

**DRAFT CANDIDATE FINDINGS OF FACT**  
**Public Resources Code Section 21081**  
**For:**  
**LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN**  
**State Clearinghouse No. 2021120568**

**Lead Agency:**  
**County of Los Angeles Department of Regional Planning**

**I. INTRODUCTION**

This document presents the Findings of Fact (Findings) prepared by the County of Los Angeles Department of Regional Planning (County) for consideration of adoption by the Board of Supervisors of Los Angeles County (Board) regarding the Program Environmental Impact Report (PEIR) for the Los Angeles County 2045 Climate Action Plan (Project or 2045 CAP). The environmental effects of the Project are addressed in the Recirculated Draft PEIR dated March 2023 and a Final PEIR dated October 2023. The PEIR was prepared in compliance with the California Environmental Quality Act (CEQA, Pub. Resources Code, §§ 21000 *et seq.*) and its implementing regulations (CEQA Guidelines, Cal. Code Regs., tit. 14, §§ 15000 *et seq.*) and is incorporated by reference herein.

This document is organized as follows:

- Section I provides an introduction that describes the basis for these Findings and identifies the components of the record of proceedings as well as where to locate them.
- Section II describes the Project, including its location, objectives, and implementation timeline.
- Section III details the environmental review process and public participation.
- Section IV identifies the EIR certification process.
- Section V provides a summary of Project impacts, including which resource areas would have significant and unavoidable impacts, impacts that would be less than significant with mitigation incorporated, and less-than-significant impacts as a result of projects facilitated by the 2045 CAP.
- Section VI summarizes the Board's findings regarding significant and unavoidable impacts and impacts that would be less than significant with mitigation incorporated. Impact finding summaries are organized by environmental resource area with impacts, findings, and mitigation measures outlined.
- Section VII describes Findings relating to Project alternatives analyzed in the EIR, including the No Project Alternative, Alternative 1, Alternative 2, and Alternative 3.
- Section VIII summarizes additional CEQA Findings regarding the EIR.
- Section IX provides details about the Mitigation Monitoring and Reporting Plan.

Public Resources Code section 21081(a) and CEQA Guidelines section 15091(a) state that no public agency shall approve or carry out a project for which an environmental impact report has been completed that identifies one or more significant effects thereof, unless such public agency makes one or more of the following findings:

1. Finding 1: Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;
2. Finding 2: Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency<sup>1</sup>; or
3. Finding 3: Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

CEQA requires that the Findings be supported by substantial evidence in the record. (CEQA Guidelines, § 15091(b).) Under CEQA, “substantial evidence” means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. (CEQA Guidelines, § 15384.) Substantial evidence must include facts, reasonable assumptions predicted upon facts, and expert opinion supported by facts. (CEQA Guidelines, § 15384(b).) Additional substantial evidence supporting all Findings made herein is contained in the EIR and/or the record of proceedings.

The Findings have been submitted by the County of Los Angeles Department of Regional Planning as Findings to be made by the decision-making body, the County of Los Angeles Board of Supervisors. The issuance of these Findings allows readers an opportunity to review them prior to a decision by the Board on the Project. It is the role of County staff to independently evaluate the proposed Findings, and to make a recommendation to the Board regarding their adequacy. It is the exclusive discretion of the Board, as decision-maker responsible for certifying the EIR, to determine the adequacy of the proposed Findings.

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. (CEQA Guidelines, § 15093.) For a project that has significant impacts that cannot feasibly be avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project’s “benefits” render “acceptable” its “unavoidable adverse environmental effects”. (CEQA Guidelines, §§ 15093, 15043(b); Pub. Resources Code, § 21081(b).)

#### **a. Record of Proceedings**

The record of proceedings for the Project upon which the Board’s Findings are based includes, but is not limited to, the following:

- The Notice of Preparation (NOP) and all other public notices issued by the County in conjunction with the project;
- All responses to the NOP received by the County;

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<sup>1</sup> There are no changes or alterations within the responsibility of and jurisdiction of another public agency such that Finding 2 is not applied below.

- The Recirculated Draft PEIR;
- The Final PEIR;
- All written comments submitted by agencies or members of the public during the public review comment periods;
- All responses to the written comments included in the Final PEIR;
- The Mitigation Monitoring and Reporting Program;
- The reports and technical memoranda included or referenced in any responses to comments in the Final PEIR;
- All documents, studies, EIRs, or other materials incorporated by reference in, or otherwise relied upon during the preparation of, the Recirculated Draft PEIR and the Final PEIR;
- Any documents expressly cited in these Findings; and
- Any other relevant materials constituting the record of proceedings pursuant to Public Resources Code Section 21167.6(e).

**b. Custodian and Location of Records**

The following Findings of fact are based in part on the information contained in the EIR for the Project, as well as additional facts found in the complete record of proceedings. The County is the custodian of the Administrative Record for the Project. This information is provided in compliance with Public Resources Code section 21081.6(a)(2) and CEQA Guidelines section 15091(e).

The 2045 CAP Environmental Impact Report consists of:

1. Draft Program Environmental Impact Report dated May 2022;
2. Recirculated Draft Program Environmental Impact Report dated March 2023; and
3. Final Program EIR dated October 2023 consisting of the Recirculated Draft PEIR and the Final PEIR, which together provide in one place all clarifications, corrections, and minor revisions to the text, tables, figures, and appendixes of the Recirculated Draft PEIR generated either from responses to comments or independently by the County.

The EIR is hereby incorporated by reference and is available for review with all documents and other materials that constitute the record of proceedings for the County's actions related to the Project. The complete record of proceedings is available at Los Angeles County, Department of Regional Planning, 320 W. Temple Street 13<sup>th</sup> Floor, Los Angeles CA 900012. Copies of the documents that constitute the record of proceedings are also on the County's website. The Final PEIR, Notice of Availability, and Notice of Completion are also located on the County's website at <https://planning.lacounty.gov/long-range-planning/climate-action-plan/documents/>.

## **II. DESCRIPTION OF THE PROJECT**

The Project, e.g., the Draft 2045 CAP as described in the Final PEIR, is up for approval. Subsections a., b., and c. below summarize the main components of the Project, including location, objectives, and implementation.

### **a. Project Location**

The Project is not constrained to a single location within the region. Rather the Project area for the 2045 CAP consists of the unincorporated areas of Los Angeles County. These unincorporated areas occupy approximately 1,696,000 acres, or 2,650 square miles. Altogether, the Project area accounts for approximately 65 percent of the total land area of Los Angeles County.

### **b. Project Objectives**

Overall, the 2045 CAP represents the County's plan to meet greenhouse gas (GHG) emissions reduction targets for unincorporated Los Angeles County by the years of 2030, 2035, and 2045. It was developed with the goal to implement the GHG emissions reduction policies of the General Plan Air Quality Element, and to ensure the County contributes its fair share to statewide GHG emissions reductions. The Project addresses the following objectives:

1. Identify detailed programs, actions, and performance goals to achieve the climate action policies of the General Plan.
2. Identify GHG emissions reduction targets tailored to the unincorporated County that closely align with state and County climate goals.
3. Provide a road map for reducing GHG emissions to achieve the County's GHG emissions reduction targets.
4. Encourage sustainable housing production at all levels of affordability, including increasing housing densities near transit to the extent allowed in the General Plan.
5. Demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects and provide CEQA streamlining for development projects (serve as a "qualified CAP") via the 2045 Climate Action Plan Consistency Review Checklist (2045 CAP Checklist).

### **c. Project Overview and Implementation**

The 2045 CAP now being considered for approval reflects the further development and refinement that resulted from public review of Draft 2045 CAP analyzed in the Draft PEIR and the Revised Draft 2045 CAP analyzed in the Recirculated Draft PEIR. See Section III, below, for details. The 2045 CAP identifies strategies, measures, and actions to effectively meet GHG emission reduction targets for 2030, 2035, and 2045. The 2045 CAP builds on previous County work and defines new reduction targets beyond the year 2020 that are consistent with the State of California's targets and legislative actions for GHG emissions reductions. The 2045 CAP details the GHG emissions reduction vision and goals of *OurCounty: Los Angeles Countywide Sustainability Plan* for the unincorporated Los Angeles County and implements the GHG emissions reduction strategies of the General Plan's Air Quality Element. Specifically, the 2045 CAP, once approved, would replace the existing implementation strategy of the Air Quality Element called the Unincorporated Los Angeles County Community Climate Action Plan 2020 (2020 CCAP). Approval of the 2045 CAP would require an amendment to the General Plan to replace the 2020 CCAP, an

implementing component of the General Plan's Air Quality Element. The 2045 CAP is a policy document intended to reduce community-wide GHG emissions and would support development allowed under the General Plan. No changes to General Plan land use designations, zoning, or land use, or specific projects, are proposed as part of the 2045 CAP.

Implementation of the 2045 CAP would occur over the following three phases, which takes advantage of easier short-term measures and actions to meet the 2030 target and then builds up to more complex solutions as the 2035 target and 2045 target dates approach:

- Phase 1: Short-Term Actions (2024–2030)—Short-term actions that are high-priority with large emissions reductions that would lay the foundation for longer term actions. The short-term target of the 2045 CAP is to reduce GHG emissions in the County by 40 percent below 2015 levels by 2030.
- Phase 2: Medium-Term Actions (2030–2035)—Actions needed to achieve the 2030 or 2035 GHG emissions reduction targets that may need additional time, funding, or new technology to implement. The medium-term target of the 2045 CAP is to reduce GHG emissions in the County by 50 percent below 2015 levels by 2035.
- Phase 3: Long-Term Actions (2035–2045)—Actions needed to achieve the 2045 GHG emissions reduction target that may need substantial time, funding, or new technology to implement. The long-term target of the 2045 CAP is to reduce GHG emissions in the County by 83 percent below 2015 levels by 2045. The long-term aspirational goal of the 2045 CAP is to achieve carbon neutrality in the County by 2045.

The Draft 2045 CAP includes the following:

- A GHG emissions inventory for 2018.
- Emissions forecasts for 2030, 2035, and 2045.
- GHG emissions targets for 2030, 2035, and 2045.
- A long-term aspirational goal for carbon neutrality by 2045.
- A suite of GHG emissions reduction strategies, measures, and actions to reduce GHG emissions from major sectors.
- A technical modeling appendix to explain the Draft 2045 CAP's GHG emissions reduction estimates.
- A consideration of environmental justice and equity concerns.
- Implementation and monitoring measures to ensure successful climate action.
- A new development review consistency checklist to allow future projects to streamline GHG emissions analyses pursuant to CEQA as anticipated by CEQA Guidelines section 15183.5 by using the 2045 CAP.

### **III. ENVIRONMENTAL REVIEW PROCESS AND PUBLIC PARTICIPATION**

The County of Los Angeles is the lead agency responsible for conducting environmental review under CEQA and shall be primarily responsible for carrying out the Project. The County issued a Draft PEIR for the Draft 2045 CAP on May 25, 2022. After the July 18, 2022 conclusion of the comment period for the Draft PEIR, the County elected to revise the Draft 2045 CAP in response to public and other input received, and to transition the Draft 2045 CAP's aspirational goal of carbon neutrality by 2045 into a

target consistent with new legislation, Assembly Bill (AB) 1279. AB 1279 was enacted in September 2022 after the close of the Draft PEIR comment period.

The County released the Revised Draft 2045 CAP on March 16, 2023. The County issued a Recirculated Draft PEIR on the Revised Draft 2045 CAP on March 24, 2023, in compliance with CEQA. The Recirculated Draft PEIR describes changes to the Draft 2045 CAP in Chapter 2, *Project Description*, and analyzes the Project as revised on a resource-by-resource basis throughout Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*. It also adds content to address issues raised by public comments on the Draft PEIR and makes other minor clarifications. The Recirculated Draft PEIR wholly replaced the May 2022 Draft PEIR.

Pursuant to CEQA Guidelines section 15085, upon publication of the Recirculated Draft PEIR, the County filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that the Recirculated Draft PEIR had been completed and was available for review and comment by the public. The County also posted a Notice of Availability of the Recirculated Draft PEIR at this time pursuant to CEQA Guidelines section 15087. During the public review period, beginning March 30, 2023 and ending on May 15, 2023, the County received comments on the environmental document. Comments were received via email to: [climate@planning.lacounty.gov](mailto:climate@planning.lacounty.gov); and by mail at: Los Angeles County Department of Regional Planning 320 W. Temple Street 13<sup>th</sup> Floor, Los Angeles CA 90012. After the close of public review period, the County provided responses in writing to all comments received on the Recirculated Draft PEIR. See Table 1 below for a list of the parties who commented on the Recirculated Draft PEIR.

Name	Date(s)	Response to Comment
<b>Agencies and Tribes</b>		
California Air Resources Board	5/15/2023	Responses are provided in Section 2.3.1, Responses to Comments from Agencies and Tribes. See Letter A1.
San Manuel	4/26/2023	Responses are provided in Section 2.3.1, Responses to Comments from Agencies and Tribes. See Letter A2.
Los Angeles County Sanitation Districts	5/15/2023	Responses are provided in Section 2.3.1, Responses to Comments from Agencies and Tribes. See Letter A3.
<b>Organizations</b>		
Abundant Housing LA	5/15/2023	This comment on the Revised Draft 2045 CAP does not raise significant environmental issues related to the Recirculated Draft PEIR, and no further response is required on this issue pursuant to CEQA Guidelines section 15088(a). Nonetheless, see Chapter 1, which addresses generally comments received on the Revised Draft 2045 CAP.
Acton Town Council	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O2.
Altadena Town Council	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O3.
Altadena Wild	5/15/2023	This comment on the Revised Draft 2045 CAP does not raise significant environmental issues related to the Recirculated Draft PEIR, and no further response is required on this issue pursuant to CEQA Guidelines section 15088(a). Nonetheless, see Chapter 1, which addresses generally comments received on the Revised Draft 2045 CAP.
BizFed	5/9/2023 5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O5a and Letter O5b.

Name	Date(s)	Response to Comment
Building Industry Association	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O6.
Center for Biological Diversity	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O7.
Communities for a Better Environment	5/16/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O8.
Endangered Habitats League	4/11/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter O9.
FivePoint Newhall Land and Farming Company	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter 10.
League of Women Voters	3/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter 12.
Santa Clarita Organization for Planning and the Environment	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter 13.
Southwest Mountain States Regional Council of Carpenters	5/12/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter 14.
Tejon Ranch Company	5/15/2023	Responses are provided in Section 2.3.2 Responses to Comments from Organizations. See Letter 15.
The Greenlining Institute	5/15/2023	This comment on the Revised Draft 2045 CAP does not raise significant environmental issues related to the Recirculated Draft PEIR, and no further response is required on this issue pursuant to CEQA Guidelines section 15088(a). Nonetheless, see Chapter 1, which addresses generally comments received on the Revised Draft 2045 CAP.
<b>Individuals</b>		
Chelsea Katan	4/10/2023	Responses are provided in Section 2.3.3 Responses to Comments from Individuals. See Letter I1.
Emmanuel Alcantar		Responses are provided in Section 2.3.3 Responses to Comments from Individuals. See Letter I2.

The CEQA process includes public involvement at several steps, including consultation with California Native American Tribes consistent with AB 52. (Pub. Resources Code, § 21080.3.1). AB 52 establishes a process for CEQA lead agencies to consult with tribes that are traditionally and culturally affiliated with a project area—here, the unincorporated areas of Los Angeles County. For this Project, the County also invited public involvement in the form of public review of the Draft 2045 CAP and the Revised Draft 2045 CAP; and as part of the CEQA scoping process and following issuance of the Draft PEIR and Recirculated Draft PEIR.

#### IV. EIR CERTIFICATION PROCESS

The County released the Final PEIR on October 12, 2023 and posted the Final PEIR on its website. The County submitted the Final PEIR with the Governor's Office of Planning and Research on October 23, 2023, per Cal. Code of Reg. Title 14 Chap. 3 ss 15089(b).

Prior to considering adoption of these Findings on November 15, 2023, pursuant to CEQA Guidelines section 15090, the Board certified that:

- The EIR has been completed in compliance with CEQA;

- The EIR was presented to the decision-making body of the lead agency – Los Angeles County Board of Supervisors – and that the decision-making body reviewed and considered the information contained in the EIR prior to approving the Project; and
- The EIR reflects the lead agency's independent judgment and analysis.

Following publication of the Final PEIR, County staff has recommended the Board approve the Project as identified in the Final PEIR. The Findings and Statement of Overriding Considerations herein address the Project.

## **V. SUMMARY OF IMPACTS**

Impacts associated with specific environmental resource areas resulting from the Project are summarized in Table ES-2 of the Recirculated Draft PEIR (p. ES-20 et seq.) and discussed below.

The EIR concludes that the Project will have a less-than-significant impact with mitigation measures incorporated on some components of the following issue areas:

- Aesthetics (Impacts 3.2-5 and 3.2-10)
- Air Quality (Impacts 3.4-3b and 3.4-7 [Valley Fever])
- Biological Resources (Impacts 3.5-1, 3.5-4, 3.5-6, and 3.5-9)
- Cultural Resources (All impacts)
- Hazards and Hazardous Materials (Impact 3.10-2, 3.10-3, 3.10-6, 3.10-8, 3.10-9, and 3.10-12)
- Hydrology and Water Quality (Impacts 3.11-5 and 3.11-11)
- Transportation (Impacts 3.15-1, 3.15-3, 3.15-4, and 3.15-6)
- Tribal Cultural Resources (All impacts)
- Wildfire (Impacts 3.18-1, 3.18-3, 3.18-5, 3.18-6, 3.18-8, and 3.18-10)

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe any significant impacts, including those that can be mitigated but not reduced to a less-than-significant level. The Project, as a result of the implementation of projects facilitated by the 2045 CAP, would have a significant and unavoidable impact on some components of the following environmental resource areas:

- Aesthetics (Impacts 3.2-1, 3.2-2, 3.2-3, 3.2-4, 3.2-6, 3.2-7, 3.2-8, and 3.2-9)
- Agriculture and Forestry (Impacts 3.3-1, 3.3-2, 3.3-5, 3.3-7, 3.3-8, and 3.3-11)
- Air Quality (Impacts 3.4-1, 3.4-2, 3.4-3a, 3.4-5, 3.4-6, and 3.4-7 [local Air Pollutant and toxic air contaminant {TAC} emissions])
- Biological Resources (Impacts 3.5-2, 3.5-3, 3.5-5, 3.5-7, 3.5-8, 3.5-10, and 3.5-11)
- Noise and Vibration (All impacts)
- Utilities and Service Systems (Impact 3.17-1, 3.17-3, 3.17-5, and 3.17-7)

CEQA does not require specific Findings to be made for impacts that would be less than significant without the incorporation of mitigation measures. The EIR concludes that the Project will have a less-than-significant impact and require no mitigation measures with respect to components of the following issue areas:



- Agriculture and Forestry (Impacts 3.3-3, 3.3-4, 3.3-6, 3.3-10, and 3.3-12)
- Air Quality (Impacts 3.4-4 and 3.4-8)
- Geology and Soils (All Impacts)
- Greenhouse Gas Emissions (All impacts)
- Hazards and Hazardous Materials (Impact 3.10-1, 3.10-4, 3.10-5, 3.10-7, 3.10-10, and 3.10-11)
- Hydrology and Water Quality (Impacts 3.11-1, 3.11-2, 3.11-3, 3.11-4, 3.11-6, 3.11-7, 3.11-8, 3.11-9, 3.11-10, and 3.11-12)
- Land Use and Planning (All impacts)
- Population and Housing (All impacts)
- Transportation (Impacts 3.15-2 and 3.15-5)
- Utilities and Service Systems (Impact 3.17-2, 3.17-4, 3.17-6, and 3.17-8)
- Wildfire (Impacts 3.18-2, 3.18-4, 3.18-7, and 3.18-9)

## **VI. FINDINGS OF FACT REGARDING THE PROJECT'S SIGNIFICANT AND LESS-THAN-SIGNIFICANT ENVIRONMENTAL IMPACTS**

In making each of the findings below, the County has considered the plans, programs, and policies discussed in the PEIR.

### **a. Findings Regarding Project Impacts Determined to Be Less Than Significant with Mitigation Incorporated**

The following significant impacts were analyzed in the PEIR. Because of the environmental analysis of the Project; presumed compliance with existing laws, codes, and statutes; and the identification and incorporation of feasible mitigation measures, the following significant impacts have been determined by the County to be reduced to a level of less than significant; and the County has found – in accordance with Public Resources Code section 21081(a)(1) and the CEQA Guidelines section 15091(a)(1) – that “Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant effects on the environment as identified in the final EIR.” This is referred to herein as “Finding 1.” Please refer to the PEIR for a further discussion of impacts within each resource section.

#### **i) Aesthetics**

Impact 3.2-5: Projects facilitated by the 2045 CAP would create a new source of substantial shadow, light, or glare, which would adversely affect day or nighttime views in the area.

Finding 1: Mitigation measures would reduce the Project's impacts due to the creation of a new source of substantial shadow, light, or glare, which would adversely affect day or nighttime views in the area to less-than-significant levels. The Board finds that Mitigation Measure 3.2-3, described below, is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The implementation of Mitigation Measure 3.2-3, Reduce Light and Glare Impacts, would ensure that lighting from projects facilitated by the 2045 CAP would not substantially intrude on daytime or nighttime views in the area because its provisions would

substantially limit light trespass and confine generated light to within project boundaries. Also, adhering to design and siting requirements would reduce the potential for glare. Accordingly, with the implementation of Mitigation Measure 3.2-3, Impact 3.2-5 would be reduced to less than significant.

Mitigation Measures:

**Mitigation Measure 3.2-3: Reduce Light and Glare Impacts (Recirculated Draft PEIR, p. 3.2-18)**

To reduce significant light and glare impacts of projects facilitated by the 2045 CAP, the County shall require the following measures to be incorporated: a) All lighting shall be focused toward the site and outdoor lighting shall be directed downward; b) The design of exterior light fixtures shall incorporate shielding to prevent glare and offsite light spillage; c) Outdoor lighting shall include non-glare fixtures; and d) Structure design shall include exterior finishes and materials that would be minimally reflective or sited or oriented in such a way as to direct glare away from sensitive receptors.

Impact 3.2-10: Projects facilitated by the 2045 CAP would not cause or contribute to a new source of substantial shadow, light or glare, which would result in a significant cumulative impact to views in the area.

Finding 1: Mitigation measures would reduce the Project's impacts related to causing or contributing to a new source of substantial shadow, light or glare, which would result in a significant cumulative impact to views in the area to less-than-significant levels. The Board finds that Mitigation Measure 3.2-3 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than cumulatively considerable and therefore, less than significant.

Facts in Support of Finding: Pre-mitigation, the cumulative impact attributable to nighttime lighting would be significant, and the Project's contribution to this impact would be cumulatively considerable as a result of the incremental impacts of the implementation of projects facilitated by the 2045 CAP. However, the implementation of Mitigation Measure 3.2-3 would ensure that nighttime lighting associated with projects facilitated by the 2045 CAP would not substantially intrude on daytime or nighttime views in the area because its provisions would substantially confine generated light to within the projects' boundaries. Accordingly, with the implementation of Mitigation Measure 3.2-3, the Project's contribution to cumulative impacts would be less than cumulatively considerable, and therefore less than significant.

