



COMMUNITY  
DEVELOPMENT

## City of Lancaster Initial Study

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- 1. Project title and File Number:** Conditional Use Permit No. 23-012  
Stroud Energy Storage Project
  - 2. Lead agency name and address:** City of Lancaster  
Community Development Department  
Planning and Permitting Division  
44933 Fern Avenue  
Lancaster, California 93534
  - 3. Contact person and phone number:** Jocelyn Swain, Senior Planner  
City of Lancaster  
Community Development Department  
(661) 723-6100
  - 4. Location:** ±9.7 acres on the south side of Avenue J at  
approximately 92<sup>nd</sup> Street West  
(APNs: 3203-034-004)
  - 5. Applicant name and address:** Stroud ESS, LLC/Kevin Butler  
11455 El Camino Real, Ste 160  
San Diego, CA 92130
  - 6. General Plan designation:** Non-Urban Residential (NU)
  - 7. Zoning:** RR-2.5 (Rural Residential, minimum lot size  
2.5 acres)

**8. Description of project:**

The proposed project consists of the construction and operation of the Stroud Energy Storage Project which is a lithium-ion battery energy storage facility capable of delivering up to 250 megawatts (MWs) of energy storage capacity and associated ancillary services into the California electric grid. The proposed project will be comprised of battery modules installed in racks housed in purpose-built outdoor Battery Energy Storage System (BESS) enclosures, associated equipment, a project substation, and a generation tie-line (gen-tie) connecting the proposed project to the adjacent existing Southern California Edison (SCE) Antelope Substation. The proposed project is located within the California Independent Service Operator (CAISO) Big Creek/Ventura Local Capacity Resource Area and will be charged from the CAISO grid via the proposed project's interconnection to the Antelope Substation. Energy stored in the proposed project will then be discharged into the grid when the energy is needed, providing important electrical reliability services to the local area.

The proposed project will be monitored and operated remotely 24 hours per day, 7 days per week from an off-site control center with no permanent on-site operations and maintenance personnel. The proposed project will include a small office and storage structure equipped with restroom facilities for temporary operations and maintenance (O&M) personnel use. Operating staff, typically in crews of two to four staff members, will visit the site bi-weekly and as needed for project maintenance. The site will be fully fenced and will not be open to the public.

The proposed project includes other design features including access roads, security fencing and lighting. A drainage basin will be installed to retain stormwater on-site. The road easements on the east side of the project site will be vacated.

### **Facilities**

The proposed project will consist of the following components: battery enclosures, power conversion system (PCS), medium voltage transformers, outdoor electrical equipment, project substation, power distribution center, gen-tie line, fire and thermal runaway safety equipment, and operations & maintenance (O&M) office and storage enclosures. Each of these components is described in greater detail below.

#### Battery Enclosures

The proposed project will be comprised of battery modules installed in racks and housed within purpose-built outdoor enclosures. A typical battery enclosure will house hundreds of battery modules, typically capable of storing between 0.4 to 5.0 megawatt hours (MWh) of energy.

Each individual module within an enclosure is monitored and controlled to ensure safe and efficient operations. Every enclosure is equipped with integrated operational management systems and fire and safety systems such as heating ventilation and cooling (HVAC), gas, heat and smoke detection and alarms, and fire suppression. The modules within each enclosure are accessed for maintenance from the outside via cabinet doors.

The dimensions of a typical BESS enclosure vary significantly between manufacturers and are arranged in repeated “blocks” across the site. System blocks may consist of a single large enclosure, one to twelve medium sized enclosures, or several dozen smaller enclosures set side-by-side to create banks of batteries with similar overall dimensions. Smaller enclosures are typically closely spaced or mechanically attached at the time of construction installation, and larger enclosure placed in smaller groupings or individually. A typical example of an enclosure grouping would consist of four enclosures measuring approximately 20 feet long by 8 feet wide with a height of 10 feet. Smaller enclosures may be as small as 3.5 feet long by 5 feet wide by 8 feet tall while larger enclosures may measure over 50 feet long by 12 feet wide with a height of up to 15 feet. In some instances, enclosures may be stacked two high. The number, size, layout and capabilities of each enclosure will vary depending on the battery, enclosure manufacturer design, and BESS system manufacturer(s) selected for the proposed. Regardless of the system manufacturer, the project’s developed footprint and overall capability will remain substantially the same. In some instances, the battery enclosures may also contain inverters, which convert low-voltage direct current (DC) to low-voltage alternating current (AC) (and vice-versa when charging).

### Power Conversion System (PCS)

For battery enclosures not containing an integrated inverter, low voltage DC cables will connect the battery enclosures to low profile, pad-mounted inverter-transformers located adjacent to each enclosure. Inverters convert electricity from low-voltage direct current (DC) to low-voltage alternating current (AC) when power is being taken (discharged) from the battery into the grid. The opposite occurs when charging the battery from the grid. A medium-voltage transformer is used to convert the low-voltage AC current to medium-voltage AC current and vice versa. The dimensions, performance and number of PCS units required to support the BESS system may vary depending on a number of factors, including manufacture design, final project configuration, project ambient conditions and other factors.

### Medium Voltage (MV) Transformers

In some instances, the inverter is contained within the battery enclosures and a stand-alone medium voltage (MV) transformer is used. The MV Transformer equipment is connected directly to the battery enclosures via low-voltage AC wiring. MV Transformers will also be distributed throughout the site to convert medium-voltage AC current to low-voltage AC current to supply power to ancillary loads such as HVAC and lighting.

### Outdoor Electrical Equipment

Additional MV transformers and other additional electrical equipment such as electrical cabinets and panels will be installed outside the BESS enclosures within the site area. This equipment is smaller in size than the BESS enclosures and is distributed through the site as needed. Buried and/or above-grade cables will be placed throughout the site to connect power and communications to individual components and to the Project Substation. All outside electrical equipment will be housed in the appropriate National Electrical Manufacturers Association (NEMA) rated enclosures.

### Project Substation

The onsite substation will be a secure, separately fenced area where high-voltage electrical equipment, switchgear cabinets, auxiliary transformers, meters and communications equipment are located. This area includes the necessary equipment to set-up the power from the medium voltage stored on site to the high voltage level of the transmission system where it is delivered into the grid via the project gen-tie line.

### Power Distribution Center (PDC)

The power distribution center is an enclosure that houses and protects critical low- and medium-voltage electrical, life-safety, communications, and command equipment.

### Generation Tie-Line (Gen-tie)

The gen-tie line and fiber optic cables will be constructed from the onsite substation into the Antelope substation. Two routes are proposed for the gen-tie line: Option A and Option B. Option A would run approximately 0.1 miles (454 feet) from the western boundary of the project into the SCE substation property. Option B would cross to the north side of Avenue J from the project site and then head west along the north side of Avenue J, crossing back to the south side into the SCE substation property. The bay position in the Antelope Substation would be designated by SCE.

### Fire and Thermal Runway Safety Equipment and Design Features

The battery energy storage systems, facilities and its UL-compliant equipment will include an integrated fire protection system designed to manage and prevent the risk of fire or thermal runaway leading to fire at the facility. In the unlikely situation that an event does occur, the facility equipment, systems and operational procedures are designed so that such an event does not propagate to surrounding batteries, cabinets, or neighboring areas.

The proposed project will comply with all City, County and State codes and regulations related to health, fire and safety. Specifically, the Project will be required to comply with Chapter 1206 of latest version of the California Fire Code. Chapter 1206 of the Fire Code applies to Stationary Electric Energy Storage Systems (ESS) and addresses development standards for design, installation, commissioning, operation, maintenance and decommissioning of these systems, including fire and safety equipment requirements. Compliance with these advanced, nationally adopted standards are designed to ensure the site installation and operation of battery storage systems for operators, first responders and neighboring community are safe.

### O&M Office and Storage Enclosures:

Two modular buildings will be provided on the project site to contain the office and restroom facilities for O&M personnel when they are on-site and equipment storage. These modular buildings would be approximately 40 feet long by 8 feet wide.

### Utilities

The proposed project will utilize an alternative form waste disposal (septic system, etc.) for the office building on site. Water will be brought into the site and stored in water tanks for both fire fighting purposes and drinking/hand washing purposes.

Table 1 provides a summary of the equipment to be installed on the project site.

**Table 1  
Proposed Project Equipment Details**

<b>Equipment</b>	<b>Description</b>	<b>Size</b>	<b>Height</b>
Battery Containers with Side Mounted A/C	Integrated battery, battery controls and ancillary equipment with HVAC	Approximately 7.5 acres of battery containers	Max 20 feet
Power Conversion System Equipment	Inverters, low-voltage (LV) and medium-voltage (MW) transformer skids	Within the battery storage area (7.5 acres)	10 feet
Power Distribution Center	Substation control bldg.	Contained within the approximately .6 acre project substation area	20 feet
Step-Up Transformer	Main power high voltage transformer	Contained within the approximately .6 acre project substation area	30 feet
Auxiliary transformers	MV-LV auxiliary transformers	Contained within the approximately 7.5 acre battery storage area	10 feet
Transmission Towers/ Poles and Static Masts	Steel monopole or wood pole electrical transmission, lightning protection structures	Dependent upon interconnection conditions	Height to be determined by SCE requirements – similar to existing
Other equipment including lighting, electrical, safety, communications, and security equipment		Contained within the 9.7 acre project site	15 feet
Perimeter fence/wall		Approximately 2,980 linear feet	Maximum height 8 feet
O&M Building	Prefabricated portable office.	One portable office building (40' x 8'); a second portable office building would be installed for storage.	Up to 20 feet

**Project Construction**

Project construction includes site preparation, grading, installation of drainage and retention facilities, foundations/supports, setting battery enclosures, wiring and electrical system

installation, and assembly of the accessory components including inverter transformers and generation step-up transformers.

Raw materials required for construction include gravel for roads and pads; concrete, sand, and cement for foundations; and water for concrete, dust control, and erosion controls. Additionally, up to 15,000 cubic yards of cut and fill would be required to support construction of the proposed project. Table 2 provides the approximate construction schedule.

