

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



Project title: “Wildflower Green Energy Farm”/R2010-00256-(5), Conditional Use Permit No. 201000121, Environmental Assessment No. 201000063

Project location: 16700 Lancaster Rd. and 47031 167th St., Lancaster, CA 93536

APN: See Figure 2 in attached Project Description **Thomas Guide:** _____ **USGS Quad:** Lake Hughes/Fairmont Butte/Del Sur

Gross Acreage: 4,092 ac. (3,708 ac. Energy Farm + 384 ac. Gen-Tie Line Corridor)

Description of project: Antelope Power, LLC (the “Applicant”) is proposing to construct, own, and operate the Wildflower Green Energy Farm (the “Project”) that includes: (1) a solar/wind energy facility with a generating capacity of up to 300 megawatts (MW) (the “Energy Farm”); and (2) an underground 230-kilovolt (kV) gentie line (the “Gen-Tie Line”) that would connect the Energy Farm either to Southern California Edison’s (“SCE”) existing Antelope Valley Substation in the City of Lancaster (a distance of 4.8 miles), or to Los Angeles Department of Water and Power’s (“LADWP”) Barren Ridge–Rinaldi renewable transmission line (a distance of 1.5 miles). For purposes of environmental impact analysis, a Gen-Tie Line “Corridor” has been defined, extending approximately one-eighth mile on both sides of Avenue J, from the southeastern corner of the Energy Farm site, to the Antelope Valley Substation. The entire geographic area in which the Energy Farm and Gen-Tie Line corridor would be located are referred to collectively as the “Site.”

The Energy Farm is comprised of two parts: a 2,116-acre “Northern Energy Farm” containing all of the solar arrays and approximately two-thirds of the wind turbines, and a 1,592-acre “Southern Energy Farm” containing the remaining one-third of the wind turbines. The geographic area over which these two Project components would occur is referred to as “the Energy Farm Site.” The Project also includes two voluntary conservation areas within the Energy Farm, to protect habitat and provide buffers adjacent to the Fairmont and Antelope Buttes Significant Ecological Area (the “SEA”) and the Antelope Valley California Poppy State Natural Reserve (the “Poppy Reserve”). Other notable features within the Energy Farm are extensive open space/habitat management areas, three wildlife migration corridors, and

pedestrian/equestrian trails to provide public access through the Energy Farm with scenic viewing opportunities of the Poppy Reserve, the SEA and the more distant mountains.

The purpose of the Project is to provide utility companies with electricity generated from clean renewable wind and solar technologies. The Project seeks to optimize the renewable energy generation potential of the Site, while minimizing potential adverse environmental effects. The Applicant would implement the Energy Farm through a development plan that harnesses the wind and solar resources of the Site, with a combined output of up to 300 MW of renewable/clean energy. The Applicant has prepared a plan that sets forth a proposed number and configuration of wind turbines and solar panels based on current technology and knowledge of the Site's localized topographic features and meteorological resources. Nonetheless, renewable energy technology is undergoing rapid advancements and the Applicant is collecting meteorological data, conducting geotechnical analysis and other technical studies, and these may necessitate minor adjustments in the final siting of the on-site wind turbines and solar panels. In addition to the proposed renewable energy generating facilities, Project support facilities proposed include an operations and maintenance building with a water storage tank and a septic tank/leachfield wastewater disposal system, a surface parking lot, a temporary lay down yard, access roads, an electrical substation, and a second water storage tank for semi-annual solar panel washing.

The Applicant is requesting a Conditional Use Permit (CUP) to authorize grading for the Energy Farm and Gen-tie Line of up to 4,145,200 cubic-yards (combined cut and fill quantity), to allow development of a renewable energy farm within an A-2-5 (Heavy Agricultural) zone; and to allow development within the Fairmont Buttes Significant Ecological Area (SEA No. 57).

Development Area: Based on the Project's siting criteria, the Energy Farm would be constructed within an overall maximum development envelope of 2,350 gross acres; this plan provides some flexibility for adjusting final locations of solar and wind improvements, based on micrositing factors. Total construction disturbance would actually affect approximately 970 acres, including 870 acres in the Northern Energy Farm and 100 acres in the Southern Energy Farm. Construction of the Gen-Tie Line would occur within a 20-foot-wide easement area, totaling 12.4 acres with an interconnection to the SCE Antelope Valley Substation or 3.4 acres with an interconnection to the LADWP Barren Ridge-Rinaldi renewable transmission line.

General plan designation: R (Non-Urban), 0.2 dwelling units/acre (du/ac)

Community/Areawide Plan designation: Antelope Valley Area Plan: N1 (Non-Urban 1), 0.5 du/ac

Zoning: A-2-5 (Heavy Agricultural—Five Acre Minimum Required Lot Area)

Surrounding land uses and setting: The Project is located within the Fairmont area of the unincorporated Antelope Valley in Los Angeles County, approximately 1 mile south of Avenue D (State Route 138) and 3.3 miles west of the western edge of the City of Lancaster, California. Site topography varies, with the lowest elevation being approximately 2,700 feet above mean sea level (msl) located near Broad Canyon in the northern periphery, and the highest elevation being approximately 2,900 feet above msl located near the California Aqueduct in the southwestern portion of the Site. The Southern Energy Farm consists of moderately sloping plateaus from south to north with limited canyons. The Northern Energy Farm consists of moderately sloping plateaus from north to south. Elevations along the Gen-tie Line Corridor range from approximately 2,760 feet above msl at the southeast corner of the Site, to 2,460 feet above msl at the east end near Southern California Edison's existing Antelope Valley Substation. The landscape within the Site consists mainly of alfalfa grasses (planted as a crop), desert grass, and sagebrush scrub.

Since the 1950s, approximately 2,200 acres concentrated in the area of the Northern Energy Farm have been utilized for ranching activities including horse breeding, boarding and training, and related farming of alfalfa hay fields. The developed part of the ranch, called Healy Farms, is concentrated southeast of the intersection of Lancaster Road and 170th Street West. It consists of: (1) one single-family home, two trailers, and a single-family residence north of the Healy Ranch; (2) horses and associated grazing areas, which are assumed to have been previously graded; (3) a horse barn with an apartment; (4) a shop to provide limited maintenance for farm equipment, as well as the storage of equipment and materials for construction, operation, and maintenance; (5) two diesel and gasoline aboveground fuel tanks (ASTs) to fuel farming vehicles and equipment; and (6) fields used for hay production. Fallow alfalfa fields, cattle grazing, dry washes, scrubland, two residential sites and a hunting club occur in the Southern Energy Farm. Land uses within and surrounding the Gen-Tie Line corridor consist of undeveloped grazing land, Avenue J (a two-lane road), crossings by two high-voltage transmission line corridors, and three single family residences just west of the SCE Substation.

A majority of the surrounding lands are unoccupied agricultural and grazing lands. The nearest residential communities are Fairmont, approximately 1 mile to the west, Antelope Acres, located approximately 5.2 miles to the east/northeast, and Neenach, located approximately 8.7 miles to the northwest, along the north side of State Highway 138. County Significant Ecological Area (SEA) 57 is located partially within and immediately east of the northern part of the Northern Energy Farm area. Approximately 475.8 acres of this SEA occurs on site. To the northeast are the Poppy Reserve, the Antelope and Fairmont Buttes, with residential development located further to the east. To the south are the Angeles National Forest and lands administered by the Bureau of Land Management (BLM). The LADWP operates the Fairmont Reservoir, a water retention facility, located southwest of the Site. This reservoir collects water from the Eastern Sierra Mountains via the Los Angeles Aqueduct before the water enters an intake below the reservoir for the Elizabeth Lake Tunnel. Land to the west is primarily undeveloped, with several residences scattered across large lots between 180th and 190th Streets. Scattered residences are visible from the western border of the Energy Farm Site; however, most residences are not visible due to distance and topography.

Adjacent land uses consist of low-density rural residential and related light agricultural activities, as well as a church, undeveloped grazing lands, and open space areas, including the Poppy Reserve. The Poppy Reserve lands are adjacent to portions of the Northern and Southern Energy Farm sites. Two homes are located adjacent to the southwestern boundary of the Energy Farm Site, adjacent to the California Aqueduct. Between the Northern and Southern Energy Farms there is one residence within a complex maintained by the Leona Valley Hunt Club (also known as the Antelope Valley Sportsman’s Club) and one residence located north of the Leona Valley Hunt Club. There is also one residence located due west of the Healy Farms, on the south side of Lancaster Road, and three other homes north of that road, all of which are accessed from Lancaster Road outside of the Site. One church property, the Church at Fairmont, located at Lancaster Road and 160th Street, is surrounded by the Northern Energy Farm area. The California Aqueduct, which is part of the State Water Project, runs along the southwestern edge of the Northern Energy Farm site and along the entire western edge of the Southern Energy Farm site.

Major projects in the area (Expanded discussion of projects in the area will be discussed in the EIR):

<i>Project/Case No.</i>	<i>Description and Status</i>
R2009-02089	Alpine Solar Project/NRG—92 MW/800 ac Approved; 35 ac addition approved.

R2009-02239	AV Solar Ranch One Project—230 MW/2300 ac—Approved
SCH 2007081156	Tehachapi Renewable Transmission Project—CPUC approved December 17, 2009, Supplemental Draft Environmental Impact Statement (EIS underway)
R2011-0377	Antelope Solar Farm/FRV—20 MW/320 ac—early environmental review
R2011-00410	Ruby Solar/Ruby Solar LLC—20 MW/160 ac—early environmental review
R2011-00408	Blue SkyWind Energy Project/NextEra—225 MW/7,500 ac—early environmental review
R2010-00911	Recurrent—Antelope Solar 1/Recurrent Energy—10 MW/111 ac—early environmental review
R2008-00878	Recurrent—Antelope Solar 2/Recurrent Energy—10 MW/80 ac—early environmental review
R2010-00808	Antelope Valley Solar/Renewable Resources Group—650 MW/5,175 ac—Approved October 19, 2011.

Reviewing Agencies:

Responsible Agencies

- None
- Regional Water Quality Control Board:
 - Los Angeles Region
 - Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- U.S. Fish & Wildlife
- Caltrans

Special Reviewing Agencies

- None
- Santa Monica Mtns. Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mtns. Area
- City of Lancaster, City of Palmdale
- Kern County, Ventura County
- Antelope Valley AQMD
- DTSC, DOGGR
- NAHC, CUSF, CHP
- Antelope Valley Conservancy
- California Dept. of Conservation
- SCE, LADWP

Regional Significance

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area

Trustee Agencies

- None
- State Fish and Game

- State Parks

- CA DHS, DWR, SWRCB
- FAA

County Agencies

- Subdivision Committee
- DPW: *GMED; Traffic & Lighting; Environmental Programs; Land Development (NPDES review; drainage & grading, water supply); Watershed Management; Flood Maintenance; Transportation Planning; Waterworks & Sewer*
- Sheriff, SEATAC
- Sanitation Districts
- Parks and Recreation
- Fire Department (+ Hazardous Materials Division)
- Public Health: Environmental Hygiene, Land Use Program, Environmental Health

Public agency approvals which are or may be required:

AGENCY NAME	PERMIT/APPROVAL/COORDINATION ROLE
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Federal Agencies

Environmental Protection Agency	Section 404 Clean Water Act Review
U.S. Fish and Wildlife Service	Federal Endangered Species Act Section 7 consultation and incidental take authorization and Section 10 incidental take permit
Federal Aviation Administration	Notice of Proposed Construction (Form 7461-1) Hazard Determination; Approval of Lighting Plan
Department of Defense/Homeland Security	Consultation Regarding Military Air Space
Other Federal Agencies	Other actions that may be required to implement the Project.

State Agencies

Antelope Valley Air Quality Management District	Comply with requirements of SCAQMD Rule 403 as a large operation.
Regional Water Quality Control Board	Porter Cologne Water Quality Act, Clean Water Act, National Pollutant Discharge Elimination System Permit; Water Quality Certification, Discharges to Surface Water, Regional General Permits, Report of Waste Discharge (ROWD)/Waste Discharge Requirements (WDR)
State Water Quality Control Board	Statewide General Permit: Water Quality Order 99-08-DWQ: General Permit for Storm Water Discharges Associated with Construction Activity
California Department of Fish and Game	Section 1600, Streambed Alteration Agreement; State Endangered Species Consultation Incidental take permit/authorization
California Public Utility Commission	Interconnect Approval
California Department of Transportation	Encroachment of Right-of-Way; Transportation Permits for Hauling Oversized Loads
Other State Agencies	Other actions that may be required to implement the Project.