Mitigation Measures:

**Mitigation Measure 3.2-3.** See Impact 3.2-5 for a discussion of this mitigation measure.

**ii) Air Quality**

Impact 3.4-3b: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would not expose sensitive receptors to substantial pollutant concentrations relating to Valley Fever.

Finding 1: Mitigation measures would reduce the Project's impacts relating to exposing sensitive receptors to substantial pollutant concentrations relating to Valley Fever to less-than-significant levels. The Board finds that Mitigation Measures 3.4-1, 3.4-2, and 3.4-8 described below, are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Projects facilitated by the 2045 CAP would result in a significant impact related to exposure of sensitive receptors to substantial pollutant concentrations related to Valley Fever. Implementation of Mitigation Measures 3.4-1 and 3.4-2 would control and reduce fugitive dust emissions and reduce potential off-site exposures. Mitigation Measure 3.4-8 would reduce potential exposures to construction workers located on-site and off-site, reducing this impact to a less-than-significant level. Because the exact specifications for projects that may be facilitated by the 2045 CAP are unknown, this determination applies to horizon years 2030, 2035, and 2045. Although the magnitude of long-term impacts would increase over time to the extent that more projects would be facilitated by CAP measures and actions to meet the 2045 CAP's increasingly aggressive 2030, 2035, and 2045 GHG reduction targets, the impact would remain less than significant for all horizon years.

Mitigation Measures:

Mitigation Measure 3.4-1: Construction Emissions (Recirculated Draft PEIR, p. 3.4-51 et seq.)

If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable air quality management district (AQMD) adopted thresholds of significance, the lead agency shall require applicants for new projects facilitated by the 2045 CAP measures and actions to incorporate mitigation measures to avoid or reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include, but are not limited to:

- When wind gusts exceed 25 miles per hour, cease all active construction activities or follow the applicable guidelines outlined in Table 3 of SCAQMD Rule 403 or Sections (C)(10) through (C)(14) of AVAQMD Rule 403.
- Use construction equipment rated by the U.S. Environmental Protection Agency (USEPA) as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower, as commercially available.
- Ensure that construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limit nonessential idling of construction equipment to no more than five consecutive minutes.
- Where acceptable to the fire department, control weed growth by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering.
- Water all active construction areas at least three times daily or four times daily if needed to control dust emissions. Watering should be sufficient to prevent airborne visible dust from leaving the site. Where local water supplies are not available in sufficient quantities within unincorporated areas of the County, use nontoxic chemical soil stabilizers or dust suppressants to control dust emissions in sufficient amounts to prevent airborne visible dust from leaving the site.
- Increase watering frequency and/or application frequency of nontoxic chemical soil stabilizers or dust suppressants whenever wind speeds exceed 25 miles per hour. Reclaimed water shall be used whenever possible.

- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
- Pave, apply water three times daily or as often as necessary to control dust, or where local water supplies are not available in sufficient quantities within unincorporated areas of the County, apply (nontoxic) soil stabilizers or dust suppressants on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
- Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the Project site, or as often as needed, to keep streets free of visible soil material.
- Where local water supplies are not available in sufficient quantities within unincorporated areas of Los Angeles County, hydroseed or apply nontoxic chemical soil stabilizers or dust suppressants to inactive construction areas.
- Enclose, cover, water three times daily, or apply nontoxic chemical soil stabilizers or dust suppressants to exposed stockpiles (dirt, sand, etc.).
- In areas with existing vegetation, install the facility components with minimal disturbance. Take all necessary precautions to not use vehicles or machinery for grading or alter the existing grade in these areas.
- Design project facilities to limit ground disturbance or grading to only the access roads, substations and related underground transmission lines, tanks, basins, inverter pads, or other areas required by the County. Ensure that the facilities comply with all applicable grading standards.
- Site utility-scale renewable energy projects in a way that minimizes site disturbance, such as grading, brush clearance, and other forms of earthwork.
- In areas with existing vegetation, install facility components with minimal disturbance. Take all necessary precautions to avoid using vehicles or machinery for grading, or altering the existing grade in these areas.
- Establish and maintain a landscaped buffer:
  - Maintain a landscaped area at least 10 feet deep along any facility perimeter fencing and between such fencing and any public right-of-way or adjacent property with an existing residential or agricultural use.
  - Establish the landscaped area in such manner that adequate corner sight distance is maintained from all access roads to the public right-of-way to the satisfaction of the County of Los Angeles Department of Public Works.
  - Maintain the landscaped area throughout the life of the facility.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions (Recirculated Draft PEIR, p. 3.2-53 et seq.)**

If, during subsequent project-level environmental review, operational fugitive dust emissions are determined to have the potential to be significant, the lead agency shall require applicants for new projects facilitated by the 2045 CAP measures and actions to incorporate mitigation measures to avoid or reduce air pollutant emissions during operational activities. Mitigation measures that may be identified during the environmental review include, but are not limited to, the following:

- Unpaved main access roads for operational vehicle trips shall be paved or effectively stabilized using soil stabilizers that can be determined to be as efficient as or more efficient for fugitive dust control than California Air Resources Board–approved soil stabilizers, and that shall not increase any other environmental impacts, including loss of vegetation.
- All other unpaved roads shall be stabilized using water or soil stabilizers so that vehicle travel on these roads does not cause visible dust plumes.
- Gravel pads, grizzly strips, or other material track-out control methods approved for use by the local AQMD shall be installed where vehicles enter or exit unpaved roads onto paved roadways.
- Traffic speeds on unpaved roads shall be limited to no more than 10 miles per hour, except that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions. Traffic speed signs shall be displayed prominently at all site entrances and at egress point(s) from the central maintenance complex.
- Where acceptable to the local and County fire departments, all unpaved, non-road surfaces that may potentially be disturbed shall be covered with a minimum of 3 inches of mulch. Where acceptable to the local and County fire departments, vegetation shall be maintained at 6 inches height.
- All trucks hauling dirt, sand, soil, or other loose materials shall be covered or shall maintain at least 6 inches of freeboard (minimum vertical distance between top of the load and top of the trailer) in accordance with California Vehicle Code Section 23114.
- A fugitive dust control plan that includes a dust plume response plan shall be prepared for review and approval by applicable agencies before any earthwork activities.
- Where acceptable to the local and County fire departments, weed control shall be accomplished by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering.
- Existing vegetation may be mowed, but removal of existing vegetation root systems shall be prohibited, except where necessary for construction of access roads, substations and related underground transmission lines, tanks, basins, inverter pads, or other areas required by the County.
- Continuous particulate monitors shall be installed at the discretion of the lead agency.

**Mitigation Measure 3.4-8: Valley Fever (Recirculated Draft PEIR, p. 3.4-71).**

During heavy grading where the top 12–18 inches of soil would be disturbed, and in locations with potential Valley Fever fungal spores, applicants for projects facilitated by the 2045 CAP measures shall require construction contractors to comply with the following measures as feasible to reduce potential Valley Fever impacts:

- Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations.
- Require that the cabs of grading and construction equipment be air-conditioned or enclosed with sufficient ventilation and particulate matter filtration systems.
- Require crews to work upwind from excavation sites where possible.
- Where acceptable to the fire department, control weed growth by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering.
- During rough grading and construction, ensure that the access way into the project site from adjoining paved roadways is paved or treated with environmentally safe dust control agents.

**Impact 3.4-7:** The Project, as a result of projects facilitated by the 2045 CAP, could contribute to a significant cumulative impact, to air quality associated with Valley Fever.

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to contributions of the projects facilitated by the 2045 CAP to a significant cumulative impact to air quality associated with Valley Fever to less-than-significant levels. The Board hereby makes Finding 1 and determines this impact to be less than cumulatively considerable and therefore, less than significant.

**Facts in Support of Finding:** Valley Fever cumulative impacts would be significant, and the Project's contribution would be cumulatively considerable; however, implementation of Mitigation Measures 3.4-1: Construction Emissions; 3.4-2: Operational Fugitive Dust Emissions; and 3.4-8: Valley Fever; would reduce Valley Fever cumulative impacts to less than significant.

**Mitigation Measures:**

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-3b for a discussion of this mitigation measure.

**Mitigation Measure 3.4-2. Operational Fugitive Dust Emissions.** See Impact 3.4-3b for a discussion of this mitigation measure.

**Mitigation Measure 3.4-8. Valley Fever.** See Impact 3.4-3b for a discussion of this mitigation measure.

**iii) Biological Resources**

**Impact 3.5-1:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would have a substantial direct adverse impact on one or more species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Finding 1: Mitigation measures would reduce the Project's substantial direct adverse impacts on one or more species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS to less-than-significant levels. The Board finds that Mitigation Measures 3.5-1, 3.4-2, and 3.4-8 described below are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: A total of 275 special-status plant species and 239 special-status wildlife species have been documented in Los Angeles County. While the 2045 CAP is a policy document and does not include specific projects that would have adverse impacts on special-status species and their habitat, various projects facilitated by the 2045 CAP measures and actions could adversely affect special-status species and their habitat. Measures to protect biological resources would come from two sources: the County's General Plan 2035 and the EIR for the Project.

The County adopted a General Plan update in 2015, which included biological resources mitigation measures General Plan Mitigation Measure BIO-1 and General Plan Mitigation Measure BIO-2. These measures would protect biological resources from impacts resulting from implementation of projects facilitated by the 2045 CAP measures and actions. Briefly, General Plan Mitigation Measure BIO-1 would require project-level surveys and analysis to characterize the project site and determine the presence/absence of special-status species in advance of a future discretionary project approval. If construction activities could cause direct impacts to special-status species, then General Plan Mitigation Measure BIO-2 requires the identification and implementation of mitigation measures and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities. The text of General Plan Mitigation Measures BIO-1 and BIO-2 is set forth in full in the Mitigation Monitoring and Reporting Program for this Project.

Mitigation Measure 3.5-1 and Mitigation Measure 3.5-2 also would be followed and enforced to protect biological resources. Mitigation Measure 3.5-1 would ensure that, on a project-specific level, necessary surveys would be conducted, and a biological resources assessment prepared to analyze the specific impacts of projects facilitated by the 2045 CAP and would propose appropriate mitigation measures to offset those impacts. Mitigation Measure 3.5-2 would avoid direct mortality to special-status species from construction activities by requiring preconstruction surveys (and construction monitoring where warranted) for special-status species as necessary. Federal and state regulations would continue to apply. Mitigation measures would apply only if specific projects have significant impacts.

Mitigation Measures:

Mitigation Measure 3.5-1 (Recirculated Draft PEIR, p. 3.5-19)

The County shall require biological resources to be analyzed on a project-specific level by a qualified biological consultant. Prior to or during the preparation of project-level environmental documents, and prior to the start of construction activities, a biological resources assessment shall be conducted to characterize the project site. Suitable buffer areas surrounding the project site shall be included where native habitat is contiguous with off-site habitat areas. The assessment and analysis shall emphasize identifying endangered, threatened, rare, and other special-status species; regionally and locally unique species; and sensitive natural communities, jurisdictional waters, and oak woodlands. Focused surveys shall be conducted as necessary to



determine the presence of special-status species (e.g., focused sensitive plant or wildlife surveys). Focused surveys shall be conducted according to established CDFW or USFWS protocols, if available for the object species. Natural communities shall be mapped and identified according to floristic alliance- and/or association-based mapping protocols consistent with CDFW natural communities. A jurisdictional delineation may be required if there are signs of potentially regulated wetlands and non-wetland waters. A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze direct and indirect impacts on biological resources, and propose mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as those species with potential to occur on-site).

**Mitigation Measure 3.5-2 (Recirculated Draft PEIR, p. 3.5-19 et seq.)**

If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as described in Mitigation Measure 3.5-1) shall include a mitigation measure requiring pre-construction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. The mitigation measures shall also include consultation with and obtaining permits from USFWS or CDFW prior to construction, if required by FESA or CESA for listed endangered and threatened species. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate offsite habitat areas. Relocation of such species into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas shall be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.

**Impact 3.5-4:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would have a substantial adverse impact on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.

**Finding 1:** Mitigation measures would reduce the Project's impacts on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means to less-than-significant levels. The Board finds that Mitigation Measures 3.5-1 and 3.5-3, described below, are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** Impacts of projects facilitated by the 2045 CAP may be significant in the absence of mitigation measures. The Conservation and Natural Resources Element of the General Plan would continue to be followed and enforced to protect biological resources, including through General Plan Mitigation Measures BIO-1 and BIO-2. The implementation of Mitigation Measures 3.5-1 and 3.5-3 identified in the EIR also would be required. For example, Mitigation Measure 3.5-1 would ensure that surveys are conducted to identify any state or federally protected wetlands prior to any new development projects implemented under the 2045



CAP measures. Mitigation Measure 3.5-3 would ensure that new projects facilitated by 2045 CAP measures and actions would provide appropriate mitigation for impacts on state and federally protected wetlands. Federal and state regulations would continue to apply. Thus, with the implementation of the recommended mitigation measures, impacts on state or federally protected wetlands due to the implementation of projects facilitated by the 2045 CAP would be less than significant.

Mitigation Measures:

[Mitigation Measure 3.5-1](#). See Impact 3.5-1 for a description of this mitigation measure.

[Mitigation Measure 3.5-3 \(Recirculated Draft PEIR, p. 3.5-23\)](#)

Prior to the issuance of any grading permit for permanent impacts in the areas designated as jurisdictional features, the project applicant shall obtain a Clean Water Act Section 404 permit from USACE, a Clean Water Act Section 401 certification from the RWQCB, and a Streambed Alteration Agreement/LSAA permit under Section 1602 of the California Fish and Game Code from CDFW, where the project warrants.

Impact 3.5-6: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10 percent canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua tree, Southern California black walnut, etc.).

Finding 1: Mitigation measures would reduce the Project's impacts regarding the conversion of oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10 percent canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua tree, Southern California black walnut, etc.) to less-than-significant levels. The Board finds that Mitigation Measures 3.5-1 and 3.5-5 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Mitigation Measures 3.5-1 and 3.5-5 would reduce impacts to oak woodlands and other unique native woodlands by requiring surveys and impact analyses for these resources, and measures to reduce or compensate for impacts. With the implementation of these mitigation measures, impacts on oak woodlands and other unique native woodlands would be less than significant.

Mitigation Measures:

[Mitigation Measure 3.5-1](#). See Impact 3.5-1 for a description of this mitigation measure.

[Mitigation Measure 3.5-5 \(Recirculated Draft PEIR, p. 3.5-26\)](#)

Proponents of projects resulting in the loss of oak woodlands shall mitigate with in-kind replacement habitat at a minimum of 1:1 mitigation ratio documented through a County-approved habitat mitigation plan. The plan shall include the number of replacement trees (or acreage and average density of woodland), location of replacement woodland, understory habitat components, sequencing for any phased tree removal, and performance standards for mitigation. The plan shall include monitoring for a minimum of five years, with annual reports submitted to the County.

For oak woodlands impacts, project mitigation shall be consistent with recommendations in the County's Oak Woodland Conservation Management Plan and its 2014 Guide. If a project cannot be redesigned to avoid impacts to oak woodlands, an appropriate mitigation strategy would be developed by selecting from the Guide's list of recommended mitigation measures prioritizing the acquisition of oak woodland habitat comparable to the habitat that was affected over the restoration of degraded off-site and in-lieu fees. A Mitigation Monitoring Plan consistent with the Guide's recommendations would be prepared and implemented.

Impact 3.5-9: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to a substantial cumulative adverse impact on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means.

Finding 1: Mitigation measures would reduce the Project's contribution to a substantial cumulative adverse impact on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means to less-than-significant levels. The Board finds that Mitigation Measures 3.5-1 and 3.5-3 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The 2045 CAP would contribute a significant incremental contribution to this significant cumulative impact that could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of Mitigation Measures 3.5-1 and 3.5-3. With the implementation of these mitigation measures and compliance with the regulatory agencies of USACE, CDFW, and RWQCB implementing their "no net loss" of biological resource habitat policies, the Project-specific, incremental contribution, in combination with the cumulative projects' impacts on special-status species over the span of the 2045 CAP, would not be cumulatively considerable. A less-than-significant cumulative impact on wetlands would result.

Mitigation Measures:

Mitigation Measure 3.5-1. See Impact 3.5-1 for a description of this mitigation measure.

Mitigation Measure 3.5-3: See Impact 3.5-4 for a description of this mitigation measure.

Proponents for individual projects facilitated by the 2045 CAP provisions shall analyze impacts on wildlife movement and corridors that may introduce new or additional barriers to wildlife dispersal or constrain existing wildlife corridors to future movement, or indirect impacts constraining future wildlife movement. Where projects may interfere with wildlife movement, alternative designs shall be included in the analysis to reduce wildlife movement impacts. Corridors, linkages, and pinch points shall not be entirely closed by any development, and partial mitigation shall be mandatory for project-specific impacts on wildlife corridors and wildlife nursery sites. This shall include provision of a minimum of half the corridor width. (The width shall be at least what is needed to remain connective for the top predators using the corridor.) Mitigation can include preservation by deed in perpetuity of other parts of the wildlife corridor connecting through the development area; it can include native landscaping to provide cover on the corridor. For nursery site impacts, mitigation shall include preservation by deed in perpetuity for another comparable nursery site of the same species.

#### **iv) Cultural Resources**

**Impact 3.6-1:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5.

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to causing a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5 to less-than-significant levels. The Board finds that Mitigation Measures 3.6-1, 3.6-2, 3.6-3, 3.6-4, 3.6-5, and 3.6-6 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** The Project, due to projects facilitated by 2045 CAP measures and actions, would result in a less-than-significant impact on historical resources after implementation of Mitigation Measures 3.6-1 through 3.6-6. The implementation of these measures would reduce significant impacts on historical resources resulting from projects facilitated by 2045 CAP measures and actions by avoiding or reducing the significant impact. Mitigation Measure 3.6-1 requires identification of historical resources of a built nature that could be affected by a project to avoid or reduce inadvertent significant impacts on such resources. The measure further requires that projects be designed to conform with the Secretary of the Interior's Standards to avoid or reduce significant impacts on such resources. Mitigation Measure 3.6-2 requires identification of significant archaeological resources (i.e., resources considered historical resources or unique archaeological resources) to avoid or reduce inadvertent significant impacts on such resources. The measure further requires that archaeological/Native American monitoring be considered to ensure that there is an opportunity to avoid or reduce inadvertent significant impacts on such resources. Mitigation Measure 3.6-3 requires that construction personnel involved in ground-disturbing activities be trained in the identification of cultural resources to assist in avoidance or minimizing of inadvertent potentially significant impacts on such resources. Mitigation Measures 3.6-4 and 3.6-5 require that significant archaeological resources be avoided and preserved in place if feasible. If avoidance and preservation in place is not feasible, then data recovery is required to recover the scientifically consequential information contained in the resource, which would avoid or reduce significant adverse impacts on the resource. Mitigation Measure 3.6-6 provides for final disposition of archaeological materials, such as curation or donation to a Native American group or other entity, to reduce significant impacts on such resources by preserving the materials for those with research or educational interests.

**Mitigation Measures:**

**Mitigation Measure 3.6-1: Historic Resources Assessment (Recirculated Draft PEIR, p. 3.6-24)**

Prior to demolition or alteration of buildings and/or structures or the construction of aboveground infrastructure with potentially significant impacts on historic architectural resources, the project proponent shall retain an architectural historian meeting the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 FR 44738–44739) (Qualified Architectural Historian) to conduct a historic resources assessment of affected properties. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a review of other pertinent archives and sources; a pedestrian field survey; recordation of all identified historic architectural resources on California Department of Parks and Recreation (DPR) 523 forms; evaluation of resources which may be eligible for listing in the California

Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment for each future project facilitated by 2045 CAP measures and actions. If a historic architectural resource is found eligible by the Qualified Architectural Historian, then the Qualified Architectural Historian shall coordinate with the project proponent and the County to ensure the project is constructed in conformance with the Secretary of the Interior's Standards. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to historic resources assessments and Secretary of the Interior's Standards plan reviews).

**Mitigation Measure 3.6-2: Archaeological Resources Assessment (Recirculated Draft PEIR, p. 3.6-24 et seq.)**

Prior to conducting construction activities that would involve ground disturbance, the project proponent shall retain an archaeologist meeting the minimum PQS set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 FR 44738–44739) (Qualified Archaeologist) to conduct an archaeological resources assessment. The assessment shall include a records search at the South Central Coastal Information Center or review of a prior record search conducted within the previous one year; a Sacred Lands File search at the California Native American Heritage Commission (NAHC); geoarchaeological review including a focused assessment of land use history and any available geotechnical data to assess the potential for subsurface archaeological resources; a pedestrian field survey in instances where ground surface is exposed; recordation of all identified archaeological resources on DPR 523 forms; evaluation of resources affected by the project for eligibility for listing in the California Register (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a]), and for local listing; and preparation of a technical report documenting the methods and results of the assessment. Resources that do not qualify as historical resources shall be considered by the Qualified Archaeologist for qualification as unique archaeological resources as defined in Public Resources Code Section 21083.2(g). The technical report also shall provide recommendations as to whether additional studies are warranted to further identify or evaluate archaeological resources (i.e., Extended Phase I boundary delineation, Phase II testing and evaluation) and if archaeological monitoring and Native American monitoring of ground disturbing activities is warranted (e.g., in areas where there is a higher potential to encounter buried resources). Prior to the initiation of field work for any Extended Phase I or Phase II investigation, the Qualified Archaeologist shall prepare a work plan outlining the investigation's objectives, goals, and methodology. When developing a work plan for Native American resources, the County shall consult with local Native American tribes.

If archaeological/Native American monitoring is warranted, the Qualified Archaeologist shall determine the locations and duration of monitoring and reporting requirements. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to archaeological resources assessments, Extended Phase I and Phase II reports, and monitoring reports).

**Mitigation Measure 3.6-3: Construction Worker Cultural Resources Sensitivity Training (Recirculated Draft PEIR, p. 3.6-25)**

For projects with ground-disturbing activities that may encounter potentially significant archaeological resources, the Qualified Archaeologist shall implement a cultural resources

sensitivity training program. The Qualified Archaeologist, or its designee, shall instruct all construction personnel of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, applicable laws protecting archaeological resources, and confidentiality of discoveries. Native American monitor(s) shall be invited to participate in presenting tribal perspectives as part of the training curriculum. In the event that construction crews are phased, additional trainings shall be conducted for new construction personnel. The project proponent or its contractors shall ensure construction personnel are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

**Mitigation Measure 3.6-4: Archaeological Resources Discoveries (Recirculated Draft PEIR, p. 3.6-25)**

In the event archaeological resources are encountered during construction of a project, the project proponent shall cease all activity within 50 feet of the find shall cease. The discovery shall be evaluated for significance by the Qualified Archaeologist. When assessing significance and developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. If the Qualified Archaeologist determines that the resource is significant (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a] or for unique archaeological resource in Public Resources Code Section 21083.2[g]), the Qualified Archaeologist shall provide a method for avoidance and preservation in place, which shall be the preferred manner of mitigating impacts. If avoidance is infeasible, the Qualified Archaeologist shall develop a Phase III Archaeological Resources Data Recovery and Treatment Plan consistent with Mitigation Measure 3.6-5. The Qualified Archaeologist also shall determine, based on the initial assessment of the discovery, whether the 50-foot buffer may be reduced. All reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center (including but not limited to Extended Phase I, Phase II, and Phase III reports).