**Table 2  
Construction Schedule**

<b>Timeframe</b>	<b>Construction Activity</b>
Month 1	Commence grading activities
Months 2-11	BESS equipment construction (trenching, foundations, etc.)
Months 3-11	Commercial delivery and installation of equipment
Month 12	Reclamation complete

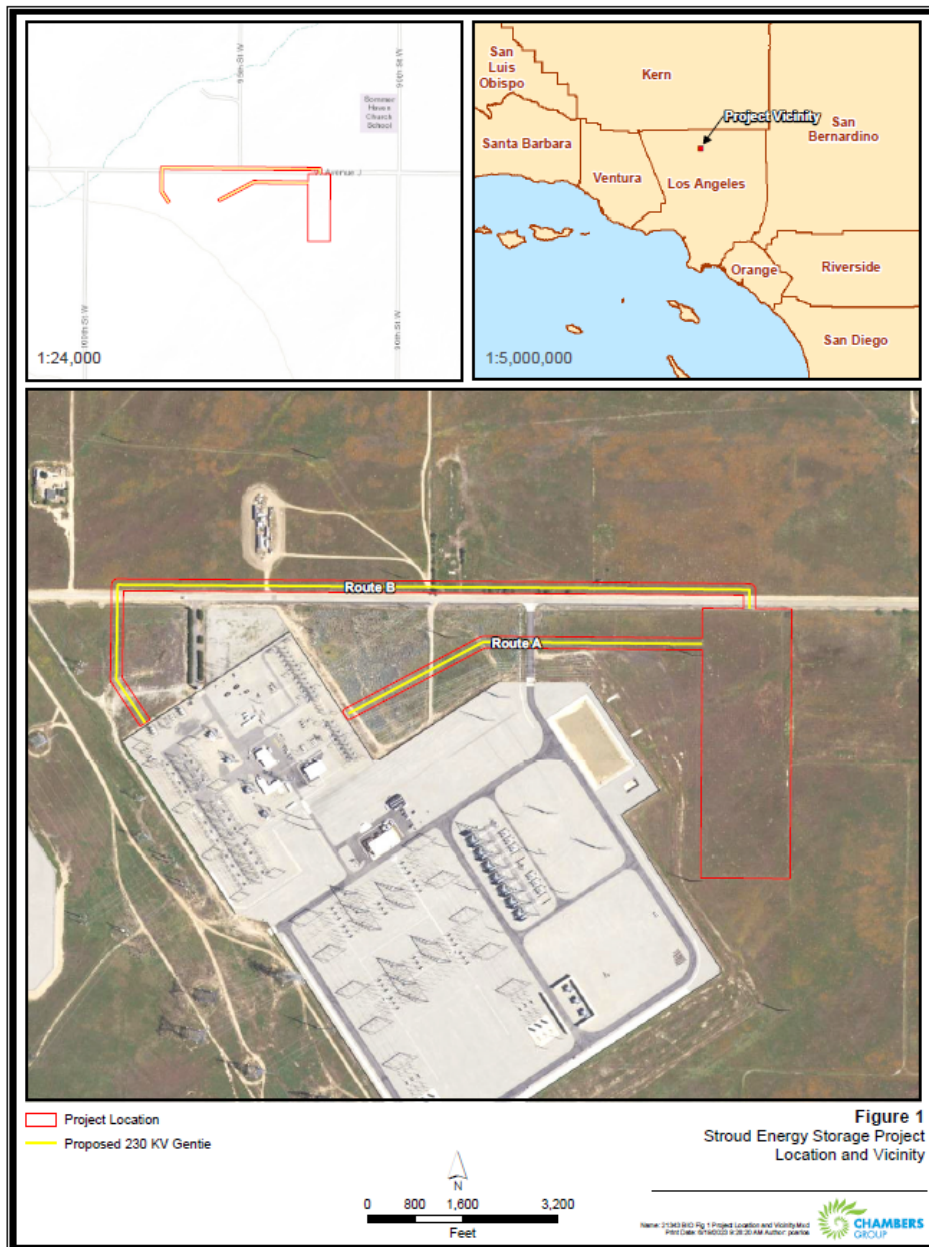
Construction activities would occur in a manner consistent with City requirements for workdays and hours. The approximately 15 acre-feet of water required during construction is expected to be procured from a commercial water purveyor. Trips associated with construction are estimated to be between 15 and 35 per day depending upon the construction phase. In addition, approximately 100 haul trips are estimated over several days during site grading. Peak trips associated with construction would be 75 daily trips. Table 3 provides an anticipated construction workforce and the types/numbers of heavy equipment that may be used during construction activities.

**Table 3  
Construction Workforce and Equipment**

<b>Construction Activity</b>	<b>Workforce</b>	<b>Typical Construction Equipment</b>
Office staff/management	20	Pickups and small vehicles
Foundations	37	Dozer, grader, excavator or drill rig, crane, concrete pump trucks, concrete trucks, pickup trucks with trailers, all terrain forklifts, water trucks, dump trucks, compactors, pile drivers, generators, welders
Fence construction	12	Forklift, backhoe, pickup trucks
Roads	8	Dozer, grader, front end loaders, compactor, roller, pickup trucks, water trucks, dump trucks, scrapers
Battery placement	20	Crane, forklift, pickup trucks
Laborers	80	Pickup trucks
Owner Representatives	8	Pickup trucks
Battery Supplier	60	Pickup trucks
Total Workers	245	

### **Operations and Maintenance**

The proposed project will operate 24 hours per day, 7 days per week. The majority of operations will be performed remotely, however, it is estimated that maintenance will include two to four staff performing maintenance visits weekly and as needed. Structures will be provided onsite for storage and maintenance use during operation, including restroom facilities. For the purposes of water supply and sewer/septic demand, assuming a demand of 20 gallons/person/day. This results in a demand of approximately 0.02 acre-feet per year for domestic use.



**Figure 1, Project Location Map**





**9. Surrounding land uses and setting:**

The project site is located in the western portion of the City of Lancaster. This area of the City is predominantly undeveloped, former agricultural fields with single family residences on larger lots, utility scale solar facilities, high voltage transmission lines, and the Southern California Edison (SCE) Antelope Substation.

The project site is vacant and the properties to the north and east are also vacant. The property to the west and south is partially vacant and partially developed with the SCE Antelope Substation. The property to the west of the SCE Antelope Substation is developed with battery storage and solar facilities. At the southwest corner of 90<sup>th</sup> Street West and Avenue J is Del Sur Gardens, a small mobile home/trailer park. Other single family residences are located north of Avenue J on the west side of 90<sup>th</sup> Street West along with several solar facilities. Additionally, other residential uses are scattered through the general area. Table 4 provides the zoning and land uses immediately surrounding the project site.

**Table 4  
Zoning/Land Use Information**

Direction	Zoning		Land Use
	City	County	
North	N/A	A-2-2 (Heavy Agriculture, 2 acre minimum)	Vacant
East	RR-2.5	N/A	Vacant; followed by Del Sur Gardens (County zoning C-RU [Rural Commercial])
South	RR-2.5	N/A	Vacant; partially developed with Antelope Substation
West	RR2.-5	N/A	SCE Antelope Substation; vacant

**10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.)**

Approvals from other public agencies for the proposed project include, but are not limited to, the following:

- California Department of Fish and Wildlife
- Antelope Valley Air Quality Management District
- Los Angeles County Fire Department
- California Public Utilities Commission
- Southern California Edison

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

In accordance with Assembly Bill (AB) 52, consultation letters for the proposed project were sent to three individuals associated with three tribes which have requested to be included. These letters were mailed via certified return receipt mail and included copies of the site plans, project description, and cultural resources report. Table 5 identifies the tribes, the person to whom the letter was directed and the date the letter was received.

**Table 5  
Tribal Notification**

<b>Tribe</b>	<b>Person/Title</b>	<b>Date Received</b>
Gabrieleno Band of Mission Indians – Kizh Nation	Andrew Salas / Chairman	January 19, 2024
Yuhaaviatam of San Manuel Nation (YSMN)	Alexandra McCleary / CRM Senior Manager	January 19, 2024
Fernandeño Tataviam Band of Mission Indians (FTBMI)	Sarah Brunzell, Manager	January 19, 2024

A response was received from both the Yuhaaviatam of San Manuel Nation (YSMN) and the Fernandeño Tataviam Band of Mission Indians (FTBMI). The YSMN requested conditions be included to address the inadvertent discovery of cultural resources during construction activities. These requested measures have been included in the cultural resources section. The AB 52 process is ongoing with the FTBMI and typically includes measures to address the inadvertent discovery of cultural resources and may include worker education and tribal monitoring depending upon the location and type of project. Any requested measures will be included in the project’s approval.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

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

DETERMINATION: On the basis of this initial evaluation:

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

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

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

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

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

*Jocelyn Swain*  
 Jocelyn Swain, Senior Planner

January 24, 2024  
 Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Use. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
I. <u>AESTHETICS</u> . Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings with a state scenic highway?			X	
c) In non-urbanized areas, substantially degrade the existing visual character or quality or public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views of the area?			X	

- a. The City of Lancaster General Plan identifies five scenic areas in the City and immediately surrounding area (LMEA Figure 12.0-1). Views of the scenic areas are not generally visible from the project site or the immediately surrounding roadways. However, views of the open desert and the mountains surrounding the Antelope Valley are available from the project site and nearby roadways (90<sup>th</sup> Street West, Avenue J). The proposed project consists of a 250-megawatt battery storage facility. This facility would be similar in appearance to the other energy facilities in the immediately surrounding area such as solar field, battery storage facilities and the Southern California Edison Antelope Substation. With implementation of the proposed project, the available views would not change and would continue to be available from the surrounding roadways and project site. Therefore, impacts would be less than significant.
- b. The project site is not located along any designated State Scenic Highways. There are no State designated scenic routes or highways within the City of Lancaster. Additionally, there are no trees, rock outcroppings, or buildings on the project site. However, 90<sup>th</sup> Street West, approximately 0.25 miles east of the project site, is designated in the City’s Master Environmental Assessment as a local scenic roadway, from Avenue K to the County line, because of views of the mountain ranges to the north and south of the valley. The proposed project would develop the site with a battery storage facility similar to the surrounding uses (e.g., substation, solar facilities, battery storage, etc.). While this development would change the

appearance of the existing site, it would not substantially change the views available along 90<sup>th</sup> Street West in this location or the reasons the General Plan designates the roadway scenic. Therefore, impacts would be less than significant.

- c. The proposed project is consistent with the zoning code as it pertains to this use and zone. The requirements are supplemented by the City's Design Guidelines which were adopted on December 8, 2009 (and updated on March 30, 2010). These guidelines provide the basis to achieve quality design for all development within the City including residential, commercial, and industrial. However, there are no specific guidelines or standards for utilities, utility scale solar, or battery storage facilities. The proposed project would comply with these guidelines to the extent practicable with screening and buffering (e.g., setbacks, fencing and landscaping). Therefore, impacts would be less than significant.
- d. The ambient lighting in the vicinity of the project site is moderate primarily due to the lighting associated with the adjacent SCE Antelope Substation. Some of the nearby solar /battery storage facilities also have perimeter and security lighting. In addition, lighting is generated by street lights along 90<sup>th</sup> Street West and Avenue J along with vehicle headlights from passing motorists. Some lighting is also visible in the distance from residential uses in the general area. Light and glare would be generated from the proposed project in the form of additional security lighting, building lighting and occasional maintenance vehicles. All lighting associated with the proposed project would be shielded and focused downward onto the project site. Additionally, the proposed project would not produce substantial amounts of glare as the development would be constructed from non-reflective materials to the extent feasible. Therefore, impacts would be less than significant.



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

- a. The California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP) tracks and categorizes land with respect to agricultural resources. Land is designated as one of the following and each has a specific definition: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land and Other Land.

The maps for each county are updated every two years. The latest available map for Los Angeles County is from 2018. According to the 2018 map, the project site is designated as Grazing Land. Grazing land is defined as “land on which the existing vegetation is suited to the grazing of livestock.” As the project site is not designated farmland of importance by the State nor is it currently utilized for agricultural purposes, no impacts to agricultural resources would occur.

- b. The project site and properties to the east, west, and south are zoned RR-2.5 which does allow for some types of light agricultural uses. Additionally, the property to the north is located in the County and is designated for Heavy Agricultural uses (A-2-2). However, the project site and the surrounding area are not utilized for agricultural production and are not subject to a Williamson Act contract. Therefore, no impacts would occur.
- c-d. According to the City of Lancaster’s General Plan, there are no forests or timberlands located within the City of Lancaster. Therefore, the proposed project would not result in the rezoning of forest or timberland and would not cause the loss of forest land or the conversion of forest land to non-forest land. Therefore, no impacts would occur.
- e. See responses to Items IIa-d.