Local Agencies

County of Los Angeles	CEQA Review
	Conditional Use Permit for construction in an agricultural zone; for grading (cut and fill) of approximately 4,145,200 cubic yards of soil; and for development within an SEA
	Grading Permit, Building Permit
	County Road Encroachment Permit; Transportation Permits for Hauling Oversized Loads
City of Lancaster	CEQA Review (Responsible Agency), Conditional Use Permit, for construction of portion of underground transmission line.
Other Local Agencies	Other actions that may be required to implement the Project.

Lead agency name and address:

County of Los Angeles
Attn: Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

Project sponsor's name and address:

Antelope Power, LLC

Contact person and phone number: Anthony Curzi, Planner, Zoning Permits—North Section
(213) 974-6461


ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

IMPACT ANALYSIS SUMMARY MATRIX		No Impact				Potential Concern
		Less than Significant Impact				
		Less than Significant Impact w/ Project Mitigation				
		Potentially Significant Impact				
Environmental Factor	Pg.					
1. Aesthetics	12	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Wind turbines and/or solar array fields would be visible from nearby public trails at the California Poppy Reserve and from the Los Angeles Backbone Trail System; new night lighting sources
2. Agriculture/Forest	14	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Site is zoned for agricultural uses; presence of prime and unique farmland
3. Air Quality	16	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Construction exhaust emissions and fugitive dust; limited operational emissions, avoids emissions from traditional thermal energy plants
4. Biological Resources	18	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Development within an SEA; natural drainage modification; sensitive plants and wildlife resources
5. Cultural Resources	24	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Disturbance of potential presence of buried archaeological and paleontological resources from grading and excavation
6. Energy	27	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Positive regional and statewide effect through expansion of clean, renewable electricity generation sources. On-site energy use minor.
7. Geology/Soils	28	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Fault/Liquefaction zone; potential unstable ground hazards; grading
8. Greenhouse Gas Emissions	30	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Gaseous construction emissions, minor operational emissions. Positive long-term effects by providing emission-free, renewable electrical power generation at utility scale.
9. Hazards/Hazardous Materials	31	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Moderate and High Fire Hazard Severity Zones; use of flammable materials during construction and operation; hazardous solid waste disposal
10. Hydrology/Water Quality	36	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Alterations to surface drainages; potential for increased erosion and runoff; potential water contaminants from construction or developed site runoff; subsurface septic system
11. Land Use/Planning	40	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Conditional Use Permit required to permit Energy Farm in Agricultural Zone and for proposed grading. SEA conformance criteria apply.
12. Mineral Resources	42	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None
13. Noise	43	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Short-term construction noise; long-term noise associated with wind turbines and periodic maintenance activities
14. Population/Housing	45	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Construction of 23 miles of access roads.
15. Public Services	46	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Limited potential for increase in demand for Fire and Sheriff services
16. Recreation	48	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Public trail linkages (Los Angeles Backbone Trail System); views from Poppy Reserve
17. Transportation/Traffic	49	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Construction and operation traffic; site access
18. Utilities/Services	52	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solid waste disposal; water supply/ storage for fire suppression
19. Mandatory Findings of Significance	55	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Geotechnical, drainage and flood control, wildfire, noise, hydrology and water quality, air quality, biological resources, cultural resources, agriculture, aesthetics, recreation, traffic, fire/ sberiff services, utilities, environmental safety, cumulative impacts

DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

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



 Signature

11/2/11

 Date



 Signature

11/2/11

 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 the Lead Department 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 Department 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 Section XVII, “Earlier Analyses,” may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. 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) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significance. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.
- 8) Climate Change Impacts: When determining whether a project’s impacts are significant, the analysis should consider, when relevant, the effects of future climate change on: 1) worsening hazardous conditions that pose risks to the project’s inhabitants and structures (e.g., floods and wildfires), and 2) worsening the project’s impacts on the environment (e.g., impacts on special status species and public health).

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Have a substantial adverse effect on a scenic vista, including County-designated scenic resources areas (scenic highways as shown on the Scenic Highway Element, scenic corridors, scenic hillsides, and scenic ridgelines)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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No designated scenic highways or designated scenic corridors are located in the vicinity of the Site; however, the proposed solar panel arrays and wind turbines might be visible from SR-138 which is a second priority scenic route. Development of the Energy Farm could also affect viewsbeds from and of public recreation areas in the vicinity of the Proposed Project, such as the Antelope Valley California Poppy Reserve. Further analysis of this issue will be included in the EIR.

b) Be visible from or obstruct views from a regional riding or hiking trail?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Planned segments of the Los Angeles County Backbone Trail System run through the Energy Farm site, which is visible from adjacent recreational areas, including trails at the adjacent Antelope Valley California Poppy Reserve Park managed by the California State Parks Department. Further analysis of potential visual impacts from recreational trails will be included in the EIR.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, historic buildings, or undeveloped or undisturbed areas?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Energy Farm site and underground transmission line corridor consist of both disturbed and natural areas. Scenic features in the vicinity include Fairmont and Antelope Buttes (which incorporate the Antelope Valley California Poppy Reserve) to the north and hillsides and ridgelines to the south, as well as Broad Canyon and Myrick Canyon which traverse through the northern and southern portions of the Proposed Energy Farm. No direct alterations of these natural features are proposed. Flat bottomlands and mesas within the Energy Farm site contain fields of wildflowers, including California Poppy, that are similar to wildflower fields in the adjacent Poppy Reserve. The Project includes 342 acres for conservation and approximately 1,000 acres of open space/wildlife habitat management land that would retain existing open space features. Assessment of visual impacts involving development of wind and solar facilities on portions of the Energy Farm site containing wildflower fields will be included in the EIR.

d) Substantially degrade the existing visual character or quality of the site and its surroundings because of height, bulk, pattern, scale, character, or other features?

The Project would develop a large number of 15-foot-high solar module arrays and up to 50 wind turbine towers, that could reach a height of 328 feet, plus the distance of fully extended blades, which could extend the total height to nearly 500 feet. These facilities would be developed on a mostly underdeveloped site in a rural area and thus would alter the visual character of the Site and possibly its surroundings. Since the Gen-Tie Line would be placed underground, it would not permanently alter the visual character of that part of the project area. Further analysis of construction period and long-term impacts to the existing visual character of the Site and surroundings will be included in the EIR.

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

Shadow impacts are not anticipated to occur on or off site as a result of Project development. Proposed solar PV panel surfaces are designed to absorb sunlight to enable conversion of that light into electrical power; reflective surfaces that could generate significant daytime glare, therefore, would not be used. The Proposed Project would include minimal amounts of outdoor security lighting, along with wind turbine-mounted lighting that would flash intermittently to warn aircraft; these new light sources might increase nighttime lighting and in the immediate vicinity. Potential impacts associated with proposed outdoor lighting sources will be addressed as part of the EIR.

2. AGRICULTURE/FOREST

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

<p>a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Portions of the Energy Farm site are designated Prime Farmland, Unique Farmland, and Farmland of Local Importance pursuant to the State Farmland Mapping and Monitoring Program. Development of solar and wind energy facilities in these areas, as well as construction of the Gen-Tie Line would preclude farming in these areas. Effects of converting farmland to non-agricultural uses will be evaluated in the EIR.

<p>b) Conflict with existing zoning for agricultural use, with a designated Agricultural Opportunity Area, or with a Williamson Act contract?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Portions of the Energy Farm site have been used for a variety of agricultural purposes over the last few decades, including grazing, horse breeding/training, and alfalfa farming. The Energy Farm site and most of the Gen-Tie Line are on land zoned A-2-5 (Heavy Agriculture), a classification that provides for renewable energy development as a conditionally permitted use. No part of the Site is under a Williamson Act Contract. The effects of the reduction of the use of land for agricultural activities will be addressed in the EIR.

<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)) or timberland zoned Timberland Production (as defined in Public Resources Code § 4526)?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Site does not contain forest land or timberland zoned for Timberland Production. The Angeles National Forest, the closest forest to the Site is located more than 1 mile south of the Site.

<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See preceding response.

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?

This Project would not directly affect any land outside of the Project limits and since there is no forest land in this area and since this Site is not producing crops or other forms of agriculture that contribute to the agricultural sector of the economy, it would not result in conversion of other agricultural lands or any forest lands. Impacts involving conversion of land designated as Important Farmland by the California Department of Conservation will be evaluated in the EIR, as discussed in the response to item a in this section.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The Site is located in the western Mojave Desert area, where air pollution control is under the jurisdiction of the Antelope Valley Air Quality Management District. Construction activities would contribute additional air pollutant emissions. It is anticipated that any operational emissions that may be generated to support the Project would be outweighed by the emissions reductions realized by the generation of up to 300 MW of clean electrical energy. Further analysis of this impact, with respect to conformance with the Antelope Valley Air Quality Management District regulations, will be conducted as part of an air quality assessment to be included in the EIR.

b) Violate any applicable federal or state air quality standard or contribute substantially to an existing or projected air quality violation (i.e. exceed the State’s criteria for regional significance which is generally (a) 500 dwelling units for residential uses or (b) 40 gross acres, 650,000 square feet of floor area or 1,000 employees for nonresidential uses)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Proposed Project meets at least one of the criteria established to be classified as a “regionally significant project” per the definition provided in Section 15206 of the CEQA Guidelines. Project construction could result in localized concentrations of criteria pollutants that may exceed federal or state air quality standards. Construction emissions will be quantified to determine if applicable federal and/or state pollutant standards could be exceeded and to identify measures to mitigate such impacts.

c) Exceed a South Coast AQMD or Antelope Valley AQMD CEQA significance threshold?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Please refer to the earlier response to items a) and b) in this section.

d) Otherwise 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?

Air quality monitoring has determined that this area is in non-attainment for state air quality standards regarding ozone and particulate matter (PM₁₀), and for federal air quality standards for ozone. Construction of the Proposed Project would contribute additional air pollutant emissions, including emissions of criteria pollutants that would contribute to regional ozone and PM₁₀ levels. It is anticipated that any operational emissions that may be generated to support the Project would be outweighed by the emissions reductions realized by the generation of up to 300 MW of clean electrical energy. Further analysis of this impact, with respect to the significance thresholds established by the Antelope Valley Air Quality Management District, will be conducted as part of an air quality assessment to be included in the EIR.

e) Expose sensitive receptors (e.g., schools, hospitals, parks) to substantial pollutant concentrations due to location near a freeway or heavy industrial use?

There are no existing or planned freeways or heavy industrial uses on or near the Site; thus, there is no threat of exposure to significant pollution concentrations from such sources. The limited number of nearby residences could be temporarily exposed to localized concentrations of criteria pollutants generated during Project construction. Operation of the Energy Farm is not anticipated to generate sufficient emissions such that it could result in exposing sensitive receptors to significant pollution levels. However, any potential impacts to sensitive receptors will be analyzed further in the EIR.

f) Create objectionable odors affecting a substantial number of people?

Odors associated with exhaust from construction vehicles and machinery would occur on a temporary and periodic basis, but would not be noticeable beyond the immediate vicinity of the active construction site. No significant odor impacts during construction are anticipated. The completed solar and wind power facilities would not generate atmospheric emissions and would not involve outdoor activities that could generate odors on- or off-site.

4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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 (DFG) or U.S. Fish and Wildlife Service (USFWS)?

The Site is located in the western Antelope Valley. Approximately 475.8 acres of the Energy Farm (12.8 percent of the total site) occur within the Fairmont & Antelope Buttes Significant Ecological Area (SEA) No. 57. The Portal Ridge–Liebre Mountain SEA No. 58 lies adjacent to the Site’s southwestern boundary across the California Aqueduct, and the Joshua Tree Woodland SEA No. 60 is found 2 miles to the northwest. Other open space areas within the region include: the Antelope Valley California Poppy State Natural Reserve (immediately east and southeast of the Northern Energy Farm and north of the Southern Energy Farm), Angeles National Forest (approximately 1 mile southwest), Desert Pines County Wildlife Sanctuary (approximately 2.5 miles west), Arthur B. Ripley Desert State Park (approximately 2.5 miles west), and Ritter Ridge SEA No. 56 (approximately 10 miles southeast).