**Mitigation Measure 3.6-5: Treatment of Archaeological Resources (Recirculated Draft PEIR, p. 3.6-25 et seq.)**

If the assessment conducted under Mitigation Measure 3.6-2 or Mitigation Measure 3.6-4 identifies significant archaeological resources (i.e., meets the definition for historical resource in CEQA Guidelines Section 15064.5[a] or for unique archaeological resource in Public Resources Code Section 21083.2[g]), then avoidance and preservation in place shall be the preferred manner of mitigating impacts. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If avoidance and preservation in place of significant archaeological resources is determined by the County to be infeasible, then the Qualified Archaeologist shall prepare a Phase III Archaeological Resources Data Recovery and Treatment Plan. The plan shall include: a detailed research design; justification for data recovery or other treatment methods depending on the nature of the resource's eligibility; excavation methodology; and, reporting and curation requirements. When developing treatment for resources that are Native American in origin, the County shall consult with local Native American tribes. All Phase III reports resulting from implementation of this measure shall be filed with the South Central Coastal Information Center.

**Mitigation Measure 3.6-6: Curation and Disposition of Cultural Materials (Recirculated Draft PEIR, p. 3.6-26)**

The project proponent shall arrange curation for all Native American archaeological materials, with the exception of funerary objects or grave goods (i.e., artifacts associated with Native American human remains). For significant Native American archaeological materials, the project proponent shall first consider repositories that are accredited by the American Association of Museums and that meet the standards outlined in 36 CFR 79.9. If a suitable accredited repository is not identified, then the project proponent shall consider nonaccredited repositories as long as they meet the minimum standards set forth by 36 CFR 79.9. If a suitable nonaccredited repository is not identified, then the project proponent shall donate the collection to a local California Native American tribe(s). Non-significant archeological materials shall be donated to a local California Native American tribe(s). If neither an accredited or nonaccredited repository or tribe accepts the collection, then the project proponent may offer the collection to a public, nonprofit institution with a research interest in the materials, or to a local school or historical society in the area for educational purposes. Disposition of Native American human remains and associated funerary objects or grave goods shall be determined by the landowner in consultation with the County and the MLD.

The project proponent shall curate all significant historic-period archaeological material, or portions thereof at the discretion of the Qualified Archaeologist, at a repository accredited by the American Association of Museums that meets the standards outlined in 36 CFR 79.9. If no accredited repository accepts the collection, then the project proponent may curate it at a nonaccredited repository as long as it meets the minimum standards set forth in 36 CFR 79.9. If neither an accredited nor a nonaccredited repository accepts the collection, then the project proponent may offer the collection to a public, nonprofit institution with a research interest in the materials, or to a local school or historical society in the area for educational purposes.

**Impact 3.6-2:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would cause a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to causing a substantial adverse change in the significance of a unique archaeological resource pursuant to CEQA Guidelines Section 15064.5 to less-than-significant levels. The Board finds that Mitigation Measures 3.6-2, 3.6-3, 3.6-4, 3.6-5, and 3.6-6 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would result in less-than-significant impacts on unique archaeological resources after the implementation of Mitigation Measures 3.6-2 through 3.6-6. The implementation of these measures would reduce significant impacts on unique archaeological resources by avoiding or reducing the significant impact. Mitigation Measure 3.6-2 requires identification of unique archaeological resources to avoid or reduce inadvertent significant impacts on such resources. The measure further requires that archaeological/Native American monitoring be considered to ensure that there is an opportunity to avoid or reduce inadvertent significant impacts on such resources. Mitigation Measure 3.6-3 requires that construction personnel involved in ground-disturbing activities be trained in the identification of cultural resources to assist in avoidance or minimizing of inadvertent significant impacts on such



resources. Mitigation Measures 3.6-4 and 3.6-5 require that unique archaeological resources be avoided and preserved in place if feasible. If avoidance and preservation in place is not feasible, then data recovery is required to recover the scientifically consequential information contained in the resource, which would avoid or reduce significant adverse impacts on the resource. Mitigation Measure 3.6-6 provides for final disposition of archaeological materials, such as curation or donation to a Native American group or other entity, to reduce significant impacts on such resources by preserving the materials for those with research or educational interests.

Mitigation Measures:

**Mitigation Measure 3.6-2. Archaeological Resources Assessment.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-4. Archaeological Resources Discoveries.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-5. Treatment of Archaeological Resources.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.** See Impact 3.6-1 for a description of this mitigation measure.

**Impact 3.6-3:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to directly or indirectly destroying a unique paleontological resource or site or unique geologic feature to less-than-significant levels. The Board finds that Mitigation Measures 3.6-7, 3.6-8, and 3.6-9 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would result in less-than-significant impacts on unique paleontological resources and unique geologic features after implementation of Mitigation Measures 3.6-7 through 3.6-9. These measures would reduce significant impacts on unique paleontological resources by avoiding or reducing the significant impact. Mitigation Measure 3.6-7 requires, prior to any construction activities that involve ground disturbance, identification of unique paleontological resources and unique geologic features to avoid or reduce inadvertent potentially significant impacts on such resources. The measure further requires that paleontological monitoring be considered to ensure that there is an opportunity to avoid or reduce inadvertent potentially significant impacts on such resources. Mitigation Measure 3.6-8 requires that construction personnel involved in ground-disturbing activities be trained in the identification of paleontological resources to assist in avoidance or minimizing of inadvertent potentially significant impacts on such resources. Mitigation Measure 3.6-9 requires that unique paleontological resources are recovered and curated.

Mitigation Measures:

**Mitigation Measure 3.6-7: Paleontological Resources Assessment and Monitoring (Recirculated Draft PEIR, p. 3.6-28 et seq.)**

For projects facilitated by 2045 CAP measures and actions that involve ground disturbance, the project proponent shall retain a paleontologist who meets the Society of Vertebrate Paleontology's (SVP 2010) definition for qualified professional paleontologist (Qualified Paleontologist) to prepare a paleontological resources assessment report prior to the start of construction activities. The report shall include methods and results of the paleontological resources assessment, monitoring requirements (including depths, frequency, and reporting), and maps that outline where monitoring is required. Monitoring shall follow SVP Guidelines: no monitoring of ground-disturbing activities within units of Low Sensitivity or No Potential; monitoring of all ground-disturbing activities (with depths specified) in units of Low to High Significance; and at all depths within units of High Significance unless the Qualified Paleontologist's report identifies previous disturbances or the use of construction methods which do not warrant monitoring; and monitoring at the initiation of excavation in units of Undetermined Significance. The report also shall stipulate whether screen washing is necessary to recover small specimens following SVP Guidelines and determine whether unique geologic features are present onsite. If monitoring is conducted, then the Qualified Paleontologist shall prepare a final report summarizing monitoring results and submit it to the project proponent and the County.

**Mitigation Measure 3.6-8: Paleontological Resources Sensitivity Training (Recirculated Draft PEIR, p. 3.6-29)**

Prior to the start of ground-disturbing activities for projects facilitated by 2045 CAP measures and actions with potentially significant impacts on paleontological resources, the Qualified Paleontologist or its designee shall conduct construction worker paleontological resources sensitivity training (or may be provided via digital recording) for all construction workers. Construction workers shall be informed on how to identify the types of paleontological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of paleontological resources, and safety precautions to be taken when working with paleontological monitors. The project proponent shall ensure that construction workers are made available for and attend the training. The project proponent shall retain documentation demonstrating attendance and provide it to the County.

**Mitigation Measure 3.6-9: Paleontological Discoveries (Recirculated Draft PEIR, p. 3.6-29 et seq.)**

If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area determined by the paleontological monitor shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the monitor's discretion, and to reduce any construction delay, the grading/excavation contractor shall assist, where feasible, in removing rock/sediment samples for initial processing and evaluation. If a fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (2010). Any fossils encountered and recovered shall be prepared to the point of identification, catalogued, and curated at a public, nonprofit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. Accompanying notes, maps, and photographs shall also



be filed at the repository. If no institution accepts the fossil collection, it may be donated to a local school or other interested organization in the area for educational purposes.

If construction workers discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

Any salvage reports resulting from implementation of this measure shall be filed with the Natural History Museum of Los Angeles County.

Impact 3.6-4: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would disturb any human remains, including those interred outside of dedicated cemeteries.

Finding 1: Mitigation measures would reduce the Project's impacts relating to disturbing any human remains, including those interred outside of dedicated cemeteries to less-than-significant levels. The Board finds that Mitigation Measure 3.6-10 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would result in less-than-significant impacts on human remains after implementation of Mitigation Measure 3.6-10. This measure would reduce significant impacts on human remains by immediately halting construction activities in the event of a possible discovery to avoid or reduce significant impacts. Mitigation Measure 3.6-10 requires the project proponent and the County to follow Health and Safety Code Section 7050.5(c) and Public Resources Code Section 5097.98 in the event Native American human remains are encountered. As a result, next steps would include halting work, notifying the County Coroner, and consulting with the Native California Indian group or person(s) that the Native American Heritage Commission designates as most likely descended from ancestral Native Americans in an area or region of California, i.e., the most likely descendant (MLD). Further, the measure requires the project proponent, the County, and the landowner to work with the MLD for treatment of the remains to avoid or reduce significant impacts, or the landowner to reinter the remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance if an agreement cannot be reached to avoid or reduce significant impacts.

Mitigation Measures:

Mitigation Measure 3.6-10: Human Remains Discoveries (Recirculated Draft PEIR, p. 3.6-30)

If human remains are encountered, then the project proponent or its contractor shall immediately halt work within 50 feet of the discovery and contact the County Coroner in accordance with Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5, which require that no further disturbance shall occur until the County Coroner has made the necessary findings as to the remains' origin and disposition. If the County Coroner determines that the remains are Native American, then the County Coroner will notify the NAHC within 24 hours in accordance with Health and Safety Code Section 7050.5(c), and Public Resources Code Section 5097.98. The NAHC shall then identify the person(s) thought to be the MLD. The MLD may, with the permission of the land owner, or their authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person

responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The project proponent, the County, and the landowner shall discuss and confer with the MLD on all reasonable options regarding the MLD's preferences for treatment.

Until the project proponent, the County, and the landowner have conferred with the MLD, the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity and is adequately protected according to generally accepted cultural or archaeological standards or practices (e.g., the NAHC's A Professional Guide for the Preservation and Protection of Native American Human Remains and Associated Grave Goods [NAHC 2022], which reiterates statutory requirements), and that further activities take into account the possibility of multiple burials.

If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Public Resources Code Section 5097.94(k), if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

Impact 3.6-5: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would incrementally contribute to a significant cumulative impact on historical resources.

Finding 1: Mitigation measures would reduce the incremental contribution of projects facilitated by the 2045 CAP to a significant cumulative impact on historical resources to less-than-significant levels. The Board finds that Mitigation Measures 3.6-1 through 3.6-6 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would make a cumulatively considerable contribution to this significant cumulative impact that could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of Mitigation Measures 3.6-1 through 3.6-6. With the implementation of these measures, the Project-specific, incremental contribution, combined with the cumulative projects' incremental impacts on historical resources over the timespan of the Project, would not be cumulatively considerable because they would specify that, before construction of aboveground infrastructure that might affect known historic architectural resources, an architectural historian must identify historical resources, provide recommendations, require archaeological monitoring, and prepare a plan for the treatment of historical resources. With the implementation of Mitigation Measures 3.6-1 through 3.6-6, a less-than-significant cumulative impact on historic resources would result.

Mitigation Measures:

Mitigation Measure 3.6-1. Historic Resources Assessment. See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-2. Archaeological Resources Assessment.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-4. Archaeological Resources Discoveries.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-5. Treatment of Archaeological Resources.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.](#) See Impact 3.6-1 for a description of this mitigation measure.

Impact 3.6-6: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would incrementally contribute to a significant cumulative impact on unique archaeological resources.

Finding 1: Mitigation measures would reduce the Project's impacts relating to incrementally contributing to a significant cumulative impact on unique archaeological resources to less-than-significant levels. The Board finds that Mitigation Measures 3.6-2 through 3.6-6 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would make a significant incremental contribution to this significant cumulative impact that could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of Mitigation Measures 3.6-2 through 3.6-6. With the implementation of these measures, the Project-specific, incremental contribution, combined with the cumulative projects' impacts on unique archaeological resources over the span of the 2045 CAP, would not be cumulatively considerable because they would require identification and treatment of unique archaeological resources, and would thereby avoid or reduce significant impacts. With the implementation of these mitigation measures, a less-than-significant cumulative impact to unique archaeological resources would result.

Mitigation Measures:

[Mitigation Measure 3.6-2. Archaeological Resources Assessment.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-4. Archaeological Resources Discoveries.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-5. Treatment of Archaeological Resources.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.](#) See Impact 3.6-1 for a description of this mitigation measure.

Impact 3.6-7: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would incrementally contribute to a significant cumulative impact on unique paleontological resources or sites or unique geologic features.

Finding 1: Mitigation measures would reduce the Project's impacts relating to incrementally contributing to a significant cumulative impact on unique paleontological resources or sites with unique geologic features to less-than-significant levels. The Board finds that Mitigation Measures 3.6-7 through 3.6-9 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would make a significant incremental contribution to this significant cumulative impact that could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of Mitigation Measures 3.6-7 through 3.6-9. With the implementation of these measures, the Project-specific, incremental contribution, combined with the cumulative projects' impacts on unique paleontological resources or sites or unique geologic features over the timespan of the Project, would not be cumulatively considerable because they would require identification and treatment of unique paleontological resources or sites or unique geologic features and would thereby avoid or reduce significant impacts. With the implementation of these mitigation measures, a less-than-significant cumulative impact on unique paleontological resources or sites or unique geologic features would result.

Mitigation Measures:

Mitigation Measure 3.6-7. Paleontological Resources Assessment and Monitoring. See Impact 3.6-3 for a description of this mitigation measure.

Mitigation Measure 3.6-8. Paleontological Resources Sensitivity Training. See Impact 3.6-3 for a description of this mitigation measure.

Mitigation Measure 3.6-9. Paleontological Discoveries. See Impact 3.6-3 for a description of this mitigation measure.

Impact 3.6-8: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would incrementally contribute to a significant cumulative impact on human remains, including those interred outside of dedicated cemeteries.

Finding 1: Mitigation measures would reduce the Project's impacts relating to incrementally contributing to a significant cumulative impact on human remains, including those interred outside of dedicated cemeteries to less-than-significant levels. The Board finds that Mitigation Measure 3.6-10 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would make a significant incremental contribution to this significant cumulative impact that could be mitigated to a level that would be less than cumulatively considerable (i.e., less than significant) by the implementation of Mitigation Measure 3.6-10. With the implementation of this measure, the Project-specific, incremental contribution, combined with the cumulative projects' impacts on human remains interred outside formal cemeteries over the timespan of the Project, would not be cumulatively considerable because the measure would require the project proponent and the County to follow the law governing such finds, including by halting work, notifying the County

Coroner, and consulting with the MLD or taking other specified, appropriate actions to assure treatment of the remains with appropriate dignity. If human remains of Native American origin are discovered during work associated with a project facilitated by the 2045 CAP, then the project proponent and/or the County would be required to comply with state laws related to the disposition of Native American burials (e.g., Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98). With the implementation of this mitigation measure, a less-than-significant cumulative impact would result.

Mitigation Measures:

**Mitigation Measure 3.6-10. Human Remains Discoveries.** See Impact 3.6-4 for a description of this mitigation measure.

**v) Hazards and Hazardous Materials**

**Impact 3.10-2:** The Project, as a result of solar photovoltaic (PV) and other projects facilitated by the 2045 CAP measures and actions, could 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.

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to creating 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 to less-than-significant levels. The Board finds that Mitigation Measure 3.10-2 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** Implementation of Mitigation Measure 3.10-2 would ensure that hazardous waste from broken cadmium telluride (CdTe) modules is disposed of properly if not recycled. Implementing this measure would reduce the impact to a less-than-significant level.

Mitigation Measures:

**Mitigation Measure 3.10-2 (Recirculated Draft PEIR, p. 3.10-23)**

The County shall require applicants of solar PV installation projects that include the use of CdTe modules to dispose of panels or recycle panels in accordance with current local, state, and federal regulations. Broken and end-of-project life PV modules, materials, and components shall be:

- Stored on-site in a manner that complies with federal and state laws until recycling or disposal actions can be taken.
- Stored on-site no longer than allowed by federal and state laws.
- Recycled in accordance with federal and state laws applicable at that time.

**Impact 3.10-3:** Projects facilitated by the 2045 CAP would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of sensitive land uses.

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to emitting hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of sensitive land uses to less-than-significant levels. The Board finds that Mitigation Measure

3.10-2 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Several sensitive receptors and receptor locations are situated within the unincorporated County areas, and it is not known at the time of PEIR preparation whether projects facilitated by 2045 CAP measures and actions would be constructed near one or more of them. Projects facilitated by 2045 CAP measures and actions could create hazardous emissions. Impacts generated by the release of hazardous emissions near sensitive receptors would temporarily occur during construction phases of such projects. However, compliance with the Education Code and Public Resources Code would ensure that any prospective school site would be reviewed to determine that it is not a current or former hazardous waste disposal site, a hazardous substance release site, or the site of a hazardous substance pipeline. This would ensure that prospective sites located within 0.25 mile of a school that handle or emit hazardous substances would not endanger sensitive receptors, including students. This portion of the impact would be less than significant.

In addition, projects facilitated by 2045 CAP measures and actions may include small-scale distributed solar facilities or utility-scale solar energy generation facilities. These projects may include the use of CdTe solar technology modules, which contain elemental cadmium. Although elemental cadmium is an acutely toxic substance, human exposure from CdTe PV modules would likely occur only if CdTe fine particles are inhaled. Fine particles would not be generated unless the modules were ground up or vaporized in a fire. This impact would be significant.

Compliance with applicable federal, state, and local laws and regulations would assure that impacts on sensitive receptors would be less than significant, except for impacts from solar PV installation projects that include the use of CdTe modules if the panels are ground to the level of dust particles or experience fire that reaches the CdTe melting point. Implementation of Mitigation Measure 3.10-2 would ensure that hazardous waste from broken CdTe modules is disposed of properly if not recycled. Implementing this measure would reduce the impact to a less-than-significant level.

Mitigation Measures:

**Mitigation Measure 3.10-2.** See Impact 3.10-2 for a description of this mitigation measure.

Impact 3.10-6: Projects facilitated by the 2045 CAP would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Finding 1: Mitigation measures would reduce the Project's impacts relating to impairing implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Implementing Mitigation Measure 3.15-1 would reduce the impact to a less-than-significant level because the traffic control plan would avoid or substantially reduce any potential impairment of an emergency response or evacuation plan that may result during construction activities associated with projects facilitated by the 2045 CAP measures and actions.



Mitigation Measures:

**Mitigation Measure 3.15-1: Traffic Control Plan (Recirculated Draft PEIR, p. 3.15-22 et seq.)**

LA County shall require project applicants and construction contractors to coordinate with relevant LA County departments, transit providers, and emergency service providers to develop a traffic control plan to reduce the impacts of construction traffic on transit service, roadway operations, emergency responders, pedestrian and bicycle facilities, and public safety in the surrounding area. (A traffic control plan may not be required for minor construction activities.) The project applicant shall be responsible for monitoring to ensure that the plan is effectively implemented by the construction contractor(s). Measures that may be employed throughout the course of the construction period include, but are not limited, to the following.

- Provide advance notice of lane and sidewalk closures, durations, and alternative routes to emergency service providers, motorists, bicyclists, and pedestrians.
- Provide clearly marked pedestrian detours if any sidewalk or pedestrian walkway closures are necessary.
- Provide clearly marked bicycle detours if heavily used bicycle routes must be closed, or if bicyclist safety may otherwise be comprised.
- Provide crossing-guards and/or flag persons as needed to avoid traffic conflicts and ensure pedestrian and bicyclist safety.
- Locate all stationary equipment as far as possible from areas used heavily by vehicles, bicyclists, and pedestrians.
- Use nonskid traffic plates over open trenches to reduce hazards.
- Implement traffic control measures to reduce vehicle travel delays through construction zones.
- Maintain acceptable response times and performance objectives for emergency response services.
- Avoid routing construction traffic through residential areas to the extent feasible.
- Prohibit mobilization and demobilization of heavy construction equipment during AM and PM peak traffic hours.
- Maintain access for driveways and private roads outside the immediate construction zone by using steel plates or temporary backfill, as necessary.
- Provide designated areas for construction worker parking wherever feasible to reduce use of parking on streets or in city center areas.

**Impact 3.10-8:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to a significant cumulative adverse impact with regard to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment.

Finding 1: Mitigation measures would reduce the incremental contributions of projects facilitated by the 2045 CAP to a significant cumulative impact with regard to hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment to less-than-significant levels. The Board finds that Mitigation Measure 3.10-2 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: If, one or more projects facilitated by the Project, in combination with past, present, and reasonably foreseeable future projects, accidentally released hazardous materials into the environment, then a potentially significant impact on the environment and/or public could result. Numerous laws and regulations regulate the transportation, handling, storage, and disposal of hazardous materials. Nonetheless, given the broad use and storage of hazardous materials, including panels containing CdTe at solar facilities in the Antelope Valley and other unincorporated areas of Los Angeles County, and the potential for their accidental release, the cumulative impact would be significant. However, the Project's incremental contribution would be brought to less than cumulatively considerable (i.e., less than significant) with the implementation of Mitigation Measure 3.10-2. This mitigation measure would ensure that hazardous waste from broken CdTe modules, the primary hazard generated by solar facilities, and likely hazard derived from projects facilitated by the 2045 CAP would be disposed of properly if not recycled. Thus, cumulative impacts would be less than significant.

Mitigation Measures:

Mitigation Measure 3.10-2. See Impact 3.10-2 for a description of this mitigation measure.

Impact 3.10-9: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to a significant cumulative adverse impact related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of sensitive land uses.