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

- a. Development proposed under the City’s General Plan would not create air emissions that exceed the Air Quality Management Plan (GPEIR pgs. 5.5-21 to 5.5.-22). The project site is designated as Non-Urban Residential (NU) and zoned RR-2.5. Solar facilities and associated types of uses, such as battery storage facilities, are permitted with a Conditional Use Permit. As such, any emissions associated with the proposed project have already been accounted for in the Air Quality Management Plan. Additionally, the proposed project would comply with all applicable air quality rules and regulations including Rules 401, 402, and 403 with respect to fugitive dust control. All emissions associated with the construction and operation of the proposed project would be less than significant without mitigation and would not contribute to an increase the frequency or severity of a violation in the Federal or State ambient air quality standards. As such, the proposed project would not conflict with or obstruct the implementation of the Air Quality Management Plan and no impacts would occur.
- b. An air quality study was prepared for the proposed project by Vista Environmental and documented in a report entitled “Air Quality and Greenhouse Gas Emissions Impact Analysis, Stroud Energy Storage Project, City of Lancaster” and dated June 16, 2023.

This study quantified the anticipated construction and operational air quality emissions associated with the proposed project and detailed the assumptions for the analysis in pages 35 through 37 of the report. These assumptions included the type of activities/phases which would

take place, the number of days, trips and hours per day of activity. Based on this analysis, construction is anticipated to start in the first quarter of 2025 and last for approximately 12 months. Table 6 identifies the air district thresholds for each criteria pollutant and Tables 7 and 8 summarize the anticipated criteria pollutant emissions from construction and operations, respectively. These emissions were calculated utilizing CalEEMod Version 2022.1.1.13 and the inputs and outputs are contained in the Appendix to the Air Quality study.

As shown in these tables, construction and operational air quality emissions would be less than significant and no mitigation is required.

**Table 6  
AVAQMD Air Quality Thresholds**

Criteria Pollutant	Daily Threshold (Pounds)	Annual Threshold (Tons)
Greenhouse Gases (CO <sub>2</sub> e)	548,000	100,000
Carbon Monoxide (CO)	548	100
Oxides of Nitrogen (NO <sub>x</sub> )	137	25
Volatile Organic Compounds (VOC)	137	25
Oxides of Sulfur (SO <sub>x</sub> )	137	25
Particulate Matter (PM <sub>10</sub> )	82	15
Particulate Matter (PM <sub>2.5</sub> )	65	12
Hydrogen Sulfide (H <sub>2</sub> S)	54	10
Lead (Pb)	3	0.6

**Table 7  
Estimated Construction Emissions**

Construction Year	Pollutant Emissions <sup>1</sup> (tons per year)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2025	0.30	2.29	3.19	<0.01	0.64	0.25
AVAMQD Thresholds	25	25	100	25	15	12
Exceeds Thresholds?	No	No	No	No	No	No
Notes:						
1. Construction based on adherence to fugitive dust suppression requirements from Rule 403.						

**Table 8**  
**Estimated Operational Emissions**

Emissions Source	Pollutant Emissions (tons per year)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mobile Sources <sup>1</sup>	<0.01	<0.01	0.01	<0.01	<0.01	<0.01
Area Sources <sup>2</sup>	0.32	<0.01	0.25	<0.01	<0.01	<0.01
Energy Sources <sup>3</sup>	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Total Emissions	0.32	<0.01	0.26	<0.01	<0.01	<0.01
AVAMQD Thresholds	25	25	100	25	15	12
Exceeds Thresholds?	No	No	No	No	No	No
Notes:						
<ol style="list-style-type: none"> <li>1. Mobile sources consist of emissions from vehicles and road dust.</li> <li>2. Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.</li> <li>3. Energy usage consists of emissions from natural gas usage (no natural gas would be utilized by the proposed project.)</li> </ol>						

c. The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The AVAQMD CEQA Guidelines details that sensitive receptor land uses consist of residences, schools, daycare centers, playgrounds and medical facilities. The nearest sensitive receptor to the project site is a single family residence located approximately 600 feet east of the project site.

The AVAQMD CEQA Guidelines identifies types of uses and specified distance from the use to the receptor in which cases it must be evaluated to determine if it exposes sensitive receptors to substantial pollutant concentrations. These uses include industrial projects, distribution centers, major transportation projects, dry cleaners using perchloroethylene and gasoline dispensing facilities. The proposed project does not fall into any other these categories.

The proposed project is an energy storage facility which would emit nominal air emissions (see Tables 7 and 8). Therefore, the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

However, since the construction of the proposed project would result in the disturbance of the soil, it is possible individuals could be exposed to Valley Fever. Valley Fever or coccidioidomycosis, is primarily a disease of the lungs caused by the spores of the *Coccidioides immitis* fungus. The spores are found in soils, become airborne when the soil is disturbed, and are subsequently inhaled into the lungs. After the fungal spores have settled in the lungs, they change into a multicellular structure called a spherule. Fungal growth in the lungs occurs as the spherule grows and bursts, releasing endospores, which then develop into more spherules.

Valley Fever is not contagious, and therefore, cannot be passed on from person to person. Most of those who are infected would recover without treatment within six months and would have a life-long immunity to the fungal spores. In severe cases, especially in those patients with rapid and extensive primary illness, those who are at risk for dissemination of disease, and those who have disseminated disease, antifungal drug therapy is used.

Nearby sensitive receptors as well as workers at the project site could be exposed to Valley Fever from fugitive dust generated during construction. There is the potential that cocci spores would be stirred up during excavation, grading, and earth-moving activities, exposing construction workers and nearby sensitive receptors to these spores and thereby to the potential of contracting Valley Fever. However, implementation of Mitigation Measures 14 and 15 (see Geology and Soils) which requires the project operator to implement dust control measures in compliance with AVAQMD Rule 403, and implementation of Mitigation Measure 1, below, which would provide personal protective respiratory equipment to construction workers and provide information to all construction personnel and visitors about Valley Fever, the risk of exposure to Valley Fever would be minimized to a less than significant level.

### Mitigation Measures

1. Prior to ground disturbance activities, the project operator shall provide evidence to the Community Development Director that the project operator and/or construction manager has developed a “Valley Fever Training Handout”, training, and schedule of sessions for education to be provided to all construction personnel. All evidence of the training session materials, handout(s) and schedule shall be submitted to the Community Development Director within 24 hours of the first training session. Multiple training sessions may be conducted if different work crews will come to the site for different stages of construction; however, all construction personnel shall be provided training prior to beginning work. The evidence submitted to the Community Development Director regarding the “Valley Fever Training Handout” and Session(s) shall include the following:
  - A sign-in sheet (to include the printed employee names, signature, and date) for all employees who attended the training session.
  - Distribution of a written flier or brochure that includes educational information regarding the health effects of exposure to criteria pollutant emissions and Valley Fever.
  - Training on methods that may help prevent Valley Fever infection.
  - A demonstration to employees on how to use personal protective equipment, such as respiratory equipment (masks), to reduce exposure to pollutants and facilitate recognition of symptoms and earlier treatment of Valley Fever. Where respirators are required, the equipment shall be readily available and shall be provided to employees for use during work. Proof that the demonstration is included in the training shall be submitted to the county. This proof can be via printed training materials/agenda, DVD, digital media files, or photographs.

The project operator also shall consult with the Los Angeles County Public Health to develop a Valley Fever Dust Management Plan that addresses the potential presence of the *Coccidioides* spore and mitigates for the potential for *Coccidioidomycosis* (Valley Fever). Prior to issuance of permits, the project operator shall submit the Plan to the Los Angeles County Public Health for review and comment. The Plan shall include a program to evaluate the potential for exposure to Valley Fever from construction activities and to identify appropriate safety procedures that shall be implemented, as needed, to minimize

personnel and public exposure to potential *Coccidioides* spores. Measures in the Plan shall include the following:

- Provide HEP-filters for heavy equipment equipped with factory enclosed cabs capable of accepting the filters. Cause contractors utilizing applicable heavy equipment to furnish proof of worker training on proper use of applicable heavy equipment cabs, such as turning on air conditioning prior to using the equipment.
- Provide communication methods, such as two-way radios, for use in enclosed cabs.
- Require National Institute for Occupational Safety and Health (NIOSH)-approved half-face respirators equipped with minimum N-95 protection factor for use during worker collocation with surface disturbance activities, as required per the hazard assessment process.
- Cause employees to be medically evaluated, fit-tested, and properly trained on the use of the respirators, and implement a full respiratory protection program in accordance with the applicable Cal/OSHA Respiratory Protection Standard (8 CCR 5144).
- Provide separate, clean eating areas with hand-washing facilities.
- Install equipment inspection stations at each construction equipment access/egress point. Examine construction vehicles and equipment for excess soil material and clean, as necessary, before equipment is moved off-site.
- Train workers to recognize the symptoms of Valley Fever, and to promptly report suspected symptoms of work-related Valley Fever to a supervisor.
- Work with a medical professional to develop a protocol to medically evaluate employees who develop symptoms of Valley Fever.
- Work with a medical professional, in consultation with the Los Angeles County Public Health, to develop an educational handout for on-site workers and surrounding residents within three miles of the project site, and include the following information on Valley Fever: what are the potential sources/ causes, what are the common symptoms, what are the options or remedies available should someone be experiencing these symptoms, and where testing for exposure is available. Prior to construction permit issuance, this handout shall have been created by the project operator and reviewed by the project operator and reviewed by the Community Development Director. No less than 30 days prior to any work commencing, this handout shall be mailed to all existing residences within a specified radius of the project boundaries as determined by the Community Development Director. The radius shall not exceed three miles and is dependent upon the location of the project site.
- When possible, position workers upwind or crosswind when digging a trench or performing other soil-disturbing tasks.
- Prohibit smoking at the worksite outside of designated smoking areas; designated smoking areas will be equipped with handwashing facilities.
- Post warnings on-site and consider limiting access to visitors, especially those without adequate training and respiratory protection.

- Audit and enforce compliance with relevant Cal OSHA health and safety standards on the job site.
- d. Construction and operation of the proposed project is not anticipated to produce significant objectionable odors. Most objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. These types of uses are not part of the proposed project.

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents, and emissions from diesel equipment. Standard construction requirements that limit the time of day when construction may occur as well as AVAQMD Rule 442 that limits VOC content in solvents would minimize odor impacts from construction. The proposed project would consist of the development of an energy storage facility, which does not include any components that are known sources of odors. Therefore, odor impacts would be less than significant.



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

- a. A biological resources survey was conducted for the project site by Chambers Group, Inc., and documented in a report entitled “Biological Technical Report for the Stroud Energy Storage Project, City of Lancaster, California” and dated July 2023.

This biological report consisted of a literature review, a reconnaissance level survey and burrowing owl surveys habitat assessments. The literature review was conducted prior to the surveys taking place and included a review of the California Natural Diversity Database

(CNDDDB), the USFWS Critical Habitat Mapper and the California Native Plant Society’s Electronic Inventory of Rare and Endangered Vascular Plants of California for the quadrangles containing and surrounding the project site.