Between March 2010 and May 2011, a team of biologists surveyed all portions of the Energy Farm site. Field surveys include focused studies for vegetation communities, wetlands and waters, sensitive plants, and wildlife species. Wildlife studies include focused surveys for burrowing owls, eagles and other raptors, nesting birds, migratory birds, bats, and butterflies. Botanical surveys included detailed vegetation surveys following procedures described by the California Native Plant Society for all observed vegetation types on the Energy Farm Site and focused surveys for sensitive plants. (A copy of the completed Biological Constraints Analysis that contains the results of the biological investigations is on file with the Los Angeles County Department of Regional Planning.) The biologists also reviewed recent aerial photos of the Gen-Tie Line corridor to identify basic habitat characteristics for that Project component.

No special status invertebrate, fish, or amphibian species have been observed on the Site. In 2010, an active Swainson’s hawk nest was identified approximately 4 miles northeast of the Energy Farm site along Highway 138. This nest failed in 2010 and was occupied by ravens in 2011. Golden eagles, protected under the federal Bald and Golden Eagle Protection Act and a California fully protected species, have been documented foraging over the Energy Farm site but no suitable nesting habitat is present. Six additional California bird species of special concern were recorded within the Energy Farm site during surveys conducted in 2010 and 2011: American white pelican (migrating high over the site), northern harrier, burrowing owl, loggerhead shrike, tricolored blackbird, and yellow-headed blackbird. Of these, the shrike and burrowing owl are likely to breed on the Energy Farm site and the tricolored blackbird breeds nearby and forages within the Energy Farm Site; the others are likely transients or winter visitors only. Peregrine falcon, a State fully protected species, was observed during fall surveys; however, no suitable nesting habitat is present on the Energy Farm site. Five bird species on the State watch list were also observed as a winter resident or migrant including: Cooper’s hawk, ferruginous hawk, merlin, prairie falcon, and white-faced ibis. No nests or nesting colonies were observed for any of these five species. No federal- or State-listed mammals have been observed or are likely to occur on the Energy Farm or within the Gen-Tie Line corridor.

Data collected by the United States Fish and Wildlife Service (USFWS) from telemetered California condors indicate that the Site and surrounding portions of the Antelope Valley are not used by the California condor for foraging, nesting, breeding, or any diurnal or nocturnal roosts (USFWS 2009). Furthermore, the Site contains no habitats that are known for condor nesting (Snyder and Snyder 2000). There are no historical records of condor use in this area (Willett 1933), and the Site is located approximately 11 miles south from the nearest limits of U.S. Fish and Wildlife Service-designated Critical Habitat for this species.

One of the three vernal pools on-site (2.27 acres) supports a population of spreading navarretia, a federally threatened plant species. Short-joint beavertail cactus, a California Native Plant Society (CNPS) 1B.2 plant, is also found on ridgetops in perennial grasslands and California buckwheat scrub.

The Project limits potential Energy Farm development areas to approximately 23 percent of the entire Energy Farm 3,708 acres. All of the solar arrays, along with two-thirds of the wind turbines, would be located in the Northern Energy Farm, and the remaining one-third of the wind turbines in the Southern Energy Farm. This concept follows the natural topography, limits total grading, and provides additional open space for wildlife migration between the Liebre Portal Ridge to the south and the Poppy Reserve to the north. Project design features include 342 acres of land for conservation, along with approximately 1,000 acres for open space and wildlife/habitat management, and three, 300-foot-wide wildlife migration corridors. The Southern Energy Farm is designed with a minimal development footprint (construction would disturb approximately 100 acres or about 6.3 percent of that 1,592 acres) to reduce direct impacts to plants and wildlife habitat, and to provide open space and habitat linkages to the north and south.

A Biological Constraints Analysis (“BCA”) has been completed and reviewed by the County’s Significant Ecological Area Technical Advisory Committee (“SEATAC”). In addition, a comprehensive Biota Report will be prepared, in accordance with Los Angeles County SEATAC recommendations, to assess the Project’s potential impacts to sensitive plants and wildlife species observed or which have a potential to occur within the Energy Farm and Gen-Tie Line corridor because of suitable habitat conditions will be included in the EIR.

b) Have a substantial adverse effect on sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, and regulations DFG or USFWS? These communities include Significant Ecological Areas (SEAs) identified in the General Plan, SEA Buffer Areas, and Sensitive Environmental Resource Areas (SERAs) identified in the Coastal Zone Plan.

Approximately 475.8 acres of the occur within the Fairmont & Antelope Buttes SEA No. 57. Of those 475.8 acres, approximately 26.3 acres (5.5 percent) will be within the development envelope of the Northern Energy Farm. Development of two solar arrays and two wind turbines on approximately 26.3 acres that have been altered by irrigated alfalfa farming, occurs within this SEA. The Portal Ridge–Liebre Mountain SEA No. 58 lies adjacent to the Site’s southwestern boundary across the California Aqueduct, and the Joshua Tree Woodland SEA No. 60 is found 2 miles to the northwest. Other open space areas within the region include: the Antelope Valley California Poppy Reserve (immediately southwest of the Site), Angeles National Forest (approximately 1 mile southwest), Desert Pines County Wildlife Sanctuary (approximately 2.5 miles west), Arthur B. Ripley Desert State Park (approximately 2.5 miles west), and Ritter Ridge SEA No. 56 (approximately 10 miles southeast).

Approximately 1,277.5 acres of the Energy Farm site (30.5 percent) is comprised of non-native annual grasslands and agricultural fields and is actively grazed by cattle. A horse ranch occupies a small area in the west-central portion. These vegetation types and land uses are regionally abundant and do not generally support habitat for special status plant and wildlife species. Native annual grasslands are the most extensive vegetation type on the Energy Farm Site, covering 1,021.1 acres (24.3 percent of the Energy Farm site). Native scrub and shrublands, mostly dominated by rubber rabbitbrush, comprise another 896.1 acres (21.4 percent, of the Energy Farm site) and non-native grasslands an additional 836.1 acres (20.0 percent of the Energy Farm site). Native annual forblands comprise 703.9 acres (16.8 percent) and agriculture comprises 441.4 acres (10.5 percent). Disturbed, developed, native perennial grasslands, non-native forblands, native perennial forblands, non-native trees, and all waters comprise less than 5 percent each. Seven special status plant communities have been identified on the Energy Farm site: purple needlegrass grassland (52.2 acres), desert needlegrass grassland (2.3 acres), one-sided bluegrass grasslands (11.2 acres), oak gooseberry thickets (0.8 acre), narrowleaf goldenbush scrub (2.7 acres), southern willow scrub (3.1 acres), and desert olive patches (0.9 acre). Wildflower fields, a locally important vegetation type covering 703.9 acres, are dominated by California poppy and miniature lupine. A portion of the Energy Farm would encroach into these fields. In addition, there are three vernal pools on the Energy Farm site, totaling 2.38 acres. One vernal pool (2.27 acres) supports a population of spreading navarretia, a federally threatened plant species. Short-joint beavertail cactus, a CNPS 1B.2 plant, is also found on ridgetops in perennial grasslands and California buckwheat scrub. The majority of the vegetation within the Gen-Tie Line corridor is non-native annual grasslands; however, there could also be some annual grasslands, native perennial grasslands, and wildflower fields that will be differentiated based on subsequent field verification.

Three broad washes traverse the northern and southeastern portions of the Site (Broad Canyon, Myrick Canyon and Willow Springs Canyon), and a number of smaller ephemeral washes and drainage channels were observed within the Energy Farm site and Gen-Tie Line corridor. The Project would not encroach into the three larger wash areas; however, some of the smaller drainage courses could be altered by project construction. If these natural drainage features contain the elements that qualify as a "Streambed" under the California Fish and Game Code, impacts to such features would require approval of a Streambed Alteration Agreement by the California Department of Fish and Game (CDFG). Such impacts might affect riparian resources or other sensitive communities. Further analysis of such impacts will be included in an EIR.

The Project limits potential Energy Farm development areas to approximately 23 percent of the entire 3,708 acres. All of the solar arrays, along with two-thirds of the wind turbines, would be located in the Northern Energy Farm, and the remaining one-third of the wind turbines in the Southern Energy Farm. This concept follows the natural topography, limits total grading, and provides additional open space for wildlife migration between the Liebre Portal Ridge to the south and the Poppy Reserve to the north. Project design features include 342 acres of land for conservation, along with approximately 1,000 acres for open space and wildlife/habitat management, and three, 300-foot-wide wildlife migration corridors. The Southern Energy Farm is designed with a minimal development footprint (construction would disturb approximately 100 acres or about 6.3 percent of that 1,592 acres) to reduce direct impacts to plants and wildlife habitat, and to provide open space and habitat linkages to the north and south.

A Biological Constraints Analysis ("BCA") has been completed and approved by the County's Significant Ecological Area Technical Advisory Committee ("SEATAC"). A comprehensive Biota Report will be also prepared, in accordance with Los Angeles County SEATAC recommendations, to assess the Project's potential impacts to sensitive natural communities on and adjacent to the Site and will be included in the EIR.

c) Have a substantial adverse effect on federally protected wetlands (including marshes, vernal pools, and coastal wetlands) or waters of the United States, as defined by § 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?

The Site is mostly flat in the west and north, with the remainder comprised of low rolling hills. Three broad washes traverse the northern and southeastern portions of the Site (Broad Canyon, Myrick Canyon and Willow Springs Canyon), and a number of smaller ephemeral washes and drainage channels occur elsewhere within the Energy Farm site and Gen-Tie Line corridor. Field surveys conducted as part of the Biological Constraints Analysis (“BCA”) determined that none of the drainages within the Energy Farm site are hydrologically connected to Waters of the U.S. and are not under the jurisdiction of the U.S. Army Corps of Engineers (ACOE).

Based on the scarcity of trees and water sources that provide shelter and rehydration, the Site is not likely to provide significant stopover points for migrating songbirds. A total of 3.51 acres of wetlands and 31 waterbodies, comprising 8.26 acres (not including portions of the drainage occupied by wetland areas), were identified within the Energy Farm site, as potentially jurisdictional by the ACOE, the California Department of Fish and Game (CDFG), or the Regional Water Quality Control Board (RWQCB). All wetland and waters features were determined to be isolated and, therefore, likely outside of the jurisdiction of the ACOE; however, CDFG and RWQCB jurisdiction is anticipated. A number of surface drainages occur within the Gen-Tie Line corridor; additional field surveys will be required to determine whether construction of that major Project component could impact federal or state jurisdictional water features and if so, to identify associated permitting/ mitigation requirements. This additional research will be included in the EIR.

There are three vernal pools, totaling 2.38 acres, within the Energy Farm site. One vernal pool (2.27 acres) supports a population of spreading navarretia, a federally threatened plant species. Potential impacts to the vernal pool resources and measures to avoid significant impacts will be discussed in the Biota Report to be prepared for the EIR.

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?

The ridges and valleys associated with the Tebachiapi Mountains to the west and northwest provide a primary southwest-northeast wildlife movement corridor of regional significance that bridges the Sierra Nevada and San Gabriel Mountain Ranges. In addition, the broad-front linkage between the San Gabriel Mountains (including Portal Ridge) and the Mojave Desert provide a primary northwest-southeast wildlife corridor running south of the Site. These two corridors may be used by large mammal species moving to and from wintering grounds in the high desert, as well as for summer feeding, denning, and breeding. The Site is not an integral part of either of these primary regional corridor or the secondary linkages associated with these topographic features. There is potential for localized wildlife movement on tertiary corridors between the Energy Farm site and SEA No. 57; however, movement away from these features is constrained by the California Aqueduct just south of the Site, Highway 138 north of the Site, and the general absence of tall vegetation throughout the Antelope Valley. There are no wildlife nurseries on or near the Site.

The Energy Farm site falls entirely within the Antelope Valley (Lancaster) Important Bird Area (IBA) which encompasses the Antelope Valley of the western Mojave Desert in northern Los Angeles County and southern Kern County. The Antelope Valley IBA is experiencing rapid conversion of the wild and agricultural landscape to an urban environment. Within the

IBA, remnant Joshua tree woodlands to the north and east of the Energy Farm site support one of the western-most populations of Le Conte's thrasher (*Toxostoma lecontei*) in the state. The grasslands within the IBA support impressive wintering bird communities, including large number of raptors, large flocks of vesper sparrows (*Poocetes gramineus*), horned larks (*Eremophila alpestris*), mountain bluebirds (*Sialia currucoides*), and mountain plovers (*Charadrius montanus*). Swainson's hawk maintains its southern-most breeding area in the state, mainly in association with the alfalfa fields to the north and east of the Energy Farm site. The IBA falls within the path of a major spring migration route for songbirds, and windbreaks throughout the region host hundreds of vireos, thrushes, and warblers in April and May.

