring activities as referenced in Draft EIR Mitigation Measure CUL-1. The City appreciates the NAHC’s clarification that monitoring is a contractual agreement between the lead agency and the monitor/monitoring firm hired. The requested clarification has been made to pages 1-9 and 5.4-14 through 5.4-15 of the Draft EIR and is reflected below and in Section 4.0, *Errata*.

CUL-1 In the event that archeological resources are unearthed during excavation and grading activities of future development, the contractor shall cease all earth-disturbing activities within a 100-meter radius of the area of discovery, notify the City’s Planning Director, and, with direction from the City’s Planning Director, shall retain a qualified archaeologist certified by the County of Orange Los Angeles to evaluate the significance of the find and recommend an appropriate course of action.

If evidence of subsurface tribal cultural resources is found, the registered professional archaeologist, in coordination with the City, shall contact the Native American Heritage Commission to determine the appropriate Native American monitor for the find. The registered professional archaeologist and Native American Monitor shall collect the resource and prepare a technical report describing the results of the investigation. The test-level report shall evaluate the site including discussion of significance (depth, nature, condition, and extent of the resources), final mitigation recommendations, and cost estimates.
Salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. Work within the area of discovery shall resume only after the resource has been appropriately mitigated.

This change provides a minor update, correction, or clarification and does not represent “significant new information” as defined in CEQA Guidelines Section 15088.5.

A-3 This comment summarizes the statutes of AB 52 and Senate Bill 18 (SB 18), particularly concerning tribal consultation requirements. A discussion pertaining to the project’s consistency with the tribal consultation requirements identified under AB 52 is included in Draft EIR Section 5.4, Cultural and Tribal Cultural Resources, and Appendix J, AB 52 Consultation. The City has conducted consultation with tribes that have requested to be listed on the City’s notification list for the purposes of AB 52. Only the Kimia Fatehi of the Fernandeño Tataviam Band of Mission Indians responded via email on March 2, 2017 requesting consultation with the City. The Kimia Fatehi has indicated that the project area is sensitive to the tribe; however, no specific information was provided to indicate the actual presence of tribal cultural resources on-site. Kimia Fatehi requested specific procedures for initiating the tribal consultation process for AB 52 on a project-by-project basis, as development is not currently proposed as part of the project. As discussed in Draft EIR Section 5.4 and Response A-1 above, the City will continue to notify the tribe in compliance with AB 52 as future projects are initiated within the project area.

The project does not involve an amendment to a general plan, specific plan, or the designation or proposed designation of open space pursuant to California Government Code Section 65352.3 and 65562.5. Thus, the project is not subject to SB 18 requirements and the City did not initiate tribal consultation under SB 18. As identified in Draft EIR Section 3.9, Discretionary Actions and Approvals, implementation of the TOD Framework could require future amendments to the General Plan, Palmdale Transit Village Specific Plan, and Palmdale Trade and Commerce Specific Plan. Pursuant to SB 18 requirements, the City would initiate tribal consultation as future projects involving an amendment to the General Plan and adopted Specific Plans are initiated within the project area.

A-4 The provided attachment includes a summary of portions of AB 52, SB 18, and the NAHC’s recommendations for conducting cultural resources assessments. Refer to Responses A-1 through A-3 above.
October 12, 2017

Carlene Saxton, Senior Planner
City of Palmdale
Economic and Community Development Department
38250 Sierra Highway
Palmdale, CA 93550

Dear Ms. Saxton:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "PALMDALE TRANSIT ORIENTED DEVELOPMENT FRAMEWORK PLAN," CONSISTS OF APPROXIMATELY 1,035 ACRES AND IS CENTERED AROUND PALMDALE TRANSPORTATION CENTER, IT IS COMPRISED OF THREE COMPONENTS THAT ARE DESIGNED TO WORK TOGETHER, INCLUDING: THE LAND USE FRAMEWORK, TRANSPORTATION REPORT, URBAN DESIGN, AND STREETSCAPE RECOMMENDATIONS REPORT, PALMDALE, FFER 201700115

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

In Section 5.13.1.1 PUBLIC SERVICES, Fire Protection, Paragraph one, sentences two, and three should be updated as follows:

"The LACFD is one of the largest regional fire service organizations in California responding to 13,071 fire incidents in 2016. LACFD currently serves approximately 4,000,000 residents in unincorporated County areas and 58 contract cities. LACFD operates 173 fire stations and is staffed with approximately 4,770 firefighters and SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  BRADbury  CUDAHY  HAWTHORNE  LA HABRA  LYNWOOD
ARTESSA  CALABASAS  DIAMOND BAR  HIDDEN HILLS  LA MIRADA  MAUIUI
AZUSA  CANADIAN  DUARTE  HUNTINGTON PARK  LA PUENTE  MALIBU
BALDWIN PARK  CERRITOS  EL MONTE  INDUSTRY  LAKewood  MAYWOOD
BELL  CEDAR  GARDENA  INGLEWOOD  LANCASTER  NORMAale
BELL GARDENS  CEDAR COMMERCE  GLENDALE  IRVINE  PALOS VERDES
BELLFLOWER  COVINA  HAWAIIAN GARDENS  LA CANADA-Flintridge  LOMITA  PARAMOUNT
PICO RIVERA  POMONA  RANCHO PALOS VERDES  ROLLING HILLS  ROSEMEREAD
SOUTH EL MONTE  SOUTH GATE  TEMPLE CITY  WALTERS  SAN DIAMAS
SANTA CLARITA  WEST HOLLYWOOD  WESTLAKE VILLAGE  WHITTIER

COMMENT LETTER B
RECEIVED
OCT 17 2017
PLANNING DEPT.
support personnel."

Paragraph two, should be updated as follows:

"Palmdale is served by the following five fire stations located within the city as well as seven stations that serve outlying areas."

Station 24 - 1050 W. Rancho Vista Blvd.
Station 37 - 38318 9th Street East
Station 131 - 2629 East Avenue S
Station 93 - 5624 East Avenue R
Station 136 - 3650 Bolz Ranch Road

**LAND DEVELOPMENT UNIT:**

1. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.

2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.

3. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.

4. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

5. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.

6. Fire Department requirements for access, fire flows, and hydrants are addressed during the building permit stage.
7. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

8. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
   a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
   b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
   c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
   d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
   e) A cul-de-sac shall not be more than 500 feet in-length when serving land zoned for commercial use.

9. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
   a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
   b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
   c) Additional hydrants will be required if hydrant spacing exceeds specified distances.
   d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
   e) A cul-de-sac shall not be more than 500 feet in-length when serving land zoned for commercial use.
10. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

11. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.

12. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
   a) Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
   b) Provide 42 feet in-width when parallel parking is allowed on each side of the access roadway/driveway.
   c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans.
   d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

13. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.

14. All access devices and gates shall meet the following requirements:
   a) Any single-gated opening used for ingress and egress shall be a minimum of 26 feet in-width clear-to-sky.
   b) Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
c) Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used the 50 feet shall be measured from the right-of-way to the intercom control device.

d) All limited access devices shall be of a type approved by the Fire Department.

e) Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.

15. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.

16. Provide three sets of alternate route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction. Complete architectural/structural plans are not necessary.

17. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

The County of Los Angeles Fire Department Land Development Unit’s comments are only general requirements. Specific fire and life safety requirements will be addressed at the building and fire plan check phase. There may be additional requirements during this time.