On March 3, 2023 a general biological survey was conducted for the project site, gen-tie line routes, and immediately adjacent areas and all plant and animal species observed were recorded. The observed species are identified in Table 9 (plants) and Table 10 (animals). A total of 20 plant species were observed during the survey and no special status plants were observed.

A burrowing owl assessment was conducted throughout suitable habitat within the project site and 500-foot buffer in areas that were not surveyed during the 2022 surveys. The survey was conducted to determine presence/absence of burrowing owl, occupied burrows, potential burrows, areas where burrows were concentrated, and owl sign. Detailed information regarding these surveys is contained within the biological resources report.

**Table 9  
Observed Plant Species**

Rubber rabbitbrush ( <i>Ericameria nauseosa</i> )	Shortpod mustard ( <i>Hirschfeldia incana</i> *)	Sand-aster ( <i>Corethrogyne filaginifolia</i> )
Russian thistle ( <i>Salsola australis</i> *)	Tumble mustard ( <i>Sisymbrium altissimum</i> *)	Prickly lettuce ( <i>Lactuca serriola</i> *)
Fiddleneck ( <i>Amsinckia</i> sp.)	Turkey mullein ( <i>Croton setiger</i> )	Lupine ( <i>Lupinus</i> sp.)
Rattlesnake sandmat ( <i>Euphorbia albomarginata</i> )	California poppy ( <i>Eschscholzia californica</i> )	California buckwheat ( <i>Eriogonum fasciculatum</i> )
Red-stemmed filaree ( <i>Erodium cicutarium</i> *)	Slender wild oat ( <i>Avena barbata</i> *)	Mediterranean schismus ( <i>Schismus barbatus</i> *)
Slender dobie-pod ( <i>Tropidocarpum gracile</i> )	Four-wing saltbush ( <i>Atriplex canescens</i> )	Chinaberry tree ( <i>Merlia azedarach</i> *)
Brome ( <i>Bromus</i> sp.)	Fescue ( <i>Fetuca myuros</i> *)	
* Denotes a non-native species.		

The project site contained three vegetation communities: disturbed, disturbed rubber rabbitbrush scrub and tamarisk thickets. The database searches identified four special status plant species which had been documented within five miles of the project site: alkali mariposa lily, Pierson’s morning glory, slender mariposa lily, and short joint beavertail. Based on the survey of the project site and the previous surveys in 2022, these species have been determined to be absent from the project site due to lack of suitable habitat; the species occurs outside the site’s elevation range; and soil type. Therefore, no impacts to special status plant species would occur.

**Table 10**  
**Observed Animal Species**

Mountain bluebird ( <i>Sialia currucoides</i> )	Common raven ( <i>Corvus corax</i> )	American robin ( <i>Turdus migratorius</i> )
European starling ( <i>Sturnus vulgaris</i> )	Lark sparrow ( <i>Chondestes grammacus</i> )	Dark-eyed junco ( <i>Junco hyemalis</i> )
White-crowned sparrow ( <i>Zonotrichia leucophrys</i> )	Western meadowlark ( <i>Sturnella neglecta</i> )	Savannah sparrow ( <i>Passerculus sandwichensis</i> )
Horned lark ( <i>Eremophila alpestris</i> )	Black phoebe ( <i>Sayornis nigricans</i> )	

A current database search resulted in a list of 34 federal and/or state listed endangered or threatened, Species of Concern, or otherwise special status wildlife species that may potentially occur within the survey area. After a literature review, the reconnaissance-level survey, focused burrowing owl survey, and the assessment of the various habitat types within the survey area, it was determined that 30 of the special status wildlife species were considered absent from the survey area; three species have a low potential to occur and one species has a high potential because it was detected near the survey area in 2022.

While there is a historical record of a wintering ferruginous hawk observed immediately adjacent to the survey area, the observation is from 1998 when the area was much less developed. In addition, low quality foraging habitat and no suitable nesting habitat for this species was found within the survey area. Therefore, this species is considered to have a low potential to occur.

A loggerhead shrike was observed approximately 900 feet east of the survey area during the 2022 focused burrowing owl survey. However, the survey area contains only marginal foraging habitat and no suitable nesting habitat for this species. Therefore, these species are not anticipated to be impacted by project activities.

The Swainson’s hawk, a state threatened species, was observed flying overhead approximately 1-mile northwest of the survey area. Suitable nesting habitat is not found within the survey area. Although Swainson's hawks are known to prefer low vegetation that support abundant prey such as grasslands or alfalfa fields, this habitat does not exist within the survey area. Suitable foraging habitat within the survey area is considered low quality due to the disturbed habitat that exists and the surrounding development within one mile of the survey area. Although a Swainson’s hawk nest was discovered approximately 2.25 miles to the west/northwest of the survey area in 2011, this location was revisited in 2016 and was not found (CNDDDB 2023). Based on the Swainson’s Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties (California Energy Commission 2010), the agencies consider a nest site to be active if it was used at least once during the past five years. More than 5 years have occurred since this location was considered active and no other locations have been identified within 5 miles of the site; therefore, associated impacts of this project on Swainson’s hawk are not anticipated to occur.

The survey area contains low quality habitat for the burrowing owl. This species has been recorded within two miles of the site and suitable habitat occurs throughout the survey area. However, no burrowing owl or burrowing owl sign were observed during the focused surveys conducted in 2022 or during the habitat assessment survey conducted in 2023. Therefore, this species is not anticipated to occur within the site. However, in order to ensure that no impacts to burrowing owls, a mitigation measure require a preconstruction avoidance survey has been identified. With implementation of the identified mitigation measures, impacts to biological resources would be less than significant.

### Mitigation Measures

2. A nesting bird/burrowing owl preconstruction survey shall be conducted by a qualified biologist within 7 days prior to the start of construction/ground disturbing activities (e.g., grading, building, electrical, etc.). If active bird nests are identified during the survey, the applicant shall either delay work in the area of the nest until all birds have fledged and/or left the nest or a buffer shall be established around the nest. A minimum buffer of 500 feet shall be installed around active raptor nests and 50 feet around other migratory bird species.
3. In the event that burrowing owls or active burrowing owl burrows are identified during the preconstruction survey, the following shall be implemented:
  - Avoid disturbing occupied burrows during the nesting period from February 1<sup>st</sup> through August 31<sup>st</sup>.
  - Avoid impacting burrows occupied during the non-breeding season by migratory or non-migratory resident burrowing owls.
  - Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development.
  - Development and implement a worker awareness program to increase the on-site worker's recognition of and commitment to burrowing owl protection.
  - Place visible markers near burrows to ensure that equipment and machinery does not collapse burrows.
  - Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur.
- b. No jurisdictional or non-jurisdictional features were observed within or directly adjacent to the survey area. In addition, no riparian, wetland, vernal pool habitats, or non-jurisdictional swale features were documented within the survey area. Therefore, no impacts would occur.
- c. There are no State or federally protected wetlands on the project site as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur.

- d. Wildlife corridors are areas that connect fragmented habitats. They serve as wildlife linkages (wildlife travel corridors) between otherwise fragmented patches of habitat caused by changes in vegetation communities, rugged terrain, and human disturbances. These linkages may be drainages, canyons, or ridgelines that provide access to foraging areas, water, breeding sites, and dispersal areas and provide cover and shelter during travel. Disturbance to wildlife corridors such as anthropogenic activity and development can cause harm to migrating species, cause species to exceed their population thresholds, and/or prevent healthy gene flow between populations.

The survey area is not located within a wildlife corridor. None of the project features are large enough to create a physical barrier to wildlife movement. The quality of habitat within the survey area is poor (primarily disturbed and ruderal habitat) and surrounded by solar, battery storage, and substation developments. Therefore, no impacts would occur.

- e. The proposed project would not conflict with any local policies or ordinances, such as a tree preservation policy, protecting biological resources. The proposed project would be subject to the requirements of Ordinance No. 848, Biological Impact Fee, which requires the payment of \$770/acre to offset the cumulative loss of biological resources in the Antelope Valley as a result of development. This fee is required of all projects occurring on previously undeveloped land regardless of the biological resources present and is utilized to enhance biological resources through education programs and the acquisition of property for conservation. Therefore, no impacts would occur.
- f. There are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or State habitat conservation plans which are applicable to the project site. The West Mojave Coordinated Habitat Conservation Plan only applies to federal land, specifically land owned by the Bureau of Land Management. In conjunction with the Coordinated Management Plan, a Habitat Conservation Plan (HCP) was proposed which would have applied to all private properties within the Plan Area. However, this HCP was never approved by the California Department of Fish and Wildlife nor was it adopted by the local agencies (counties and cities) within the Plan Area. As such, there is no HCP that is applicable to the project site and no impacts would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
V. <u>CULTURAL RESOURCES</u> . Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resources pursuant to §15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?				X

a-c. A cultural resource survey was conducted for the project site by Chambers Group, Inc. and documented in a report entitled Stroud Energy Storage Project (Project) Cultural Resources Study Results Letter Report, City of Lancaster, Los Angeles County, CA” and dated May 8, 2023.

As part of the cultural report, records searches from various entities were requested as summarized below:

- California Historical Resources Information System (CHRIS) Southern California Coastal Information Center (SCCIC) at California State University Fullerton on April 15, 2022. The records search was returned on May 18, 2022 and included all document cultural resources and previous archaeological investigations within a mile of the project site/study area.
- Sacred Lands File Search from the Native American Heritage Commission on April 15, 2022. The sacred lands file search produced negative results.
- A paleontological records search from the Natural History Museum of Los Angeles County on April 15, 2022. The results were received on April 24, 2022 and show that no known fossil localities are located within the project site.

The records search indicated that a total of 46 previous cultural resource investigations have been conducted within a mile of the project site of which four included the project site. Additionally, 34 previously recorded cultural resources have been located within one mile of the project site; and one was partially located within the project site. The previously recorded cultural resources on the project site is identified as P-13-003983/CA-LAN-003983H. The site is a historic trash scatter consisting of approximately 25 metal cans, glass fragments, and modern trash. The site is located along the eastern boundary of the project site and minimally encroaches into the project site.

On March 3, 2023 a pedestrian survey of the project site was conducted by walking transects spaced at 15 meter intervals to ensure thorough coverage. The ground surface was examined for the presence of prehistoric artifacts, historical artifacts, sediment discoloration that might indicate the presence of a cultural midden, roads and trails, and depressions and other features that might indicate the presence of former structures.

As a result of the survey, the previously recorded historic site (P-19-003983) was relocated and additional artifacts associated with the site were identified. The recorded site record was updated to reflect these additional resources which included three metal sanitary food cans, one rotary opened metal can and two metal food cans (smashed). The expanded site was assessed and determined not to be eligible for listing under any of the criteria for the California Register of Historic Resources. No other cultural resources were identified on the site. Therefore, impacts would be less than significant. While no cultural resources have been identified during the records search or site surveys, mitigation measures have been included below to ensure that any previously unknown resources encountered are treated appropriately.

Additionally, as previously described consultation letters were sent out to three tribes in accordance with AB 52. The YSMN responded and requested specific measures to address inadvertent discovery of cultural resources. These measures have been added. Additionally, the FTBMI responded and the AB 52 process is ongoing. Typically requested measures include measures for the proper handling of any identified previously unknown cultural resources and can include measures such as worker education and tribal monitoring, depending upon the location and type of project. All requested measures identified by the FTBMI shall be included in the project approvals. With incorporation of these measures, impacts would be less than significant.