The Project limits potential Energy Farm development areas to approximately 23 percent of the entire Energy Farm's 3,708 acres. All of the solar arrays, along with two-thirds of the wind turbines, would be located in the Northern Energy Farm, and the remaining one-third of the wind turbines in the Southern Energy Farm. This concept follows the natural topography, limits total grading, and provides additional open space for wildlife migration between the Liebre Portal Ridge to the south and the Poppy Reserve to the north. Project design features include 342 acres of land for conservation, along with approximately 1,000 acres for open space and wildlife/habitat management, and three, 300-foot-wide wildlife migration corridors. The Southern Energy Farm is designed with a minimal development footprint (construction would disturb approximately 100 acres or about 6.3 percent of that 1,592 acres) to reduce direct impacts to plants and wildlife habitat, and to provide open space and habitat linkages to the north and south.

Most bird species, including their nests and eggs, are protected under the federal Migratory Bird Treaty Act (MBTA) (1918). Further protection to bird nests, eggs and young, and birds of prey is provided by the California Fish and Game Code. Construction and/or operation of the Proposed Energy Farm could result in impacts to birds or their nests protected by the MBTA, or the abandonment of an active nest by the adult bird. Birds in flight could be injured or killed by wind turbine blades. Potential impacts to birds and bird nests will be evaluated as part of the Biota Report to be prepared as part of the EIR.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5" inch in diameter measured at 4.5 feet above mean natural grade) or otherwise contain oak or other unique native trees (junipers, Joshuas, etc.)?

Biological surveys conducted as part of the project's Biological Constraints Analysis confirmed that oak trees, stands, or woodlands, as well as other unique native trees such as junipers and Joshuas, do not occur within or near the Energy Farm site or Gen-Tie Line corridor.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36) and the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.56, Part 16)?

The State of California's Antelope Valley California Poppy Reserve is adjacent to the northern and eastern sides of the proposed Energy Farm. This reserve is one of the areas protected by the County's Wildflower Reserve regulations, set forth in Title 12, Chapter 12.36 of the Los Angeles County Code. These regulations prohibit animal grazing within a wildflower reserve during the main growing seasons. The Project would develop some of the grazing land within the Energy Farm site, but would also allow for the possibility of animal-based vegetation management such as sheep grazing within the solar arrays. The Project would not conflict with the County Code provisions concerning the Poppy reserve. There are no oak trees on the Site; therefore, provisions of the County's Oak Tree Ordinance do not apply. As discussed in the response to item b), a portion of SEA 57 occurs within the Northern Energy Farm, and approximately 26.3 acres (5.5 percent) of that land, which has been under active cultivation as an irrigated alfalfa field, is within a proposed development envelope. The EIR will address the Project's impacts to biological values in that SEA, as well as the SEA conformance criteria set forth in the County General Plan and the Antelope Valley Area Plan.

g) Conflict with the provisions of an adopted state, regional, or local habitat conservation plan?

Potential impacts to sensitive biological resources within County SEA's 57 and 58 and the Poppy Reserve will be assessed in the EIR, as noted in the previous response to item b) in this section.

5. CULTURAL RESOURCES

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

A preliminary cultural resources investigation was conducted, including a review of records of past surveys for historic resources, a review of records of recorded resources that may occur on or around the Energy Farm site, and field surveys to look for signs of resources that may not have been identified in the past (SRI, July 2010). This research covered approximately 2,300 acres of the Energy Farm development envelope and none of the Gen-Tie Line corridor. Three historical-period resources have been recorded within the 2,300-acre initial survey area: the historic townsite of Fairmont and two historical-period refuse deposits. Some historical-period resources—sites associated with tuff mining related to the construction of the first Los Angeles Aqueduct in the early 20th century—are also located on Fairmont Butte, about one mile east of the Project area.

The site record for the townsite of Fairmont identifies five separate historical-period elements, including a group of several destroyed structures, a school, a tree line, a horse ranch, and an earthen-bermed reservoir. That site record indicates that several buildings were not examined during the recording of the townsite, and it is possible that additional historical-period resources could be present on site. Field surveys identified a historic-period earthen dam and buried pipes that had not been recorded. Project development, as proposed, could potentially impact historic resources, but the scale and significance of such impacts is not currently known.

Shea’s Castle, a 7,000-square-foot stone structure, was built in 1924 as a replica of a medieval Irish castle; it is located on a 512-acre site in the Southern Energy Farm area. Related facilities include a similarly styled stone stable, several outbuildings, and a house. There is also a 3,000-foot dirt runway for small planes (inactive), a dirt track for all terrain vehicle racing and a stone arch dam to hold 7 to 8 acres of storm water runoff. This site includes an artesian well and storage tank, along with electrical infrastructure to supply an all-electrical power system. The Castle site was built for his wife by Richard Peter Shea, a successful real estate developer who made a fortune developing properties in the Hancock Park area of Los Angeles. The Castle site has been associated with entertainment industry celebrities and was used as a backdrop in filming of several movies and television shows. The Proposed Project would not affect the Castle site or any of its structures or other improvements.

There are no structures within the proposed Gen-Tie Line corridor, which follows the alignment of Avenue J, a partially improved road, and the likelihood of uncovering historic resources during excavation for this underground transmission line is considered low. This corridor has not been subject to formal records search or a field survey; therefore, the potential for impacts to significant historic resources in this area cannot be ruled out at this point.

Additional historic research and field surveys will be conducted for the remaining portion of the Energy Farm and Gen-Tie Line corridor as part of the EIR to determine if the Project could result in any impacts to significant historic resources and if so, to identify measures to avoid or mitigate such impacts.

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

In the initial cultural resources survey as noted above, it was determined that a total of 30 archaeological sites and 11 isolated artifacts have been recorded within a 1-mile radius of the 2,300-acre survey area, none of which are listed in the National Register of Historic Places (NRHP) or as a California Historic Landmark (CHL). Three historical-period resources have been recorded within the Northern Energy Farm area. In addition, a preliminary field survey identified 11 prehistoric and historical-period resources within the Northern Energy Farm that had not been previously recorded. Full documentation and recordation of these sites will be completed and included in the EIR. Further investigations of past archaeological survey records, along with field surveys, will be conducted for the remaining portion of the Energy Farm and the Gen-Tie Line corridor, as part of the EIR.

The Fairmont Butte area is a large and well-known group of prehistoric and historical-period sites that lay on and around Fairmont Butte, which is located adjacent to the eastern edge of the Northern Energy Farm area. A majority (seven sites and one isolate) of the previously recorded sites and isolates (10 sites and one isolate) within the surveyed part of the Energy Farm are associated with the Fairmont Buttes archaeological area and include resources that are prehistoric in age (midden deposits, bedrock milling features, and several sites with enigmatic circular rock alignment). These sites were likely food-processing and habitation areas. Some historical-period resources—sites associated with tuff mining related to the construction of the first Los Angeles Aqueduct in the early 20th century—are also located on Antelope Butte, about 1 mile east of the Project area.

As noted above, the initial cultural resources investigations covered approximately 2,300 acres of the Energy Farm site. To date, a review of cultural resources and potential Native American sacred lands and sites within approximately 1,408 acres of the Energy Farm site and the 384-acre Gen-Tie Line Corridor has not been undertaken. The types of previously recorded sites (if any) that may be located within the Proposed Gen-tie Line Corridor are expected to be similar to those found in the initial survey area. Further investigations of past archaeological survey records, consultation with Native American resources, and archaeological field surveys, will be conducted for the remainder of the Site, as part of the EIR.

The Project would set aside 384 acres as conservation land, along with approximately 1,000 acres for open space and wildlife/habitat management and 3,300-foot wide wildlife corridors. Potential Energy Farm development areas are limited to approximately 23 percent of the entire Energy Farm site. These design features could avoid potential impacts to prehistoric resources. Potential impacts to archaeological resources within the proposed limits of development will be assessed in the EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or contain rock formations indicating potential paleontological resources?

Most of the Site is situated on flat-lying areas, which are underlain almost entirely by older and younger alluvium. The potential for fossil remains being encountered by earthwork at depths less than five feet below the current ground surface in areas underlain by younger alluvium is considered to be low. At such shallow depths, any remains likely would be too young to be considered fossilized unless contradicted by the definite local occurrence of fossil remains. At depths greater than 5 feet in these areas and at any depth in areas underlain by older alluvium, the potential for fossil remains being encountered by earthwork at the Site is undetermined, because the region is so poorly known with regard to paleontologic resources. Excavation for construction of foundations for solar panels would be approximately 15 feet deep and wind turbines foundations would be excavated 8 to 15 feet deep. These construction activities and possibly other grading for the Project could potentially uncover buried paleontological resources. Further analysis of this issue will be included in the EIR.

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

The initial Cultural Resources investigations for the 2,300 acres of the Energy Farm site (see response to item a, above), found no evidence of any human burial sites. The remainder of the Energy Farm and the Gen-Tie Line corridor have not been surveyed; therefore, further research to examine those remaining parts of the Site for indications of potential human remains will be conducted as part of the EIR.

6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Comply with Los Angeles County Green Building Standards?(L.A. County Code Title 22, Ch. 22.52, Part 20 and Title 21, § 21.24.440.)

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed 16,000-square-foot (sf) operations and maintenance building exceeds the threshold of 10,000 sf that is subject to compliance with the County's Green Building standards. The entire Project is subject to compliance with other aspects of the County's Green Building Program, pertaining to low impact drainage controls and water conservation in landscaping. Compliance is anticipated, although design specifications have not been completed. Specific building design, low-impact development, and landscaping/irrigation features that achieve or exceed the County's standards will be discussed in the EIR.

b) Involve the inefficient use of energy resources (see Appendix F of the CEQA Guidelines)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Proposed Project will provide a significant benefit to the region's energy efficiency through production and transmission of 300 MW annually of clean, renewable electrical power. On-site operations and maintenance facilities will be powered by electricity produced by on-site wind and/or solar sources, and possibly with natural gas trucked in and stored in a tank. There would be no impact due to inefficient use of energy resources.

7. GEOLOGY AND SOILS

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

Would the project:

a) Be located in an active or potentially active fault zone, Seismic Hazards Zone, or Alquist-Priolo Earthquake Fault Zone, and expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault.

The Site is located in a seismically active region with both active and potentially active faults. An Alquist-Priolo hazard zone crosses the center portion of the Energy Farm site. The San Andreas Fault is located approximately 3 miles south of the Site. Other mapped faults may impact the Site, as well. Further geotechnical investigation and analysis of potential building constraints and related design measures concerning surface fault rupture will be included in the geotechnical report to be prepared as part of the EIR.

ii) Strong seismic ground shaking?

Given this location in a seismically active region and its proximity to the San Andreas Fault, strong seismic ground-shaking at some time in the Project's operating life is something to be considered in the project design. Further analysis of potential ground shaking magnitudes and design measures to prevent significant damage to the proposed energy facilities will be included in the geotechnical report to be prepared as part of the EIR.

iii) Seismic-related ground failure, including liquefaction?

The Background Report for the draft update of the Antelope Valley Area Plan indicates that there are numerous locations within this area that are susceptible to seismically induced liquefaction hazards. A geotechnical investigation and report will be conducted as part of the EIR, which will include evaluation of the surface and subsurface materials, groundwater conditions, and identification of seismic constraints such as liquefaction that may occur on-site.

iv) Landslides?

The Background Report for the draft update of the Antelope Valley Area Plan indicates that earthquake-induced landslides is a seismic hazard that exists throughout many areas of the valley. The steeper portions of the Energy Farm site may be susceptible to landslides, depending on localized soil conditions. The entire Gen-Tie Line corridor is comprised of relatively flat land and is not subject to landslide hazards. A geotechnical investigation and report will be conducted as part of the EIR, which will include an evaluation of the surface and subsurface materials and landslide potential throughout the Energy Farm site. This will support an analysis of proposed wind turbine and solar array locations, relative to potential landslide hazards, and provide a basis to determine the need for design or mitigation measures to prevent significant impacts due to landslides.