The County of Los Angeles Fire Department’s Land Development Unit appreciates the opportunity to comment on this project.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

The statutory responsibilities of the County of Los Angeles Fire Department’s Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.
The County of Los Angeles Fire Department’s Forestry Division has no further comments regarding this project.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that numerous locations in the project area may require environmental assessment and/or mitigation under formal environmental oversight by the appropriate authorized government agencies, which include, but are not limited to, the California Department of Toxic Substances Control, the Los Angeles Regional Water Quality Control Board, and/or the HHMD Site Mitigation Unit. In addition, future commercial/industrial businesses to be constructed in the project area will have to acquire all appropriate HHMD Certified Unified Program Agency permits.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

[Signature]

MICHAEL Y. TAKEHITA, ACTING CHIEF, FORESTRY DIVISION PREVENTION SERVICES BUREAU

MYT:ac
RESPONSE TO COMMENT LETTER B
County of Los Angeles Fire Department
Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau
October 12, 2017

B-1 This comment includes requested revisions to Draft EIR Section 5.13.1.1, Fire Protection. The requested clarifications have been made to Draft EIR page 5.13-1 and are reflected below and in Section 4.0, Errata.

FIRE PROTECTION

Fire protection services within the City of Palmdale (City) are provided by contract with the Los Angeles County Fire Department (LACFD). The LACFD is one of the largest regional fire service organizations in California, responding to 23,629 fire incidents from 2012-2014 in 2016.1 LACFD currently serves approximately 4,000,000 residents in unincorporated County areas and 58 contract cities. LACFD operates 167 fire stations and is staffed with approximately 4,631 firefighters and support personnel. Additionally, LACFD has nine emergency operations divisions. LACFD has established the following goals: 1) responding within five minutes to any call for services; and staffing each shift in each station with a minimum three-person team of professional firefighters.

Palmdale is served by the following five fire stations located within the City, as well as seven fire stations that serve outlying areas.2

- Station 24 – 1050 West Avenue P
- Station 37 – 38318 9th Street East
- Station 131 – 2629 East Avenue S
- Station 93 – 55624 East Avenue R
- Station 136 – 3650 Bolz Ranch Road

This change provides a minor update, correction, or clarification and does not represent “significant new information” as defined in CEQA Guidelines Section 15088.5.

B-2 This comment identifies several Los Angeles County Fire Department (LACFD) development standards for fire safety. The Draft EIR acknowledges that future development within the project planning area would be reviewed on a project-by-project basis by the LACFD to ensure that new development meets the Department’s fire safety requirements; refer to Draft EIR page 5.13-26. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR’s environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

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2 City of Palmdale, City of Palmdale Local Hazard Mitigation Plan, page 21, April 2015. Ibid.
This comment notes that the Draft EIR should address potential impacts related to erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archaeological and cultural resources, and the County Oak Tree Ordinance.

Draft EIR Section 5.11, *Hydrology and Water Quality* includes an analysis of the project’s potential to result in substantial on- or offsite erosion or siltation; refer to Draft EIR Impact 5.11.4.3 (Erosion or Siltation). As concluded in Impact 5.11.4.3, compliance with National Pollutant Discharge Elimination System (NPDES) and Palmdale Municipal Code Section 8.04.265 Chapter 70 requirements, as well as General Plan EIR (GPEIR) Policies, would reduce the project’s potential erosion impacts to a less than significant level. Further, the project’s impacts to the Anaverde Creek watershed and Lake Palmdale watershed would be less than significant following conformance with the federal, State, and local requirements for water quality identified in Section 5.11. As indicated in Draft EIR Section 8.7, *Hazards and Hazardous Materials*, the project is not located in a high fire hazard area. Thus, no wildfire hazard impact would occur with project implementation.

The project’s impacts to archaeological and cultural resources are addressed in Draft EIR Section 5.4, *Cultural and Tribal Cultural Resources*. As concluded in Draft EIR Section 5.4, impacts related to cultural and tribal cultural resources associated with project implementation would be less than significant following adherence to the established regulatory framework, General Plan Goals and Policies, and Mitigation Measure CUL-1. As defined in Section 5.3, *Biological Resources*, the biological composition of the project planning area, and surrounding areas, is consistent with plant communities commonly found in desert conditions. Thus, the project area does not include oak trees and project implementation would not conflict with the County Oak Tree Ordinance.

This comment notes that numerous locations in the project area may require environmental assessment and/or mitigation under formal environmental oversight by the appropriate government agency. As indicated in Draft EIR Section 5.10, *Hazards and Hazardous Materials*, the project’s potential impacts associated with site disturbance activities and potential accidental conditions would be reduced to less than significant following adherence to the established regulatory framework, General Plan Goals and Policies, and Mitigation Measures HAZ-1 through HAZ-5.

This comment also notes that future commercial/industrial businesses to be constructed in the project area would necessitate acquisition of all appropriate Certified Union Program Agency (CUPA) permits from the LACFD Health Hazardous Materials Division (HHMD). Draft EIR Section 5.10, acknowledges that the LACFD HHMD oversees the County’s CUPA program and that the project’s long-term operations would be subject to the HHMD standards and regulations. Future development involving commercial/industrial uses would coordinate with the LACFD HHMD on a project-by-project basis for project-specific CUPA permitting requirements and would be subject to all applicable Federal, State, and local laws related to the storage and handling of hazardous materials; refer to Draft EIR Impact 5.10.4.1, *Release of Hazardous Materials*. 
From: BRISKIN, ALEX I NH-04 USAF AFMC AFLCMC/EZV, Acquisition Environmental and Industrial Facilities
[mailto:alex.briskin@us.af.mil]
Sent: Tuesday, October 31, 2017 1:30 PM
To: Carlene Saxton
Subject: USAF at AFP 42 comments for Palmdale TOD EIR

View in HTML

Dear Ms. Saxton:

The United States Air Force (USAF) at Air Force Plant (AFP) 42 in Palmdale, California is submitting the following comments in response to your Notice of Availability of a Draft Environmental Impact Report (EIR) for the Palmdale Transit Oriented Development (TOD) Framework Plan:

1. The acronym TOD is not defined in the public draft review.

2. Given that the TOD crosses Accident Potential Zone (II), please ensure that Framework and all other corresponding Plans follow the AFP 42 Air Installation Compatible Use Zone (AICUZ) established land use recommendations for the clear zones (CZ), APZ I and II, and for the four noise zones.

3. Please consider providing commute alternatives for AFP 42 employees, such as rail or bus.

4. Section 1.1, 2nd paragraph: There is a factual error in the executive summary when it states that “Most facilities are owned by private aerospace contractors”. This is true only for the Skunk Works, the reminder of the facilities are owned by the USAF and leased to the private aerospace contractors, namely Boeing, Lockheed Martin, and Northrop Grumman. Also, in the statement that, “While Palmdale Regional Airport once offered commercial flights” is assigned a degree of permanence but in reality has had a lack of commercial air service.

5. Section 6.3: The EIR states that unavoidable, significant impacts to air quality and greenhouse gas (GHG) emission levels would occur. If that increase resulted in additional regulation or restriction for the Antelope Valley, that could impact the operations that occur at AFP 42 and potential city development.

I am naming Christina Powell of my staff as the contact person for this issue. Should you have any questions please contact Dr. Powell at (937) 938-3747 or christina.powell.3@us.af.mil.

Sincerely,
Alex

Alex Briskin, P.E.
Chief, Acquisition Environmental and Industrial Facilities Division
937.938.4087
RESPONSE TO COMMENT LETTER C
United States Air Force at Air Force Plant 42
Alex Briskin, P.E., Chief, Acquisition Environmental and Industrial Facilities Division
October 31, 2017

C-1 This comment states that the acronym “TOD” is not defined in the Draft EIR. It is noted that Draft EIR pages 2-1 and 3-1 include a definition of TOD (Transportation Oriented Development).