Finding 1: Mitigation measures would reduce the Project's impacts relating to contributing to a significant cumulative adverse impact related to hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of sensitive land uses to less-than-significant levels. The Board finds that Mitigation Measure 3.10-2 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Cumulative projects that include solar facilities may include the use of CdTe solar technology modules, which can be toxic if released to the environment. Given the broad use and storage of hazardous materials, including CdTe cells at solar facilities in Antelope Valley and other unincorporated areas of Los Angeles County, and for the potential for their accidental release in the vicinity of sensitive land uses, when the Project's impacts are added, the cumulative impact would be significant. However, the Project's incremental contribution would be less than cumulatively considerable (i.e., less than significant) with implementation of Mitigation Measure 3.10-2. This mitigation measure would ensure that any hazardous waste from broken CdTe modules, toxic byproducts from solar facilities, from projects facilitated by the 2045 CAP would be disposed of properly if not recycled and would not result in an incremental contribution to a significant cumulative impact.



Mitigation Measures:

**Mitigation Measure 3.10-2.** See Impact 3.10-2 for a description of this mitigation measure.

**Impact 3.10-12:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to cumulative impairment of the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to contributing to cumulative impairment of the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** The Project's incremental contribution would be less than cumulatively considerable (i.e., less than significant) because the traffic control plan required by Mitigation Measure 3.15-1 would avoid or substantially reduce any Project-specific potential impairment of an emergency response or evacuation plan that may result during construction activities associated projects facilitated by the 2045 CAP measures and actions.

Mitigation Measures:

**Mitigation Measure 3.15-1: Traffic Control Plan.** See Impact 3.10-6 for a description of this mitigation measure.

**vi) Hydrology and Water Quality**

**Impact 3.11-5:** Projects facilitated by the 2045 CAP would not, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

**Finding 1:** Mitigation measures would reduce the Project's impacts in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation to less-than-significant levels. The Board finds that Mitigation Measure 3.10-2 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** Projects facilitated by the 2045 CAP measures and actions would result in a less-than-significant impact regarding the potential to create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials. However, Impact 3.10-2 concludes that a significant impact would result (pre-mitigation) regarding the potential for projects facilitated by the 2045 CAP measures and actions to 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 from solar PV projects, under specified circumstances (identified in Section 3.10) into the environment. Implementation of Mitigation Measure 3.10-2 would ensure that hazardous waste is properly managed. As a result, the impact resulting from a risk of release of pollutants due to project inundation flood hazard, tsunami, or seiche zones would be less than significant with mitigation incorporated.

Mitigation Measures:

**Mitigation Measure 3.10-2.** See Impact 3.10-2 for a description of this mitigation measure.

Impact 3.11-11: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to cumulative conditions of flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation.

Finding 1: Mitigation measures would reduce the Project's impacts contributing to cumulative conditions of flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation to less-than-significant levels. The Board finds that Mitigation Measure 3.10--2 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The 2045 CAP would result in a less than cumulatively considerable contribution to cumulative impacts related to flood, tsunami, or seiche water quality hazards in the County, with the exception of risk of pollutant releases from solar PV project hazardous waste that is improperly stored or disposed of, which would be significant impact that is cumulatively considerable. Implementation of Mitigation Measure 3.10-2 would ensure that hazardous waste is properly managed. The impact would be less than cumulatively considerable and less than significant with mitigation incorporated.

Mitigation Measures:

Mitigation Measure 3.10-2. See Impact 3.10-2 for a description of this mitigation measure.

## **vii) Transportation**

Impact 3.15-1: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would conflict with an applicable program plan, ordinance, or policy addressing the circulation system.

Finding 1: Mitigation measures would reduce the Project's impacts relating to conflicting conflict with an applicable program plan, ordinance, or policy addressing the circulation system to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Projects facilitated by the 2045 CAP measures and goals could result in a significant impact with respect to consistency with applicable program plans, ordinances, or policies addressing the circulation system, including an emergency response or evacuation plan; thus, impacts would be significant. Mitigation Measure 3.15-1 would reduce this to a less-than-significant impact because the Traffic Control Plan would substantially reduce any safety and mobility concerns for motorists, transit operators, bicyclists, and/or pedestrians that may result during construction activities associated with projects facilitated by the 2045 CAP measures and actions.

Mitigation Measures:

Mitigation Measure 3.15-1: Traffic Control Plan. See Impact 3.10-6 for a description of this mitigation measure.

Impact 3.15-3: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would substantially increase hazards due to a road design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Finding 1: Mitigation measures would reduce the Project's impacts relating to substantially increasing hazards due to a road design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: During the construction period, the presence of construction or the increased amount of heavy-duty construction vehicles on roadways could substantially increase hazards due to incompatible uses with normal vehicles on roadways. This could result in a significant impact. However, with the implementation of Mitigation Measure 3.15-1, this would be reduced to a less-than-significant impact because the Traffic Control Plan would avoid or substantially reduce any hazardous conditions for motorists, transit operators, bicyclists, and/or pedestrians that may result during construction activities associated projects facilitated by the 2045 CAP measures and actions.

Mitigation Measures:

Mitigation Measure 3.15-1: Traffic Control Plan. See Impact 3.10-6 for a description of this mitigation measure.

Impact 3.15-4: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would not cause a cumulatively considerable contribution to a significant cumulative impact relating to conflict with an applicable program plan, ordinance or policy addressing the circulation system.

Finding 1: Mitigation measures would reduce the Project's impacts relating to causing a cumulatively considerable contribution to a significant cumulative impact relating to conflict with an applicable program plan, ordinance or policy addressing the circulation system to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: With the implementation of the Traffic Control Plan required by Mitigation Measure 3.15-1 the Project-specific, incremental contribution, combined with the cumulative projects' impacts to transportation resources over the span of the 2045 CAP, would not be cumulatively considerable because the mitigation measure would avoid or substantially reduce any safety and mobility concerns for motorists, transit operators, bicyclists, and/or pedestrians that may result during construction activities associated with projects facilitated by the 2045 CAP measures and actions.

Mitigation Measures:

Mitigation Measure 3.15-1: Traffic Control Plan. See Impact 3.10-6 for a description of this mitigation measure.

Impact 3.15-6: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would not cause a cumulatively considerable contribution to a significant cumulative impact relating to a substantial increase in hazards due to a road design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Finding 1: Mitigation measures would reduce the Project's impacts relating to causing a cumulatively considerable contribution to a significant cumulative impact relating to a substantial increase in hazards due to a road design feature (e.g., sharp curves or dangerous intersections)

or incompatible uses (e.g., farm equipment) to less-than-significant levels. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The number of traffic-related deaths and severe injuries that occur on unincorporated area roadways indicates that a significant cumulative impact exists regarding roadway hazards. Past, present, and reasonably foreseeable future projects, including projects implemented in accordance with the Regional Transportation Plan, General Plan, Vision Zero, and municipal code requirements have introduced or could introduce new roadways, roadway improvements, or incompatible uses that could result in substantially increased hazards that could result in significant impacts when cumulatively considered. However, with the implementation of the Traffic Control Plan required by Mitigation Measure 3.15-1 the Project-specific, incremental contribution, combined with the cumulative projects' impacts to transportation over the span of the 2045 CAP, would not be cumulatively considerable because the mitigation measure would avoid or substantially reduce any safety and mobility concerns for motorists, transit operators, bicyclists, and/or pedestrians that may result during construction activities associated with projects facilitated by 2045 CAP measures and actions.

Mitigation Measures:

Mitigation Measure 3.15-1: Traffic Control Plan. See Impact 3.10-6 for a description of this mitigation measure.

**viii) Tribal Cultural Resources**

Impact 3.16-1: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would cause a substantial adverse change in the significance of a tribal cultural resource or of a resource determined by the County, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code section 5024.1(c).

Finding 1: Mitigation measures would reduce the Project's impacts relating to causing a substantial adverse change in the significance of a tribal cultural resource or of a resource determined by the County, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code section 5024.1(c) to less-than-significant levels. The Board finds that Mitigation Measures 3.16-1 and 3.6-2 through 3.6-6 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Implementation of Mitigation Measure 3.16-1 would reduce impacts of projects facilitated by the 2045 CAP on tribal cultural resources to a less-than-significant level because it would require the County to consult with California Native American tribes pursuant to AB 52 to identify tribal cultural resources that could be affected by a project facilitated by the 2045 CAP. Further, if a tribal cultural resource is identified as a result of consultation, the County will implement mitigation measures or consider alternatives capable of avoiding or minimizing significant impacts on the tribal cultural resource. Additionally, Mitigation Measures 3.6-2 through 3.6-6 (identified in Section 3.6, Cultural Resources) require archaeological monitoring and preparation of a plan for the treatment of archaeological resources, including those that may also qualify as tribal cultural resources, which would further reduce the impact's significance.

Mitigation Measures:

Mitigation Measure 3.16-1: AB 52 Consultation. (Recirculated Draft PEIR, p. 3.16-10 et seq.)

Consistent with AB 52, before the release of a negative declaration, mitigated negative declaration, or EIR, the County shall initiate consultation within 14 days of a decision to undertake a project facilitated by Draft 2045 CAP measures or actions. The County shall provide formal notification to the designated contact of, or a tribal representative of, each traditionally and culturally affiliated California Native American tribe that has requested notice. The County shall begin the consultation process within 30 days after receiving a California Native American tribe's request for consultation.

If tribal cultural resources are identified, the County shall implement mitigation measures that would avoid or substantially lessen significant impacts on such resources, including but not limited to the measures recommended in Public Resources Code section 21084.3, or shall implement alternatives that would avoid significant impacts on the tribal cultural resources. Such measures shall be implemented in consultation with the California Native American tribe.

**Mitigation Measure 3.6-2. Archaeological Resources Assessment.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-4. Archaeological Resources Discoveries.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-5. Treatment of Archaeological Resources.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.** See Impact 3.6-1 for a description of this mitigation measure.

**Impact 3.16-2:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would cause a cumulatively considerable contribution to a significant cumulative impact caused by an adverse change in the significance of a tribal cultural resource or of a resource determined by the County, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code section 5024.1(c).

**Finding 1:** Mitigation measures would reduce the Project's impacts relating to causing a cumulatively considerable contribution to a significant cumulative impact caused by an adverse change in the significance of a tribal cultural resource or of a resource determined by the County, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c) to less-than-significant levels. The Board finds that Mitigation Measures 3.16-1 through 3.16-6 are feasible and hereby adopts them. The Board hereby makes Finding 1 and determines this impact to be less than significant.

**Facts in Support of Finding:** Mitigation Measure 3.16-1 and Mitigation Measures 3.6-2 through 3.6-6 would require the County to initiate consultation (within 14 days of a decision to undertake a project facilitated by 2045 CAP measures or actions) with California Native American tribes to avoid or lessen impacts on tribal cultural resources and would require archaeological monitoring and preparation of a plan for the treatment of such resources. As a result, with implementation of these measures, the Project-specific, incremental contribution, combined with the cumulative projects' impacts on tribal cultural resources over the span of the 2045 CAP, would not be cumulatively considerable, and therefore would be less than significant.

Mitigation Measures:

**Mitigation Measure 3.16-1:** See Impact 3.16-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-2. Archaeological Resources Assessment.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-4. Archaeological Resources Discoveries.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-5. Treatment of Archaeological Resources.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.** See Impact 3.6-1 for a description of this mitigation measure.

**ix) Wildfire**

**Impact 3.18-1:** Projects facilitated by the 2045 CAP would not substantially impair an adopted emergency response plan or emergency evacuation plan.

Finding 1: Mitigation measures would reduce the Project's impacts relating to substantially impairing an adopted emergency response plan or emergency evacuation plan to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Implementation of the traffic control plan required by Mitigation Measure 3.15-1 would avoid or substantially reduce any potential impairment of an emergency response or evacuation plan that may result during construction activities associated with projects facilitated by the 2045 CAP measures and actions. Because any impacts related to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact would occur, implementing this mitigation measure would reduce the impacts to a less-than-significant level.

Mitigation Measures:

**Mitigation Measure 3.15-1: Traffic Control Plan.** See Impact 3.10-6 for a description of this mitigation measure.

**Impact 3.18-3:** Projects facilitated by the 2045 CAP could require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, composting facilities, power lines, or other utilities) that may exacerbate fire risk or may result in temporary or ongoing impacts on the environment.

Finding 1: Mitigation measures would reduce the Project's impacts relating to requiring the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, composting facilities, power lines, or other utilities) that may exacerbate fire risk or may result in temporary or ongoing impacts on the environment to less-than-significant levels. The Board finds that Mitigation Measure 3.18-3 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.



Facts in Support of Finding: The implementation of Mitigation Measure 3.18-3 would ensure that the risk of fire from infrastructure associated with projects facilitated by the 2045 CAP measures and actions would be managed through collaboration with the Los Angeles County Fire Department (LACoFD), and that the applicant and its contractors would implement fire safety measures to prevent wildland fire and would be prepared to respond immediately if a fire should ignite. Therefore, this impact of projects facilitated by the 2045 CAP would be reduced to a less-than-significant level.

Mitigation Measures:

Mitigation Measure 3.18-3: Fire Safety During Construction and Operation (Recirculated Draft PEIR, p. 3.18-23 et seq.).

Future applicants and/or their contractors shall prepare and implement project-specific fire protection plans for projects located in the VHFHSZ to ensure that wildfire-related hazards are not exacerbated by projects facilitated by the 2045 CAP measures or goals. The applicant shall prepare and submit a fire protection plan to the County for review and approval at least 60 days before the start of construction activities. The fire protection plan shall include or require, but not limited to, the following measures along with Fire Code compliance, as applicable to address construction and operation:

- A training module within the pre-construction worker training (e.g., Worker Environmental Awareness training, safety training, fire equipment and procedures) on the specifics of the approved plan for all construction crew members before the start of construction.
- List project site roles and responsibilities and identify appropriate emergency notification procedures and site-specific emergency response and evacuation measures and routes that would be followed during emergency situations. All construction vehicles shall have fire suppression equipment.
- Instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site. Protocol for the project contractor and/or the applicant to perform visual inspections daily to ensure that all ignition risks are reduced or eliminated before leaving the worksite. Identify fire safety and prevention measures for project-specific infrastructure that can ignite fires, such as power lines, battery storage facilities, and composting facilities.

Impact 3.18-5: Projects facilitated by the 2045 CAP could expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Finding 1: Mitigation measures would reduce the Project's impacts relating to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires to less-than-significant levels. The Board finds that Mitigation Measure 3.18-3 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Implementation of Mitigation Measure 3.18-3 would ensure that the risks of fire from projects facilitated by the 2045 CAP measures and actions would be managed through collaboration with LACoFD and the California Department of Forestry and Fire Protection (CAL FIRE), and that the applicant and its contractors would implement fire safety measures to

prevent wildland fire and would be prepared to respond immediately if a fire should ignite. Therefore, this impact would be reduced to a less-than-significant level.

Mitigation Measures:

[Mitigation Measure 3.18-3: Fire Safety During Construction and Operation](#). See Impact 3.18-3 for a description of this mitigation measure.

Impact 3.18-6: Projects facilitated by the 2045 CAP could result in significant cumulative impacts with regard to impairing an adopted emergency response plan or emergency evacuation plan.

Finding 1: Mitigation measures would reduce the Project's impacts relating to resulting in significant cumulative impacts with regard to impairing an adopted emergency response plan or emergency evacuation plan to less-than-significant levels. The Board finds that Mitigation Measure 3.15-1 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: The traffic control plan required by Mitigation Measure 3.15-1 would avoid or substantially reduce the contribution of projects facilitated by the 2045 CAP measures and actions to impairment of an emergency response or evacuation plan to less than cumulatively considerable. The cumulative impact on emergency access and emergency response would be reduced to a less than cumulatively considerable and therefore less-than-significant level.

Mitigation Measures:

[Mitigation Measure 3.15-1: Traffic Control Plan](#). See Impact 3.10-6 for a description of this mitigation measure.

Impact 3.18-8: Projects facilitated by the 2045 CAP could require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, composting facilities, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing cumulative impacts on the environment.

Finding 1: Mitigation measures would reduce the Project's impacts relating to requiring the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, composting facilities, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing cumulative impacts on the environment to less-than-significant levels. The Board finds that Mitigation Measure 3.18-3 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Implementation of Mitigation Measure 3.18-3 would ensure that the incremental cumulative risk of wildfire from projects facilitated by the 2045 CAP measures and actions would be managed through collaboration with LACoFD, fire safety measures to prevent wildland fires, and preparations for immediate responses if a fire should ignite. This measure would reduce the contribution of projects facilitated by 2045 CAP measures and actions to less than cumulatively considerable, and therefore to a less-than-significant level.

Mitigation Measures:

[Mitigation Measure 3.18-3: Fire Safety During Construction and Operation](#). See Impact 3.18-3 for a description of this mitigation measure.



Impact 3.18-10: Projects facilitated by the 2045 CAP could expose people or structures, either directly or indirectly, to a significant cumulative risk of loss, injury, or death involving wildland fires.

Finding 1: Mitigation measures would reduce the Project's impacts relating to exposing people or structures, either directly or indirectly, to a significant cumulative risk of loss, injury, or death involving wildland fires to less-than-significant levels. The Board finds that Mitigation Measure 3.18-3 is feasible and hereby adopts it. The Board hereby makes Finding 1 and determines this impact to be less than significant.

Facts in Support of Finding: Implementation of Mitigation Measure 3.18-3 would ensure that the incremental cumulative risk of wildfire from projects facilitated by the 2045 CAP measures and actions would be managed through collaboration with LACoFD, implementation of fire safety measures to prevent wildland fires, and preparations for immediate responses if a fire should ignite. This measure would reduce the Project's incremental contribution to the cumulative impact to less than cumulatively considerable, and this cumulative impact would be reduced to a less-than-significant level.

Mitigation Measures:

Mitigation Measure 3.18-3: Fire Safety During Construction and Operation. See Impact 3.18-3 for a description of this mitigation measure.

**b. Findings Regarding Project Impacts Determined to Be Significant and Unavoidable**

Where, as a result of the environmental analysis of the Project, the County has determined that either: (1) even with compliance with existing laws, codes and statutes, and/or the identification of feasible mitigation measures, significant impacts cannot be reduced to a level of less than significant; or (2) no feasible mitigation measures or alternatives are available to mitigate the significant impact, the County has found in accordance with Public Resources Code section 21081(a)(3) and CEQA Guidelines section 15091(a)(3) that "Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR." This is referred to herein as "Finding 3."

**i) Aesthetics**

Impact 3.2-1: Projects facilitated by the 2045 CAP would have a substantial adverse effect on a scenic vista.

Finding 3: There are no feasible and reasonable mitigation measures that would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: The 2045 CAP is a policy document that does not include specific projects that would have a direct, adverse effect on scenic vistas. Nonetheless, many of the projects facilitated by 2045 CAP measures and actions would involve retrofitting of existing buildings, development along existing transit areas, infill projects in urban locations that are already developed, electric vehicle charging stations, or distributed energy resources like rooftop solar PV panels on existing structures. These projects would have significant impacts on the surrounding area due to the inherent change to scenic vistas that would result.

The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the severity of impact on scenic vistas; however, these measures would not on their own merits

ensure that the impact would be less than significant. Therefore, the County finds that even with implementation of these mitigation measures, potential impacts of projects facilitated by the 2045 CAP would remain significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

Mitigation Measure 3.2-1: Alternative Design (Recirculated Draft PEIR, p. 3.2-11)

Projects facilitated by the 2045 CAP that would obstruct views from publicly-accessible vantage points as defined in this analysis (such as from a vista point or a regional riding, hiking, or multiuse trail) shall identify and protect public views and significant landscape features or landforms visible from such views, and shall implement project-specific mitigation as applicable. If it is determined that a project would obstruct scenic views, the County shall consider alternative designs that seek to avoid and/or minimize these impacts. Project-specific design measures may include reduction in height of improvements or width of improvements to reduce obstruction of views or other adverse visual effects, or relocation of improvements to reduce obstruction of views. The County shall consider taking the following (or equivalent) actions: i) Require that the scale and massing of new development provide appropriate transitions in structure height and bulk that are sensitive to the physical and visual character of the affected area; ii) ensure structure heights are stepped back to maintain appropriate transitions in scale and to protect scenic views; and iii) avoid siting electric towers, solar power facilities, wind power facilities, communication transmission facilities and/or above ground lines where they could obstruct views from public vantage points, such as a regional riding, hiking, or multiuse trail, along scenic roadways and routes, or scenic vista points.

Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures (Recirculated Draft PEIR, p. 3.2-11)

To partially screen views of projects facilitated by 2045 CAP measures and actions in locations where they would be visible from publicly accessible vantage points (e.g., scenic vistas, trails, scenic roadways and routes) and affect visual character or quality, if feasible and effective, the County shall (and other implementing state or local agencies can and should) require the construction of a berm, vegetative screening, or other form of visual barrier of sufficient height to provide a visual transition from ground level to surrounding hills or ridgelines. The color of proposed building facades and roofs shall be designed to visually blend in and minimize the potential for visual contrast between the project elements and their natural landscape surroundings. Bright or very light colors (including white) shall be avoided. Re-contouring and revegetation of temporarily disturbed, graded areas shall be completed to provide a natural appearing landform upon completion of construction.

Impact 3.2-2: Projects facilitated by the 2045 CAP would be visible from or obstruct views from a regional riding, hiking, or multiuse trail.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the severity of an impact on a public regional riding, hiking, or multiuse trail by adjusting the scaling and massing of structures, using step-backs from sensitive

adjoining uses, planning for project/facility siting, and installing visual screening; however, these measures would not on their own merits ensure that the impact of projects facilitated by the 2045 CAP would be less than significant. The Board therefore finds that, even with implementation of Mitigation Measures 3.2-1 and 3.2-2, alternative design or visual screening measures may not be feasible or effective for every Project facilitated by the 2045 CAP measures and actions. Therefore, the Board finds that this impact would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.2-1: Alternative Design.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Impact 3.2-3:** Projects facilitated by the 2045 CAP would substantially damage scenic resources, including, but not limited to, trees, rocks, outcropping, and historic building within a state scenic highway.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the severity of an impact relating to substantial damage to scenic resources within a state scenic highway by adjusting the scaling and massing of structures, using step-backs from sensitive adjoining uses, planning for project/facility siting, and installing visual screening; however, these measures would not on their own merits ensure that the impact of projects facilitated by the 2045 CAP would be less than significant. For example, details about the siting and design of future utility-scale solar PV projects facilitated by the 2045 CAP, and the feasibility and effectiveness of mitigation measures, are unavailable. No additional feasible mitigation measures are available. The Board, therefore, finds that even with implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2, impacts may include substantial damage to scenic resources. Therefore, the Board finds Impact 3.2-3 would remain significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.2-1: Alternative Design.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Impact 3.2-4:** Projects facilitated by the 2045 CAP would substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations of governing scenic quality.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the significance of project-caused changes to existing visual character or quality by adjusting the scaling and massing of structures, using step-backs from sensitive adjoining uses, planning for project/facility siting, and installing visual screening; however, these measures would not on their own merits ensure that the impact would be less than significant. For example, details about the siting of future utility-scale solar PV projects facilitated by the 2045 CAP, and the feasibility and effectiveness of mitigation measures, are unavailable. Therefore, the impacts of such projects relative to visual character or quality cannot be accurately assessed at this time, nor can project-specific mitigation be developed. No additional feasible mitigation measures are available. The Board, therefore, finds that even with implementation of these two mitigation measures, impacts may include substantial degradation of the existing visual character or quality of public views. Therefore, the Board finds Impact 3.2-4 would remain significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.2-1: Alternative Design.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Impact 3.2-6:** Projects facilitated by the 2045 CAP would cause or contribute to a significant cumulative impact to scenic vistas.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: In locations where scenic vistas are of exceptionally high quality, such as in the Antelope Valley, the addition of incremental impacts from projects facilitated by 2045 CAP measures and actions could be more likely to cause or make a cumulatively considerable contribution to a significant cumulative impact on scenic vistas. By contrast, in locations where the quality of scenic vistas is of lesser quality and more mundane, there is a decreased likelihood that projects facilitated by the 2045 CAP measures and actions would cause or contribute to a significant cumulative impact on scenic vistas. The Board, therefore, finds that even with implementation of these two mitigation measures, significant cumulative impacts on scenic vistas would remain. Therefore, the Board finds projects facilitated by the 2045 CAP would cause a cumulatively considerable contribution to significant cumulative impacts to scenic vistas. The Board, therefore, finds that even with implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2, a significant unavoidable impact to scenic vistas would remain. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.2-1: Alternative Design.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures.** See Impact 3.2-1 for a discussion of this mitigation measure.