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

Proposed grading would affect approximately 870 acres in the Northern Energy Farm and approximately 100 acres in the Southern Energy Farm, where the existing topsoil would be removed and either returned to where it was excavated or relocated within the site as part of fill material. Additional excavation for the Gen-Tie Line would disturb topsoil and expose ground surfaces to erosion. Grading would expose substantial ground surface areas to potential erosion from wind or storm water and site improvements would alter existing drainage patterns and amounts of runoff. Further analysis of potential erosion impacts due to construction activities and developed site conditions will be included in the EIR.

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?

Please refer to the previous responses to items a) and b) herein. A geotechnical investigation and report will be conducted as part of the EIR to identify areas of known or potential ground instability that represent a hazard or design constraint for the proposed energy production and transmission facilities.

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

The occurrence of expansive soils underlying the Site and the scope of any associated mitigation measures will be evaluated as part of the geotechnical study to be prepared and incorporated in the EIR.

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?

Wastewater generated by the existing residence(s) and ranch facilities is discharged into a subsurface septic system on site. Wastewater from the proposed operations and maintenance facilities would be discharged into a new underground septic tank/leach field system. Soil suitability and design parameters for this new system will be addressed in the geotechnical study to be prepared as part of the EIR.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, § 22.56.215) or hillside design standards in the County General Plan Conservation and Open Space Element?

A number of proposed wind turbines/towers would be located on hillsides of varying steepness. Approximately 15 acres in the proposed development areas occur on land with natural slopes of 25 percent or more; therefore, Project compliance with the provisions of the County's hillside development standards and policies will be discussed in the EIR.

8. GREENHOUSE GAS EMISSIONS

	<i>Less Than Significant</i>			
	<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>

Would the project:

a) Generate greenhouse gas (GhGs) emissions, either directly or indirectly, that may have a significant impact on the environment (i.e., on global climate change)? Normally, the significance of the impacts of a project’s GhG emissions should be evaluated as a cumulative impact rather than a project-specific impact.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Project development would require grading with large, diesel-powered machinery to prepare suitable sites for wind turbine towers, solar arrays, energy collection lines, operations and maintenance facilities, substation, vehicular access and outdoor storage/activity yards, as well as the Gen-Tie Line. A variety of combustion-engine driven construction machinery and vehicles would be employed throughout the construction phases that would be fueled with gasoline, diesel, and natural gas, all of which generate greenhouse gases within their emissions. Potential levels of GHG emissions during the construction phases will, therefore, be quantified and assessed in the EIR. Sources of GHG emissions associated with long-term operations of the Proposed Project would include vehicular emissions associated with employee commuting trips and maintenance vehicles, and natural gas consumption. These operational emissions containing greenhouse gases would be minor and would not contribute to significant impacts involving global climate change. By providing a utility-scale source of clean and renewable electricity, this project is expected to avoid significant GHG emissions that could otherwise occur if this energy were generated by traditional thermal energy production processes. A comprehensive quantitative assessment of the project’s GHG-emission impacts and benefits, relative to climate change, will be provided in the EIR.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases including regulations implementing AB 32 of 2006, General Plan policies and implementing actions for GhG emission reduction, and the Los Angeles Regional Climate Action Plan?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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This Project, as a clean, renewable energy power project, would help implement a key statewide and regional strategy to reduce GHG emissions from power generation by providing a utility-scale source of clean electrical power that would not involve any combustion processes. Gaseous emissions generated by construction machinery and vehicles would include GHG emissions, which will be quantified and assessed in the EIR. Project operations would generate only very limited GHG emissions associated with Project operations, which would be largely offset by the GHG benefits of the Project. This project would not conflict with any plans, policies or regulations adopted to reduce GHG emissions. This will be demonstrated through a discussion of how this project will implement key GHG reduction strategies established by state legislation and regional planning programs will be provided in the EIR.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks on-site?

Construction methods and materials for this project would be typical of projects of this type and would involve the use of hazardous materials, such as gasoline, diesel fuel, oils, lubricants, solvents, detergents, degreasers, paints, ethylene glycol, and welding materials/supplies. All hazardous materials would be stored on-site in vessels/containers that are specifically designed for the characteristics of the materials to be stored; as appropriate, and these would be supplemented with secondary containment, if needed.. Transport, storage, use and disposal of hazardous substances during the construction phases would be carefully managed to prevent a significant impact, through implementation of a Hazardous Materials Construction Management Program, to be developed for approval by the Los Angeles County Fire Department. This would define hazardous materials storage areas and methods, accident prevention and response procedures, hazardous waste collection and disposal methods, and all related Contractor responsibilities. The approved program would be implemented throughout the construction phases and would be sufficient to reduce potential impacts to less than significant. Construction phase impacts and proposed mitigation measures will be discussed in the EIR.

Limited quantities of hazardous materials would be used and stored on-site at the Operations and Maintenance (“O & M”) Building for operational and maintenance purposes. These materials would include oils, lubricants, paints, solvents, degreasers and other cleaners, FM200 fire suppressant, and transformer mineral oil. Due to the limited quantities involved, the controlled environment, and the concrete floor of the operations and maintenance building, a spill can be cleaned up without adverse environmental consequences. Natural gas would be stored in a pressurized container, for minor applications such as water heating within the O & M facilities. Maintenance of wind turbines would involve use of common greases and oils that are flammable and thus considered hazardous. Solar panel bearings would also require application of a common, but flammable grease material. A variety of batteries may be stored on site, which could be hazardous if damaged or leaking occurs. Transformers within the substation will be cooled with a fire resistant mineral oil or a synthetic equivalent. Hazard levels associated with these aspects of the Energy Farm are considered low, but will require further analysis. A Hazardous Materials Management Plan (HMMP) would be developed for approval by the Los Angeles County Fire Department, prior to Project operations and would include procedures for hazardous materials handling, use, and storage, emergency response, and spill control and prevention. Implementation of the HMMP would reduce potential operational impacts to less than significant. Storage, use, and disposal of hazardous materials as part of Project operations and the key elements of the Project’s HMMP will be discussed in the EIR.

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

A Phase I Environmental Site Assessment (“Phase I ESA”) has been completed for the Energy Farm portion of the Site, in accordance with the American Society for Testing and Materials (ASTM) Standard Practice E 1527-05, to identify

Recognized Environmental Conditions (“RECs”) onsite.¹ A REC indicates the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The Phase I ESA identified four RECs on the Energy Farm site. An underground storage tank (UST) suspected to have been used for fuel storage, and inactive for more than 20 years, was identified within the Healy Farms, and a small solid waste dump site was identified in a low area formerly used for water storage, just south of the farms. The dump contained solid wastes associated with onsite ranching activities and a variety of municipal solid wastes from neighboring properties. Among these wastes were some drums and smaller containers that may have contained hazardous substances. There was no evidence that the UST had leaked any hazardous materials before it was filled with dirt and buried; however, water testing was conducted at a nearby deep water well and beneath the dump site. Detectable traces of common metals were found in the well testing area, at concentrations below California Maximum Contaminant Levels for drinking water. Groundwater was not encountered to depths of 102 feet beneath the solid waste dump site and it was concluded that the dump site did not result in a release of hazardous substances to groundwater. The dump site was removed and all wastes disposed of in June 2010. Solid waste materials within a former irrigation vault and a small solid waste dump site, estimated at covering just over an acre in surface area, were identified on a residential site in the Southern Energy Farm. The origin and composition of the wastes within the concrete vault are unknown. Wastes identified in the small dump site include inert materials such as scrap metal, wood and plastic, along with a variety of above-ground containers ranging in size from one quart to 55 gallons. Some of the containers were in a degraded condition and evidence of release of paints and petroleum substances was observed. Additional evaluation of these waste materials is necessary to determine whether a release of hazardous materials has occurred and how to most effectively dispose of the kinds of wastes that are identified. This additional evaluation and the recommended mitigation measures will be presented in the EIR.

Several other drips of petroleum product releases associated with ranching and farming equipment were observed on site; however, these were not characterized as RECs. Two Above-Ground Storage Tanks (AST’s) were identified in the Farms complex; these provide fuel for farm machinery and equipment. No signs of leaking or hazardous conditions were observed at these tanks.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 500 feet of sensitive land uses (e.g., homes, schools, hospitals)?

Approximately 10 residential dwelling units are located within 500 feet of the Energy Farm boundaries. Three adjacent properties contain dwelling units located within 500 feet of the Gen-Tie Line corridor. No schools or hospitals are located within 500 feet of Proposed Project. Proposed wind turbines and solar arrays, as well as the Project substation, do not include any equipment or processes that require handling of acutely hazardous materials and would not generate any hazardous or emissions. As discussed in the response to item a), further analysis of the use, storage and disposal of a variety of common hazardous substances as part of regular Project operations will be provided in the EIR. Since the Gen-Tie Line would be placed in underground ducts covered with a cementitious fill material, this Project component would not generate any hazardous emissions or represent a threat involving hazardous materials to any adjacent land uses.

¹ KTA Associates, Inc., Phase I Environmental Site Assessment for the Fairmont Project in Southern California, November 9, 2009, and KTA Associates, Inc. Phase I Environmental Site Assessment for the Wildflower Project in Southern California, May 18, 2011.

Public safety issues related to wind electrical generation could arise from tower or rotor failure if wind turbines experience excess speed, material fatigue, excessive stresses, or vibration from seismic ground shaking causing a rotor blade to crack or dislocate from a turbine tower. To prevent potential hazards to Energy Farm personnel and individuals in the vicinity of the Site, the Project is designed with setbacks for wind turbines and associated facilities from residences, roads, property lines, and other features. For example, wind turbines would be setback a minimum of 0.25 mile (1,320 feet) from any non-participating off-site residence and at least the overall height of the tower plus the fully extended blade from any public street. Based on current 3.0-MW turbine technology, this distance is approximately 498 feet. Solar PV arrays and ancillary facilities involve a low hazard level from potential electrical fires involving electrical circuitry. In addition to compliance with Los Angeles County Fire Department regulations for design and operations of the solar facilities, all arrays would be set back at least 50 feet from any side or rear property line, public street, public access, utility easement, or pedestrian easement and at least 50 feet from any off-site residence or other structure. With the proposed setback standards, adjacent land uses would not be exposed to significant hazards associated with the placement of wind turbines or solar PV arrays. Nonetheless, this issue will be further discussed in the EIR.

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

A search of available environmental regulatory databases for sites of concern (SOCs) was conducted the ASTM E-1527-05 standard, to screen for potential sources of contamination or activities of environmental concern within the Energy Farm and a 1-mile area surrounding the Site. No SOCs were found in the search of available (“reasonably ascertainable”) government records. A similar records search has not been conducted for the Gen-Tie Line corridor; therefore, this research will be conducted and included in the EIR.

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 for people residing or working in the project area?

The Proposed Energy Farm is not located within an airport land use plan or within 2 miles of an airport.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

The eastern terminus of the Proposed Gen-tie Line (only for the SCE transmission line interconnection option) is located approximately one mile southwest of the Bobunk’s Airpark Airport, a privately owned dirt airstrip with two runways. The Project would not be affected by and would not affect air traffic associated with that private airstrip. There is an inactive private landing strip within the Shea’s Castle property in the Southern Energy Farm. This would not be activated for any Project-related operations.

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

Emergency access to and in the vicinity of the Site could be adversely affected during construction activities. A traffic impact study will be prepared to quantify estimated construction traffic volumes and distribution patterns, and to consider the effects of oversized vehicles hauling large containers of wind turbines and solar field components, as well as large construction machines such as cranes. A Construction Traffic Management Plan will be developed, including provisions to maintain sufficient access by emergency vehicles during Project construction. The traffic impact study and the recommended Construction Traffic Management Plan will be included in the EIR.

During operations, emergency access to and in the vicinity of the Project area could potentially be affected by wildfires or flooding. The proposed Project would have established plans and procedures for responding to emergency situations, including potential disruption of emergency access during wildfires or localized flooding. Since the operating solar and wind generation facilities would not involve regular truck traffic and small volumes of commuter traffic for the 15 to 20 on-site personnel, it would not interfere with emergency response efforts utilizing State Highway 138, Lancaster Road or local streets. The Healy Farms has not been included in any emergency response or evacuation plans in the past, and this Site has not been identified as a key resource in any such plans. This project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

h) Expose people or structures to a significant risk of loss, injury or death involving fires, because the project is located:

See discussion below

i) in a Very High Fire Hazard Severity Zones (Zone 4)?