C-2 The commenter requests the City confirm the project is consistent with the land use recommendations and noise zones established in the AFP Air Installation Compatible Use Zone (AICUZ). Draft EIR Section 5.1, Land Use and Planning, analyzes the project’s consistency with the AICUZ clear zones (CZ) and accident potential zones (APZ) I and II. As concluded in Impact 5.1.4.7, Air Installation Compatible Use Zone Study, future development within APZ II would continue to be reviewed by the City on a project-by-project basis to ensure development is consistent with the AICUZ. Therefore, the proposed project would not conflict with the AICUZ study and impacts would be less than significant in this regard. As concluded in Draft EIR Section 8.11, Noise, the project planning area is located outside the 60-65 decibel (dB) day-night sound level (DNL) contours established by the AICUZ study and thus would not conflict with the noise zones established in the AICUZ.

C-3 The commenter requests the City consider commute alternatives for AFP 42 employees. This comment is noted. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR’s environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

C-4 The commenter states that page 1-1 of the Draft EIR Executive Summary incorrectly states that most airport facilities in the project area are owned by private aerospace contractors. The City appreciates the U.S. Air Force’s clarification that Skunk Works is a private aerospace contractor and that the remainder of the facilities are owned by the U.S. Air Force. The requested clarification has been made to page 1-1 of the Draft EIR and is reflected below and in Section 4.0, Errata.

1.1 PROJECT LOCATION
The project planning area for the Palmdale TOD Framework Plan Project (herein referred to as the “project”), which includes several components as described below, consists of approximately 1,035 acres and is centered around the PTC and the proposed location for the City’s future High Speed Rail station. The project planning area is generally bounded by Rancho Vista Boulevard (Avenue P) to the north and Palmdale Boulevard (SR-138) to the south and by SR-14 to the west and 10th Street East to the east. The PTC is a regional multi-modal hub that provides connections between AVTA local and commuter bus service, Metrolink commuter rail service, Santa Clarita Transit, Greyhound bus service, and Amtrak Throughway bus service.
The Palmdale Regional Airport is located approximately one mile northeast of the PTC. While Palmdale Regional Airport once offered commercial flights, U.S. Air Force Plant 42 is now the primary user of the site. Most facilities are owned by the U.S. Air Force and are leased to private aerospace contractors, including Boeing, Lockheed Martin, and Northrop Grumman.

This change provides a minor update, correction, or clarification and does not represent “significant new information” as defined in CEQA Guidelines Section 15088.5.

C-5 Concerning the project’s significant and unavoidable air quality and greenhouse gas (GHG) impacts, the commenter notes that additional regulations or restrictions to the Antelope Valley to mitigate GHG emission levels could impact operations of AFP 42 and potential City development. It should be noted that the project does not propose any site-specific development. It considers future implementation of the TOD Framework. Future development would most likely occur in incremental phases over time, based largely on economic considerations, market demand, and other planning considerations. The phasing and exact details of individual projects would be evaluated by the City on a case-by-case basis. This will allow the City to ensure consistency with regional plans pertaining to air quality and greenhouse gas emissions. Further, the project encourages transit oriented development that supports the Multimodal Station, which would help to reduce air quality and greenhouse gas impacts associated with mobile source emissions. The Draft EIR acknowledges that if the City of Palmdale approves the proposed project, the City shall be required to cite their findings in accordance with Section 15091 of CEQA and prepare a Statement of Overriding Considerations in accordance with Section 15093 of CEQA.

C-6 This comment serves as the conclusion to the letter and provides contact information. The City appreciates and values your comments during the EIR participation process. Responses to specific comments are provided above; no further response is required.
November 3, 2017

Carlene Saxton, Senior Planner
City of Palmdale
38250 Sierra Highway
Palmdale, CA 93550
Email: csaxton@cityofpalmdale.org

Comments on Draft Environmental Impact Report for the City of Palmdale Transit Oriented Development Framework Plan, State Clearinghouse No. 2017011057

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received the Palmdale Transit Oriented Development Framework Plan (DEIR) for the above-referenced plan (Plan) on September 27, 2017. The DEIR was prepared by the City of Palmdale (Palmdale) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We encourage Palmdale to take this opportunity to integrate elements into the Plan that: (1) promote watershed management; (2) support “Low Impact Development” (LID); and (3) reduce the effects of hydromodification. Our comments are outlined below.

PURPOSE OF THE PLAN

The Palmdale Transit Oriented Development Framework Plan is an overarching policy document that will guide decisions of future growth and development, transportation and infrastructure, and conservation of natural resources in the City of Palmdale, Los Angeles County planning area. Given the conceptual, long-term nature of the plan, the DEIR provides a general overview of the potential impacts of proposed projects; subsequent and focused environmental review will occur as individual projects are proposed to implement elements of the Plan.

WATER BOARD’S AUTHORITY

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or
perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

**RECOMMENDED ELEMENTS TO INCLUDE IN THE PLAN**

We recognize the effort put forth by Palmdale to incorporate the policies and objectives of various local and regional watershed and management plans into one comprehensive programmatic Plan. We encourage Palmdale to take this opportunity and incorporate into the Plan elements and strategies that promote watershed management, support LID, and reduce the effects of hydromodification.

1. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of our region.

   The watershed approach for managing water resource quality and quantity is a collaborative process that focuses public and private efforts on the highest priority problems within a drainage basin. The Mojave and Antelope Integrated Regional Water Management Groups have each assembled a collaborative group of stakeholders, both public and private, to address both water quantity and water quality issues within their respective Mojave and Antelope Valley groundwater basins. A number of water management plans are being developed through that stakeholder collaboration process, and strategies continue to be developed and refined to sustain water quantity and to manage salts and nutrients to maintain the quality of groundwater and surface water resources.

2. The foremost method of reducing impacts to watersheds from development is LID, the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of non-point source pollutants. LID results in less surface runoff and potentially less impacts to receiving waters, the principles of which include:
- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;

- Reducing compacted and impervious cover created by development and the associated road network; and

- Managing runoff as close to the source as possible.

LID development practices that maintain aquatic values also reduce local infrastructure requirements and maintenance costs and benefit air quality, open space, and habitat. Vegetated areas for storm water management and infiltration onsite are valuable in LID. We encourage SCAG to establish LID implementation strategies for transportation-related projects and to incorporate these strategies into the Plan.

3. Because increased runoff from developed areas is a key variable driving a number of adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation. Traditional methods for managing urban storm water do not adequately protect the environment and tend to treat symptoms instead of causes. Such practices have led to channelization and stream armor that permanently alter stream habitat, hydrology, and aesthetics, resulting in overall degradation of a watershed.

Storm water control measures that are compatible with LID are preferred over more traditional methods. Examples include the use of bioretention swales, pervious pavement, and vegetated infiltration basins, all of which can effectively treat post-construction storm water runoff, help sustain watershed processes, protect receiving waters, and maintain healthy watersheds. Any particular one of these control measures may not be suitable, effective, or even feasible in every instance, but the right combination, in the right places, can successfully achieve these goals.

We encourage Palmdale to establish guidelines for implementing specific storm water control measures into the Plan. Additional information regarding sustainable storm water management can be accessed online at http://www.waterboards.ca.gov/water_issues/programs/low_impact_development/.

4. Hydromodification is the alteration of the natural flow of water through a landscape (i.e. lining channels, flow diversions, culvert installations, armoring, etc.). Disturbing and compacting soils, changing or removing the vegetation cover, increasing impervious surfaces, and altering drainage patterns limit the natural hydrologic cycle processes of absorption, infiltration, and evapotranspiration, and increases the volume and frequency of runoff and sediment transport. Hydromodification results in stream channel instability, degraded water quality, changes in groundwater recharge processes, and
aquatic habitat impacts. Hydromodification also can result in disconnecting a
stream channel from its floodplain. Floodplain areas provide natural recharge,
attemperate flood flows, provide habitat, and filter pollutants from urban runoff.
Floodplain areas also store and release sediment, one of the essential processes
to maintain the health of the watershed. Information regarding hydromodification
can be accessed online at

We encourage Palmdale to establish guidelines and develop mitigation
measures that will help to avoid hydromodification from future projects. The
guidelines should include maintaining natural drainage paths of streams and
creeks and establishing buffers and setback requirements to protect channels,
water bodies, and floodplain areas from encroaching development.