No human remains, including those interred outside of formal cemeteries, were identified on the project site or along the proposed gen-tie routes. Therefore, no impacts would occur.

#### Mitigation Measures

4. The applicant shall retain the services of a qualified archaeologist, meeting the Secretary of the Interior standards, and require that all initial ground-disturbing work be monitored by an archaeological specialist (monitor) proficient in artifact and feature identification in monitoring contexts. The qualified archaeologist and/or monitor shall be present at the project construction phase kickoff meeting. As the project proceeds, based on the results of initial monitoring observations, and in consultation with the qualified archaeologist, the monitoring approach may be modified as needed to provide adequate observation and oversight.
5. Prior to commencing construction activities and prior to any ground disturbance on the project site, the consultant shall conduct initial Worker Environmental Awareness Program (WEAP) training to all construction personnel, including supervisors, present at the outset of project construction, for which the Lead Contractor and all subcontractors shall make their personnel available. This WEAP training will educate construction personnel on how to work with the monitor(s) to identify and minimize impacts to archaeological resources and maintain environmental compliance. This WEAP training will educate the monitor(s) of construction procedures to maintain safe work practices

and avoid construction-related injury or harm. This training may be performed periodically, such as for new personnel coming on to the project as needed.

6. The contractor shall provide the consultant with a schedule of initial potential ground-disturbing activities. A minimum of 48 hours will be provided to the consultant of commencement of any initial ground-disturbing activities such as vegetation grubbing or clearing, grading, trenching, or mass excavation.

A monitor shall be present on-site at the commencement of ground-disturbing activities related to the project. The monitor shall observe initial ground-disturbing activities and shall have stop-work authority to allow for recordation and evaluation of finds during construction. The monitor shall maintain a daily record of observations to serve as an ongoing tracking and to provide a reference for final monitoring reporting upon completion of the project. The consultant, City, lead contractor, and subcontractors shall maintain a line of communication regarding schedule and activity such that the monitor is aware of all ground-disturbing activities in advance in order to provide appropriate oversight.

7. In the event of the discovery of previously unidentified archaeological materials, the contractor shall immediately cease all work activities within an area of no less than 60 feet of the discovery. After cessation of excavation, the contractor shall immediately contact the City. Except in the case of cultural items that fall within the scope of the California Health and Safety Code 7050.5, CEQA Section 15064.5, or California Public Resources Code Section 5097.98, the discovery of any cultural resource within the project site shall not be grounds for a project-wide "stop work" notice or otherwise interfere with the project's continuation except as set forth in this mitigation measure. Additionally, all consulting Native American Tribal groups shall be notified of any unanticipated discovery on the project site for input and coordination on the proper disposition of the resource. In the event of an unanticipated discovery of archaeological materials during construction, the applicant retained qualified archaeologist shall be contacted to evaluate the significance of the materials prior to resuming any construction-related activities in the vicinity of the find. If the qualified archaeologist determines that the discovery constitutes a significant resource under CEQA and it cannot be avoided, the applicant shall implement an archaeological data recovery program.
8. At the completion of all ground-disturbing activities, the consultant shall prepare an archaeological resources monitoring report summarizing all monitoring efforts and observations, as performed, and any and all prehistoric and historic archaeological finds as well as providing follow-up reports of any finds to the SCCIC, as required.
9. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, regarding any pre-contact finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.



10. If significant pre-contact cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
11. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.
12. The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted of any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.
13. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

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

- a. Project construction would consume energy in two general forms: 1) the fuel energy consumed by construction vehicles and equipment and 2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site clearing, grading, and construction. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. In addition, some incidental energy conservation would occur during construction through compliance with State requirements that equipment not in use for more than five minutes be turned off. Project construction equipment would also be required to comply with the latest EPA and CARB engine emissions standards. These emissions standards require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption.

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The project-related incremental increase in the use of energy bound in construction materials such as asphalt, steel, concrete, pipes and manufactured or processed materials (e.g., lumber and gas) would not substantially increase demand for energy compared to overall local and regional demand for construction materials.

The proposed project would consume energy for interior and exterior lighting, heating/ventilation and air conditioning (HVAC), refrigeration, electronics systems, appliances, and security systems, among other things. The proposed project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. Furthermore, the electricity provider is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor owned utilities, electric service providers, and community choice aggregators (CCA) to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from

resources, which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat.

The project would adhere to all Federal, State, and local requirements for energy efficiency, including the Title 24 standards, as well as the project's design features and as such the project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Additionally, as a battery energy storage system project, the proposed project would provide necessary facilities to store energy generated from alternative sources for use when energy demands are high or during hours when alternative energy isn't being produced in as large of quantities (e.g., evening/nighttime hours). This is a positive energy impact.

- b. In 1978, the California Energy Commission (CEC) established Title 24, California's energy efficiency standards for residential and non-residential buildings, in response to a legislative mandate to create uniform building codes to reduce California's energy consumption, and provide energy efficiency standards for residential and non-residential buildings. The previous standards went into effect on January 1, 2017 and January 1, 2020 and substantially reduced electricity and natural gas consumption. Additional savings result from the application of the standards on building alterations such as cool roofs, lighting, and air distribution ducts.

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, is a statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. An updated version of both the California Building Code and the CALGreen Code went into effect on January 1, 2023.

In 2014, Lancaster created Lancaster Choice Energy (LCE), allowing residents and businesses in Lancaster to choose the source of their electricity, including an opportunity to opt up to 100% renewable energy. SCE continues to deliver the electricity and provide billing, customer service and powerline maintenance and repair, while customers who choose to participate in this program would receive power from renewable electric generating private-sector partners at affordable rates.

Additionally, as a battery energy storage system project, the proposed project would provide necessary facilities to store energy generated from alternative sources for use when energy demands are high or during hours when alternative energy isn't being produced in as large of quantities (e.g., evening/nighttime hours). This is a positive energy impact.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VII. <u>GEOLOGY AND SOILS</u> . Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		

- a. The project site is not identified as being in or in proximity to the fault rupture zone (LMEA Figure 2-5). According to the Seismic Hazard Evaluation of the Lancaster East and West Quadrangles, the project site may be subject to intense seismic shaking (LMEA pg. 2-16).

However, the proposed project would be constructed in accordance with the seismic requirements of the Uniform Building Code (UBC) adopted by the City, which would render any potential impacts to a less than significant level. The site is generally level and is not subject to landslides (SSHZ).

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking or other events. This phenomenon occurs in saturated soils that undergo intense seismic shaking typically associated with an earthquake. There are three specific conditions that need to be in place for liquefaction to occur: loose granular soils, shallow groundwater (usually less than 50 feet below ground surface) and intense seismic shaking. In April 2019, the California Geologic Survey updated the Seismic Hazard Zones Map for Lancaster (SSHZ) (<https://maps.conservation.ca.gov/cgs/EQZApp/app/>.) Based on these maps, the project site is not located in an area at risk for liquefaction. No impacts would occur.

- b. The project site is rated as having a low risk for soil erosion (USDA SCS Maps) when cultivated or cleared of vegetation. As such, there remains a potential for water and wind erosion during construction and operation. The proposed project would be required, under the provisions of the Lancaster Municipal Code (LMC) Chapter 8.16, to adequately wet or seal the soil to prevent wind erosion. Additionally, the mitigation measures listed below are required to control dust/wind erosion. With implementation of the mitigation measures, impacts would be less than significant.

#### Mitigation Measures

- 14. The applicant shall submit the required Construction Excavation Fee to the Antelope Valley Air Quality Management District (AVAQMD) prior to the issuance of any grading and/or construction permits. This includes compliance with all prerequisites outlined in District Rule 403, Fugitive Dust, including submission and approval of a Dust Control Plan, installation of signage and the completion of a successful onsite compliance inspection by an AVAQMD field inspector. Proof of compliance shall be submitted to the City.
  - 15. Upon completion of construction, an Active Operation Renewable Energy Dust Control Plan, as outlined in District Rule 302 – Other Fees, shall be required.
- c. Subsidence is the sinking of the soil caused by extraction of water, petroleum, etc. Subsidence can result in geologic hazards known as fissures. Fissures are typically associated with faults or groundwater withdrawal, which result in the cracking of the ground surface. According to Figure 2-3 of the City of Lancaster’s Master Environmental Assessment, the closest sinkholes and fissures to the project site are located in the vicinity of Avenue I and 60<sup>th</sup> Street West, approximately 3 miles to the northeast. However, the project site is not known to be within an area subject to sinkholes, subsidence (LMEA Figure 2-3) or any other form of soil instability. The proposed project would be required to have a geotechnical study prepared and all recommendations followed as part of the building permit process. These recommendations would ensure any impacts associated with forms of soil instability would be less than significant. For a discussion of potential impacts regarding liquefaction, please refer to Item VI.a.
  - d. The soil on the project site is characterized by a low shrink/swell potential (LMEA Figure 2-3), which is not an expansive soil as defined by Table 18-1-B of the Uniform Building Code. A soils

report on the soils within the project site shall be submitted to the City by the project developer prior to grading of the property and the recommendations of the report shall be incorporated into the development of the property. Therefore, impacts would be less than significant.

- e. The proposed project would not be connected into the sanitary sewer system. The project site would have a small office and half bath for the occasional maintenance workers. The half bath would be connected to some type of alternative waste water disposal system to be determined based on the geotechnical report and building plans. Therefore, no impacts would occur.
- f. A paleontological records search was conducted by the Los Angeles County Natural History Museum as part of the preparation of the cultural resources report. No paleontological resources have been identified or previously encountered on the project site and it is not expected that the proposed project would directly or indirectly destroy a unique paleontological resources, site or geologic form. However, mitigation measures have been included to ensure any paleontological resources accidentally encountered during project construction are appropriately handled. With inclusion of these mitigation measures, impacts would be less than significant.

#### Mitigation Measures

- 16. The applicant shall be required to obtain the services of a qualified paleontologist to remain on-call for the duration of the proposed ground disturbing construction activity. A paleontological mitigation plan (PMP) outlining procedures for paleontological data recovery shall be prepared for the proposed project and submitted to the City for review and approval. The development and implementation of the PMP shall include consultations with the applicant's engineering geologist as well as a requirement that the curation of all specimens recovered under any scenario shall be through an appropriate repository agreed upon by the City. All specimens become the property of the City of Lancaster unless the City chooses otherwise. If the City accepts ownership, the curation location may be revised. The PMP shall include developing a multilevel ranking system, or Potential Fossil Yield Classification (PFYC), as a tool to demonstrate the potential yield of fossils within a given stratigraphic unit. The PMP shall outline the monitoring and salvage protocols to address paleontological resources encountered during Project related ground disturbing activities. As well as the appropriate recording, collection, and processing protocols to appropriately address any resources discovered.
- 17. At the completion of all ground-disturbing activities, the project paleontologist shall prepare a final paleontological mitigation report summarizing all monitoring efforts and observations, as performed in line with the PMP, and all paleontological resources encountered, if any. As well as providing follow-up reports of any specific discovery, if necessary.