The southern portion of the Energy Farm site, generally south of Lancaster Road, is classified by the County within a High Fire Hazard Severity Zone. A moderate fire hazard zone occurs along the southern edge of Lancaster Road, just east of the existing Healy Farm facilities. Development of the proposed energy farm will alter several hundred acres of existing surface topography and vegetation and will reduce much of the flammable characteristics of this landscape; however, the extensive remaining open space on and surrounding the Site will continue to exhibit wildland fire hazards. The Project will be designed in accordance with the County's vegetation management and fuel modification standards for development in a wildland fire hazard area, to minimize such hazards. Assessment of existing and post-development fire hazards will be included in the EIR.

ii) in a high fire hazard area with inadequate access?

Lancaster Road and 170 St. SW provide public vehicular access to and through the Site. Both are considered adequate to carry a range of fire trucks and emergency response vehicles in the event of a wildfire. The 23 miles of new roads constructed for the project will also greatly enhance access across the site for possible firefighting operations.

iii) in an area with inadequate water and pressure to meet fire flow hazards?

Private, on-site water wells are the only water source available to the Site and have been adequate to support the hay farming, horse ranching, and residential uses that have occurred here in the past. The Project is being designed to meet all applicable standards for water flow and pressure established by the County Fire Department. Current plans include a 56,000-gallon water storage tank, an additional water well, a duplex fire pump assembly, and two fire hydrants to be installed near the planned operations and maintenance building in the Proposed Energy Farm. Adequate water pressure must be demonstrated to verify compliance with Fire Department requirements. A 70,000-gallon water storage tank would be built within the Healy Farms area, to provide a water supply for semi-annual solar panel washing. This could potentially provide a supplemental source of water for fire suppression on site. Additional analysis of the proposed water supply and flows will be conducted, in consultation with the County Fire Department, and included in the EIR.

iv) in proximity to land uses that have the potential for dangerous fire hazard (such as refineries, flammables, and explosives manufacturing)?

The surrounding land is sparsely mostly undeveloped, with several scattered residences, a church, the Fairmont Water Reservoir, and the California Aqueduct. None of those uses represent a dangerous fire hazard.

10. HYDROLOGY AND WATER QUALITY

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Construction activities would involve grading and ground surface alterations which could expose soils to potential erosive forces of wind or storm water. A variety of construction materials would be stored on site and some of these could include constituents that could impact surface water quality conditions, such as fuels, lubricants, solvents, coatings, etc. Without proper construction controls, loose sediments and a variety of construction materials could be captured within Site runoff and potentially threaten on-site water quality or downstream receiving waters. Construction activities would be conducted in accordance with the water quality control measures required for a General Construction Permit (“GCP”), issued by the Lobantan Regional Water Quality Control Board, to prevent construction discharges that could violate water quality standards. Further discussion of the GCP requirements and anticipated construction period water quality control measures will be provided in the EIR.

Impervious surfaces would increase due to site development, including compacted internal roads, building pads and buildings for operations and maintenance facilities, and pad areas for solar arrays and wind towers. As a result, there could be an increase in site runoff during rain storm events, compared to current conditions. In the operations and maintenance site, there could be a variety of machinery, materials, supplies, including liquid and solid substances, within the laydown/ storage yard, during periods when wind turbines and solar arrays are being assembled and maintained. If there is improper storage and cover of such items, or if there are accidental spills of any hazardous materials, there could be impacts to surface water quality constituents. A long-term water quality management plan would be developed, in accordance with the countywide SUSMP, to ensure that the developed site runoff does not generate water pollution impacts or violate any water quality standards. Further discussion of potential sources of water pollutants in developed site runoff and best management practices to be incorporated into the project design to avoid significant water quality impacts, will be provided in the EIR.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Water demands for the Energy Farm would occur primarily at the operations and maintenance building(s), along with semi-annual washing of the solar panels, and water storage for emergency fire suppression needs. Total water demand is expected to be lower than the historical demand associated with the ranching/ hay farming that has occurred for the last several decades. Water supply for the Project would be from an existing deep well (>1,000 feet) within the ranch compound, and/ or from a new well that may be drilled within the operations and maintenance area. Significant impacts to the groundwater table are not anticipated; however, analysis of the project’s total water demand and impact on local groundwater supply sources will be provided in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

There are no rivers on or adjacent to the Site. The Project is being designed to control runoff from developed areas without a substantial alteration to the existing site drainage patterns. No development would be located within the segments of the three broad washes that traverse edges of the Energy Farm site, and no development would occur within any known flood hazard area. The proposed grading plan would alter existing drainage conditions on-site, including alterations to ephemeral drainages. A Hydrology Study will be prepared to evaluate pre- and post-development surface hydrology and to identify design measures to prevent on or off-site potential siltation or erosion impacts associated with changes in drainage conditions. Results of this hydrology study will be discussed in the EIR.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

There are no rivers on or adjacent to the Site. The Project is being designed to control runoff from developed areas without a substantial alteration to the existing site drainage patterns. The proposed grading plan would alter existing drainage patterns on-site, including alterations to ephemeral drainages. A Hydrology Study will be prepared to evaluate pre- and post-development surface hydrology and to identify design measures to prevent on- or off-site potential flooding impacts associated with changes in volumes of site runoff. Results of this hydrology study will be discussed in the EIR.

e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

There are no public storm water drainage systems or private, community-scale systems that collect storm water runoff from the Energy Farm, and none are planned. No impact to storm water drainage systems is anticipated. Nonetheless, changes in site runoff and a discussion of the proposed on-site drainage network will be discussed in the EIR.

f) Generate construction or post-construction runoff that would violate applicable storm water NPDES permits or otherwise significantly affect surface water or groundwater quality?

The Project will be designed to comply with applicable NPDES Permits, and as such, violations of such permit conditions are not expected. Potential water quality impacts and measures to avoid significant impacts during construction and as a result of the developed site conditions will be evaluated in the EIR. Please refer to the previous response to item a) herein.

g) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84 and Title 22, Ch. 22.52)?

A conceptual drainage plan is being developed for the proposed project, in accordance with the provisions of the County's Low Impact Development Ordinance (LIDO) and conflicts are not anticipated. Nonetheless, this plan and its LID compliance measures will be described in the EIR.

h) Generate construction or post-construction runoff that would violate applicable storm water NPDES permits or otherwise significantly affect surface water or groundwater quality?

The Project will be designed to comply with applicable NPDES Permits, and as such, violations of such permit conditions are not expected. Potential water quality impacts and measures to avoid significant impacts during construction and as a result of the developed site conditions will be evaluated in the EIR. Please refer to the previous response to item a) herein.

i) Result in point or nonpoint source pollutant discharges into State Water Resources Control Board-designated Areas of Special Biological Significance?

"Areas of Special Biological Significance" is a formal designation reserved for ocean waters, which do not occur on or near the Site. The State Water Resources Board also created a "Preservation of Biological Habitats of Special Significance" (BIOL) classification, which allows the regional boards to identify other beneficial waters as areas or habitats requiring special protection. The Site is located within the jurisdiction of the Lahontan Regional Water Quality Control Board, which administers statewide water quality regulations for point and nonpoint sources of water pollution. Within the Lahontan region, BIOL-designated areas include some watercourses, lakes, and wetlands to protect unique combinations of plants and/or wildlife species. There are no BIOL-designated areas within the Antelope Hydrologic Unit in which the Site is located,² therefore, this Project would have no impacts on such areas.

j) Use septic tanks or other private sewage disposal system in areas with known septic tank limitations or in close proximity to a drainage course?

Wastewater from the existing ranch facilities is currently disposed of with an on-site, underground septic system. Los Angeles County Department of Public Health records indicate this was installed in accordance with a permit for a 1,000-gallon system issued in 1974. It is located within the ranch compound, near the home and trailers. Proposed operations and maintenance facilities would discharge wastewater into a new subsurface septic tank/leach field system. Wastewater discharges from the operations and maintenance facility would consist of similar kinds of gray water and black water currently discharged from the ranch facilities. The proposed operations and maintenance site is relatively flat, and there are no drainage courses in that area. Soil suitability for an underground wastewater disposal system and measures to prevent groundwater quality impacts will be discussed in the EIR.

² Water Quality Control Plan for the Lahontan Region, Table 2-1. Beneficial Uses of Surface Water of the Lahontan Region.

k) Otherwise substantially degrade water quality?

This project does not include any point sources of water discharges that could degrade water quality. Potential effects from non-point sources as a result of construction and in the fully developed conditions will be evaluated in the EIR, as noted in prior responses.

l) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or within a floodway or floodplain?

No housing or other residential uses are included in the proposed project; therefore, there would be no impact involving placement of housing within either of these flood hazard areas.

m) Place structures, which would impede or redirect flood flows, within a 100-year flood hazard area, floodway, or floodplain?

Part of the northern edge and part of the southeastern corner of the Proposed Energy Farm are located within a 100-year flood plain established by the Federal Emergency Management Agency (FEMA). These same areas are identified as Floodplain Management Areas in the Antelope Valley Area Plan's Hazards and Resources Map. Proposed solar arrays and wind turbines would be located outside of those flood hazard zones. The site plan is designed to avoid development within the two flood hazard zones that affect the northern edge of the Site and a portion of the eastern edge of the Site. This will be confirmed as part of the analysis conducted in the Hydrology Study to be prepared for the EIR.

n) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

There are no levees or dams in this area and this Site is not within any known inundation areas from such facilities.

o) Place structures in areas subject to inundation by seiche, tsunami, or mudflow?

There are no natural surface water bodies in this area that could overflow onto the energy farm or transmission line corridor as a result of seismically-induced seiche conditions. The Fairmont Reservoir is located approximately 0.35 mile (1,800+ feet) west of the southwestern corner of the Site, at an elevation approximately 100 feet higher than the nearest edge of the Energy Farm site. Intervening topography slopes from the reservoir toward the Site. If it were full and there was a strong enough earthquake event to generate seiche conditions at the reservoir, it is considered unlikely that reservoir spillover water would inundate any of the proposed energy farm facilities, due to the distance involved and because the California Aqueduct lies between the reservoir and any proposed Project improvements, and thus would intercept the spillover. Located in the "upper desert" region of northern Los Angeles County, there is no threat of tsunami conditions at the Site. The potential for mudflow risks associated with heavy storm runoff from local hillsides and drainages will be evaluated in a geotechnical study and hydrology report to be prepared and incorporated into the EIR.

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Physically divide an established community?

Much of the Northern Energy Farm site has been operated as a private horse ranch and hay farm for the last several decades, and it is surrounded by primarily undeveloped lands, with some scattered residences, a church and water storage/transmission facilities. No physical components of a broader community structure occur around the Energy Farm site. Thus, this Project would not physically divide an established community.

b) Be inconsistent with the plan designations of the subject property? Applicable plans include: the County General Plan, County specific plans, County local coastal plans, County area plans, County community/neighborhood plans, or Community Standards Districts.

The majority of the Energy Farm and Gen-tie Line corridor is designated in the Los Angeles County Antelope Valley General Plan as N1-Non-Urban (0.5 du/ac) and is zoned A-2-5 (Heavy Agriculture), a designation and zoning that allows for renewable energy projects as conditionally permitted uses. In addition, portions within the northern, central, and eastern portions of the Proposed Energy Farm are located within the Fairmont & Antelope Buttes SEA No. 57.

The County of Los Angeles is currently in the process of updating the Antelope Valley Areawide Plan, known as the "Town and Country Plan." According to the June 1, 2010, Preliminary Draft Land Use Map, the Proposed Energy Farm will be primarily located within the Rural Land ("RL") designation, with residential densities ranging from 1 du/10 acres to 1 du/40 acres.

Within Los Angeles County, the Gen-Tie Line corridor will be located in RL 20 and Rural Land 10 (RL 10) land use designations. The RL 10 designation allows a maximum residential density of 1 du/10 acres and a maximum FAR of 0.5. The eastern 1.5 miles of the Gen-Tie Line corridor is located within the City of Lancaster, and is designated in the Lancaster General Plan mostly as NU (Non-Urban Residential, 0.4–2.0 du/acre) and is zoned RR-2.5 (Rural Residential, 1 du/2.5 acres). A small segment is designated in the City's General Plan as UR Urban Residential (2.1–6.5 du/acre) with a Specific Plan overlay.