5. Groundwater protection should be considered a Plan-wide issue, ubiquitous to all
elements of the Plan and associated strategies. Water quality and water quantity
are fundamental to sustaining communities and promoting development. With
the passage of California Assembly Bill 685 in 2012, it is now the policy of the
State of California that every human being has the right to safe, clean, affordable,
and accessible water adequate for human consumption, cooking, and sanitary
purposes. Palmdale is encouraged to incorporate the principles of this policy into
the Plan.

PERMITTING REQUIREMENTS FOR INDIVIDUAL PROJECTS

A number of activities that will be implemented by individual projects under the Plan
have the potential to impact waters of the State and, therefore, may require permits
issued by either the State Water Resources Control Board (State Water Board) or
Lahontan Water Board. The required permits may include the following.

1. Streambed alteration and/or discharge of dredge and/or fill material to a surface
water, including water diversions, may require a CWA, section 401 water quality
certification for impacts to federal waters (waters of the U.S.), or dredge and fill
WDRs for impacts to non-federal waters, both issued by the Lahontan Water
Board.

2. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm
water permit, including a National Pollutant Discharge Elimination System
(NPDES) General Construction Storm Water Permit, Water Quality Order (WQO)
2009-0009-DWQ, obtained from the State Water Board, or an individual storm
water permit obtained from the Lahontan Water Board.

3. Water diversion and/or dewatering activities may be subject to discharge and
monitoring requirements under either NPDES General Permit, Limited Threat
Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste
Discharge Requirements for Discharges to Land with a Low Threat to Water
Quality, WQO-2003-0003, both issued by the Lahontan Water Board.
Project proponents should consult with Water Board staff early on should implementation of individual projects result in activities that trigger these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at http://www.waterboards.ca.gov/lahontan/.

Thank you for the opportunity to comment on the DEIR. If you have any questions regarding this letter, please contact me at (760) 241-7305 tiffany.steinert@waterboards.ca.gov or Jan Zimmerman, Senior Engineering Geologist, at (760) 241-7376 Jan.zimmerman@waterboards.ca.gov. Please send all future correspondence regarding this Project to the Water Board’s email address at Lahontan@waterboards.ca.gov and be sure to include the Project name in the subject line.

Tiffany Steinert
Engineering Geologist

cc: State Clearinghouse (SCH No. 2017011057) (state.clearinghouse@opr.ca.gov)
California Dept. of Fish and Wildlife (reg4assistant@wildlife.ca.gov)
RESPONSE TO COMMENT LETTER D
Lahontan Regional Water Quality Control Board
Tiffany Steinert, Engineering Geologist
November 3, 2017

D-1 This comment provides a general introduction. Responses to specific comments are provided below; no further response is required.

D-2 This comment summarizes major features of the proposed project and raises no comments on the Draft EIR. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

D-3 This comment provides information about the State Water Resources Control Board and Lahontan Water Board’s responsibilities and introduces the Water Quality Control Plan for the Lahontan Region (Basin Plan). There are no comments raised about the Draft EIR. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

D-4 The commenter encourages the City to incorporate “elements and strategies that promote watershed management, support LID, and reduce the effects of hydromodification” into the project. The Draft EIR includes a variety of measures which promote watershed management, support LID, and reduce the effects of hydromodification. As no site-specific development is being proposed, future development would be reviewed on a project-by-project basis specific to consistency with water quality requirements. Responses to specific comments are provided below.

D-5 This comment notes that water quality management plans are being developed to manage water resource quality and quantity. This comment is noted. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR’s environmental analysis. Responses to specific comments are provided below; no further response is required. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

D-6 This comment encourages the inclusion of LID implementation strategies for transportation-related projects and suggests LID development practices to incorporate into the project. The Draft EIR incorporates a comprehensive and programmatic approach to evaluate the project’s various implementation options in compliance with CEQA Guidelines Section 15168 (Program EIR). As site-specific development is not currently being proposed, site-specific LID implementation strategies have not been identified and would be considered as future development is proposed within the project area. Notwithstanding, Draft EIR Section 5.11, Hydrology and Water Quality, incorporates several Federal, State, and local regulations to reduce impacts to local watersheds. Future development accommodated through project implementation would be subject to General Plan Policy ER4.1.2, ER5.2.3, and CD8.4.4, among others. Pursuant to General Plan Policy ER4.1.2, the City would restrict building coverage and total impervious area near natural recharge areas. Pursuant to Policies ER5.2.3 and CD8.4.4, the City would
ensure new development incorporates runoff-control measures during construction and operations. As indicated in Impact 5.11.4.1, Violation of Water Quality Standards or Degradation of Water Quality, the need for any additional site-specific mitigation measures aimed at reducing impacts to water quality would be assessed during project-level environmental review process.

D-7 This comment encourages the City to establish guidelines for implementing specific stormwater control measures into the project. The Draft EIR incorporates a comprehensive and programmatic approach to evaluate the project’s various implementation options in compliance with CEQA Guidelines Section 15168 (Program EIR). Implementation of specific stormwater control measures would occur as site-specific development is implemented within the project area. Notwithstanding, Draft EIR Section 5.11 acknowledges that the project would accommodate increased development which would alter existing drainage patterns and therefore could result in the overall degradation of a watershed. However, future development within the project planning area would be required to comply with Federal, State, and local requirements regarding storm drain facilities and water quality; refer to Draft EIR Impact Statements 5.11.4.1, 5.11.4.3, 5.11.4.4, and 5.11.4.5. Conformance with the existing regulatory framework and the GPEIR Policies outlined in Section 5.11 would reduce potential impacts related to stormwater drainage to less than significant. The need for any additional site-specific mitigation measures aimed at reducing impacts to stormwater drainage would be assessed during project-level environmental review process.

D-8 This comment encourages the City to establish guidelines and develop mitigation measures that will help avoid hydromodification from future projects. The Draft EIR incorporates a comprehensive and programmatic approach to evaluate the project’s various implementation options in compliance with CEQA Guidelines Section 15168 (Program EIR). Specific guidelines and mitigation measures for hydromodification would occur as site-specific development is implemented within the project area. Notwithstanding, Draft EIR Section 5.11 acknowledges that the project would accommodate increased development which could result in hydromodification. The project’s potential impacts to groundwater quality are assessed in Impact 5.11.4.1, Violation of Water Quality Standards or Degradation of Water Quality. The project’s potential impacts to groundwater recharge are assessed in Impact 5.11.4.2, Groundwater Supplies. As indicated in Impacts 5.11.4.1 and 5.11.4.2, future development within the project planning area would be required to comply with Federal, State, and local requirements in place for water quality. Conformance with the existing regulatory framework and the GPEIR Policies outlined in Section 5.11 would reduce potential impacts related to hydromodification to less than significant. The need for any additional site-specific mitigation measures aimed at reducing hydromodification impacts would be assessed during project-level environmental review process.

D-9 This comment encourages the City to incorporate the principals of Assembly Bill (AB) 685 into the project. The TOD Framework considers one area of the City; whereas AB 685 would be more applicable to the City’s General Plan, which establishes goals and policies that pertain to the entire City. AB 685 requires state agencies to consider state policy when revising, adopting or establishing policies, regulations, and grant criteria when those policies, regulations, and grant criteria are pertinent to the uses of water described in Water Code Section 106.3. Notwithstanding, the City recognizes that future development accommodated through project implementation would be subject to all applicable Federal, State, and local laws related to water quality.
D-10 This comment lists specific permits issued by the State Water Resources Control Board or Lahontan Water Board which may be required for future development. The Draft EIR acknowledges that future development within the project planning area would be reviewed on a project-by-project basis by the State Water Resources Control Board and Lahontan Water Board to ensure that new development meets the Board’s permitting requirements; refer to Draft EIR Section 5.11. This comment does not identify a specific concern with the adequacy of the Draft EIR or raise an issue or comment specifically related to the Draft EIR’s environmental analysis. Therefore, no further response is warranted. (State CEQA Guidelines §15088(a) requires that a lead agency only evaluate and respond to comments raised on environmental issues.)