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

- a. The proposed project would generate greenhouse gas emissions during both construction and operation. However, these emissions would be minimal and would not create a significant impact on the environment. The greenhouse gas emissions were calculated using the CalEEMod Version 2022.1 and the parameters discussed in the air quality report. Table 11 summarizes the construction and operational greenhouse gas emissions associated with the proposed project. As seen in this table, these emissions are substantially below the AVAQMD thresholds and impacts would be less than significant.
- b. The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The 2022 Scoping Plan identifies GHG reduction measures necessary to achieve the AB 1279 target of 85 percent below 1990 levels by 2045. These actions and strategies build upon those identified in the first update to the Scoping Plan (2013) and in the second update to the Scoping Plan (2017). Table 12 analyzes the project’s consistency with the applicable 2022 Scoping Plan policies and actions.

Additionally, the City of Lancaster’s Climate Action Plan was adopted in March 2017. This plan identifies projects that would enhance the City’s ability to further reduce GHG emissions. A total of 61 projects across eight sectors were identified which include 1) traffic; 2) energy; 3) municipal operations; 4) water; 5) waste; 6) built environment; 7) community and 8) land use. Forecasts for both community and government operations were prepared for 2020, 2030, 2040, and 2050. Under all scenarios assessed, the City meets the 2020 target and makes substantial progress towards achieving post-2020 reductions.

**Table 11  
 Greenhouse Gas Annual Emissions**

Category	Greenhouse Gas Emissions (metric tons/year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
<b>Construction</b>				
Year 2025	639	0.02	.002	647
<b>Amortized Construction Emissions<sup>1</sup></b>	<b>21.30</b>	<b>&lt;0.01</b>	<b>&lt;0.01</b>	<b>21.57</b>
<b>Operations</b>				
Mobile Sources <sup>2</sup>	2.15	<0.01	<0.01	2.19
Area Sources <sup>3</sup>	0.94	<0.01	<0.01	0.95
Energy <sup>4</sup>	2.66	<0.01	<0.01	2.68
Water and Wastewater <sup>5</sup>	0.08	0.01	0.00	0.29
Solid Waste <sup>6</sup>	0.03	<0.01	<0.01	0.04
Refrigeration <sup>7</sup>	--	--	--	<0.01
<b>Total Operational Emissions</b>	<b>6.12</b>	<b>0.02</b>	<b>&lt;0.01</b>	<b>6.59</b>
<b>Total Annual Emissions (Construction/Operations)</b>	<b>27.42</b>	<b>0.02</b>	<b>&lt;0.01</b>	<b>28.16</b>
<b>AVAQMD Threshold</b>				<b>100,000</b>
<b>Exceed Thresholds?</b>				<b>No</b>
<b>Notes:</b>				
1. Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.				
2. Mobile sources consist of GHG emissions from vehicles.				
3. Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.				
4. Energy usage consists of GHG emissions from electricity used and generated onsite.				
5. Water includes GHG emissions from electricity used for transport of water and processing of wastewater.				
6. Waste includes the CO <sub>2</sub> and CH <sub>4</sub> emissions create from the solid waste placed in landfills.				
7. Refrigeration includes GHG emissions from refrigerants used in air conditioning units.				



**Table 12**  
**Consistency with the 2022 Scoping Plan**

<b>AB 32 GHG Inventory Sector and Scoping Plan Action</b>	<b>Proposed Project Consistency</b>
<b>GHG Emissions Reductions Relative to SB 32 Target:</b> 40% below 1990 levels by 2030.	<b>No Conflict:</b> The proposed project includes the construction and operation of an energy storage facility. Therefore, the proposed project would help the State achieve the 40% below 1990 levels by 2030.
<b>Smart Growth/Vehicle Miles Traveled (VMT):</b> VMT per capita reduced 25% below 2019 levels by 2030 and 30% below 2019 levels by 2045.	<b>Not applicable.</b> Senate Bill 375 directs each regional MPO (SCAG is MPO for project area) to adopt a SCS/RTP that meet this reduction target. The Connect SoCal was prepared to meet these reduction targets. Additionally, the City has adopted its own VMT mitigation program and the proposed project screens out as having a low VMT (less than 110 trips per day.)
<b>Electricity Generation:</b> Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO <sub>2e</sub> ) in 2030 and 30 MMTCO <sub>2e</sub> in 2035.	<b>No Conflict.</b> Senate Bill 100 requires that 100 percent of retail sales of electricity be generated by renewable or zero-carbon source of electricity by December 1, 2045. The proposed project would help facilitate the achievement of this goal by providing facilities which can store energy from alternative sources.

The proposed project would also be in compliance with the greenhouse gas emission goals and policies identified in the City of Lancaster’s General Plan (pgs. 2-19 to 2-24) and with the City’s Climate Action Plan. Specifically, the proposed project would be consistent with the following measures identified in the climate action plan. Therefore, impacts would be less than significant.

Energy

- Measure 4.2.1a: Renewable Energy Purchase Plan – The proposed project is a battery energy storage facility which ensure that alternative energy generated can be stored and available when it is needed, increasing the amount of renewable energy utilized.
- Measure 4.2.1b: Utility Scale Solar Development – The proposed project would compliment the utility scale solar facilities in the area.
- Measure 4.2.1c: Battery Storage – Utility Scale – The proposed project is a 250 megawatt utility scale battery storage facility.

Community

- Measure 4.7.3a: Xeriscaping – The landscaping installed along Avenue J for screening would be native and drought tolerant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
IX. <u>HAZARDS AND HAZARDOUS MATERIALS.</u> Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		X		
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

a-b. Project construction would require typical construction materials to install the battery energy storage enclosures, inverters/transformers, substation, fencing, gen-tie line, and other associated infrastructure. Two temporary office buildings would be installed for the O&M staff for office space and equipment storage. There are no structures currently on the site and no demolition of existing buildings would be required. Therefore, the proposed project would not expose individuals or the environment to asbestos containing materials or lead-based paint.

Project operation may require the routine transport, use, and disposal of hazardous materials as part of the operation and maintenance of the facility. All batteries installed on the property would be replaced as needed in accordance with all applicable regulations. The use of these materials and the routine activities on the project site would be conducted in compliance with all applicable regulations to minimize potential hazards to the public and to the environment.

The facility would also be equipped with any required/necessary safety mechanisms, which include fire suppression systems within the battery enclosures, dust suppression systems, detectors/alarms, shutdown systems, and temperature monitoring and controls. These safety mechanisms would be determined as part of the engineering design. Additionally, the project would require coordination with, and approval by, the Los Angeles County Fire Department for fire access, life safety equipment, and hazardous materials permitting. These requirements have been identified in the mitigation measures below. With implementation of the mitigation measures, impacts would be less than significant.

### Mitigation Measures

18. The use, storage, and transport of hazardous materials associated with the operation of the proposed facility shall be in compliance with all applicable regulations. Any necessary permits shall be obtained from the Los Angeles County Fire Department, Antelope Valley Air Quality Management District, or other applicable agency.
  19. Disposal of any hazardous material shall be done in accordance with all applicable regulations and associated with an EPA HazWaste ID number issued for the project site.
- c. The project site is not located within a quarter mile of an existing or proposed school. The closest school to the project site is Del Sur Elementary School located at the northwest corner of 90<sup>th</sup> Street West and Avenue H, approximately 2.5 miles north of the project site. Additionally, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials. Therefore, no impacts would occur.
- d. A Phase I Environmental Site Assessment was prepared for the project site by Partner Engineering and Science, Inc. The results of the study are documented in a report entitled "Phase I Environmental Site Assessment Report, J90, APN 3203-034-004, Lancaster, California 93536" and dated May 19, 2023.

A survey of the project site was conducted on April 12, 2023. No evidence of illegal dumping, wastewater treatment facilities, drywells, heating/cooling structures, wells, wastewater disposal or evidence of hazardous materials/waste disposal was present on the project site. There are no structures on the project site and as such lead-based paint and asbestos containing materials would not be a concern.

In addition to the survey of the project site, a regulatory database search was conducted for the project site and immediately surrounding properties within the specified search distances by ERIS. The subject site is not located on any database listings. The SCE Antelope Substation is listed on a variety of regulatory databases. The substation property was identified as a permitted aboveground storage tank site for a 3,703-gallon tank. Additionally, a 2,000-gallon gasoline underground storage tank was identified on the property, that was reportedly installed in 1972

and active until at least 1989. The tank was reportedly removed from the property. The property was identified on various databases associated with hazardous waste generation and storage under EI ID: 10190025. Routine inspections were conducted from 2016 to 2021, and no violations were found. This site qualified as an RCRA NON-GEN site under the EPA Handler ID: CAL000331602 in 2008. As of January 2023, no Compliance Monitoring and Enforcement (violation) records are associated with this facility. The property was also identified on the EMISSIONS database from 2011 to 2020. Based on the lack of documented releases and violations, the regulatory oversight/status, and the removal of the UST on the property, these listings are not expected to represent a significant environmental concern. Therefore, no impacts would occur.

- e. The proposed project is not located within an airport land use plan. The nearest airfield, General William Fox Airfield, is located approximately 4 miles northeast of the project site. There are no circumstances related to this proximity that could be expected to result in a safety hazard for people residing in the project area, therefore no impacts would occur.
- f. The proposed project would generate minimal traffic as a result of construction and operational activities. The traffic generated by the proposed project is not expected to block the roadways. Therefore, the proposed project would not impair or physically block any identified evacuation routes and would not interfere with any adopted emergency response plan. Impacts would not occur.
- g. Most of the surrounding properties are vacant and undeveloped with the exception of the SCE Antelope Substation and other solar and residential uses in the vicinity. It is possible that these properties could be subject to grass fires. The project site is located within the service boundaries of Los Angeles County Fire Station No. 130, located at 44558 40<sup>th</sup> Street West which would serve the project site in the event of a fire. This fire station is located approximately 5 miles east of the project site. Additionally, there are other fire stations in the general area (Station No. 134 and Station No. 84) which would be available to assist if needed. Therefore, potential impacts from wildland fires would be less than significant.

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

a. The project site is not located near an open body of water or in an aquifer recharge area. The California Aqueduct is located over 4 miles south of the project site. The proposed project would be required to comply with all applicable provisions of the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program establishes a comprehensive storm

water quality program to manage urban storm water and minimize pollution of the environment to the maximum extent practicable. The reduction of pollutants in urban storm water discharge through the use of structural and nonstructural Best Management Practices (BMPs) is one of the primary objectives of the water quality regulations. BMPs that are typically used to manage runoff water quality including controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets, cleaning parking lots on a regular basis, incorporating peak-flow reduction and infiltration features (grass swales, infiltration trenches and grass filter strips) into landscaping and implementing educational programs. The proposed project would incorporate appropriate BMPs during construction, as determined by the City of Lancaster Public Works Department. Therefore, impacts would be less than significant.

- b. The proposed project would not include any groundwater wells or pumping activities. All water required for the operation of the site would be purchased by the applicant, trucked to the site and stored in the on-site water tanks. Therefore, impacts would be less than significant.
- c. Development of the proposed project would increase the amount of surface runoff as a result of impervious surfaces associated with the paving of the pads for the battery energy storage containers and associated electrical equipment and the office/storage buildings. The proposed project would be designed, on the basis of a hydrology study, to accept current flows entering the property and to handle the additional incremental runoff from the developed sites. Therefore, impacts from drainage and runoff would be less than significant.