This Project would not conflict with the County's existing or proposed Area Plan designations; however, it would require the issuance of a Conditional Use Permit (CUP) for construction of the proposed up to 300-MW renewable energy project in an agricultural zone; for grading (cut and fill) of approximately 4,145,200 cubic-yards of soil; and for development within a County-designated Significant Ecological Area 57 ("SEA No. 57"). Project consistency with the planning policies for SEA No. 57 and with the County's existing and proposed land use policies for the Fairmont area will be addressed in the EIR.

Construction of the segment of the Gen-Tie Line within the City of Lancaster would not conflict with the City's land use plans and policies in that area; however, it may require some form of land use approval or construction permit. This will be determined as part of the land use analysis conducted for the EIR

c) Be inconsistent with the zoning designation of the subject property?

As discussed in the preceding response, the Energy Farm and Gen-Tie Line would not conflict with County of Los Angeles or City of Lancaster zoning provisions, but requires a Conditional Use Permit process for the Los Angeles County portion of the Site, to ensure the Project is compatible with surrounding land uses and result in minimal environmental harm. As such, the EIR will include a discussion of the Project's consistency with local land use policies and regulations, including the applicable zone district regulations.

d) Conflict with Hillside Management Criteria, SEA Conformance Criteria, or other applicable land use criteria?

The Project's development footprint occurs within approximately 26.3 acres (5.5 percent) of the Site area within the Fairmont & Antelope Buttes SEA No. 57 (a total of 475.8 acres, or 12.8 percent, of the total Project Site is located within the SEA), and also includes approximately 15 acres on land with natural slopes of 25 percent or greater. Compliance with the SEA Conformance Criteria and the Hillside Management criteria will be evaluated in the EIR.

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Phase I ESA did not identify any mining, oil or gas wells on or near the Energy Farm site, and there is no evidence of any prior mining on site. According to Map 3-1 of the Antelope Valley General Plan Update—Background Report, the Site is not designated as a mineral resource area by the County.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Please refer to the preceding response.

13. NOISE

	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>			

Would the project result in:

a) Exposure of persons to, or generation of, noise levels in excess of standards established in the County noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08) or the General Plan Noise Element?

When fully developed and operational, the proposed energy farm would employ 15 to 20 people on a daily basis. For the most part, these people would work inside the operations and maintenance building and would periodically travel around the Site for routine monitoring and maintenance activities. There are few noise sources in this sparsely settled rural area, and future workers on-site would not be exposed to significant noise levels. The Proposed Project would generate different kinds of noise than presently occur on site. During construction, noise would be generated by a variety of machinery and vehicles, with a range of noise levels, depending on the types and numbers of machines and vehicles and their locations. During operations, noise sources would include street traffic associated with on-site employee commute trips, wind rotors turning, activities in the outdoor laydown/ storage yard, vehicles arriving and departing within the on-site parking lot serving the Operations and Maintenance building, and periodic maintenance activities within the solar arrays and at wind turbines. Project design features include minimum setbacks for all wind turbines, of at least one-quarter mile from any non-participating off-site residence or other noise-sensitive land use, to reduce potential noise impacts. A noise study will be prepared for the EIR, to evaluate the potential construction and operational noise impacts of the Project, and to determine whether any surrounding land uses noise levels generated by this Project that exceed the County’s noise ordinance or General Plan Noise Element standards.

b) Exposure of sensitive receptors (e.g., schools, hospitals, senior citizen facilities) to excessive noise levels?

Sensitive noise receptors in the area of the Energy Farm include several scattered residences and one church, but there are no sensitive receptors such as schools, hospitals, senior citizen facilities, libraries, or similar land uses located in the Project area. During construction, the nearest residences might be exposed to periodically high levels of noise, depending on the type and number of machinery and vehicles that are active at a particular time and where the construction activity occurs. Temporary construction noise impacts will be evaluated as part of the noise study to be included in the EIR. Long-term noise impacts from this Project are not anticipated to significantly affect any sensitive receptors; however, further assessment of potential long-term noise impacts will be included in the EIR.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from parking areas?

Long-term operational activity would result in some new noise sources that are not expected to result in significant increases in ambient noise levels. Nonetheless, as discussed in the response to item b) above, a noise study evaluating the change in noise levels associated with the long-term project operations will be prepared for the EIR to determine whether there could be a substantial permanent increase in off-site noise levels.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project, including noise from amplified sound systems?

During the construction phases, a variety of machinery, tools, and vehicles will be active. Noise levels associated with construction activities will vary, based on the range of machinery and vehicles involved and the intensity level of the construction activity. There might be some construction work that generates substantial increases in local noise levels that could negatively affect the nearest residential uses. Construction phase noise impacts will be evaluated in a noise study, as part of the EIR.

No outdoor sound systems are proposed; however, there will be regular maintenance activities at the solar arrays and wind turbines involving large equipment that would generate noise for short-time periods. Noise impacts associated with periodic and ongoing maintenance work will be evaluated in the noise study prepared for the EIR.

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 expose people residing or working in the project area to excessive noise levels?

There are no public airports within 2 miles, and the proposed energy farm and the Gen-Tie Line corridor are not within any airport land use plan area.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The eastern terminus of the Gen-tie Line (only for the SCE transmission line interconnection option) is located approximately 1 mile southwest of the Bobunk's Airpark Airport, a privately owned dirt airstrip with two runways. There is minimal air traffic associated with this airstrip and, therefore, insignificant aircraft noise from this facility. Future workers at the Energy Farm would not be exposed to excessive noise levels from this private airstrip.

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

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

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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When fully operational, the proposed solar and wind energy generation facilities would produce enough electricity to power more than 114,000 homes. The electricity would be transmitted to the regional electric grid for distribution to electricity consumers. The Project would not directly induce any population growth, but it would indirectly support continued regional growth that relies on electricity for many needs. Decisions as to which areas will receive the electricity generated by this Project is beyond the control of this Project, and future growth that would benefit from this renewable energy source would occur when and where it is approved by the local governmental agency with land use decision-making powers. A total of 23 miles of private, internal access roads are proposed within the Energy Farm. These would be graded and compacted, but not paved. These would provide access to and within solar arrays, wind turbines, the operations and maintenance site and the substation. As such, these internal circulation elements would not induce growth by providing additional capacity for the local or regional transportation network. However the issue will be further studied in the EIR.

b) Cumulatively exceed official regional or local population projections?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Since this project would have no residential uses and a small workforce of about 15 to 20 people on site at any time, it would not materially affect local or regional population projections.

c) Displace existing housing, especially affordable housing?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The on-site housing on-site will remain in place with the Project.

d) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As noted in the preceding response, existing housing on-site would remain in place. Thus, the Project would not displace anyone.

15. PUBLIC SERVICES

	<i>Less Than Significant</i>	<i>Less Than Significant</i>	<i>No Impact</i>
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Impact</i>	

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

Fire protection?

Fire protection services in the project area are provided mainly by the 11 fire stations that comprise Battalion 11 of the County of Los Angeles Fire Department. Battalion 11 headquarters is in Lancaster. The southern portion of the Energy Farm site, generally south of Lancaster Road, is classified by the County within a High Fire Hazard Severity Zone. A moderate fire hazard zone occurs along the southern edge of Lancaster Road, just east of the existing Healy Farm facilities.. During the construction phases, there could be more than 330 workers on site on a given day, along with a variety of machinery, construction supplies and materials, and fuels and other hazardous materials on-site. It is possible that construction activities could accidentally ignite a fire that could spread to off-site land uses. It is also possible that a wildfire off-site could impact the Site. At various times in the construction process, there might be a need for temporary traffic controls to ensure through traffic and emergency access is maintained. The need for specific mitigation measures for the construction phases will be discussed in the EIR. Given that the Site is located in a landscape susceptible to wildfires, the developed and operational solar, wind, operations/maintenance, and substation facilities may require protection from wildfires at some time in the project's operating life. Project design features will include special measures such as a fuel modification plan and vegetation management, to reduce the threat of wildfire within the developed portions of the Energy Farm; this will be addressed in the EIR. Response times from LA County Fire Stations might be adversely affected during peak construction traffic periods, when the most oversized vehicles are traveling to the Site; this potential impact will be addressed in the traffic study to be prepared for the EIR. Fire Department response times would not be adversely affected by the small workforce traffic associated with this Project. Fire suppression resources would not be impacted by the underground Gen-Tie Line, which would not be exposed to potential wildland fire or other ground surface based fires. The need for fire suppression resources to protect proposed structures and energy facilities, and impacts related to meeting those needs will be evaluated in the EIR.

Sheriff protection?

The nearest sheriff station is located in the City of Lancaster, approximately 17 miles east of the Proposed Energy Farm. During the construction phases, on-site storage of machinery, supplies, materials, vehicles, etc. could be targets of theft or vandalism, possibly requiring response from the Sheriff Department. Demand for Sheriff response would be reduced through private on-site security measures to be implemented throughout construction by the Project developer. Specific security measures will be identified in construction plans and approved by the Sheriff Department prior to the issuance of grading permits. This routine procedure would reduce demand for Sheriff resources during construction to less than significant. As discussed in the preceding response, there could be an adverse effect on emergency response times during periods of peak construction traffic involving oversized vehicles that might restrict normal traffic flows. This potential impact will be addressed in the traffic study to be prepared for the EIR.

The fully developed and operational energy farm would be privately operated and maintained by 15 to 20 people on a daily basis that would represent a secure presence during normal business hours. Low-level security lighting will be provided at the

operations and maintenance and substation sites. Given the fixed nature and size of the solar arrays, wind turbines, and substation, opportunity for theft of those is negligible. Periodic maintenance activities at solar arrays and wind turbines would be handled by a small work crew and, in the case of wind turbines, some large machinery. This work is not likely to require Sheriff Department resources for surveillance and security. Public access would be restricted by fencing around the solar arrays, substation and operations and maintenance site, to minimize threats of burglary or vandalism and to protect people from accidental harm. The Project includes new public recreation trails, for pedestrian and equestrian use. This occasional recreational trail usage is not expected to result in circumstances that would require an increase in demand for Sheriff Department resources. The underground Gen-Tie Line would have no impact on Sheriff services. This project is not expected to place a significant demand on the County Sheriff Department; nevertheless, a discussion of proposed on-site security measures will be provided in the EIR.

Schools?

Since this project consists entirely of energy generation and transmission facilities, with a small on-site workforce, it would not add any students to the local school district and this project would have no effect on public schools.

Parks?

This renewable energy generation and transmission project would have no demands for public park services or public parkland and would not encroach into any existing or planned parkland; therefore, no impact is anticipated. Other potential effects on public parkland, i.e. the Poppy Reserve, will be addressed in the EIR with respect to Aesthetics and Land Use.

Libraries?

This renewable energy generation and transmission project would have no demands for library services and would have no impact with respect to levels of service for parks and recreation resources.

Other public facilities?

This project would not require staffing resources or facilities from any other kinds of public services.

16. RECREATION

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

This renewable energy generation and transmission project would have no demands for public park services or public parkland and would not encroach into any existing or planned parkland.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Approximately 6.7 miles of new pedestrian/equestrian trails are included in the plan for the Energy Farm, to implement planned segments of the County’s Backbone Trail Network that could potentially link to recreation areas on the Fairmont and Antelope Buttes, and to provide opportunities for views of scenic areas visible from the Site, such as the Poppy Reserve and distant mountains. Construction of these trails would involve some limited grading outside of Energy Farm development areas, but this is not expected to result in significant environmental impacts. Potential effects of trail construction and use on wildlife habitat will be addressed as part of the Biota Report to be included in the EIR.

c) Is the project consistent with the Department of Parks and Recreation Strategic Asset Management Plan for 2020 (SAMP) and the County General Plan standards for the provision of parkland?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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This renewable energy production/transmission project is not subject to any of the standards concerning parkland that are set forth in the SAMP or General Plan.

d) Would the project interfere with regional open space connectivity?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Healy Farms has functioned as a private horse-breeding and training ranch, with alfalfa and hay farming, since the mid-1950s. This land is adjacent to the Antelope Valley California Poppy Reserve, a regionally significant open space area. This Site does not currently provide any public access to regional recreational open spaces, including the adjacent Antelope Valley California Poppy Reserve. There are planned elements of the County’s Backbone Trail network that would link the Energy Farm to the Poppy Reserve and recreational trails to the north and south, but these remain unbuilt at the present time. The Project includes approximately 6.7 miles of pedestrian/equestrian trails that incorporate segments of the County’s planned trail network. Trail routing and design features that would provide connections through the Energy Farm to adjacent open spaces would have beneficial effects that will be discussed in the EIR. The Gen-Tie Line does not traverse nor connect regional recreational open space resources and as such, would have no effect on regional open space connectivity.