D-11 This comment serves as the conclusion to the letter and provides contact information. The City appreciates and values your comments during the EIR participation process. Responses to specific comments are provided above; no further response is required.
November 8, 2017

Ref. Doc. No.: 4289637

Ms. Carlene Saxton
Senior Planner
Planning Division
City of Palmdale
38250 North Sierra Highway
Palmdale, CA 93550

Dear Ms. Saxton:

DEIR Response to
the Palmdale Transit Oriented Development (TOD) Framework Plan

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on September 25, 2017. The proposed project is located within the jurisdictional boundaries of District No. 20. Previous comments submitted by the Districts in correspondence dated February 13, 2017 (copy enclosed) still apply to the subject project with the following updated information:

1. **Public Services and Utilities, page 5.13-9, Wastewater Treatment** – The Lancaster Water Reclamation Plant currently produces an average recycled water flow of 12.8 million gallons per day.

2. All other information concerning districts’ facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

DOC. #4544152.D20
Ms. Carlyne Saxton, Senior Planner  
Planning Division  
City of Palmdale  
38250 Sierra Highway  
Palmdale, CA 93550  

Dear Ms. Saxton:

Response to the NOP for  
the Palmdale Transit Oriented Development (TOD) Framework Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on January 23, 2017. The proposed project area is located within the jurisdictional boundary of District No. 20. We offer the following comments regarding sewerage service:

1. The Districts own, operate, and maintain the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system in the proposed project area except to state that presently no deficiencies exist in Districts' facilities that serve the proposed project area. For information on deficiencies in the project site sewerage system, please contact the City Department of Public Works and/or the Los Angeles County Department of Public Works.

2. The Districts should review individual developments within the proposed project area in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.

3. The wastewater generated by the proposed project area will be treated at the Palmdale Water Reclamation Plant, which has a capacity of 12 million gallons per day (mgd) and currently processes an average flow of 8 mgd.

4. In order to estimate the volume of wastewater a project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1. Loadings for Each Class of Land Use link for a copy of the Districts' average wastewater generation factors.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is...
RESPONSE TO COMMENT LETTER E
County Sanitation Districts of Los Angeles County
Adriana Raza, Customer Service Specialist, Facilities Planning Department
November 8, 2017

E-1 This comment incorporates by reference the February 13, 2017 comment letter submitted by the County Sanitation Districts of Los Angeles County (Districts) and notes that updated information is available since the Districts’ submittal of the February 13, 2017 comment letter. This comment is noted. The Draft EIR is consistent with the sewerage service information included in the Districts’ February 13, 2017 comment letter. Refer to Response E-2 below.

E-2 The City appreciates the Districts’ clarification that the Lancaster Water Reclamation Plant (LWRP) currently produces an average recycled water flow of 12.8 million gallons per day. The requested clarification has been made to page 5.13-9 of the Draft EIR and is reflected below and in Section 4.0, Errata.

Wastewater Treatment

Wastewater generated by the City is collected by the Districts and conveyed for treatment to the PWRP or LWRP. The PWRP has a design capacity of 12 mgd and currently processes an average flow of 8 mgd (or 67 percent capacity).3 The LWRP has a design capacity of 18 mgd and currently processes an average flow of 12.9 mgd (or 72 percent capacity).4

The project planning area is mostly within District No. 20, and wastewater generated within the area is routed to the PWRP through the Districts’ trunk sewers for treatment. This change provides a minor update, correction, or clarification and does not represent “significant new information” as defined in CEQA Guidelines Section 15088.5.

E-3 This comment notes that all other information concerning the Districts’ facilities and sewerage service contained in the Draft EIR is current. Responses to specific comments are provided above; no further response is required.

---

3 Written Communication: Adriana Raza, Facilities Planning Department, County Sanitation Districts of Los Angeles County, February 9, 2017.

November 9, 2017

Carlene Saxton  
City of Palmdale  
38250 Sierra Highway  
Palmdale, CA 93550  

Subject: Palmdale Transit Oriented Development Framework Plan  
SCH#: 2017011057  

Dear Carlene Saxton:  

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 8, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.  

Please note that Section 21104(c) of the California Public Resources Code states that:  

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”  

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.  

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.  

Sincerely,  

Scott Morgan  
Director, State Clearinghouse  

Enclosures  
cc: Resources Agency
Document Details Report
State Clearinghouse Data Base

SCH# 2017011057
Project Title Palmade Transit Oriented Development Framework Plan
Lead Agency Palmdale, City of

Type EIR Draft EIR
Description The Framework project is developed to guide future public improvements and private development within the project planning area based on the past and on-going transportation, infrastructure, and planning projects. The project is comprised of three components that are designed to work together, including: the land use framework; the transportation report; and the urban design, street, and streetscape recommendations report. The framework serves as the framework or vision to guide development of the project planning area by a variety of landowners over time. The Framework’s recommendations describe a land use and development pattern to support the future Multimodal Station and enhance sustainability and quality of life in Palmdale.

Lead Agency Contact
Name Carlene Saxton
Agency City of Palmdale
Phone (661) 267-5200
Fax
Address 38250 Sierra Highway
City Palmdale
State CA
Zip 93550

Project Location
County Los Angeles
City Palmdale
Region
Lat / Long 34° 35' 03.7" N / 118° 06' 52.9" W
Cross Streets Rancho Vista Blvd, Palmdale Blvd, SR-14, and 10th St East
Parcel No. several
Township 6N Range 12W Section 26 Base SBBM

Proximity to:
Highways SR-14, SR-138
Airports Palmdale Regional
Railways UPRR/Metrolink
Waterways various
Schools
Land Use Several including residential, commercial, office, industrial, public facility, open space, specific plan

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Office of Emergency Services, California; Department of Housing and Community Development; Air Resources Board, Transportation Projects; Regional Water Quality Control Bd., Region 6 (Victorville); Native American Heritage Commission; Public Utilities Commission

Date Received 09/25/2017 Start of Review 09/25/2017 End of Review 11/08/2017

Note: Blanks in data fields result from insufficient information provided by lead agency.
RESPONSE TO COMMENT LETTER F
Governor's Office of Planning and Research
Scott Morgan, Director, State Clearinghouse
November 9, 2017

This letter acknowledges that the State Clearinghouse submitted the Draft EIR to selected State agencies for review, that the comment period for the Draft EIR closed on November 8, 2017, and that the lead agency (City of Palmdale) complied with the Draft EIR public review requirements pursuant to CEQA. This letter also attaches comments from the following responding agencies:

- Native American Heritage Commission, dated October 10, 2017; and

The Final EIR includes responses to the Native American Heritage Commission and Lahontan Regional Water Quality Control Board's comments; refer to Comment Letters A and D of this Response to Comments Document.
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SECTION 3.0
Mitigation Monitoring and Reporting Program
3.0 MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program. This requirement ensures that environmental impacts found to be significant will be mitigated. The reporting or monitoring program must be designed to ensure compliance during project implementation (Public Resources Code Section 21081.6).