The project site is designated as Flood Zone X per the Flood Insurance Rate Map (FIRM) (06037C0400F). Flood Zone X is located outside both the 100-year flood zone and the 500-year flood zone. Therefore, impacts would be less than significant.

- d. The project site is not located within a coastal zone. Therefore, tsunamis are not a potential hazard. The project site is relatively flat and does not contain any enclosed bodies of water and is not located in close proximity to any large bodies of water; the closest body of water is the California Aqueduct over 4 miles south of the project site. In the event of an earthquake, it is not anticipated that the aqueduct would create a seiche that would impact the project site. Additionally, the project site would not be subject to mudflows. Therefore, no impacts would occur.
- e. The proposed project would not conflict with or obstruct the implementation of the applicable water quality control plan or sustainable groundwater management plan. For additional information, see responses X.a through X.c. Therefore, impacts would be less than significant.

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

- a. The proposed project is for the construction and operation of a 250-megawatt battery energy storage facility on approximately 9.7 acres. The project site is located on the south side of Avenue J at approximately 92<sup>nd</sup> Street West, just east of the SCE Antelope Substation. The project site is zoned RR-2.5 which allows for solar and associated types of uses with a conditional use permit. The property is adjacent to Avenue J and the property to the north of Avenue J and south and east of the project site are vacant. The property to the west is developed with the Antelope Substation. The proposed project would not block a public street, trail or other access route or result in a physical barrier that would divide the community. Therefore, no impacts would occur.
- b. The proposed project is consistent with the City’s General Plan and must be in conformance with the Lancaster Municipal Code. Table 13 provides a consistency analysis of the proposed project with respect to the relevant goals, objectives, and policies of the General Plan. The proposed project will be in compliance with the City-adopted Uniform Building Code (UBC) and erosion control requirements (Section VII). Additionally, as noted in Section IV, the project site is not subject to and would not conflict with a habitat conservation plan or natural communities conservation plan. The existing zoning would allow for a maximum of 4 residential units. While these units would not be built, the City contains sufficient residentially zoned property to meet the needs of its residents and to account for its Regional Housing Needs Assessment numbers. Therefore, impacts would be less than significant.

**Table 13  
General Plan Consistency Analysis**

Goals, Objectives, and Policies	Consistency Analysis
<b>Policy 3.1.1:</b> Ensure that development does not adversely affect the groundwater basin.	No groundwater pumping will occur as part of the proposed project. All water necessary for the battery storage facility will be obtained from an existing water purveyor and stored on site for fire fighting and potable water



	purposes.
<b>Policy 3.2.1:</b> Promote the use of water conservation measures in the landscape plans of new developments.	The landscaping installed along Avenue J for screening purposes would be native and drought tolerant, requiring minimal amounts of water.
<b>Policy 3.2.2:</b> Consider the potential impact of new development projects on the existing water supply.	The proposed project would utilize approximately 15 acre feet of water for construction purposes and approximately 0.2 acre feet per year for potable, operational purposes.
<b>Policy 3.3.1:</b> Minimize the amount of vehicular miles traveled.	The proposed project would be operated remotely with O&M staff coming to the site on an as needed basis. No staff would be permanently based at the facility.
<b>Policy 3.3.3:</b> Minimize air pollutant emissions by new and existing development.	The proposed project would comply with all air district regulations regarding air emissions and dust control.
<b>Policy 3.4.2:</b> Preserve significant desert wash areas to protect sensitive species that utilize these habitat areas.	As discussed in the biological resources section and technical report, no desert washes were observed on the project site. Mitigation measures have been included to ensure impacts to special status plants and wildlife are minimized.
<b>Policy 3.4.4:</b> Ensure that development proposals, including City sponsored projects, are analyzed for short- and long-term impacts to biological resources and that appropriate mitigation measures are implemented.	Section IV of this initial study discusses the biological resources on the project site and identifies mitigation measures to ensure impacts to these resources are less than significant.
<b>Policy 3.5.1:</b> Minimize erosion problems resulting from development activities.	The proposed project will comply with all dust control and erosion control mitigation measures. These include best management practices as identified in NPDES and the air quality regulations pertaining to dust control.
<b>Policy 3.6.4:</b> Support state and federal legislation that would eliminate wasteful energy consumption in an appropriate manner.	The proposed project is a battery energy storage facility which will ensure that all energy produced is available at times in which it is needed, enabling increased usage of renewable energy.
<b>Policy 3.6.6:</b> Consider and promote the use of alternative energy such as wind energy and solar energy. (Note Policy 15.2.1 considers the use of waste to energy cogeneration systems as an energy source.)	The proposed battery energy storage facility will support alternative energy projects by providing a facility which can store the energy produced and make it available to the grid at times in which it is needed.
<b>Policy 4.3.1:</b> Ensure that noise-sensitive land uses and noise generators are located and designed in such a manner that City noise	The proposed project meets the noise standards of the City's General Plan as described in the Acoustical Analysis of Stroud Battery Energy

objectives will be achieved.	Storage Project, prepared by Jacobs (June 1, 2023). Additionally, the closest sensitive receptors are located approximately 600 feet to the east of the project site with vacant, undeveloped land in between.
<b>Policy 4.5.1:</b> Ensure that activities within the City of Lancaster transport, use, store, and dispose of hazardous materials in a responsible manner which protects the public health and safety.	The proposed project may utilize some hazardous materials during operations including oils/lubricants, pesticides, cleaning agents, and dispose of batteries on an as needed basis. All use and disposal of hazardous materials/waste would be done in accordance with applicable rules and regulations.
<b>Objective 4.7:</b> Ensure that development occurs in a manner that minimizes the risk of structural and wildlife fire.	The proposed project would be developed in accordance with all applicable fire code regulations. Additionally, all battery enclosures would have self-contained fire suppression systems and the site is within the service boundaries of an existing fire station.
<b>Policy 4.7.2:</b> Ensure that the design of new development minimizes the potential for fire.	
<b>Goal 16:</b> To promote economic self-sufficiency and a fiscally solvent and financially stable community.	The proposed project would provide additional jobs and revenues associated with the construction and operation of the facility.
<b>Policy 19.2.6:</b> Minimize the visual impacts of utility corridors and their associated equipment.	The proposed project would be located in an area with many utility scale solar facilities and a large SCE substation. The proposed project would blend in and be compatible with the surround uses.

In addition to the City’s General Plan, the Southern California Association of Governments (SCAG) adopts a Regional Transportation Plan / Sustainable Conservation Strategy (RTP/SCS) every five years. On May 7, 2020 SCAG adopted the 2020-2045 RTP/SCS, known as Connect SoCal, for federal transportation conformity purposes only. On September 3, 2020 SCAG adopted Connect SoCal for all other purposes. The RTP/SCS identifies ten regional goals; these goals are identified in Table 14 along with the project’s consistency with these goals.

**Table 14**  
**Connect SoCal Consistency Analysis**

<b>Goals</b>	<b>Consistency</b>
<b>Goal 1:</b> Encourage regional economic prosperity and global competitiveness.	The proposed project would help support regional economic prosperity by providing more local jobs and helping to provide electricity stability to the grid.
<b>Goal 2:</b> Improve mobility, accessibility, reliability and travel safety for people and goods.	This goal is not applicable to the proposed project.
<b>Goal 3:</b> Enhance the preservation, security, and resilience of the regional transportation system.	This goal is not applicable to the proposed project.
<b>Goal 4:</b> Increase person and goods movement and travel choices within the transportation system.	This goal is not applicable to the proposed project.
<b>Goal 5:</b> Reduce greenhouse gas emissions and improve air quality.	The proposed project would develop a utility scale battery energy storage facility. This facility would ensure that energy produced by alternative energy means (solar, wind, hydrogen) can be stored and utilized as necessary thereby reducing reliance on forms of energy with high air quality impacts.
<b>Goal 6:</b> Support health and equitable communities.	This goal is not applicable to the proposed project.
<b>Goal 7:</b> Adapt to a changing climate and support an integrated regional development pattern and transportation network.	This goal is not applicable to the proposed project.
<b>Goal 8:</b> Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	This goal is not applicable to the proposed project.
<b>Goal 9:</b> Encourage development of diverse housing types in areas that are supported by multiple transportation options.	There is no housing associated with the proposed project. This goal is not applicable to the proposed project.
<b>Goal 10:</b> Promote conservation of natural and agricultural lands and restoration of habitats.	The project site is located on previously disturbed fallow agricultural/desert in an area with a lot of other energy uses. The habitat on site is minimal and not appropriate for conservation or restoration.

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

a-b. The project site does not contain any current mining or recovery operations for mineral resources and no such activities have occurred on the project site in the past. According to the LMEA (Figure 2-4 and page 2-8), the project site is designed as Mineral Reserve Zone 3 (contains potential but presently unproven resources.) However, it is considered unlikely that the Lancaster area has large valuable mineral and aggregate deposits. Therefore, no impacts to mineral resources would occur.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIII. <u>NOISE</u> . Would the project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

- a. Construction activities associated with earth moving equipment and other construction machinery would temporarily increase noise levels in the vicinity of the project site. The closest noise sensitive receptors to the project site are the residences (mobile homes) located at the southwest corner of Avenue J and 90<sup>th</sup> Street West, approximately 600 feet east of the project site. A noise study was conducted by Jacobs and documented in a report entitled “Acoustical Analysis of Stroud Battery Energy Storage Project” and dated June 1, 2023. This study looked at the typical types of construction equipment that would be utilized on the site, typical noise levels at varying distances from of this equipment from various receptors and calculated the estimated noise levels during construction varying distances during construction (Table 15). As can be seen in this table, the noise level at offsite receptors would be below the required noise levels for the use. Additionally, mitigation measures/best management practices have been identified below which would ensure that the noise levels off-site are within the established parameters during construction. Therefore, impacts would be less than significant.

The City’s General Plan (Table 3-1) establishes an outdoor maximum CNEL of 70 dBA for commercial and industrial uses, that applies to the proposed project boundary, and 65 dBA for residential uses. The current noise levels on the roadways closest to the project site are as follows: 1) 70<sup>th</sup> Street West from Avenue J to Avenue K ranges is 54.2 dBA and 2) Avenue J from 60<sup>th</sup> Street West to 70<sup>th</sup> Street West is 60.8 dBA. No noise readings are available in the LMEA closer to the project site. The proposed project is anticipated to be operated remotely with O&M staff visiting the project site on an as needed basis. As such the noise levels in the vicinity of the project are consistent with the standards of the General Plan. While the noise levels are

consistent with the standards of the General Plan, additional features of the proposed project (e.g., landscaping, fencing, setbacks, etc.) would ensure that the project remains in compliance with the General Plan standards. Additionally, the noise study prepared for the project modeled the noise levels from the equipment on the site during operation. As shown in the study, at the property line, the noise levels would be 70 dBA and would be less than 60 dBA at the nearest residences. As such, operational noise levels are less than the 70 dBA limit at the project boundary and operational noise will be less than significant.