Impact 3.2-7: Projects facilitated by the 2045 CAP would cause or contribute to significant cumulative impacts on views from a regional riding, hiking, or multiuse trail.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: The Project's incremental contribution to cumulative impacts, in combination with the incremental impacts of other cumulative projects, would cause (or result in a cumulatively considerable contribution to) a significant cumulative impact on views from regional trails. The Project's contribution to this impact would be cumulatively considerable. The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the severity of the Project's incremental contribution to cumulative impacts but would not ensure that the Project's contribution would be less than cumulatively considerable. The Board, therefore, finds that even with implementation of these two mitigation measures, a significant cumulative impact to views from a regional riding, hiking, or multiuse trail would remain. Therefore, the Board finds that this cumulative impact would remain significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

Mitigation Measure 3.2-1: Alternative Design. See Impact 3.2-1 for a discussion of this mitigation measure.

Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures. See Impact 3.2-1 for a discussion of this mitigation measure.

Impact 3.2-8: Projects facilitated by the 2045 CAP would cause or contribute to a significant cumulative impact due to substantial cumulative damage to scenic resources, including, but not limited to, trees, rocks, outcropping, and historic building within a state scenic highway.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: In combination with the incremental contributions of other closely related past, present, and reasonably foreseeable future projects that have been or may be approved within these state routes or within the areas to contribute to their eligibility for designation as a scenic highway, the incremental contribution of projects facilitated by the 2045 CAP could cause a significant cumulative impact to occur. The Project's contribution to this impact would be cumulatively considerable. The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the severity of the Project's incremental contribution relating to substantial damage to scenic resources within a state scenic highway but would ensure that, in combination with the incremental impacts of other projects, the resulting cumulative impact would be less than significant. Accordingly, even with the implementation of these mitigation measures, the Project's contribution to significant cumulative impacts to scenic resources, including, but not limited to, trees, rocks, outcropping, and historic building within a state scenic highway would remain. Therefore, the Board finds this significant cumulative impact to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.2-1: Alternative Design.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Impact 3.2-9:** Projects facilitated by the 2045 CAP would cause or contribute to significant cumulative degradation of the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** The incremental impacts of the Project, in combination with the incremental contributions of other closely related past present and reasonably foreseeable future projects, could cause or contribute to a significant cumulative impact regarding the degradation of the existing visual character or quality of public views of the site and its surroundings as a result of the transformation of existing undeveloped landscape to a more industrial look and feel as would be associated with the development of a water recycling, waste management, or compost processing facility or with the development of utility-scale, ground-mounted renewable energy generation or infrastructure projects if proposed in more rural areas. The implementation of Mitigation Measure 3.2-1 and Mitigation Measure 3.2-2 would reduce the Project's incremental contribution to cumulative impacts but would not ensure that the contribution would not be cumulatively considerable. The Board, therefore, finds that even with the implementation of these mitigation measures, impacts may include significant cumulative degradation of the existing visual character or quality of public views of the site and its surroundings. Therefore, the Board finds this cumulative impact to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.2-1: Alternative Design.** See Impact 3.2-1 for a discussion of this mitigation measure.

**Mitigation Measure 3.2-2: Visual Screening and Other View Protection Measures.** See Impact 3.2-1 for a discussion of this mitigation measure.

**ii) Agriculture and Forestry**

**Impact 3.3-1:** Projects facilitated by the 2045 CAP would 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.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Implementing Mitigation Measure 3.3-1 would lessen the impact of the conversion of mapped Farmland to nonagricultural uses by avoiding the development of



actively farmed lands for purposes of utility-scale solar and energy storage when there is an otherwise suitable site available. However, this measure would not ensure that such conversion could be avoided. The Board, therefore, finds that even with implementation of Mitigation Measure 3.3-1, impacts may include the conversion of Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Therefore, the Board finds that this significant cumulative impact would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

Mitigation Measure 3.3-1: Avoidance of Actively Farmed Lands When Siting Utility-Scale Solar and Energy Storage Development (Recirculated Draft PEIR, p. 3.3-14)

To reduce the impacts of converting Farmland in physical use for agriculture to nonagricultural uses when a utility-scale solar development is proposed on actively farmed land, the County shall require renewable energy project applicants to demonstrate their consideration of alternate sites consisting of formerly developed and/or contaminated lands such as landfills and mine sites located within one mile of the proposed project site when such development is consistent with General Plan and zoning requirements.

Impact 3.3-2: Projects facilitated by the 2045 CAP would conflict with the existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Implementing Mitigation Measure 3.3-1 would lessen impacts caused by a conflict with a designated Agricultural Resource Area but would not ensure that no such conflict would occur. The Board, therefore, finds that even with implementation of Mitigation Measure 3.3-1, impacts may include conflicts with the existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract. Therefore, the Board finds Impact 3.3-2 would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

Mitigation Measure 3.3-1: Avoidance of Actively Farmed Lands When Siting Utility-Scale Solar and Energy Storage Development. See Impact 3.3-1 for a description of this mitigation measure.

Impact 3.3-5: Projects facilitated by the 2045 CAP would 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.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Implementing Mitigation Measure 3.3-1 would lessen impacts related to the conversion of Farmland to utility-scale solar development (a nonagricultural use) but would not ensure that land in agricultural use would not be converted. The Board, therefore, finds that even with the implementation of Mitigation Measure 3.3-1, impacts may 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. Therefore, the Board finds Impact 3.3-5 would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.3-1: Avoidance of Actively Farmed Lands When Siting Utility-Scale Solar and Energy Storage Development.** See Impact 3.3-1 for a description of this mitigation measure.

**Impact 3.3-7:** Projects facilitated by the 2045 CAP would result in a significant cumulative impact related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Implementing Mitigation Measure 3.3-1 would lessen the Project's contribution to the significant cumulative impact. However, implementation of this measure would not ensure that the conversion of mapped Farmland could be avoided and would have no impact on the conversion of mapped Farmland for residential or other uses of that land consistent with General Plan and zoning provisions. The Board, therefore, finds that even with implementation of Mitigation Measure 3.3-1, impacts may include a significant cumulative conversion of Farmland, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use. Therefore, the Board finds that Impact 3.3-7 would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.3-1: Avoidance of Actively Farmed Lands When Siting Utility-Scale Solar and Energy Storage Development.** See Impact 3.3-1 for a description of this mitigation measure.

**Impact 3.3-8:** Projects facilitated by the 2045 CAP would result in a cumulative significant impact related to conflicts with existing zoning for agricultural use, or with a designated Agricultural Resource Area.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Implementing Mitigation Measure 3.3-1 would lessen the Project's contribution to the significant cumulative impact but would not ensure that a conflict with a designated Agricultural Resource Area would be avoided. The Board, therefore, finds that even with implementation of Mitigation Measure 3.3-1, the Project's incremental contribution to the cumulative impact to existing zoning for agricultural use, or with a designated Agricultural Resource Area would be cumulatively considerable. Therefore, the Board finds that Impact 3.3-8 would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

[Mitigation Measure 3.3-1: Avoidance of Actively Farmed Lands When Siting Utility-Scale Solar and Energy Storage Development](#). See Impact 3.3-1 for a description of this mitigation measure.

Impact 3.3-11: Projects facilitated by the 2045 CAP would involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Implementing Mitigation Measure 3.3-1 would lessen the Project's cumulative contribution to conversion-related impacts but would not ensure that other changes resulting in conversion would not occur. The Board, therefore, finds that even with the implementation of Mitigation Measure 3.3-1, the Project's incremental contribution to cumulative impacts involving other changes in the existing environment that could result in conversion of Farmland would be cumulatively considerable. Therefore, the Board finds that Impact 3.3-5 would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

[Mitigation Measure 3.3-1: Avoidance of Actively Farmed Lands When Siting Utility-Scale Solar and Energy Storage Development](#). See Impact 3.3-1 for a description of this mitigation measure.

**iii) Air Quality**

Impact 3.4-1: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would conflict with or obstruct implementation of the applicable air quality plan.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Future projects in the unincorporated County that would implement 2045 CAP measures and actions would result in a significant and unavoidable impact related to conflict with or obstruction of the implementation of the applicable air quality plan. Implementation of Mitigation Measures 3.4-1 through 3.4-3 would reduce the severity of construction and operational emissions. However, even with the implementation of the measures, these impacts are not accurately quantifiable at this time and may not be reduced to below the thresholds. As a result, the impact for construction and operation of projects facilitated by 2045 CAP would remain significant and unavoidable. No feasible mitigation measures are available that would reduce impacts below South Coast Air Quality Management District (SCAQMD) or Antelope Valley Air Quality Management District (AVAQMD) thresholds on a programmatic level, and feasible mitigation may not be available for individual projects facilitated by the 2045 CAP measures and actions. Impacts would be significant and unavoidable. No additional feasible mitigation measures are available. The magnitude of long-term impacts would increase over time to the extent that more projects would be facilitated by CAP measures and actions to meet the 2045 CAP's increasingly aggressive 2030, 2035, and 2045 GHG reduction targets. Because the exact specifications for projects that may be facilitated by the 2045 CAP are unknown, this determination applies to horizon years 2030, 2035, and 2045. The Board, therefore, finds that

even with implementation of the identified mitigation measures, impacts due to conflict with or obstruction of the implementation of the applicable air quality plan would remain. Therefore, the Board finds No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-3b for a discussion of this mitigation measure.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions.** See Impact 3.4-3b for a discussion of this mitigation measure.

**Mitigation Measure 3.4-3: Architectural Coating VOC Emissions (Recirculated Draft PEIR, p. 3.4-54)**

If, during subsequent project-level environmental review, it is determined that VOC emissions impacts may be significant, the lead agency shall require Super-Compliant VOC-content architectural coatings (0 grams per liter to less than 10 grams per liter VOC) to be used during construction and operational application of paints and other architectural coatings to reduce ozone precursors. If paints and coatings with VOC content of 0 grams/liter to less than 10 grams/liter cannot be utilized, the developer shall avoid application of architectural coatings during days when the USEPA, CARB, or SCAQMD has forecasted the Air Quality Index for ozone to be greater than 100 for the project location.

Impact 3.4-2: The Project, as a result of projects facilitated by 2045 CAP measures and actions, could result in a cumulatively considerable net increase of a criteria pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Future projects in the unincorporated areas of the County facilitated by 2045 CAP measures and actions would result in a significant and unavoidable impact related to a cumulatively considerable net increase of a criteria pollutant for which the region is nonattainment during construction and operations due to the potential for individual future projects facilitated by 2045 CAP measures and actions to exceed the significance thresholds. Implementation of Mitigation Measures 3.4-1, 3.4-2, 3.4-3, 3.4-4, and 3.4-5 would help to reduce the severity of the impacts. However, even with implementation of the measures, impacts may not be reduced to below the thresholds (and impacts would remain significant and unavoidable) because no feasible mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds on a programmatic level and because feasible mitigation may not be available for individual projects facilitated by the 2045 CAP. Impacts would be significant and unavoidable. No additional feasible mitigation measures are available. Because the exact specifications for projects that may be facilitated by the 2045 CAP are unknown, this determination applies to horizon years 2030, 2035, and 2045. The magnitude of long-term impacts may increase over time to the extent that more projects would be facilitated by 2045 CAP measures and actions to meet the 2045 CAP's increasingly aggressive 2030, 2035, and 2045 GHG reduction targets. The Board, therefore, finds that even with implementation of the identified mitigation measures, a cumulatively considerable net increase of a criteria pollutant for which the

Project region is nonattainment would remain. Therefore, the Board finds Impact 3.4-2 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3: Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-4: Enhanced Energy Conservation (Recirculated Draft PEIR, p. 3.4-61)**

If, during subsequent project-level environmental review, it is determined that operational emissions impacts are significant, the lead agency shall require the project to incorporate enhanced energy conservation measures beyond those required by federal or state law, County ordinance, and the 2045 CAP measures and actions to reduce energy-related emissions. Enhanced energy conservation measures shall include one or more of the following as applicable:

- Install Energy Star rated heating, cooling, lighting, and appliances.
- Use of heating, ventilation, and air conditioning equipment with a Seasonal Energy Efficiency Ratio of 12 or higher.
- Installation of water heaters with an energy factor of 0.92 or higher.
- Install solar water heaters or tankless water heaters.
- Use passive solar cooling/heating.
- Reduce building natural gas infrastructure, use renewable natural gas in place of fossil fuel-derived natural gas, or eliminate building natural gas infrastructure and fully electrify buildings.

**Mitigation Measure 3.4-5: Low-VOC/Green Cleaning Product Educational Program (Recirculated Draft PEIR, p. 3.4-61)**

If, during subsequent project-level environmental review, it is determined that operational emissions impacts may be significant, the lead agency shall require the project applicant or developer to provide tenants and residents with information about low-VOC/green cleaning products and paints, including materials educating how to identify low-VOC cleaners and products.

**Impact 3.4-3a:** The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would expose sensitive receptors to substantial pollutant concentrations for localized air pollutants and Toxic Air Contaminants (TAC) emissions.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: The 2045 CAP would result in a significant and unavoidable impact related to exposure of sensitive receptors to substantial pollutant concentrations. The implementation of Mitigation Measure 3.4-6 and Mitigation Measure 3.4-7 would help to reduce the severity of the impacts related to localized emissions and TAC emissions. However, impacts from construction- and operational-related localized emissions and TAC emissions may not be reduced to below the thresholds and, under such conditions, impacts would remain significant and unavoidable. No feasible mitigation measures are available that would reduce impacts related to construction-related localized emissions and TAC emissions to below SCAQMD's or AVAQMD's thresholds on a Program level and feasible mitigation may not be available for individual projects facilitated by 2045 CAP measures and actions. Impacts would be significant and unavoidable. No additional feasible mitigation measures are available. Because the exact specifications for projects that may be facilitated by the 2045 CAP are unknown, this determination applies to horizon years 2030, 2035, and 2045. The magnitude of long-term impacts would increase over time to the extent that more projects would be facilitated by CAP measures and actions to meet the 2045 CAP's increasingly aggressive 2030, 2035, and 2045 GHG reduction targets. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would expose sensitive receptors to substantial pollutant concentrations for localized air pollutants and TAC emissions. Therefore, the Board finds Impact 3.4-3a to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3: Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-4: Enhanced Energy Conservation.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.4-5: Low-VOC/Green Cleaning Product Educational Program.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.4-6: Stationary Sources (Recirculated Draft PEIR, p. 3.4-68)**

Applicants for new or modified stationary sources facilitated by the 2045 CAP measures and actions that: (1) have the potential to generate 40 or more diesel trucks per day and (2) are located within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable air quality management district. If the HRA shows that the incremental cancer risk

exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m<sup>3</sup>, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the project.

**Mitigation Measure 3.4-7: Health Risk Assessment (Recirculated Draft PEIR, p. 3.4-68 et seq.)**

Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval for sensitive land uses facilitated by the 2045 CAP measures and actions within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities or similar types of facilities that produce TAC emissions:

- Industrial facilities within 1,000 feet
- Distribution centers (40 or more trucks per day) within 1,000 feet
- Major transportation projects (50,000 or more vehicles per day) within 1,000 feet
- Gasoline dispensing facilities within 300 feet

Applicants proposing projects facilitated by the 2045 CAP measures and actions which produce TAC emissions may be required to submit an HRA based on local rules and regulations, and/or at the discretion of the lead agency.

The HRA shall be prepared in accordance with policies and procedures of the applicable Air Quality Management District. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high-volume roadways and/or truck loading zones, unless it can be demonstrated to the County Department of Regional Planning that there are operational limitations.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County and shall be verified by the County Department of Regional Planning.



**Impact 3.4-5:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would make a cumulatively considerable contribution to a significant cumulative impact due to a conflict with or obstruction of implementation of the applicable air quality plan.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Future projects in the unincorporated County that would be facilitated by the 2045 CAP measures and actions would result in a significant and unavoidable cumulative impact related to construction emissions and conflict with or obstruction of the implementation of the applicable air quality plan. The implementation of Mitigation Measures 3.4-1, 3.4-2, and 3.4-3 would reduce the severity of construction emissions. However, even with the implementation of the measures, these cumulative impacts are not accurately quantifiable at this time and may not be reduced to below the thresholds. No feasible mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds on a program level, and feasible mitigation may not be available for individual projects facilitated by the 2045 CAP measures and actions for horizon years 2030, 2035, and 2045. Impacts would be cumulatively considerable, and significant and unavoidable. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would cause a cumulatively considerable contribution to a significant cumulative impact due to a conflict with or obstruction of implementation of the applicable air quality plan. Therefore, the Board finds Impact 3.4-5 to be significant and unavoidable. No additional feasible mitigation is available.

**Mitigation Measures:**

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3: Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Impact 3.4-6:** The Draft 2045 CAP would make a cumulatively considerable contribution to a significant cumulative impact to air quality associated with criteria pollutants.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Future projects in the unincorporated areas of the County facilitated by 2045 CAP measures and actions would result in a significant and unavoidable impact related to a cumulatively considerable net increase of a criteria pollutant for which the region is nonattainment during construction and operations. The implementation of Mitigation Measures 3.4-1, 3.4-2, 3.4-3, 3.4-4, and 3.4-5 would help to reduce the severity of the impacts. However, even with implementation of these measures, impacts may not be reduced to below the thresholds (and impacts would remain significant and unavoidable) because no feasible mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds on a program level and because feasible mitigation may not be available for individual



projects facilitated by the 2045 CAP for horizon years 2030, 2035, and 2045. Impacts would be significant and unavoidable. The magnitude of long-term impacts may increase over time to the extent that more projects would be facilitated by CAP measures and actions to meet the 2045 CAP's increasingly aggressive 2030, 2035, and 2045 GHG reduction targets. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would cause a cumulatively considerable contribution to a significant cumulative impact to air quality associated with criteria pollutants. Therefore, the Board finds Impact 3.4-6 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3: Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-4: Enhanced Energy Conservation.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.4-5: Low-VOC/Green Cleaning Product Educational Program.** See Impact 3.4-2 for a description of this mitigation measure.

**Impact 3.4-7:** The Project, as a result of projects facilitated by the 2045 CAP, could contribute to a significant cumulative impact to air quality associated with localized air pollutant and TAC emissions.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Future projects facilitated by 2045 CAP measures and actions may result in localized air pollutant and TAC emissions that could exceed the SCAQMD and AVAQMD significance thresholds for each of the horizon years. However, even with implementation of Mitigation Measures 3.4-1, 3.4-2, 3.4-3, 3.4-4, 3.4-5, 3.4-6, 3.4-7, and 3.4-8, the impacts related to fugitive dust, localized TAC emissions, and associated health risk impacts would be cumulatively considerable and thus significant and unavoidable. No feasible mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds on a program level, and feasible mitigation may not be available for future projects facilitated by the 2045 CAP for horizon years 2030, 2035, and 2045. Impacts would be significant and unavoidable. The magnitude of long-term impacts may increase over time to the extent that more projects would be facilitated by CAP measures and actions to meet the 2045 CAP's increasingly aggressive 2030, 2035, and 2045 GHG reduction targets. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would contribute to a significant cumulative impact to air quality associated with localized air pollutant and TAC emissions. Therefore, the Board finds Impact 3.4-7 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.4-1: Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2: Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3: Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-4: Enhanced Energy Conservation.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.4-5: Low-VOC/Green Cleaning Product Educational Program.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.4-6: Stationary Sources.** See Impact 3.4-3a for a description of this mitigation measure.

**Mitigation Measure 3.4-7: Health Risk Assessment.** See Impact 3.4-3a for a description of this mitigation measure.

**Mitigation Measure 3.4-8: Valley Fever.** See Impact 3.4-3b for a description of this mitigation measure.

**iv) Biological Resources**

**Impact 3.5-2:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would have a substantial adverse indirect impact (i.e., through habitat modifications) on one or more species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS).

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Although direct impacts on special-status species would be mitigated, significant indirect impacts on special-status species would occur due to the loss of common, non-sensitive habitat. Special-status species are dependent on both sensitive and common habitats and with the development facilitated by 2045 CAP measures and actions, habitat and resources to support special-status species could be reduced. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would have a substantial adverse indirect impact on one or more species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, the Board finds Impact 3.5-2 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.5-1 (Recirculated Draft PEIR, p. 3.5-19)**

The County shall require biological resources to be analyzed on a project-specific level by a qualified biological consultant. Prior to or during the preparation of project-level environmental documents, and prior to the start of construction activities, a biological resources assessment shall be conducted to characterize the project site. Suitable buffer areas surrounding the project site shall be included where native habitat is contiguous with off-site habitat areas. The assessment and analysis shall emphasize identifying endangered, threatened, rare, and other special-status species; regionally and locally unique species; and sensitive natural communities, jurisdictional waters, and oak woodlands. Focused surveys shall be conducted as necessary to determine the presence of special-status species (e.g., focused sensitive plant or wildlife surveys). Focused surveys shall be conducted according to established CDFW or USFWS protocols, if available for the object species. Natural communities shall be mapped and identified according to floristic alliance- and/or association-based mapping protocols consistent with CDFW natural communities. A jurisdictional delineation may be required if there are signs of potentially regulated wetlands and non-wetland waters. A biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze direct and indirect impacts on biological resources, and propose mitigation measures to offset those impacts. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of biological resources on-site (e.g., observed and detected species as well as those species with potential to occur on-site).