In compliance with Public Resources Code Section 21081.6, Table 3-1, Mitigation Monitoring and Reporting Checklist, has been prepared for the Palmdale TOD Framework Plan (herein referenced as the project or TOD Framework). This Mitigation Monitoring and Reporting Checklist is intended to provide verification that all applicable Conditions of Approval relative to significant environmental impacts are monitored and reported. Monitoring will include: 1) verification that each mitigation measure has been implemented; 2) recordation of the actions taken to implement each mitigation; and 3) retention of records in the project file.

This Mitigation Monitoring and Reporting Program delineates responsibilities for monitoring the project, but also allows the City flexibility and discretion in determining how best to monitor implementation. Monitoring procedures will vary according to the type of mitigation measure. Adequate monitoring consists of demonstrating that monitoring procedures took place and that mitigation measures were implemented. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the Mitigation Monitoring and Reporting Checklist (Table 3-1). If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

- Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:
  - The City distributes reporting forms to the appropriate entities for verification of compliance.
  - Problems or exceptions to compliance will be addressed to the City as appropriate.
  - Periodic meetings may be held during project implementation to report on compliance of mitigation measures.
  - Responsible parties provide the City with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented. Monitoring compliance may be documented through existing review and approval programs such as field inspection reports and plan review.
  - The City prepares a reporting form periodically during the construction phase and an annual report summarizing all project mitigation monitoring efforts.
- Appropriate mitigation measures will be included in construction documents and/or conditions of permits/approvals.

Minor changes to the Mitigation Monitoring and Reporting Program, if required, would be made in accordance with CEQA and would be permitted after further review and approval by the City. No change will be permitted unless the Mitigation Monitoring and Reporting Program continues to satisfy the requirements of Public Resources Code Section 21081.6.
## Table 3-1

**Mitigation Monitoring and Reporting Checklist**

<table>
<thead>
<tr>
<th>Mitigation Number</th>
<th>Mitigation Measure</th>
<th>Monitoring Timing/Frequency</th>
<th>Action Indicating Compliance</th>
<th>Monitoring Agency</th>
<th>Verification of Compliance</th>
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<tr>
<td>AES-1</td>
<td>For future development located in proximity to residentially zoned properties, as deemed necessary by the City’s Planning Director, prior to issuance of the Grading Permit, each project applicant shall submit a Construction Management Plan for review and approval by the City of Palmdale City Engineer. The Construction Management Plan shall, at a minimum, indicate the equipment and vehicle staging areas, stockpiling of materials, fencing (i.e., temporary security/screening fencing with opaque material), nighttime lighting (if proposed), and construction haul route(s). Staging areas shall be screened from view from residential properties as feasible. Construction worker parking may be located off-site with prior approval by the City; however, on-street parking of construction worker vehicles on residential streets shall be prohibited. Vehicles shall be kept clean and free of mud and dust before leaving the respective project site. Surrounding streets shall be swept as necessary such that they are maintained free of dirt and debris.</td>
<td>Prior to Issuance of Grading Permits</td>
<td>Preparation and Approval of a Construction Management Plan/ Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>AES-2</td>
<td>All construction-related lighting shall include shielding in order to direct lighting down and away from adjacent residential uses and consist of the minimal wattage necessary to provide safety at the construction site. A construction safety lighting plan shall be submitted to the City of Palmdale for review concurrent with the Grading Permit application.</td>
<td>Prior to Issuance of Grading Permits/ Periodic Site Inspections</td>
<td>Preparation and Approval of a Construction Safety Lighting Plan/ Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department/ City of Palmdale Public Works Department</td>
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<td>Mitigation Number</td>
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<td>BIO-1</td>
<td>A site-specific Biological Resources Assessment shall be conducted for future development projects in known or suspected natural habitat areas by a qualified Biologist, prior to an application being deemed complete, to determine the potential presence/absence of candidate, sensitive, or special status species, as well as the presence/absence of habitat that would support these species.</td>
<td>Prior to Development Application Approval.</td>
<td>Preparation and Approval of a Biological Resources Assessment/ Development Application Deemed Complete</td>
<td>City of Palmdale Planning Department</td>
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<tr>
<td>BIO-2</td>
<td>If deemed necessary by the site-specific Biological Resources Assessment, a Focused Survey of the proposed development site shall be conducted by a qualified Biologist, prior to any ground disturbance, for sensitive plant and wildlife species that are federally- or state-listed as endangered or threatened, having moderate to high potential for occurrence on the proposed development site.</td>
<td>Prior to Ground Disturbance Activities.</td>
<td>Preparation and Approval of a Focused Survey/ Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>BIO-3</td>
<td>If deemed necessary by the Biological Resources Assessment, a pre-construction Burrowing Owl Survey shall be conducted to determine the presence/absence of the burrowing owl on the proposed development site, before any ground disturbance occurs. The Survey shall be conducted by a qualified Biologist according to the standard protocol established by CDFW and the Burrowing Owl Consortium (BOC). If burrowing owls are determined to be present on the development site, mitigation for potential impacts to owls shall follow the guidelines outlined by the BOC, including passive relocation during the non-breeding season.</td>
<td>Prior to Ground Disturbance Activities.</td>
<td>Preparation and Approval of a Pre-Construction Burrowing Owl Survey/ Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>Mitigation Number</td>
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<td>BIO-4</td>
<td>If deemed necessary by the Biological Resources Assessment, focused Trapping Surveys shall be conducted to determine the presence/absence of the Mohave ground squirrel on the proposed development site prior to any ground disturbance. The Surveys shall be conducted according to the guidelines established by CDFW. If Mohave ground squirrel is determined to be present onsite, a State Permit shall be obtained pursuant to CDFW Code Section 2081.</td>
<td>Prior to Ground Disturbance Activities</td>
<td>Preparation and Approval of Focused Trapping Surveys/ Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>BIO-5</td>
<td>Impacts to migratory wildlife potentially impacted by future development shall be fully evaluated, including proposals to remove/disturb native and ornamental landscaping and other nesting habitat for native birds.</td>
<td>Prior to Ground Disturbance Activities</td>
<td>Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>BIO-6</td>
<td>If deemed necessary by the Biological Resources Assessment, project construction activities (including disturbances to vegetation) shall take place outside of the breeding bird season (February 1 to September 1), in order to avoid take (including disturbances, which would cause abandonment of active nests containing eggs and/or young). If project construction activities cannot avoid the breeding season, nest surveys shall be conducted and active nests shall be avoided and provided with a minimum buffer, as determined by a biological monitor.</td>
<td>Prior to Issuance of Grading Permits/ Prior to Construction Activities</td>
<td>Issuance of Grading Permits/ Construction Permits</td>
<td>City of Palmdale Planning Department</td>
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CULTURAL RESOURCES

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<td>CUL-1</td>
<td>In the event that archeological resources are unearthed during excavation and grading activities of future development, the contractor shall cease all earth-disturbing activities within a 100-meter radius of the area of discovery, notify the City's Planning Director, and, with direction from the City's Planning Director, shall retain a qualified archaeologist certified by the County of Los Angeles to evaluate the significance of the find and recommend an appropriate course of action. If evidence of subsurface tribal cultural resources is found, the registered professional archaeologist, in coordination with the City, shall determine the appropriate Native American monitor for the find. The registered professional archaeologist and Native American Monitor shall collect the resource and prepare a technical report describing the results of the investigation. The test-level report shall evaluate the site including discussion of significance (depth, nature, condition, and extent of the resources), final mitigation recommendations, and cost estimates. Salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. Work within the area of discovery shall resume only after the resource has been appropriately mitigated.</td>
<td>During Excavation and Grading Activities</td>
<td>Retain a Qualified Archaeologist/Consultation with Native American Monitor/Compliance with CEQA Guidelines for Salvage Operation if Resources are Discovered</td>
<td>City of Palmdale Planning Department</td>
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### AIR QUALITY