17. TRANSPORTATION/TRAFFIC

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

Would the project:

a) Conflict with an applicable plan, ordinance, or policy establishing a measure of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and non-motorized travel, and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? Measures of performance effectiveness include those found in the most up-to-date Southern California Association of Governments (SCAG) Regional Transportation Plan, County Congestion Management Plan, and County General Plan Mobility Element.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Relatively minor volumes of vehicular traffic are currently generated by activities at the Healy Farms, where horse ranching activities have diminished from historic levels. The Proposed Project would generate higher traffic volumes during the construction phases, comprised of varying numbers of heavy-, medium-, and light-duty trucks and passenger vehicles. The mix and volumes of traffic will depend upon the nature of the activities underway; for example, heavy truck traffic would occur primarily during short time periods when deliveries of large machinery and materials are required. Trucks would also travel to/from the Site regularly to haul away waste materials. Light duty trucks and passenger vehicle traffic would vary depending upon the number and size of construction crews that are active at a particular time. Construction traffic could potentially result in increased travel on local streets and highways, including State Highway 138, Lancaster Road and 170th St. W, the primary routes of access to the Site. Increased traffic during peak hours is of particular concern. An assessment of construction phase traffic will be conducted to determine whether there could be periods of significant congestion impact that would result in declined performance of the affected portions of the transportation network. This study will also identify key parameters for a construction traffic management plan to ensure that impacts to the surrounding travel network are minimized.

The fully developed Project would generate daily vehicular traffic throughout the work week, consisting of commute trips in private automobiles by the 15 to 20 employees at the operations and maintenance facilities. Periodically, there would be additional traffic, including a variety of trucks associated with special maintenance activities, such as cleaning solar panels and repairs and maintenance of wind turbines. This project would not affect other transportation systems involving walking, biking, bus, or train. While long-term traffic impacts are not expected to result in lower performance standards on the surrounding street and highway network, a traffic impact analysis will be prepared as part of the EIR to determine what the level of impact would be and to identify mitigation measures, if needed, to maintain performance standards.

b) Exceed the County Congestion Management Plan (CMP) Transportation Impact Analysis thresholds?

Please refer to the following response to item c).

c) Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the CMP, for designated roads or highways (50 peak hour vehicles added by project traffic to a CMP highway system intersection or 150 peak hour trips added by project traffic to a mainline freeway link)?

A traffic impact study will be prepared for the EIR to determine the volume of peak-hour trips that would be generated during construction and by the fully developed and operational Project and to assess whether those trips would exceed the thresholds of significance for the nearest element of the CMP network, State Route 138.

d) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

With full extended blades, wind turbines would reach heights of approximately 500 feet, which could potentially affect lower level air traffic patterns. Further analysis of potential effects of wind towers relative to air traffic patterns, and assessment of consistency with applicable Federal Aviation Administration (FAA) safety standards will be included in the EIR. Solar panel arrays would be 15 feet in height and would not affect any air traffic. The proposed operations and maintenance building would be approximately 22 feet high and would not affect any air traffic. Substation structures would not exceed a height of 40 feet and would not affect air traffic. Structures within a potential LADWP switchyard for that transmission line interconnection would not exceed 30 feet in height and would have no effect on air traffic. A cable riser structure for an interconnection with the SCE Antelope Valley Substation would include a steel monopole that could reach a height of 100 to 120 feet; therefore, this will also be evaluated with respect to potential effects on air traffic. The underground Gen-tie Line would have no effect on air traffic.

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

Oversized truck loads for delivery of the wind turbine components would occur during the construction phases. The potential for these oversized loads to create hazardous traffic conditions will be evaluated as part of the traffic study to be incorporated into the EIR. The Proposed Project would not change any existing public street alignments. A new driveway connection is proposed on Munz Ranch Road for access to the substation. This would be designed to be a perpendicular connection and would meet all County design standards for driveway connections to public streets. This driveway would generate minimal traffic on an infrequent basis and would not represent a traffic hazard. Vehicular access would also be created for the proposed operations and maintenance center, including three driveways on 160th St. W and two on Avenue H. Each of these would be oriented perpendicular to the public street and designed in accordance with County specifications. There is minimal traffic on both streets at the present time, and the Project would add minor volumes. The driveways associated with the O&M site would not represent a traffic hazard.

No hazardous traffic conditions are associated with the construction or operation of the Proposed Gen-tie Line.

f) Result in inadequate emergency access?

As discussed in the response to item a) and b) in this section, construction traffic, especially during periods where oversized vehicles are involved, could impede traffic flow along affected routes, including Highway 138, which could adversely affect emergency vehicle response. Further analysis of the characteristics of the construction vehicle fleet at different times and potential need for lane closures or other through traffic restrictions will be conducted as part of the traffic impact study to be included in the EIR. A construction traffic management plan will also be developed as part of the traffic study, to minimize impacts on through travel and to ensure maintenance of adequate access by emergency vehicles. Construction work within the Proposed Energy Farm area would not require closure of any public streets and would not affect emergency access to this Site or surrounding properties. Excavation work for the underground Gen-tie Line along Avenue J might result in some temporary closure of a traffic lane along that street. This street carries relatively low volumes of traffic and the affected segment provides access to four residences. Temporary traffic controls such as use of a flagman will be implemented by the Contractor, if necessary, to ensure that emergency vehicle access to any adjoining residential properties is maintained at all times. This is a routine procedure for construction of underground utilities that occur within a street right-of-way, and significant impacts to emergency access are not expected due to construction of the Gen-Tie Line.

g) Conflict with the Bikeway Plan, Pedestrian Plan, Transit Oriented District development standards in the County General Plan Mobility Element, or other adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

The County's Draft Bicycle Master Plan (January 2011) identifies on-site segments of Munz Ranch Road and Lancaster Road as Proposed Class III Bike Routes. The Project would not hinder the ability to implement these routes; however, this will be discussed further in the EIR. There are no plans or programs in effect to support any other alternative transportation modes or facilities in this area. The Antelope Valley Transit Authority does not currently provide bus service in this area. The Proposed Project would have a less than significant effect on plans, policies, or programs supporting alternative transportation.

h) Decrease the performance or safety of alternative transportation facilities?

There are no alternative transportation facilities on or near the Site; therefore, the Proposed Project would have no impact on such facilities.

18. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Exceed wastewater treatment requirements of the Los Angeles or Lahontan Regional Water Quality Control Boards?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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An underground septic tank wastewater disposal system was constructed on site in 1974 and has handled all wastewater discharges from the existing ranch facilities. The Proposed Project includes a new septic system to dispose of wastewater from the operations and maintenance facility. A permit to install this system from the Lahontan Regional Water Quality Control Board may or may not be required; this will depend on the volume of wastewater discharge and results of a review by the County of Los Angeles relative to the system characteristics and potential water quality effects. This will be discussed in the EIR.

b) Create water or wastewater system capacity problems, or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Proposed Project will utilize a private, on-site septic tank system for wastewater disposal and private on-site water wells for potable water demands. As such, this project would have no impact on any community-scale water or wastewater systems.

c) Create drainage system capacity problems, or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Proposed Project will include a local, privately maintained drainage control system and would not affect any drainage facilities off site. Design standards and key elements of the proposed on-site drainage system and related effects on surface hydrology and water quality will be discussed in the EIR, within the Hydrology/Water Quality section.

d) Have sufficient reliable water supplies available to serve the project demands from existing entitlements and resources, considering existing and projected water demands from other land uses?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Healy Farms (current land use) has relied on a private on-site water well to meet its domestic and irrigation water demands for many years. Based on past well performance and a recent analysis of groundwater quality on-site, high-quality water is available at depths of 1,000 feet or more below the ground surface. The Proposed Project will rely on this same well to provide a water supply for semi-annual solar panel washing and for daily water demands at the operations and maintenance building. A new well may be drilled at the operations and maintenance site to meet its water demands, including requirements for adequate flow and pressure for fire suppression. An analysis of the water demands associated with daily and annual operations

at the fully developed energy farm will be conducted in the EIR, to determine if a higher volume of water will need to be extracted to meet the project's needs and to confirm that increased extraction of groundwater on site would not exceed existing entitlements or have a significant impact on local groundwater resources.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84 and Title 22, Ch. 22.52) or Drought Tolerant Landscaping Ordinance (L.A. County Code, Title 21, § 21.24.430 and Title 22, Ch. 21, Part 21)?

The Project drainage and landscape plans are being designed to comply with the applicable provisions of these regulatory standards, and is not requesting any variances or exceptions from these standards. Nonetheless, proposed storm drainage and landscape/irrigation plans will be described and features that achieve compliance with applicable standards will be noted in the EIR.

f) Create energy utility (electricity, natural gas, propane) system capacity problems, or result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The Proposed Project's electricity and gas demands would be provided from on-site electrical energy facilities or containers of natural gas that are periodically trucked in; no off-site utility facilities would be affected. When completed, this Project would generate up to 300 MW of clean and renewable electrical energy that would be added to the regional electrical supply system, a positive impact. Environmental effects resulting from construction and operation of the proposed energy production and transmission facilities will be examined in an EIR, focusing on numerous types of impacts as noted throughout the other responses in this Initial Study.

g) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

A variety of solid and liquid wastes would be generated throughout the construction phases. Many of these wastes would be eligible for disposal at a landfill; i.e., non-hazardous. Volumes of construction wastes to be disposed of are difficult to estimate; however, diversion of construction wastes from landfill disposal through recycling or other means will be emphasized. A discussion of the Project's construction waste generation characteristics and targets for diversion of wastes from landfill disposal will be provided in the EIR.

The fully developed and operational energy farm would generate minor volumes of solid wastes that could require landfill disposal; these wastes would consist of typical municipal wastes that are generated by administrative office operations that would occur at the operations and maintenance facilities only. Proposed solar arrays and wind towers would not generate wastes due to daily operations, but would generate some wastes during periodic maintenance activities when parts are replaced, cleaning occurs, etc. The underground Gen-tie transmission line would not generate wastes. Solid waste disposal needs of the operating energy farm would not have a significant impact on landfill capacity.

h) Comply with federal, state, and local statutes and regulations related to solid waste?

Disposal of solid wastes during construction and throughout the operating life of the Project would comply with all applicable regulations governing waste disposal. No exceptions from any such regulations are being requested and no unique methods of solid waste disposal are proposed that could conflict with applicable standards.

19. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

As discussed in the preceding checklist responses, the Project could potentially degrade the environment due to impacts involving aesthetics, agricultural resources, air quality, sensitive plants and wildlife species, cultural and paleontological resources, hazardous materials management, changes in surface water hydrology and water quality, noise, vehicular traffic. An EIR will be prepared to address all of these potential impacts.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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There are several other solar and wind energy projects proposed in the Antelope Valley Area, along with other development projects which, in combination with the Proposed Project, could result in a variety of cumulative impacts. For example, the AV Solar Ranch One project, a solar energy generation facility, has been approved for development immediately north of this Site. The Blue Sky Wind Farm is proposed to the west and south of the Site. Further analysis is required to estimate potential effects that could combine with the effects of the Project, resulting in potentially significant cumulative impacts. The traffic study to be prepared for this Project, for example, will need to account for traffic generated by other projects that would affect the same elements of the affected roadway network. Cumulative impacts may not occur with respect to all types of impacts; nevertheless, potential cumulative impacts will be examined for each topic that is addressed in the EIR.

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

Construction activities would generate noise and pollutant emissions that could have a negative impact on the few neighboring homes near the project boundaries. Operational activities, such as the wind tower blade rotations and periodic maintenance activities, would generate noise that does not presently occur on-site and which might have some impact at the few homes surrounding the Site. Solar arrays and wind towers would change the aesthetic character of this Site, and this could have some adverse effects on views to and from the Antelope Valley California Poppy Reserve and possibly from more distant viewing locations. A majority of the Energy Farm site is located in a County-designated High Fire Hazard Area, which presents challenges for fire prevention and suppression during and after construction. Construction phase traffic could impede travel and emergency vehicle access on affected routes such as State Highway 138. Any or all of these impacts could have significant adverse consequences for human beings and further evaluation of these issues will be conducted in the EIR.