**Mitigation Measure 3.5-2 (Recirculated Draft PEIR, p. 3.5-19et seq.)**

If there is potential for direct impacts to special-status species with implementation of construction activities, the project-specific biological resources assessment report (as described in Mitigation Measure 3.5-1) shall include a mitigation measure requiring pre-construction surveys for special-status species and/or construction monitoring to ensure avoidance, relocation, or safe escape of special-status species from the construction activities, as appropriate. The mitigation measures shall also include consultation with and obtaining permits from USFWS or CDFW prior to construction, if required by FESA or CESA for listed endangered and threatened species. If special-status species are found to be nesting, brooding, denning, etc. on-site during the pre-construction survey or monitoring, construction activity shall be halted until offspring are weaned, fledged, etc. and are able to escape the site or be safely relocated to appropriate offsite habitat areas. Relocation of such species into areas of appropriate restored habitat would have the best chance of replacing/incrementing populations that are lost due to habitat converted to development. Relocation to restored habitat areas shall be the preferred goal of this measure. A qualified biologist shall be on site to conduct surveys, to perform or oversee implementation of protective measures, and to determine when construction activity may resume.

**Impact 3.5-3:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would have a substantial adverse impact on sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Although direct impacts on sensitive natural communities would be mitigated, no mitigation is provided for indirect impacts on sensitive natural communities through the loss of common, non-sensitive habitat. Sensitive natural communities are dependent on both sensitive and common habitats, and with the potential increase in development to implement the 2045 CAP, measures and actions could reduce common habitat and resources to support sensitive natural communities. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would have a substantial adverse impact on sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS. Therefore, the Board finds Impact 3.5-3 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

Mitigation Measure 3.5-1. See Impact 3.5-2 for a description of this mitigation measure.

Mitigation Measure 3.5-5 (Recirculated Draft PEIR, p. 3.5-26)

Proponents of projects resulting in the loss of oak woodlands shall mitigate with in-kind replacement habitat at a minimum of 1:1 mitigation ratio documented through a County-approved habitat mitigation plan. The plan shall include the number of replacement trees (or acreage and average density of woodland), location of replacement woodland, understory habitat components, sequencing for any phased tree removal, and performance standards for mitigation. The plan shall include monitoring for a minimum of five years, with annual reports submitted to the County.

For oak woodlands impacts, project mitigation shall be consistent with recommendations in the County's Oak Woodland Conservation Management Plan and its 2014 Guide. If a project cannot be redesigned to avoid impacts to oak woodlands, an appropriate mitigation strategy would be developed by selecting from the Guide's list of recommended mitigation measures prioritizing the acquisition of oak woodland habitat comparable to the habitat that was affected over the restoration of degraded off-site and in-lieu fees. A Mitigation Monitoring Plan consistent with the Guide's recommendations would be prepared and implemented.

Impact 3.5-5: The Project, as a result of projects facilitated by the 2045 CAP measures and actions, would interfere substantially with the movement of 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.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Projects facilitated by 2045 CAP measures and actions could adversely affect wildlife corridors, habitat linkages, and native wildlife nursery sites when expanding bicycle and pedestrian networks within recreational areas, procuring zero-carbon electricity, electrifying all new development, increasing renewable energy production on new development, and expanding energy resilience. These measures may facilitate new development such as large utility-scale energy projects (e.g., solar, battery storage, substation, transmission infrastructure) in the Antelope Valley or other rural areas and would affect wildlife corridors, habitat linkages, and native wildlife nursery sites if they narrow existing corridors or remove them completely. Impacts associated with narrowing or removing existing wildlife corridors, habitat

linkages, and/or native wildlife nursery sites would remain. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would interfere substantially with the movement of 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. Therefore, the Board finds Impact 3.5-5 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

[Mitigation Measure 3.5-1](#). See Impact 3.5-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-4 \(Recirculated Draft PEIR, p. 3.5-25\)](#)

Proponents for individual projects facilitated by the 2045 CAP provisions shall analyze impacts on wildlife movement and corridors that may introduce new or additional barriers to wildlife dispersal or constrain existing wildlife corridors to future movement, or indirect impacts constraining future wildlife movement. Where projects may interfere with wildlife movement, alternative designs shall be included in the analysis to reduce wildlife movement impacts. Corridors, linkages, and pinch points shall not be entirely closed by any development, and partial mitigation shall be mandatory for project-specific impacts on wildlife corridors and wildlife nursery sites. This shall include provision of a minimum of half the corridor width. (The width shall be at least what is needed to remain connective for the top predators using the corridor.) Mitigation can include preservation by deed in perpetuity of other parts of the wildlife corridor connecting through the development area; it can include native landscaping to provide cover on the corridor. For nursery site impacts, mitigation shall include preservation by deed in perpetuity for another comparable nursery site of the same species.

Impact 3.5-7: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would result in a cumulatively considerable contribution to a significant cumulative impact through habitat modifications on one or more species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: For indirect impacts resulting in part from the loss of common habitats and diminished resource availability, the implementation of Mitigation Measures 3.5-1 and 3.5-2 would not be sufficient to reduce the level of the Project-specific impact (as a result of projects facilitated by the 2045 CAP) to a less-than-significant level. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would result in a cumulatively considerable contribution to a significant cumulative impact through habitat modifications on one or more species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or USFWS. Therefore, the Board finds Impact 3.5-7 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

[Mitigation Measure 3.5-1](#). See Impact 3.5-2 for a description of this mitigation measure.

**Mitigation Measure 3.5-2.** See Impact 3.5-2 for a description of this mitigation measure.

**Impact 3.5-8:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would result in a cumulatively considerable contribution to a significant cumulative impact on sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** The 2045 CAP would contribute a significant and unavoidable incremental contribution to this significant cumulative impact. No further mitigation is available to reduce the significance of this incremental contribution because riparian habitat and sensitive natural communities are limited in distribution; therefore, the ability to replace or mitigate the loss of these areas are equally limited in opportunity and new habitats, especially riparian, cannot readily be created. Accordingly, the Project-specific, incremental contribution, combined with the cumulative projects' impacts on sensitive natural communities over the span of the 2045 CAP, would remain. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project would result in a cumulatively considerable contribution to a significant cumulative impact on sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS. Therefore, the Board finds Impact 3.5-8 to be significant and unavoidable. No additional feasible mitigation is available.

**Mitigation Measures:**

**Mitigation Measure 3.5-1.** See Impact 3.5-2 for a description of this mitigation measure.

**Mitigation Measure 3.5-5.** See Impact 3.5-3 for a description of this mitigation measure.

**Impact 3.5-10:** The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to a significant cumulative impact relating to substantial interference with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impediment of the use of native wildlife nursery sites.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Projects facilitated by the 2045 CAP would contribute a significant unavoidable incremental contribution to this significant cumulative impact. Even with the implementation of Mitigation Measures 3.5-1 and 3.5-4, the Project-specific, incremental contribution, combined with the cumulative projects' impacts on special-status species over the span of the 2045 CAP, would be cumulatively considerable. Additional mitigation opportunities for wildlife movement are limited or unavailable. A significant cumulative impact from interference with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impediment of the use of native wildlife nursery sites would result. The Board, therefore, finds that even with implementation of the identified mitigation measures, Impact 3.5-10 would be significant and unavoidable. No additional feasible mitigation is available.



Mitigation Measures:

[Mitigation Measure 3.5-1](#). See Impact 3.5-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-4](#). See Impact 3.5-5 for a description of this mitigation measure.

Impact 3.5-11: The Project, as a result of projects facilitated by 2045 CAP measures and actions, would contribute to the cumulative conversion of oak woodlands or other unique native woodlands.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Projects facilitated by 2045 CAP measures and actions would result in a cumulatively considerable contribution to significant cumulative impacts when combined with the incremental impacts of other projects over the span of the 2045 CAP and with the impacts of other natural factors beyond the County's control that contribute to the conversion of oak woodlands and other unique woodlands (e.g., wildfires, climate change, introduced plant diseases, insect pests). The implementation of Mitigation Measures 3.5-1 and 3.5-5 would not reduce the significance of the Project's contribution to a less than cumulatively considerable level. The Board, therefore, finds that even with implementation of the identified mitigation measures, a significant cumulative impact related to a cumulative conversion of oak woodlands or other unique native woodlands would remain. Therefore, the Board finds Impact 3.5-11 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

[Mitigation Measure 3.5-1](#). See Impact 3.5-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-5](#). See Impact 3.5-3 for a description of this mitigation measure.

**v) Noise and Vibration**

Impact 3.13-1: Projects facilitated by the 2045 CAP could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Mitigation Measure 3.13-1 would reduce impacts associated with construction activities. However, because of the potential for construction activities to occur near sensitive uses, and because of the potential intensity of construction activities, it may not be feasible to reduce the impact to a less-than-significant level. Accordingly, the impact would remain significant and unavoidable. Mitigation Measure 3.13-2 would reduce impacts associated with stationary-source noise, but because exterior noise levels may still exceed the County's noise land use compatibility criteria despite exterior noise attenuation (e.g., noise controls, sound walls, and/or berms), the impact would remain significant and unavoidable. No additional feasible mitigation measures have been identified to further reduce Project-specific incremental contributions to significant noise impacts. Residential land uses comprise the majority of existing sensitive uses in Los Angeles County that would be affected by the increase in noise generated



by projects facilitated by the 2045 CAP. Construction of sound barriers would be inappropriate to reduce traffic noise impacts for residential land uses that face the roadway because such a measure would create aesthetic and access concerns. Furthermore, for individual development projects, the cost to mitigate off-site noise impacts on existing uses (for example, by implementing noise controls such as sound walls, berms, or the replacement of existing single-paned windows) often is out of proportion with the level of impact. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Board finds Impact 3.13-1 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.13-1: Construction Noise (Recirculated Draft PEIR, p. 3.13-20)**

Construction activities associated with new projects facilitated by the 2045 CAP that occur within 500 feet of noise-sensitive receptors (i.e., residences, parks, schools, historic sites, cemeteries, and recreation areas) shall be evaluated by the project applicant for noise impacts that would result in a 5 dBA increase over existing ambient noise levels at any sensitive receptor. Mitigation measures such as installing temporary sound barriers for construction activities that occur adjacent to occupied noise-sensitive structures; equipping construction equipment with more effective mufflers, sound-insulating hoods or enclosures, vibration dampers, and other Best Available Control Technology (BACT); and reducing non-essential idling of construction equipment to no more than five minutes shall be incorporated into construction activities to reduce construction-related noise.

**Mitigation Measure 3.13-2: Stationary-Noise Source (Recirculated Draft PEIR, p. 3.13-20)**

For any project that involves a noise-sensitive use within the 65 dBA CNEL contour (i.e., areas in or above 65 dBA CNEL) exposed to project stationary-source noise levels in excess of applicable standards in the Los Angeles County Noise Ordinance, the project applicant shall submit an acoustic analysis prior to project approval. The acoustic analysis shall identify site design features (e.g., setbacks, berms, parapets, equipment enclosures, equipment mufflers, sound walls, or other similar noise control device or noise barrier) and/or required building acoustical improvements (e.g., sound transmission class rated windows, doors, and attic baffling) to ensure compliance with the County's Noise Compatibility Criteria, the California Building Code, and the California Noise Insulation Standards (Title 24 of the California Code of Regulations).

**Impact 3.13-2:** Projects facilitated by the 2045 CAP could generate excessive groundborne vibration or groundborne noise levels.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** The implementation of Mitigation Measure 3.13-3 would reduce vibration impacts associated with construction activities. However, because of the potential for construction activities to occur near sensitive uses, and because of the potential intensity of construction activities, it may not be feasible to reduce the impact to a less-than-significant level.

The Board, therefore, finds that even with implementation of Mitigation Measure 3.13-3, the Project could generate excessive groundborne vibration. Therefore, the Board finds Impact 3.13-2 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.13-3: Construction Vibration (Recirculated Draft PEIR, p. 3.13-23)**

Individual projects that use vibration-intensive construction equipment, such as pile drivers, jackhammers, and vibratory rollers near vibration-sensitive receptors shall be evaluated by the applicant for potential vibration impacts. If construction-related vibration is determined to be perceptible at vibration-sensitive uses (i.e., exceed the County's standard of 0.01 inches per second (in/sec) vibration velocity [within the range of 1 to 100 Hz frequency]), additional requirements shall be implemented during construction, such as the use of less-vibration-intensive equipment or vibration-reduction construction techniques or strategies (e.g., drilled piles to eliminate the use of a vibration-intensive pile driver, increased setback distances).

Impact 3.13-3: Projects facilitated by the 2045 CAP could make a cumulatively considerable contribution to a significant cumulative impact related to the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: While the implementation of Mitigation Measure 3.13-1 and Mitigation Measure 3.13-2 would reduce the significance of the Project-specific incremental contribution, it may not be feasible to reduce the Project-specific contribution to the significant cumulative impact to a less than cumulatively considerable / less-than-significant level. Thus, post-mitigation cumulative noise impacts would remain significant and unavoidable. No additional feasible mitigation measures have been identified to further reduce Project-specific incremental contributions to significant cumulative noise impacts. For residential land uses, which comprise the majority of existing sensitive uses in Los Angeles County that would be affected by the increase in noise generated by projects facilitated by the 2045 CAP, the construction of sound barriers would be inappropriate to reduce traffic noise impacts because such barriers would create aesthetic and access concerns. For other individual development project types, the cost to mitigate off-site noise impacts on existing uses often is out of proportion with the level of impact. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project could make a cumulatively considerable contribution to a significant cumulative impact related to the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Therefore, the Board finds Impact 3.13-3 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.13-1. Construction Noise.** See Impact 3.13-1 for a description of this mitigation measure.

**Mitigation Measure 3.13-2. Stationary-Noise Source.** See Impact 3.13-1 for a description of this mitigation measure.

**Impact 3.13-4:** Projects facilitated by the 2045 CAP could make a cumulatively considerable contribution to a significant cumulative impact relating to the generation of excessive groundborne vibration or groundborne noise levels from construction activities.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Although the implementation of Mitigation Measure 3.13-3 and Mitigation Measure 3.13-4 would reduce the Project-specific incremental contribution to significant cumulative vibration impacts, it may not be feasible to reduce the cumulative impact to a less-than-significant level. The Board, therefore, finds that even with implementation of the identified mitigation measures, a cumulatively considerable contribution to a significant cumulative impact relating to the generation of excessive groundborne vibration or groundborne noise levels from construction activities would remain. Therefore, the Board finds Impact 3.13-4, as a result of projects facilitated by the Draft 2045 CAP, to be significant and unavoidable. No additional feasible mitigation is available.

**Mitigation Measures:**

**Mitigation Measure 3.13-3. Measure 3.13-3.** See Impact 3.13-2 for a description of this mitigation measure.

**Mitigation Measure 3.13-4: New Development Near Railroad Tracks (Recirculated Draft PEIR, p. 3.13-25)**

New development that occurs within 200 feet of a railroad track (according to the FTA's vibration screening distances) shall be evaluated for potential vibration impacts. The project property owner/developers shall retain an acoustical engineer to conduct an acoustic analysis and identify, where appropriate, site design features and/or required building construction improvements to ensure that vibration impacts would remain below acceptable levels of 0.08 in/sec RMS for residential uses.

**vi) Utilities and Service Systems**

**Impact 3.17-1:** Projects facilitated by the 2045 CAP would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Construction of some utility projects, in particular utility-scale energy projects, could result in significant impacts on environmental resources including air quality, biological resources, cultural resources, water quality, transportation, and noise. Mitigation measures outlined in the PEIR would reduce these impacts. (See Section 3.4, Air Quality; Section 3.5, Biological Resources; Section 3.6, Cultural Resources; Section 3.10, Hazards and

Hazardous Materials; Section 3.13, Noise; and Section 3.15, Transportation.) Nonetheless, as described in these sections of the EIR, construction of new water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities would result in significant and unavoidable impacts. The Board, therefore, finds that even with implementation of the identified mitigation measures, the Project could cause significant environmental effects due to the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities. Therefore, the Board finds Impact 3.17-1 to be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

**Mitigation Measure 3.4-1. Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2. Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3. Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-4. Enhanced Energy Conservation.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.5-1.** See Impact 3.5-2 for a description of this mitigation measure.

**Mitigation Measure 3.5-2.** See Impact 3.5-2 for a description of this mitigation measure.

**Mitigation Measure 3.5-3.** See Impact 3.5-4 for a description of this mitigation measure.

**Mitigation Measure 3.5-4.** See Impact 3.5-9 for a description of this mitigation measure.

**Mitigation Measure 3.5-5.** See Impact 3.5-6 for a description of this mitigation measure.

**Mitigation Measure 3.6-1: Historic Resources Assessment.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-2. Archaeological Resources Assessment.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-4. Archaeological Resources Discoveries.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-5. Treatment of Archaeological Resources.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.** See Impact 3.6-1 for a description of this mitigation measure.

**Mitigation Measure 3.6-7. Paleontological Resources Assessment and Monitoring.** See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-8. Paleontological Resources Sensitivity Training.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-9. Paleontological Discoveries.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-10. Human Remains Discoveries.](#) See Impact 3.6-4 for a description of this mitigation measure.

[Mitigation Measure 3.13-1. Construction Noise.](#) See Impact 3.13-1 for a description of this mitigation measure.

[Mitigation Measure 3.13-2. Stationary-Noise Source.](#) See Impact 3.13-1 for a description of this mitigation measure.

[Mitigation Measure 3.13-3. Measure 3.13-3.](#) See Impact 3.13-2 for a description of this mitigation measure.

[Mitigation Measure 3.13-4. New Development Near Railroad Tracks.](#) See Impact 3.13-4 for a description of this mitigation measure.

[Mitigation Measure 3.15-1. Traffic Control Plan.](#) See Impact 3.10.6 for a description of this mitigation measure.

[Impact 3.17-3:](#) Projects facilitated by the 2045 CAP would result in a determination by the wastewater treatment provider which serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.

[Finding 3:](#) There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

[Facts in Support of Finding:](#) Measures and actions facilitated by the 2045 CAP would lead to increased use of recycled and gray water systems, requiring the development of new water recycling and direct potable reuse facilities. The development of these new facilities would allow for wastewater treatment providers to adequately serve their existing and projected commitments; however, this would lead to significant and unavoidable impacts. Mitigation measures outlined in the PEIR that would reduce these impacts have been developed. (See Section 3.4, Air Quality; Section 3.5, Biological Resources; Section 3.6, Cultural Resources; Section 3.10, Hazards and Hazardous Materials; Section 3.13, Noise; and Section 3.15, Transportation.) Nonetheless, as described in these sections of the EIR, construction of new water recycling and direct potable reuse facilities would result in a determination by the wastewater treatment provider that serves or may serve the Project that it has inadequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The Board, therefore, finds that even with implementation of the identified mitigation measures, Impact 3.17-3 would be significant and unavoidable. No additional feasible mitigation is available.

[Mitigation Measures:](#)

[Mitigation Measure 3.4-1. Construction Emissions.](#) See Impact 3.4-1 for a description of this mitigation measure.

[Mitigation Measure 3.4-2. Operational Fugitive Dust Emissions.](#) See Impact 3.4-1 for a description of this mitigation measure.

[Mitigation Measure 3.4-3. Architectural Coating VOC Emissions.](#) See Impact 3.4-1 for a description of this mitigation measure.

[Mitigation Measure 3.4-4. Enhanced Energy Conservation.](#) See Impact 3.4-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-1.](#) See Impact 3.5-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-2.](#) See Impact 3.5-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-3.](#) See Impact 3.5-4 for a description of this mitigation measure.

[Mitigation Measure 3.5-4.](#) See Impact 3.5-9 for a description of this mitigation measure.

[Mitigation Measure 3.5-5.](#) See Impact 3.5-6 for a description of this mitigation measure.

[Mitigation Measure 3.6-1: Historic Resources Assessment.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-2. Archaeological Resources Assessment.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-4. Archaeological Resources Discoveries.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-5. Treatment of Archaeological Resources.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-7. Paleontological Resources Assessment and Monitoring.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-8. Paleontological Resources Sensitivity Training.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-9. Paleontological Discoveries.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-10. Human Remains Discoveries.](#) See Impact 3.6-4 for a description of this mitigation measure.

[Mitigation Measure 3.10-2.](#) See Impact 3.10-2 for a description of this mitigation measure.

[Mitigation Measure 3.13-1. Construction Noise.](#) See Impact 3.13-1 for a description of this mitigation measure.



**Mitigation Measure 3.13-2. Stationary-Noise Source.** See Impact 3.13-1 for a description of this mitigation measure.

**Mitigation Measure 3.13-3. Measure 3.13-3.** See Impact 3.13-2 for a description of this mitigation measure.

**Mitigation Measure 3.13-4. New Development Near Railroad Tracks.** See Impact 3.13-4 for a description of this mitigation measure.

**Mitigation Measure 3.15-1. Traffic Control Plan.** See Impact 3.10.6 for a description of this mitigation measure.

**Impact 3.17-5:** Projects facilitated by the 2045 CAP would result in a cumulatively considerable contribution to a significant cumulative impact relating to the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects.

**Finding 3:** There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

**Facts in Support of Finding:** Construction of new water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities would result in significant and unavoidable impacts and the incremental impacts contributed by projects facilitated by the 2045 CAP would be cumulatively considerable. In an attempt to reduce these impacts, the Project would necessitate the implementation of Mitigation Measure 3.4-1 through Mitigation Measure 3.4-4 from *Air Quality*, Mitigation Measure 3.5-1 through Mitigation Measure 3.5-5 from *Biological Resources*, Mitigation Measure 3.6-1 through Mitigation Measure 3.6-10 from *Cultural Resources*, Mitigation Measure 3.10-2 from *Hazards and Hazardous Materials*, Mitigation Measure 3.13-1 through Mitigation Measure 3.13-4 from *Noise*, and Mitigation Measure 3.15-1 from *Transportation*. Although these mitigation measures would reduce the incremental impacts of the Project, the Project's contribution to cumulative impacts in many instances would remain cumulatively considerable. The Board, therefore, finds that even with implementation of the identified mitigation measures, Impact 3.17-5 would be significant and unavoidable. No additional feasible mitigation is available.

**Mitigation Measures:**

**Mitigation Measure 3.4-1. Construction Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-2. Operational Fugitive Dust Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-3. Architectural Coating VOC Emissions.** See Impact 3.4-1 for a description of this mitigation measure.

**Mitigation Measure 3.4-4. Enhanced Energy Conservation.** See Impact 3.4-2 for a description of this mitigation measure.

**Mitigation Measure 3.5-1.** See Impact 3.5-2 for a description of this mitigation measure.



[Mitigation Measure 3.5-2](#). See Impact 3.5-2 for a description of this mitigation measure.

[Mitigation Measure 3.5-3](#). See Impact 3.5-4 for a description of this mitigation measure.

[Mitigation Measure 3.5-4](#). See Impact 3.5-9 for a description of this mitigation measure.

[Mitigation Measure 3.5-5](#). See Impact 3.5-6 for a description of this mitigation measure.

[Mitigation Measure 3.6-1: Historic Resources Assessment](#). See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-2. Archaeological Resources Assessment](#). See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training](#). See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-4. Archaeological Resources Discoveries](#). See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-5. Treatment of Archaeological Resources](#). See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials](#). See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-7. Paleontological Resources Assessment and Monitoring](#). See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-8. Paleontological Resources Sensitivity Training](#). See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-9. Paleontological Discoveries](#). See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-10. Human Remains Discoveries](#). See Impact 3.6-4 for a description of this mitigation measure.