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| AQ-1              | During clearing, grading, earth-moving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventive measures using the following procedures, as specified by the AVAQMD, including but not limited to AVAQMD Rule 401, Visible Emissions, and Rule 403 Fugitive Dust:  
- On-site vehicle speed shall be limited to 15 miles per hour;  
- All on-site construction roads with vehicle traffic shall be watered periodically;  
- Streets adjacent to the project’s reach shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust;  
- All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day;  
- All clearing, grading, earth-moving, or excavation activities shall cease during periods of high winds (i.e., greater than 35 miles per hour averaged over one | Periodic Site Inspections | Ongoing During Construction | City of Palmdale Public Works Department   |
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<td>hour) so as to prevent excessive amounts of dust;</td>
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<td>• All material transported on-site or off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust;</td>
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<td>• The area disturbed by clearing, grading, earth-moving, or excavation operations shall be minimized so as to prevent excessive amounts of dust; and</td>
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<td>• These control techniques shall be indicated on project grading plans. Compliance with this measure shall be subject to periodic site inspections by the City of Palmdale.</td>
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<td>AQ-2</td>
<td>All trucks hauling excavated or graded material on-site shall comply with State Vehicle Code Section 23114, with special attention to Sections 23114(b)(F), (e)(2) and (e)(4), as amended, regarding the prevention of such material spilling onto public streets.</td>
<td>Periodic Site Inspections</td>
<td>Ongoing During Construction</td>
<td>City of Palmdale Public Works Department</td>
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<td>AQ-3</td>
<td>During construction activities, excessive construction equipment and vehicle exhaust emissions shall be controlled by implementing the following procedures, as specified by the AVAQMD:</td>
<td>Periodic Site Inspections</td>
<td>Ongoing During Construction</td>
<td>City of Palmdale Public Works Department</td>
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<td>• Properly and routinely maintain all construction equipment, as recommended by manufacturer manuals, to control exhaust emissions;</td>
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<td>• Shut down equipment when not in use for extended periods of time to reduce emissions associated with idling engines;</td>
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<td>• Encourage ride sharing and use of transit transportation for construction employee commuting to the project sites;</td>
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<td>• Use electric equipment for construction whenever possible in lieu of fossil fuel-fired equipment; and</td>
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<td>• Curtail construction during periods of high ambient pollutant concentrations; this may include ceasing construction activity during the peak-hour of vehicular traffic on adjacent roadways.</td>
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<td>AQ-4</td>
<td>The construction contractor shall adhere to AVAQMD District Rule 1113 (Architectural Coatings) to limit volatile organic compounds from architectural coatings. This rule specifies architectural coatings storage, clean up and labeling requirements.</td>
<td>Periodic Site Inspections</td>
<td>Ongoing During Construction</td>
<td>City of Palmdale Public Works Department</td>
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<td>AQ-5</td>
<td>All building demolition activities shall adhere to AVAQMD District Rule 1403 (Asbestos Emissions From Demolition/ Renovation Activities) and Regulation X (National Emissions Standards for Hazardous Air Pollutants). Additionally, the demolished material shall be transported off-site expeditiously after demolition of the structure.</td>
<td>Periodic Site Inspections</td>
<td>Ongoing During Construction</td>
<td>City of Palmdale Public Works Department</td>
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<td>AQ-6</td>
<td>A project-specific Health Risk Assessment shall be required for new sensitive land uses such as residences, hospitals, and schools located within 500 feet of Palmdale Boulevard and/or the Metrolink/Union Pacific right-of-way, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. The Health Risk Assessment shall evaluate a project per the thresholds established in the most recent guidance from the California Office of Environmental Health Hazard Assessment (i.e., carcinogenic risk equals or exceeds 10 in one million; acute non-carcinogenic hazard index equals or exceeds one; and/or if chronic non-carcinogenic hazard index equals or exceeds one). If projects are found to exceed the thresholds, mitigation shall be incorporated. Mitigation measures may include mechanical ventilation systems with Minimum Efficiency Reporting Value rated filtration.</td>
<td>Prior to Ground Disturbance Activities</td>
<td>Preparation and Approval of a Health Risk Assessment/Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>AQ-7</td>
<td>New sensitive land uses such as residences, hospitals, and schools shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 heavy truck trips per day, or 40 truck trips with transport refrigeration units (TRUs) per day, or TRU operations exceeding 300 hours per week, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If new sensitive land uses cannot meet this setback, a project-specific Health Risk Assessment shall be prepared. The Health Risk Assessment shall evaluate a project for the thresholds established in the most recent guidance from the California Office of Environmental Health Hazard Assessment.</td>
<td>Prior to Ground Disturbance Activities</td>
<td>Preparation and Approval of a Health Risk Assessment/Issuance of Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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Assessment (i.e., carcinogenic risk equals or exceeds 10 in one million; acute non-carcinogenic hazard index equals or exceeds one; and/or if chronic non-carcinogenic hazard index equals or exceeds one). If projects are found to exceed the thresholds, mitigation shall be incorporated. Mitigation measures may include mechanical ventilation systems with Minimum Efficiency Reporting Value rated filtration.

NOISE

NOI-1  To reduce noise impacts due to construction, project applicants shall require construction contractors to implement a site-specific noise reduction program, subject to City review and approval, which includes the following measures, ongoing through demolition, grading, and/or construction:

- Equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically-attenuating shields or shrouds, wherever feasible).

- Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electronically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an
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<td>exhaust muffler shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible, and this could achieve a reduction of five dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. • Stationary noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and incorporate insulation barriers, or other measures to the extent feasible.</td>
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<td>NOI-2</td>
<td>Prior to the issuance of each grading permit, project applicants shall submit to the Community Development Department a list of measures to respond to and track complaints pertaining to construction noise ongoing throughout demolition, grading, and/or construction. These measures shall include the following: • A procedure and phone numbers for notifying the City Public Works Department staff and Palmdale Sheriff's Department (during regular construction hours and off-hours); • A sign posted on-site pertaining the permitted construction days and hours and complaint procedures and who to notify in the event of a problem. The sign shall also include a listing of both the City and construction contractor’s</td>
<td>Prior to Issuance of Grading Permits/Periodic Site Inspections</td>
<td>Issuance of Grading Permits/Ongoing During Construction Activities</td>
<td>City of Palmdale Public Works Department</td>
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<td>Mitigation Number</td>
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<td>NOI-3</td>
<td>The City shall require future developments in the project planning area to implement the following measures to reduce the potential for human annoyance and architectural/structural damage resulting from elevated groundborne noise and vibration levels.</td>
<td>Prior to Issuance of Grading Permits</td>
<td>Preparation and Approval of a Preconstruction Survey/ Verification of Alternative Installation Methods/ Ongoing During Construction</td>
<td>City of Palmdale Public Works Department</td>
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- Telephone numbers (during regular construction hours and off-hours); and

- A preconstruction meeting shall be held with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed.

- Pile driving within a 50-foot radius of occupied units or designated historic structures shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers).