**Table 15  
Average Equipment Noise Levels Versus Distance**

Distance from Activity (ft)	Average Noise Level (dBA)
50	87
100	83
200	78
400	73
800	67
1,600	62
3,200	56

Mitigation Measures

20. Construction operations shall not occur between 8 p.m. and 7 a.m. on weekdays or Saturday or at any time on Sunday. The hours of any construction-related activities shall be restricted to periods and days permitted by local ordinance.
21. The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.
22. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.
23. Material stockpiles and mobile equipment staging, parking and maintenance areas shall be located as far away as practicable from noise-sensitive receptors.
24. The use of noise producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.
25. No project-related public address or music system shall be audible at any adjacent receptor.
26. All noise producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factor specifications. Mobile or fixed "package" equipment (e.g., arc-welders, air

compressors, etc.) shall be equipped with shrouds and noise control features that are readily available for the type of equipment.

- b. The proposed project would generate minimal, if any, groundborne vibration or groundborne noise levels during construction as no subterranean structures (e.g., underground parking, etc.) are part of the project. Some construction activities may generate rumbling type noise and some pile driving may be necessary; however, these activities are not anticipated to be noticeable by noise sensitive receptors as the nearest ones are located approximately 600 feet east of the project site at the southwest corner of 90<sup>th</sup> Street West and Avenue J. During operational activities, some vibration noise may be generated due to O&M vehicles on Avenue J. However, this noise would be similar to the noise generated in the area by other vehicles and would be considered less than significant.
- c. The project site is not in proximity to an airport or a frequent overflight area and would not experience noise from these sources. The closest airport is the General William J. Fox Airfield, located approximately 4 miles northeast of the project site. Therefore, no impacts would occur.

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

a. The proposed project would not generate substantial population growth as the project is an unmanned battery energy storage facility and does not include residential uses. The facility would be monitored remotely and maintenance would occur on an as needed basis. It is possible that individuals could relocate to the Antelope Valley to work at the proposed facility. However, it is much more likely that individuals currently living in the Antelope Valley would be hired to work at the facility. Additionally, the project site is located in an area which allows these types of uses with a conditional use permit, and these types of jobs are already accounted for in the City’s General Plan and regional planning documents.

The proposed project would be accessed directly from Avenue J and the roadways in the general vicinity are already improved and no new roadways would be constructed. Therefore, impacts would be less than significant.

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



	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XV. <u>PUBLIC SERVICES.</u>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?			X	
Police Protection?			X	
Schools?			X	
Parks?			X	
Other Public Facilities?			X	

- a. The proposed project would increase the need for fire and police services; however, the project site is within the current service area of both these agencies and the additional time and cost to service the site is minimal. The proposed project would not induce substantial population growth and therefore, would not substantially increase the demand on parks, schools, or other public facilities. Additionally, this growth has been accounted for in the City’ General Plan and within SCAG’s population forecasts. Impacts would be less than significant.

Construction of the proposed project may result in an incremental increase in population and may increase the number of students in the Westside School District and Antelope Valley Union High School District. Proposition 1A, which governs the way in which school funding is carried out, predetermines by statute that payment of developer fees is adequate mitigation for school impacts. Therefore, impacts would be less than significant.

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

- a. The proposed project may generate additional population growth through the creation of some jobs and may contribute on an incremental basis to the use of the existing park and recreational facilities. The proposed project does not involve the construction of any parks or recreational amenities. However, the applicant would be required to pay applicable park fees which would offset any impacts to the existing parks. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVII. <u>TRANSPORTATION</u> . Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				X
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?				X
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

- a. The proposed project would not conflict with any programs, plans, ordinance or policies with respect to transportation systems including, bicycle and pedestrian facilities. The project site is located at the northwest corner of on the south side of Avenue J at approximately 92<sup>nd</sup> Street West. Avenue J is fully developed and no improvements would be required. Therefore, no impacts would occur.
- b. In July 2020, the City of Lancaster adopted standards and thresholds for analyzing projects with respect to vehicle miles traveled (VMT). A series of screening criteria were adopted and if a project meets one of these criteria, a VMT analysis is not required. These criteria are: 1) project site – generates fewer than 110 trips per day; 2) locally serving retail – commercial developments of 50,000 square feet or smaller; 3) project located in a low VMT area – 15% below baseline; 4) transit proximity; 5) affordable housing; and 6) transportation facilities. The proposed project screens out of a VMT analysis as it would generate less than 110 vehicle trips per day (see VMT memo prepared by Chambers Group, Inc.). Therefore, no impacts would occur.
- c. The proposed project would be accessed from a driveway off of Avenue J. This roadway is fully improved. Interior to the project site, 90% compacted, all weather roadways would be installed for fire department access. These improvements would not increase hazards in the vicinity of the project nor create dangerous design situations. Therefore, no impacts would occur.
- d. The project site would be accessed from Avenue J which would provide adequate emergency access to the project site. Drive aisles/roadways within the project site would be designed to the standards required by the Los Angeles County Fire Department, ensuring adequate emergency access. Therefore, no impacts would occur.

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

- a. No archaeological or significant historic cultural resources were identified on the project site during the records searches and site survey. Letters were sent out to three tribes during the AB 52 and the City received a response from the YSMN and FTBMI. Measures that have already been requested addressing the appropriate handling of any cultural resources on the project have been included in the cultural resources section. Any measures requested by the FTBMI will be included as previously discussed. Therefore, no impacts to tribal cultural resources would occur.

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

- a. The proposed project would be required to connect to the necessary existing utilities to support the proposed development. The proposed project would store potable water in on-site tanks and utilize an alternative sewer disposal system. As such they would not be connected to sewer or water lines. The necessary services already exist in the vicinity of the project site. Connections would occur on the project site or within existing roadways or right-of-ways. Connections to these utilities are assumed as part of the proposed project and impacts to environmental resources have been discussed throughout the document. As such, impacts would be less than significant.
- b. The proposed project would utilize approximately 30 acre feet of water for construction purposes over a one-year period and a very minimal amount of water; approximately 0.02 acre feet per year, thereafter for potable, operational purposes. The proposed project would store potable water in water tanks onsite for fire fighting and potable water uses. This water would be obtained from an existing water purveyor and trucked to the site. The operational water consumption is less

than a single family residence's yearly use. Proposed growth consistent with the general plan is accounted for in the General Plan EIR and the Urban Water Management Plan's growth projections. As such, no new construction of water treatment or new or expanded entitlements would be required. Therefore, impacts would be less than significant.

- c. The proposed project would utilize a septic system or other alternative form wastewater disposal. The proposed project would not be connected to the sanitation system. The proposed project would not require the expansion of existing facilities or the construction of new facilities. Therefore, impacts would be less than significant.
- d. Solid waste generated within the City limits is generally disposed of at the Lancaster Landfill located at 600 East Avenue F. This landfill is a Class III landfill which accepts agricultural, non-friable asbestos, construction/demolition waste, contaminated soil, green materials, industrial, inert, mixed municipal, sludge, and waste tires. It does not accept hazardous materials. Assembly Bill (AB) 939 was adopted in 1989 and required a 25% diversion of solid waste from landfills by 1995 and a 50% diversion by 2005. In 2011, AB 341 was passed which required the State to achieve a 75% reduction in solid waste by 2030. The City of Lancaster also requires all developments to have trash collection services in accordance with City contracts with waste haulers over the life of the proposed project. These collection services would also collect recyclable materials and organics. The trash haulers are required to be in compliance with applicable regulations on solid waste transport and disposal, including waste stream reduction mandated under AB 341.

The proposed project is an unmanned facility and would generate minimal amounts of solid waste during construction and operation which would contribute to an overall impact on landfill services (GPEIR pgs. 5.13-25 to 5.13-28 and 5.13-31); although the project's contribution would be minimal. However, the existing landfill has capacity to handle the waste generated by the proposed project. Additionally, the proposed project would be in compliance with all State and local regulations regarding solid waste disposal. Therefore, impacts would be less than significant.

- e. See Item XIX.d.

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

a. See Item IX.f.

b-d. The project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones. The project site is located within the service boundaries of Fire Station No. 130 which would provide service in the event of a fire. Additionally, the proposed project would be constructed in accordance with all existing and applicable building and fire codes and the battery storage enclosures would have built in fire suppression systems. Therefore, no impacts would occur as a result of wildfire.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
<u>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.</u>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulative considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

- a. The project site is a small site with similar development nearby. Mitigation measures are imposed to minimize impacts to special status plants and wildlife and the project site does not provide critical habitat or wildlife connectivity. No impacts to special status plant species are anticipated. With implementation of the required mitigation measures, impacts to special status wildlife species would be less than significant.
- b. The proposed project consists of the construction and operation of an unmanned battery energy storage facility in the RR-2.5 zone. Other projects have been constructed in the vicinity of the project site; however, only one other project has been approved but not built or which have been submitted and under going review within one mile of the project site. The one project is a 400-MW battery storage facility located at the northwest corner of Avenue J-8 and 90<sup>th</sup> Street West. There is a residential project under construction approximately 1.5 miles north of the project site and three solar facilities in the City and five in the County along Avenue I which are undergoing review. These projects are not likely to combine with the proposed project to generate cumulative impacts due to the distance from the project site and timing of approval/construction for the projects.



Cumulative impacts are the change in the environment, which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable projects.

The proposed project would not create any impacts with respect to: Agriculture and Forestry Resources, Energy Resources, Mineral Resources, Tribal Cultural Resources, and Wildfire. The project would create impacts to other resource areas and mitigation measures have identified for Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards/Hazardous Materials, and Noise. Many of the impacts generated by projects are site specific and generally do not influence the impacts on another site. All projects undergo environmental review and have required mitigation measures to reduce impacts when warranted. These mitigation measures reduce environmental impacts to less than significant levels whenever possible. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable.

- c. The proposed project will develop a battery energy storage system near similar types of development. The proposed project would allow for renewable energy sources to be stored and dispatched when needed, which would assist the City and State in achieving its Renewable Portfolio Standards targets to mitigate and reverse harmful effects of global climate change. The proposed project will not result in any significant unavoidable environmental impacts. Accordingly, the project will not have environmental effect which will cause substantial adverse effects on human beings, either directly or indirectly.

List of Referenced Documents and Available Locations\*:

AIR:	Air Quality and Greenhouse Gas Emissions Impact Analysis, Stroud Energy Storage Project, City of Lancaster, Vista Environmental, June 16, 2023	CDD
BRR:	Biological Technical Report for the Stroud Energy Storage Project, City of Lancaster, California, Chambers Group, Inc., July 2023	CDD
CRS:	Stroud Energy Storage Project Cultural Resources Results Letter Report, City of Lancaster, Los Angeles County, CA, Chambers Group, Inc., May 8, 2023	CDD
ESA:	Phase I Environmental Site Assessment Report, J90, APN 3203-034-004, Lancaster, California, 93536, Partner Engineering and Science, Inc., May 19, 2023	CDD
FIRM:	Flood Insurance Rate Map	CDD
GPEIR:	Lancaster General Plan Environmental Impact Report	CDD
LGP:	Lancaster General Plan	CDD
LMC:	Lancaster Municipal Code	CDD
LMEA:	Lancaster Master Environmental Assessment	CDD
NOI:	Acoustical Analysis of Stroud Battery Energy Storage Project, Jacobs, June 1, 2023	CDD
SSHZ:	State Seismic Hazard Zone Maps	CDD
USGS:	United States Geological Survey Maps	CDD
USDA SCS:	United States Department of Agriculture Soil Conservation Service Maps	CDD
VMT:	Vehicle Miles Traveled (VMT) Analysis – Stroud Energy Storage Project, Chambers Group, Inc., May 11, 2023	CDD

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