[Mitigation Measure 3.10-2](#). See Impact 3.10-2 for a description of this mitigation measure.

[Mitigation Measure 3.13-1. Construction Noise](#). See Impact 3.13-1 for a description of this mitigation measure.

[Mitigation Measure 3.13-2. Stationary-Noise Source](#). See Impact 3.13-1 for a description of this mitigation measure.

[Mitigation Measure 3.13-3. Measure 3.13-3](#). See Impact 3.13-2 for a description of this mitigation measure.

[Mitigation Measure 3.13-4. New Development Near Railroad Tracks](#). See Impact 3.13-4 for a description of this mitigation measure.

[Mitigation Measure 3.15-1. Traffic Control Plan](#). See Impact 3.10.6 for a description of this mitigation measure.

Impact 3.17-7: Projects facilitated by the 2045 CAP would cause or contribute a cumulatively considerable contribution to a significant cumulative impact relating to inadequate wastewater treatment capacity.

Finding 3: There are no feasible and reasonable mitigation measures which would reduce this impact to a less-than-significant level. The Board hereby makes Finding 3 and determines that this impact would be significant and unavoidable.

Facts in Support of Finding: Construction of new water recycling and direct potable reuse facilities would result in significant and unavoidable impacts and the incremental impacts contributed by projects facilitated by the 2045 CAP would be cumulatively considerable. To reduce these impacts, implementation of the following mitigation measures is recommended at the Program level: Mitigation Measure 3.4-1 through Mitigation Measure 3.4-4 from *Air Quality*, Mitigation Measure 3.5-1 through Mitigation Measure 3.5-5 from *Biological Resources*, Mitigation Measure 3.6-1 through Mitigation Measure 3.6-10 from *Cultural Resources*, Mitigation Measure 3.10-2 from *Hazards and Hazardous Materials*, Mitigation Measure 3.13-1 through Mitigation Measure 3.13-4 from *Noise*, and Mitigation Measure 3.15-1 from *Transportation*. Although these mitigation measures would reduce the incremental impacts of the Project, the Project's contribution to cumulative impacts in many instances would remain cumulatively considerable. The Board, therefore, finds that even with implementation of the identified mitigation measures, Impact 3.17-7 would be significant and unavoidable. No additional feasible mitigation is available.

Mitigation Measures:

Mitigation Measure 3.4-1. Construction Emissions. See Impact 3.4-1 for a description of this mitigation measure.

Mitigation Measure 3.4-2. Operational Fugitive Dust Emissions. See Impact 3.4-1 for a description of this mitigation measure.

Mitigation Measure 3.4-3. Architectural Coating VOC Emissions. See Impact 3.4-1 for a description of this mitigation measure.

Mitigation Measure 3.4-4. Enhanced Energy Conservation. See Impact 3.4-2 for a description of this mitigation measure.

Mitigation Measure 3.5-1. See Impact 3.5-2 for a description of this mitigation measure.

Mitigation Measure 3.5-2. See Impact 3.5-2 for a description of this mitigation measure.

Mitigation Measure 3.5-3. See Impact 3.5-4 for a description of this mitigation measure.

Mitigation Measure 3.5-4. See Impact 3.5-9 for a description of this mitigation measure.

Mitigation Measure 3.5-5. See Impact 3.5-6 for a description of this mitigation measure.

Mitigation Measure 3.6-1: Historic Resources Assessment. See Impact 3.6-1 for a description of this mitigation measure.

Mitigation Measure 3.6-2. Archaeological Resources Assessment. See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-3. Construction Worker Cultural Resources Sensitivity Training.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-4. Archaeological Resources Discoveries.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-5. Treatment of Archaeological Resources.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-6. Curation and Disposition of Cultural Materials.](#) See Impact 3.6-1 for a description of this mitigation measure.

[Mitigation Measure 3.6-7. Paleontological Resources Assessment and Monitoring.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-8. Paleontological Resources Sensitivity Training.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-9. Paleontological Discoveries.](#) See Impact 3.6-3 for a description of this mitigation measure.

[Mitigation Measure 3.6-10. Human Remains Discoveries.](#) See Impact 3.6-4 for a description of this mitigation measure.

[Mitigation Measure 3.10-2.](#) See Impact 3.10-2 for a description of this mitigation measure.

[Mitigation Measure 3.13-1. Construction Noise.](#) See Impact 3.13-1 for a description of this mitigation measure.

[Mitigation Measure 3.13-2. Stationary-Noise Source.](#) See Impact 3.13-1 for a description of this mitigation measure.

[Mitigation Measure 3.13-3. Measure 3.13-3.](#) See Impact 3.13-2 for a description of this mitigation measure.

[Mitigation Measure 3.13-4. New Development Near Railroad Tracks.](#) See Impact 3.13-4 for a description of this mitigation measure.

[Mitigation Measure 3.15-1. Traffic Control Plan.](#) See Impact 3.10.6 for a description of this mitigation measure.

## **VII. FINDINGS REGARDING ALTERNATIVES**

An EIR must contain a discussion of “a range of reasonable alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” (CEQA Guidelines, § 15126.6(a).) CEQA further states that “the range of alternatives in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” (CEQA Guidelines, § 15126.6(f).) Thus, the following discussion focuses on project alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the Project, even if the alternative would impede the attainment of some project objectives or would be more costly. Among the factors that may be taken into account when

addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. (CEQA Guidelines, § 15126.6(f)(1).)

The objectives of the Project listed in the Recirculated Draft PEIR (Project Objectives) include: (1) Identify detailed programs, actions, and performance goals to achieve the climate action policies of the General Plan. (2) Identify GHG emissions reduction targets tailored to the unincorporated County that closely align with state and County climate goals. (3) Provide a road map for reducing GHG emissions to achieve the County's GHG emissions reduction targets. (4) Encourage sustainable housing production at all levels of affordability, including increasing housing densities near transit to the extent allowed in the General Plan. (5) Demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects and provide CEQA streamlining for development projects (serve as a "qualified CAP") via a Draft 2045 CAP CEQA Streamlining Checklist.

As required by CEQA, in developing the alternatives to be addressed in this section, consideration was given to an alternative's ability to meet most of the basic objectives of the project. (CEQA Guidelines, § 15126.6(a).) Alternatives may be eliminated from detailed consideration in an EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid or substantially reduce any significant environmental effects. (CEQA Guidelines, § 15126.6(c).) The concept of "feasibility" encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*); *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1509 [court upholds CEQA findings rejecting alternatives in reliance on applicant's project objectives]; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 (CNPS) ["an alternative 'may be found infeasible on the ground it is inconsistent with the project objectives as long as the finding is supported by substantial evidence in the record'"] (quoting *Kostka & Zischke, Practice Under the Cal. Environmental Quality Act* [Cont.Ed.Bar 2d ed. 2009] (*Kostka*), § 17.39, p. 825); *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165, 1166 ["[i]n the CALFED program, feasibility is strongly linked to achievement of each of the primary project objectives"; "a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"].) Moreover, "feasibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (*City of Del Mar, supra*, 133 Cal.App.3d at p. 417; see also *CNPS, supra*, 177 Cal.App.4th at p. 1001 ["an alternative that 'is impractical or undesirable from a policy standpoint' may be rejected as infeasible"] [quoting *Kostka, supra*, § 17.29, p. 824]; *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 17.) Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, also do not need to be considered. (CEQA Guidelines, § 15126(f)(2).)

#### **a. Findings Regarding Alternatives Considered But Rejected**

During public review of the Recirculated Draft PEIR, some commenters suggested that the PEIR analyze an alternative to the Project for the development of small-scale renewable resource generation. (See Recirculated Draft PEIR Comment O2-8.) The Board rejects a Project alternative for the development of small-scale renewable resource generation on the basis that such an alternative is infeasible, the suggestion pertains to a component of the Project rather than the Project as a whole, and such an alternative would not substantially reduce the Project's significant environmental impacts for the reasons

set forth in General Response 1 and Response to Comment O2-8. Other comments suggested a Project alternative for battery storage resources to be distributed throughout urban load pockets to supply local energy needs and for expanding and streamlining battery storage. (See Recirculated Draft PEIR Comments O2-8, O2-11, O2-24, O2-25, O2-26, and O2-28.) The Board rejects as infeasible a Project alternative for distributed battery storage resources throughout urban load pockets and for expanding and streamlining battery storage on the basis that such an alternative is infeasible, the suggestion pertains to a component of the Project rather than the Project as a whole, and this suggested alternative would not substantially reduce the Project's significant environmental impacts for the reasons set forth in General Response 1 and Response to Comments O2-8, O2-11, O2-24, O2-25, O2-26, and O2-28. One comment suggested an alternative to replace roadways with cool or green surfaces. (See Recirculated Draft PEIR Comment O2-42.) The Board rejects as infeasible a Project alternative for replacing roadways with cool or green surfaces on the basis that such an alternative is infeasible, the suggestion pertains to a component of the Project rather than the Project as a whole, and such an alternative would not substantially reduce the Project's significant environmental impacts for the reasons set forth in General Response 1 and Response to Comment O2-42. One comment suggested the PEIR analyze an alternative to the Project for distributed energy resources. (See Recirculated Draft PEIR Comment O7-50.) The Board rejects as infeasible a Project alternative for distributed energy resources on the basis that such an alternative is infeasible, the suggestion pertains to a component of the Project rather than the Project as a whole, and the suggested alternative would not substantially reduce the Project's significant environmental impacts for the reasons set forth in General Response 1 and Response to Comment O7-50.

The alternatives listed below were originally considered but eliminated from further consideration in the PEIR because they failed to feasibly attain most of the basic objectives of the Project, were infeasible, or failed to avoid or substantially reduce any significant environmental effects. They are as follows:

- Carbon Neutrality Target by 2045 Alternative
  - What would be required to achieve a target of carbon neutrality by 2045 would be beyond what the County alone could implement, and it would be speculative to assume that technological advancements to achieve carbon neutrality would become available within the next 25 years. Accordingly, a Carbon Neutrality Target by 2045 Alternative was not carried forward for more detailed evaluation because it is speculative and potentially infeasible: There is no present basis to assume that it could be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.
- More Aggressive Timeline to Carbon Neutrality Alternative
  - As discussed above as to why the Carbon Neutrality Target by 2045 Alternative was not carried forward, as there is no present basis to assume that it could be accomplished in a successful manner within a reasonable period of time. An even more aggressive timeline to achieving carbon neutrality than 2045 also was not carried forward for more detailed review because it would be even more speculative to assume that the technological advancements needed to achieve carbon neutrality, in addition to those identified above, would become available in time.
- Minimize Loss of Carbon Sequestration Caused by Development Alternative
  - This potential alternative was not carried forward because it would not meet most of the basic Project Objectives. More specifically, a Minimize Loss of Carbon Sequestration Caused by Development Alternative would not implement the climate action policies of the General Plan (Objective 1); would not encourage sustainable housing production (Objective 4); and would not demonstrate a level of GHG emissions below which the

County would have less than cumulatively considerable GHG impacts for future environmental review projects and provide CEQA streamlining for development projects (“qualified CAP”) (Objective 5). The Minimize Loss of Carbon Sequestration Caused by Development Alternative has also been rejected from more detailed consideration because it is legally infeasible: it would not permit the County to fully meet its Regional Housing Needs Allocation (as mandated by state housing law) within the unincorporated areas.

- Substantially Reduced Vehicle Miles Traveled Alternative
  - The Substantially Reduced Vehicle Miles Traveled Alternative was not carried forward for more detailed review because its implementation would be remote or speculative. Total VMT in California and in the County is the product of myriad individual decisions made daily by households and businesses. Achieving a substantial reduction in VMT would require a major shift in decision-making by households and businesses alike, beyond the ability of the County to implement. Significantly improved transit and alternative transportation infrastructure, widespread and inexpensive access to single-occupancy vehicle alternatives, and substantial financial incentives to use these transportation alternatives or (alternatively) providing considerable disincentives to drive could all be part of the solution. However, there is no basis to assume that this alternative could be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. The time and expense required to implement this alternative, such as substantially upgrading transportation infrastructure, would compete with the County’s pursuit of other community priorities, such as health, bridging the digital divide, child welfare, affordable housing, justice reform, and support for immigrant residents and their families.
- Aquatic Impact Avoidance Alternative
  - The Aquatic Impact Avoidance Alternative has not been carried forward for more detailed review because it would not meet most of the basic Project Objectives. Such an alternative would not implement the climate action policies of the General Plan (Objective 1); would not identify appropriate GHG emissions reduction targets that closely align with state and local climate goals (Objective 2); would not provide a road map to achieve GHG reductions to meet the GHG emissions reduction targets (Objective 3); and would not encourage sustainable housing production at all levels of affordability, including increasing housing densities near transit to the extent allowed in the General Plan (Objective 4).
  - This alternative also was not carried forward for more detailed review because its implementation is remote or speculative. Opportunities to successfully address those challenges have not been developed; therefore, the impacts of implementing the alternative cannot be reasonably ascertained.
  - Further, this alternative would not avoid or substantially lessen a significant impact of the Project. As analyzed in the context of Impact 3.11-3 in Section 3.11, Hydrology and Water Quality, approval of the 2045 CAP would not substantially alter the existing drainage pattern of the site or area, alter the course of a stream or river, or add impervious surfaces in a manner that would result in a significant impact. As analyzed in the context of criterion c) in Section 3.5, Biological Resources, approval of the 2045 CAP could incentivize future projects—such as those supporting the electrification of new development—that could cause a significant adverse impact on state or federally protected wetlands (e.g., marshes, vernal pools, or coastal wetlands) through direct removal, filling, hydrological interruption, or other means.
- Complete Phase-Out of Oil and Gas Operations by 2030 Alternative

- The Complete Phase-Out of Oil and Gas Operations by 2030 Alternative was not carried forward for more detailed review for several reasons. First, this alternative would not clearly avoid or substantially lessen any of the potential significant impacts of the Project. It is possible that this alternative could worsen or increase the Project's potential short-term significant impacts, such as localized construction-related air quality and health risk impacts from decommissioning of oil and gas wells and remediation activities at contaminated sites, though there would be future benefits.
- Second, the implementation of this alternative would be remote or speculative, given that without the amortization study, it is not possible to know whether the alternative is feasible. Without more information from this detailed study, it is speculative to assume that implementing this alternative is possible. There is no basis to assume that this alternative could be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.
- Third, this alternative addresses only one of the CAP's many measures, Measure ES 1 (Sunset Strategy for All Oil and Gas Operations). An EIR is required to consider alternatives to the project as whole, and is not required to consider alternatives to each project component.
- Limited-Scope CAP Alternative
  - This alternative would not implement the climate action policies of the General Plan (Objective 1) because, for example:
    - Its lower performance goal for Measure ES2 would conflict with Policy AQ 3.9 to "Ensure the availability of zero-carbon electricity to serve unincorporated Los Angeles County."
    - Its lower performance goal for Measure T6 would conflict with Policy AQ 2.7 to "Encourage and support the development and implementation of Zero-Emission technology and infrastructure."
    - Its lower performance goal for Measure E1 would conflict with Policy AQ 3.5 to "Require the full electrification of new development."
  - This alternative would not provide a feasible and realistic road map for reducing GHG emissions to achieve the GHG emissions reduction targets (Objective 3) because it would call for a CAP that does the bare minimum to achieve the County's targets, with no margin of safety. Such a CAP would provide no emissions "buffer" if certain measures and actions are not as effective in reducing GHG emissions in the future as they were modeled during the planning stage.
  - This alternative also would not demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects and thus be a "qualified CAP" (Objective 5). This alternative would put the County in danger of missing its GHG emissions reduction targets, and thus would not be a reliable pathway to achieving a level of GHG emissions below which GHG emissions in the County would have less than cumulatively considerable GHG impacts.

Thus, the Recirculated Draft PEIR presents a reasonable range of feasible alternatives to the Project that would reduce and/or avoid some of the Project's significant environmental effects while achieving most of the Project Objectives. The following findings and brief explanation of the rationale for the findings



regarding Project alternatives identified in the PEIR are set forth to comply with the requirements of CEQA Guidelines section 15091(a)(3).

Four alternatives to the Project were defined and analyzed:

## **b. Findings Regarding Alternatives Analyzed in the PEIR**

The Recirculated Draft PEIR analyzed three alternatives in addition to the No Project Alternative in Chapter 4, *Alternatives*, which sets forth the objectives of the Project, summarizes the Project's significant environmental impacts, discusses the alternatives considered but eliminated from further analysis, describes the alternatives evaluated in detail, and compares the impacts of the alternatives evaluated to the impacts of the Project. The Final EIR's Table 4-6, *Summary of Impacts of the Project and Alternatives*, summarizes the significant environmental impacts of the Project alternatives, and provides a fact-based comparison of the alternatives' impacts to the Project's impacts. The Project alternatives are summarized below along with the findings relevant to each alternative.

### **1. No Project Alternative.**

Facts in Support of Finding: An EIR's discussion of alternatives to the proposed project must include a "no project alternative" to allow a comparison of the environmental impacts of approving the proposed project with the effects of not approving it. (CEQA Guidelines, § 15126.6(e)(1).) The No Project Alternative examines a scenario in which the County would not approve the 2045 CAP for implementation in the unincorporated areas and none of the GHG emissions reduction strategies, measures, or actions outlined in the 2045 CAP would be implemented. The No Project Alternative is captured in the 2045 CAP's Adjusted business-as-usual (BAU) forecast, which accounts for future growth under BAU conditions but adjusts for federal, state, and County legislation and regulations that were implemented before development of the 2045 CAP.

The No Project Alternative would not implement the Project's GHG emissions reduction strategies, measures, or actions, which would facilitate fewer projects compared with implementation of the 2045 CAP. Because the No Project Alternative would facilitate fewer projects, the No Project Alternative would result in fewer adverse physical environmental impacts on the project area and its surrounding environment in comparison to the impacts associated with implementation of the 2045 CAP strategies, measures, and actions. (See Table 4-6 in Chapter 4, *Alternatives*, which provides a comparative summary of environmental impacts.)

However, in the long-term, the No Project Alternative would result in fewer environmental benefits to the County overall because air pollutant and GHG emissions would be much higher than emissions levels associated with all other alternatives and the Project. The No Project Alternative would result in greater human health risks associated with exposure to toxic air contaminants than all other alternatives and the Project, because all other alternatives and the Project would substantially reduce toxic air contaminant (TAC) emissions in the County. The No Project Alternative would neither realize the long-term GHG emission reduction benefits associated with implementation of the 2045 CAP (and all the co-benefits that would also occur, such as reduced criteria pollutant and TAC emissions), nor provide a clear pathway for the County to meet and exceed the statewide 2030 GHG reduction goal identified in SB 32 or meet and exceed the 2045 direct emission reduction target and carbon neutrality goal established by AB 1279.

The No Project Alternative would not further many County goals and policies. Specifically, the No Project Alternative would not achieve or support the County Board of Supervisors' motions pertaining to supporting the Paris Agreement, equitable energy grid resiliency, zero-emissions medium- and heavy-duty vehicles, climate resilient communities, and equitable decarbonization of buildings.

Importantly, the No Project Alternative would not achieve any of the Project's basic objectives; specifically, the No Project Alternative would not implement the climate action policies of the General Plan (Objective 1); would not identify GHG emissions reduction targets tailored to the unincorporated County that closely align with state and County climate goals (Objective 2); would not provide a road map to achieve GHG reductions to meet the GHG emissions reduction targets (Objective 3); would not encourage sustainable housing production (Objective 4); and would not demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects and provide CEQA streamlining for development projects ("qualified CAP") (Objective 5).

Finding: The EIR, including Chapter 4 of the Recirculated Draft PEIR, contains facts and analysis supporting the Finding, some of which are set forth here. Under the No Project Alternative, none of the GHG emissions reduction strategies, measures, or actions outlined in the 2045 CAP would be implemented in the unincorporated areas, resulting in fewer adverse environmental impacts than the Project because it would avoid all adverse impacts caused by projects facilitated by the 2045 CAP. (See Table 4-6 in Chapter 4, *Alternatives*, which provides a comparative summary of environmental impacts.) However, in the long-term, the No Project Alternative would result in less environmental benefits to the County overall, as air pollutant and GHG emissions would be higher than emissions levels associated with all other alternatives and the Project, resulting in greater human health risks. The No Project Alternative would neither realize the long-term GHG emission reduction benefits associated with implementation of the 2045 CAP nor provide a clear pathway for the County to meet and exceed the statewide 2030 GHG reduction goal identified in SB 32 or meet the 2045 carbon neutrality goal established by AB 1279. Lastly, the No Project Alternative would not achieve any of the Project's Objectives, which makes this alternative undesirable from a policy standpoint and therefore, the Board rejects the No Project Alternative as infeasible.

## **2. Alternative 1: Carbon Offset Alternative**

### Facts in Support of Finding:

Under Alternative 1, in addition to implementing the measures and actions called for by the 2045 CAP, the County would reduce GHG emissions by purchasing carbon offsets. Carbon offset projects could increase or protect carbon sequestration, invest in solar or wind projects, improve water or energy efficiency, capture methane at animal farms or landfills, replace high-global warming-potential gas use with a gas that has a lower global warming potential, or implement other measures. To achieve the greatest environmental co-benefits to the County, priority would be given, from highest to lowest, to offsets purchased from local projects (within Los Angeles County), regional projects (from within Southern California), projects within California, projects outside of California but within the Pacific Southwest (within Arizona, Hawaii, Utah, or Nevada), and projects elsewhere in the United States.

Implementation of Alternative 1 would generally result in the same environmental impacts as the Project but would result in greater environmental impacts associated with hazards and hazardous materials as well as utilities and service systems. Implementation of Alternative 1 would facilitate projects that include

wind projects with wind turbines that could result in a safety hazard for people residing or working in the project area due to collision risk, interference with radar or other air navigation tools, and other hazards related to air navigation. Additionally, implementation of this alternative would facilitate projects that would not encourage the reduction of solid waste like those facilitated by the Project, and instead would focus on the purchase of carbon offsets. As such, some of the adverse impacts caused by projects facilitated by Alternative 1, as compared to impacts under the 2045 CAP, would occur outside the County and so would not be subject to the same local thresholds that apply to the Project, such as thresholds established in the County General Plan or by the South Coast Air Quality Management District. Alternative 1 would result in fewer environmental benefits to the County overall because the reductions in air pollutant and GHG emissions could be realized elsewhere in Southern California, the State, or the Pacific Southwest, and because greater environmental impacts could result from wind projects facilitated by the purchase of carbon offsets.