- The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities
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<td>susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage shall be repaired back to its preexisting condition.</td>
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<td>HAZARDS AND HAZARDOUS MATERIALS</td>
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<td>HAZ-1</td>
<td>Prior to demolition and/or rehabilitation activities, an asbestos survey shall be conducted by an Asbestos Hazard Emergency Response Act (AHERA) and Cal OSHA certified building inspector to determine the presence or absence of asbestos containing materials (ACMs). If ACMs are located, abatement of asbestos shall be completed prior to any activities that would disturb ACMs or create an airborne asbestos hazard. Asbestos removal shall be performed by a State certified asbestos containment contractor in accordance with the Antelope Valley Air Quality Management District (AVAQMD) Rule 1403.</td>
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<td>City of Palmdale Building and Safety Division</td>
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<td>HAZ-2</td>
<td>If paint is separated from building materials (chemically or physically) during demolition of the structures, the paint waste shall be evaluated independently from the building material for lead by a qualified Environmental Professional. If lead-based paint is found, abatement shall be completed by a qualified Lead Specialist prior to any activities that would create lead dust or fume hazard. Lead-based paint removal and disposal shall be performed in accordance with California Code of Regulation Title 8, Section 1532.1, which specifies exposure limits, exposure monitoring and respiratory protection, and mandates good worker practices by workers exposed to lead. Contractors performing lead-based paint activities shall also be certified in Hazardous Waste Operation and Emergency Response (HAZWOPER).</td>
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<td>City of Palmdale Building and Safety Division</td>
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<td>removal shall provide evidence of abatement activities to the City Project Engineer.</td>
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<td>HAZ-3</td>
<td>A formal Phase I Environmental Site Assessment (ESA) shall be prepared on a project-by-project basis for any commercial and industrial properties involving hazardous materials or waste. The Phase I ESA shall be prepared in accordance with ASTM Standard Practice E 1527-13 or the Standards and Practices for All Appropriate Inquiry (AAI), prior to any land acquisition, demolition, or construction activities. The Phase I ESA would identify specific Recognized Environmental Conditions (RECs), which may require further sampling/remedial activities by a qualified hazardous materials Environmental Professional with Phase II/site characterization experience prior to land acquisition, demolition, and/or construction. The Environmental Professional shall identify proper remedial activities, if necessary.</td>
<td>Prior to Land Acquisition and/or Construction Activities</td>
<td>Preparation and Approval of Phase I ESA/ Issuance of Demolition/ Grading Permits</td>
<td>City of Palmdale Planning Department</td>
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<td>HAZ-4</td>
<td>For projects that would disturb soils within the existing railroad rights-of-way, qualified hazardous materials Environmental Professional with Phase II/site characterization experience shall conduct sampling in order to determine whether or not contamination exists within the areas of proposed disturbance. Results of the sampling would indicate the level of remediation efforts that may be required, if necessary. All activities conducted within railroad rights-of-way shall be conducted under the purview of the local regulatory agency in order to identify proper handling procedures should contamination be present.</td>
<td>Prior to Construction Activities</td>
<td>Sampling Results/ Completion of any Remediation Activities Required</td>
<td>City of Palmdale Planning Department</td>
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<td>HAZ-5</td>
<td>If unknown wastes or suspect materials are discovered during construction by the contractor that are believed to involve hazardous waste or materials, the contractor shall comply with the following: • Immediately cease work in the vicinity of the suspected contaminant, and remove workers and the public from the area; • Notify the City’s Project Engineer; • Secure the area as directed by the Project Engineer; and • Notify the implementing agency’s Hazardous Waste/Materials Coordinator. The Hazardous Waste/Materials Coordinator shall advise the responsible party of further actions that shall be taken, if required.</td>
<td>During Construction Activities</td>
<td>Closure/Concurrence Letter from Appropriate Regulatory Agency</td>
<td>City of Palmdale Planning Department/City of Palmdale Public Works Department</td>
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SECTION 4.0
Errata
4.0 ERRATA

Changes to the Draft Environmental Impact Report (Draft EIR) are noted below. A double-underline indicates additions to the text; strikeout indicates deletions to the text. Changes have been analyzed and responded to in Section 2.0, Response to Comments of the Final EIR. The changes to the Draft EIR do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph.

These errata address the technical comments on the Draft EIR, which circulated from September 25, 2017 through November 8, 2017. These clarifications and modifications are not considered to result in any new or substantially greater impacts as compared to those identified in the Draft EIR. Any changes referenced to mitigation measures contained in the Draft EIR text also apply to Section 1.0, Executive Summary and Section 5.0, Environmental Analysis of the Draft EIR. All mitigation measure modifications have been reflected in Section 4.0, Mitigation Monitoring and Reporting Program of the Final EIR.

Draft EIR Mitigation Measure CUL-1 is revised in the Final EIR, as follows:

| CUL-1 | In the event that archeological resources are unearthed during excavation and grading activities of future development, the contractor shall cease all earth-disturbing activities within a 100-meter radius of the area of discovery, notify the City's Planning Director, and, with direction from the City's Planning Director, shall retain a qualified archaeologist certified by the County of Orange Los Angeles to evaluate the significance of the find and recommend an appropriate course of action. If evidence of subsurface tribal cultural resources is found, the registered professional archaeologist, in coordination with the City, shall contact the Native American Heritage Commission to determine the appropriate Native American monitor for the find. The registered professional archaeologist and Native American Monitor shall collect the resource and prepare a technical report describing the results of the investigation. The test-level report shall evaluate the site including discussion of significance (depth, nature, condition, and extent of the resources), final mitigation recommendations, and cost estimates. Salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. Work within the area of discovery shall resume only after the resource has been appropriately mitigated. |
Section 1.0, Executive Summary

Draft EIR page 1-1 is revised in the Final EIR, as follows:

1.1 PROJECT LOCATION

The project planning area for the Palmdale TOD Framework Plan Project (herein referred to as the “project”), which includes several components as described below, consists of approximately 1,035 acres and is centered around the PTC and the proposed location for the City’s future High Speed Rail station. The project planning area is generally bounded by Rancho Vista Boulevard (Avenue P) to the north and Palmdale Boulevard (SR-138) to the south and by SR-14 to the west and 10th Street East to the east. The PTC is a regional multi-modal hub that provides connections between AVTA local and commuter bus service, Metrolink commuter rail service, Santa Clarita Transit, Greyhound bus service, and Amtrak Thruway bus service.

The Palmdale Regional Airport is located approximately one mile northeast of the PTC. While Palmdale Regional Airport once offered commercial flights, U.S. Air Force Plant 42 is now the primary user of the site. Most facilities are owned by the U.S. Air Force and are leased to private aerospace contractors, including Boeing, Lockheed Martin, and Northrop Grumman.

Section 5.13, Public Services and Utilities

Draft EIR page 5.13-1 is revised in the Final EIR, as follows:

FIRE PROTECTION

Fire protection services within the City of Palmdale (City) are provided by contract with the Los Angeles County Fire Department (LACFD). The LACFD is one of the largest regional fire service organizations in California, responding to 23,629 13,071 fire incidents from 2012-2014 in 2016.¹ LACFD currently serves approximately 4,000,000 residents in unincorporated County areas and 58 contract cities. LACFD operates 167 173 fire stations and is staffed with approximately 4,631 4,770 firefighters and support personnel. Additionally, LACFD has nine emergency operations divisions. LACFD has established the following goals: 1) responding within five minutes to any call for services; and staffing each shift in each station with a minimum three-person team of professional firefighters.

Palmdale is served by the following four fire stations located within the City, as well as five fire stations that serve outlying areas.²

- Station 24 – 1050 West Avenue P
- Station 37 – 38318 9th Street East

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² City of Palmdale, City of Palmdale Local Hazard Mitigation Plan, page 21, April 2015. Ibid.
Draft EIR page 5.13-9 is revised in the Final EIR, as follows:

**Wastewater Treatment**

Wastewater generated by the City is collected by the Districts and conveyed for treatment to the PWRP or LWRP. The PWRP has a design capacity of 12 mgd and currently processes an average flow of 8 mgd (or 67 percent capacity).\(^3\) The LWRP has a design capacity of 18 mgd and currently processes an average flow of 12.9 mgd (or 72 percent capacity).\(^4\)

The project planning area is mostly within District No. 20, and wastewater generated within the area is routed to the PWRP through the Districts’ trunk sewers for treatment.

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\(^3\) Written Communication: Adriana Raza, Facilities Planning Department, County Sanitation Districts of Los Angeles County, February 9, 2017.

\(^4\) Ibid. Written Communication: Adriana Raza, Facilities Planning Department, County Sanitation Districts of Los Angeles County, November 8, 2017.
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