Importantly, Alternative 1 would not provide a clear pathway for the County to meet and exceed the statewide 2030 GHG reduction goal identified in SB 32 or meet the 2045 direct emission reduction target established by AB 1279. This is because CARB's statewide targets are to reduce direct emissions occurring within state boundaries, and do not allow for carbon offsets occurring outside of the state to contribute to these targets (for example, AB 1279 states that it is "the policy of the state... to ensure that by 2045, statewide anthropogenic greenhouse gas emissions are reduced to at least 85% below the 1990 levels"). Only the state's 2045 net zero GHG emissions target appears to allow offsets. Similarly, Alternative 1 would not provide a clear pathway for the County to meet the County's local GHG reduction targets identified in the 2045 CAP. Specifically, the 2045 CAP's GHG reduction targets for 2030, 2035, and 2045 are to reduce direct, in-boundary county emissions to specific levels below 2015 emissions. Carbon offsets would likely not produce emission reductions within unincorporated county boundaries because there likely aren't enough offsets within the County to achieve these GHG targets. As such, Alternative 1 may not achieve Project Objective 2.

Alternative 1 would also likely not achieve Project Objective 5 to allow CEQA streamlining for future development projects because CEQA Guidelines section 15183.5(b)(1)(B) states that GHG reduction plans must "[e]stablish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions *from activities covered by the plan* would not be cumulatively considerable" (emphasis added). Because the 2045 CAP's GHG emission reduction targets apply to GHG emissions associated with activities occurring within unincorporated county boundaries, and the targets would be achieved by reducing GHG emissions "from activities covered by the plan," reducing emissions outside of county boundaries for activities not covered by the plan through the use of carbon offsets would not contribute toward meeting the represent 2045 CAP's GHG emission reduction targets. In addition, CEQA Guidelines section 15183.5(b)(1)(C) states that GHG reduction plans must "[i]dentify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions *anticipated within the geographic area*" (emphasis added) and CEQA Guidelines section 15183.5(b)(1)(D) states that GHG reduction plans must "[s]pecify measures... that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively *achieve the specified emissions level*" (emphasis added). Because carbon offsets would produce GHG emission reductions that occur outside the geographic area of the 2045 CAP (i.e., unincorporated county boundaries), and because the 2045 CAP's GHG emission reduction targets apply to GHG emissions associated with activities occurring within unincorporated county boundaries, carbon offsets would likely not achieve 2045 CAP's GHG emission reduction targets. As such, Alternative 1 is undesirable from a policy standpoint and would also likely conflict with several project objectives.

Alternative 1 is infeasible from a policy standpoint, given the uncertainties with its implementation. The volatile cap and trade market makes it difficult to anticipate the cost of regulatory carbon allowances. The County would have to purchase and retire carbon offsets from the voluntary market, which is not regulated. Prices in the voluntary carbon market vary widely depending on the type, size, and location of the project generating the offset, as well as the protocol or standard under which it was developed. A review of over-the-counter reputable offset retailers, conducted in April 2022, reveals current prices for voluntary offsets ranging from approximately \$15 to \$25 per metric ton of carbon dioxide equivalent (MTCO<sub>2e</sub>). Based on these prices, the 2022 purchase of 1.25 million MTCO<sub>2e</sub> could range from \$17 million to \$36 million per year. Funding sources would have to be identified, but theoretically could be sourced from the County General Fund, existing or new development fees, or other sources. However, it is unlikely that other funding sources, such as those from CARB or the U.S. EPA, could be used to finance the purchase of out-of-county and out-of-state carbon offsets, since these funding programs are generally designed to reduce direct, in-boundary emissions within the influence or control of the agency or jurisdiction applying for the funds.

To implement Alternative 1, the County would have to purchase and retire carbon offsets from the unregulated voluntary carbon market on an annual basis to meet the County's annual GHG emission reduction targets, and the prices of voluntary GHG offset credits vary widely such that it is difficult to anticipate the cost of offset purchases. Implementation of Alternative 1 could be more expensive than implementation of the Project because costs would be greater if the cost per MTCO<sub>2e</sub> for voluntary offsets were greater than the cost per MTCO<sub>2e</sub> reduced by local CAP measures. Additionally, the County would have to purchase voluntary GHG offset credits perpetually each year to achieve the 2045 CAP's annual GHG emission reduction targets, while most of the 2045 CAP's measures and actions, once implemented, would result in GHG reductions every year in perpetuity. For example, decarbonizing a single building in 2025 would produce annual GHG emission reductions over the entire life of the building (30+ years), but if these reductions were instead achieved through offsets, the County would have to purchase an individual carbon offset credit for each year of that building's operation to achieve the same cumulative annual GHG reductions as that building's decarbonization. The uncertainty of the prices in the unregulated voluntary carbon market contributes to the uncertainty of implementation, making Alternative 1 undesirable from a policy standpoint.

Finding: The EIR, including Chapter 4 of the Recirculated Draft PEIR, contains facts and analysis supporting the Finding, some of which are set forth here. Alternative 1 would have similar but incrementally fewer adverse environmental impacts than the Project because some of the adverse impacts caused by projects facilitated by Alternative 1, as compared to impacts under the 2045 CAP, would occur outside the County and so would not be subject to the same local thresholds that apply to the Project, such as thresholds established in the County General Plan or by the South Coast Air Quality Management District. However, in the long-term, Alternative 1 would result in fewer environmental benefits to the County overall, because the reductions in air pollutant and GHG emissions could be realized elsewhere in Southern California, the State, or the Pacific Southwest and because greater environmental impacts associated with hazards and hazardous materials as well as utilities and service systems could result from wind projects facilitated by the purchase of carbon offsets; this makes Alternative 1 undesirable from a policy standpoint. Alternative 1 is also rejected because the uncertainty of the prices in the unregulated voluntary carbon market makes Alternative 1 undesirable from a policy standpoint, and makes the financial feasibility of Alternative 1 uncertain in the long-term (especially through 2045). Lastly, Alternative 1 is rejected by the Board as undesirable from a policy standpoint on the basis of inconsistency with County goals and policies to meet and exceed the statewide 2030 GHG

reduction goal identified in SB 32 or meet the 2045 carbon neutrality goal established by AB 1279 in the unincorporated areas of the County, Alternative 1 is further rejected as undesirable from a policy standpoint because Alternative 1 would result in greater impacts to hazards and hazardous materials and utilities and service systems than the Project. For the above stated reasons, the Board rejects Alternative 1 as infeasible.

### **3. Alternative 2: Zero Net Energy Buildings Alternative**

Facts in Support of Finding: Zero net energy (ZNE) buildings produce enough renewable energy to meet their own annual energy consumption requirements, thereby reducing the use of nonrenewable energy in the building sector. These buildings achieve ZNE first through high levels of energy efficiency to minimize energy use, then through the addition of on-site renewable power generation and renewable energy storage systems (e.g., batteries). Under Alternative 2, the County would supplement its implementation of the Draft 2045 CAP measures and actions by requiring all new residential and commercial construction in the unincorporated areas to be ZNE by 2025, 50 percent of residential and commercial buildings in the unincorporated areas to be retrofitted to ZNE by 2030, 50 percent of new major renovations of County buildings to be ZNE by 2025, and the energy usage footprint of local government buildings to be 50 percent below 2015 levels by 2030. Further, Alternative 2 would reward projects in the unincorporated areas that voluntarily exceed state and local minimum energy codes by expedited permitting and favorable fee structures.

Energy efficiency measures include building design elements that reduce energy demand such as high-performance building envelopes, air barrier systems, daylighting, sun control and shading design, window selection and glazing, passive solar heating, natural ventilation, and water conservation. Energy use could be managed with efficient equipment and systems, such as energy-efficient lighting; electric lighting controls; high-performing heating, ventilation, and air conditioning; and energy-conversion devices. Once efficiency measures have been incorporated, the remaining energy needs of the building can be met with on-site renewable energy generation and storage. Common on-site electricity generation strategies include photovoltaic solar panels on rooftops or over surface parking, and solar water heating.

This alternative would worsen or increase the Project's significant and unavoidable air quality impacts related to operational criteria pollutant emissions and localized construction-related health risks from toxic air contaminants because the alternative would facilitate additional new construction of ZNE buildings that would cause short-term construction emissions that could exceed the SCAQMD's project-level thresholds and expose additional sensitive receptors to pollutant concentrations from localized emissions near those construction sites. Alternative 2 would also result in worse significant and unavoidable localized noise impacts than the Project. Construction of ZNE buildings facilitated by Alternative 2 would result in short-term construction noise and create new stationary noise sources that could exceed noise levels in excess of standards. Additionally, such construction of ZNE buildings would result in significant and unavoidable groundborne vibration impacts that exceed standards. As such, implementation of Alternative 2 would result in significant and unavoidable noise and vibration impacts (as well as result in cumulatively considerable noise and vibration impacts) at a greater level than the Project. Implementation of Alternative 2 would also result in greater transportation impacts compared with the Project, as construction of ZNE buildings would increase the amount of heavy-duty construction vehicles on roadways, which could substantially increase hazards due to incompatible uses with normal vehicles on roadways. Alternative 2 would create safety and mobility concerns for motorists, transit operators, bicyclists, and/or pedestrians during construction activities and result in a greater impact than the Project. This alternative would also contribute to a greater impact on utilities and service systems because

projects facilitated by Alternative 2 would not encourage the reduction of solid waste like those facilitated by the Project, and instead would focus on water and energy efficiencies.

Finding: The EIR, including Chapter 4 of the Recirculated Draft PEIR, contains facts and analysis supporting the Finding, some of which are set forth here. Alternative 2 would cause similar but incrementally greater adverse environmental impacts than the Project because the additional construction of new and retrofitted ZNE buildings would increase impacts for air quality, noise and vibration, transportation, and utilities and service systems. Alternative 2 is rejected by the Board as undesirable from a policy standpoint and infeasible on the basis of environmental considerations described above, as Alternative 2 would result in greater adverse environmental impacts than the Project on air quality, noise and vibration, transportation, and utilities and service systems. For the above stated reasons, the Board rejected Alternative 2 as infeasible.

#### **4. Alternative 3: Lower Targets Alternative**

Facts in Support of Finding: Under Alternative 3, the GHG emissions reduction targets of the 2045 CAP would be lower than those contained in the 2045 CAP. These targets would represent the minimum targets needed to “align” with California’s codified statewide targets for 2030 and 2045. Specifically, the targets under Alternative 3 would be:

- By 2030, reduce emissions to 31 percent below 2015 levels (equivalent to a 40 percent reduction below 1990 levels).
- By 2035, maintain the same level of GHG reductions achieved in 2030.
- By 2045, reduce emissions to 83 percent below 2015 levels (equivalent to an 85 percent reduction below 1990 levels).

Because Alternative 3 has lower GHG emissions reduction targets for years 2030 and 2035 compared to the Project, implementation of Alternative 3 would facilitate fewer projects through 2030 and 2035 to achieve the lower targets. Additionally, performance objectives for the measures and actions would be reduced compared to the Project. This is because the County would implement fewer 2045 CAP strategies, measures, and actions to reduce GHG emissions to achieve the less aggressive reduction targets. For example, Measure T6, Increase ZEV Market Share, has a 2030 performance goal of a 30 percent ZEV fleetwide percentage for light-duty vehicles in the County; under Alternative 3, this performance objective would likely be reduced to a 10 percent ZEV market share (or lower). Because Alternative 3 would facilitate fewer new projects through 2030 and 2035, it would result in less construction of new projects having physical environmental impacts compared with that anticipated under the Project. Thus, implementation of Alternative 3 would result in less adverse physical environmental impacts on the project area and its surrounding environment compared to the impacts associated with implementation of the 2045 CAP strategies, measures, and actions needed to meet the Project’s higher GHG emissions reduction targets.

While Alternative 3’s reduced performance objectives would facilitate fewer projects in the short-term for years 2030 through 2035 compared to the Project, it would likely facilitate the same number of projects through 2045, resulting in the same environmental impacts through 2045 compared to the Project. However, implementation of Alternative 3 would more likely facilitate a greater number of projects in the 2035 to 2045 period than the Project. Consequently, Alternative 3 would delay the realization of its environmental impacts but would not lessen or eliminate these adverse environmental impacts entirely and would likely worsen environmental impacts during the 2035 to 2045 timeframe compared to the Project.

Regarding specific environmental impacts, Alternative 3 would result in similar but lesser impacts than the Project on the following resource areas: aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, transportation, and wildfire. However, Alternative 3 would result in greater impacts than the Project for energy, GHG emissions, and air quality. Alternative 3 would also likely result in greater impacts for utilities and service systems.

Alternative 3 would result in greater energy impacts than the Project because Alternative 3 would facilitate fewer projects that would reduce Countywide energy use compared to the Project, resulting in greater energy consumption than the Project. Because Alternative 3 would facilitate fewer projects that would increase renewable energy use compared to the Project, implementation of Alternative 3 would result in much less renewable energy use and much greater non-renewable and fossil energy use as compared to the Project.

Alternative 3 would result in greater GHG emissions impacts because Alternative 3 would not reduce Countywide GHG emissions as much as the Project through 2030 and 2035, producing much greater GHG emissions than the Project. This much higher level of GHG emissions associated with Alternative 3 would likely cause the alternative to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the CARB 2022 Scoping Plan, SB 32, AB 1279, the Southern California Association of Governments 2020–2045 RTP/SCS, the OurCounty Sustainability Plan, the CALGreen Code, and the Los Angeles County Green Building Ordinance.

Implementation of Alternative 3 would result in greater air quality impacts than the Project for operational impacts because Alternative 3 would facilitate fewer projects through 2030 and 2035, resulting in much greater emissions of criteria pollutants and TACs throughout the county for these years as compared to the Project, which would result in greater human health risks than the Project. This greater level of criteria pollutant and TAC emissions associated with implementation of Alternative 3 could result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of the ambient air quality standards or emissions reductions in the SCAQMD 2016 AQMP or the AVAQMD 2017 Ozone Attainment Plan. Alternative 3 would result in a greater impact associated with exposure of sensitive receptors to operational TAC emissions because Alternative 3 would result in much greater operational TAC emissions than the Project.

Finally, Alternative 3 could result in greater utilities and service systems impacts because projects facilitated by Alternative 3 would lead to increased use of recycled and gray water systems compared to the Project, increasing the amount of wastewater requiring treatment by wastewater treatment providers, requiring the development of new water recycling and direct potable reuse facilities. Alternative 3 would also not encourage the reduction of solid waste to the same extent as those facilitated by the Project, resulting in greater solid waste generation and greater need for solid waste processing and disposal.

Importantly, Alternative 3 would not meet Project Objectives 1, 2, and 5. Alternative 3 would not meet Project Objective 1 (identify detailed programs, actions, and performance goals to achieve the climate policies of the General Plan) because implementation would result in an inconsistency with the County's General Plan Policy AQ 3.9 ("Ensure the availability of zero-carbon electricity to serve unincorporated Los Angeles County."). As stated above, Alternative 3 has lower GHG emissions reduction targets for years 2030 and 2035 compared to the Project such that Alternative 3's performance objectives for CAP strategies, measures, and actions would be lower than the Project's performance objectives. For example, Alternative 3 would reduce the performance objectives for 2045 CAP Measure ES2, *Procure*



*Zero Carbon Electricity*, which is to supply the County's power demand with zero-carbon electricity and is critical to achieving significant GHG emissions reductions. If the performance goals of Measure ES2 were reduced, then Alternative 3 would conflict General Plan Policy AQ 3.9 because Measure ES2 would not require zero-carbon electricity to serve the County. Measure ES2 is one of the five core measures necessary to meet the Project's targets for 2030 and 2035. Reducing Measure ES2's performance objectives would inhibit the County's ability to exceed the 2030 target by more than 160,000 MTCO<sub>2</sub>e and the 2035 target by more than 230,000 MTCO<sub>2</sub>e, which would occur under implementation of the Project.

Alternative 3 would not meet Project Objective 2 (identify GHG emissions reduction targets tailored to the unincorporated County that closely align with state and County climate goals) because implementation of Alternative 3 does not align with County or state goals. The 2030 target of 40 percent below 1990 levels is far off the emissions reduction trajectory needed to achieve emissions of 83 percent below 2015 levels by 2045, which means that Alternative 3 does not align with either County or state goals (Recirculated Draft PEIR, pp. 4.18 to 4.19). Specifically, CARB projects that a 48 percent reduction in 1990 emissions levels by 2030 is needed: "The Scoping Plan Scenario achieves the AB 1279 target of 85 percent below 1990 levels by 2045 and identifies a need to accelerate the 2030 target to 48 percent below 1990 levels" (CARB 2022b). This is far beyond the 40 percent reduction required by SB 32. The Project's 2030 target of 40 percent below 2005 levels is equivalent to 48 percent below 1990 levels, which aligns the Project with state goals and the 2022 Scoping Plan, which Alternative 3 would not do. Additionally, Alternative 3 does not align with the statewide targets codified in AB 1279, which establishes the state policy to achieve net zero GHG emissions as soon as possible but no later than 2045 and to achieve and maintain net negative GHG emissions thereafter. AB 1279 also mandates that by 2045, statewide anthropogenic GHG emissions are to be reduced at least 85 percent below 1990 levels.

Further, Alternative 3 would not align with the state's GHG emissions reduction goals because it would exclude several recommended priority local GHG emissions reduction strategies that the 2022 Scoping Plan recommends be incorporated "to the extent appropriate to ensure alignment with State climate goals." Such recommended strategies that Alternative 3 would not incorporate includes, for example: creating a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (Measures T6, T7, T8, and T9); increasing access to public transit by increasing density of development near transit (Measure T1); improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, and incorporating microtransit (Measure T4); adopting all-electric new construction reach codes for residential and commercial uses (Measure E2); facilitating deployment of renewable energy production and distribution and energy storage (Measures ES2, ES3, and ES4); and deploying renewable energy production and energy storage directly in new public projects and on existing public facilities (Measure ES3). Alternative 3 would not need these strategies to achieve its reduced targets for 2030 and 2035, thereby conflicting with Project Objective 2.

Alternative 3 would not meet Project Objective 5 (demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects and provide CEQA streamlining for development projects via the Checklist) because Alternative 3's lower targets would not meet CEQA standards for a level of GHG emissions that would not be cumulatively considerable for future environmental review of projects. CEQA requires that thresholds of significance are based on substantial evidence. (CEQA Guidelines, § 15064.7.) Further, CEQA permits lead agencies to develop thresholds of significance for GHG emissions which "consider a project's consistency with the State's long-term climate goals or strategies." (CEQA Guidelines, § 15064.4(b)(3).) The Project's GHG reduction targets are more stringent than or align with statewide targets (Recirculated

Draft PEIR, p. 2-12). However, as discussed above, Alternative 3 would not meet Project Objective 2 because implementation of Alternative 3 does not align with state goals. Consequently, Alternative 3's targets do not demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects, thereby conflicting with Project Objective 5.

Finding: The EIR, including Chapter 4 of the Recirculated Draft PEIR, contains facts and analysis supporting the Finding, some of which are set forth here. Under Alternative 3, the County would establish lower targets than included in the Project, i.e., targets representing the minimum needed to “align” with California’s codified statewide targets for 2030 and 2045. The Board rejects Alternative 3 as undesirable from a policy standpoint and infeasible on the basis of environmental considerations, because Alternative 3 would result in greater adverse environmental impacts associated with energy, GHG, air quality, and utilities and service systems. Alternative 3 would not meet Project Objectives 1, 2, and 5, and the Board finds that Alternative 3’s failure to meet these Project Objectives makes this alternative undesirable from a policy standpoint and rejects Alternative 3 as infeasible. Specifically, Alternative 3 would not align with County and state GHG emissions reduction goals, including the County’s General Plan Policy AQ 3.9, AB 1279, or CARB’s 2022 Scoping Plan. This failure substantially impairs the ability of Alternative 3 to achieve the basic Project Objectives, including Objectives 1, 2, and 5. For the above stated reasons, the Board rejected Alternative 3 as infeasible.

## **5. Environmentally Superior Alternative**

Facts in Support of Finding: CEQA requires an EIR to identify the “environmentally superior alternative” if the no project alternative is environmentally superior. (CEQA Guidelines, § 15126.6 (e)(2).).

The Recirculated Draft PEIR determined that the No Project Alternative is the environmentally superior alternative. The No Project Alternative would not implement the GHG emissions reduction strategies, measures, or actions identified by the Project, which would result in fewer facilitated projects compared with the 2045 CAP and thus, result in fewer adverse environmental impacts in comparison to the impacts associated with implementation of the 2045 CAP. Because the No Project Alternative would avoid impacts potentially associated with facilitated projects in comparison to the impacts associated with implementation of the 2045 CAP, the No Project Alternative is considered the environmentally superior alternative. However, in the long-term, the No Project Alternative would result in substantially fewer environmental benefits to the County overall for several reasons. First, air pollutant (criteria pollutants and toxic air contaminants) and GHG emissions would be much higher under the No Project Alternative than air pollutant and GHG emissions under all other alternatives and the Project such that impacts to human health would be higher. This is because the Project would substantially reduce countywide GHG emissions, and many of these emission reductions would produce parallel reductions in criteria pollutants and toxic air contaminants primarily by reducing fuel combustion. The No Project Alternative would result in greater human health risks associated with exposure to toxic air contaminants than all other alternatives and the Project, because all other alternatives and the Project would substantially reduce TAC emissions in the County. The No Project Alternative would neither realize the long-term GHG emission reduction benefits associated with implementation of the 2045 CAP (and all the co-benefits that would also occur, such as reduced criteria pollutant and TAC emissions), nor provide a clear pathway for the County to meet and exceed the statewide 2030 GHG reduction goal identified in SB 32 or meet and exceed the 2045 direct emission reduction target and carbon neutrality goal established by AB 1279. Significantly, the No Project Alternative would not meet any of the Project Objectives and the County is

not obligated to select the environmentally superior alternative for implementation if it would not accomplish the basic Project Objectives. (CEQA Guidelines, § 15126.6.)

CEQA Guidelines section 15126.6(e)(2) states “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Of Alternatives 1-3, Alternative 3 would reduce adverse environmental impacts compared to the Project to the greatest extent because it would facilitate fewer new projects compared with that anticipated under the 2045 CAP.

Because Alternative 3 has lower GHG emissions reduction targets for years 2030 and 2035 compared to the Project, implementation of Alternative 3 would facilitate fewer new projects through 2030 and 2035 to achieve the lower targets and performance objectives for the measures and actions compared to the Project. Thus, the County would implement fewer 2045 CAP strategies, measures, and actions to reduce GHG emissions to achieve the less aggressive reduction targets such that Alternative 3 would result in less short-term adverse physical environmental impacts compared to the impacts associated with implementation of the 2045 CAP strategies, measures, and actions needed to meet the Project’s higher GHG emissions reduction targets.

However, Alternative 3 would likely only delay these impacts as compared to the Project rather than lessen or eliminate these impacts entirely because Alternative 3 has lower GHG emissions reduction targets for years 2030 and 2035 compared to the Project (it has the same targets for the year 2045). Alternative 3 would likely facilitate the same number of projects through 2045, resulting in the same environmental impacts through 2045 compared to the Project. However, Alternative 3 would more likely facilitate a greater number of projects in the 2035 to 2045 period than the Project, worsening environmental impacts during the 2035 to 2045 timeframe as compared to the Project. Consequently, Alternative 3 would delay the realization of its environmental impacts but would not lessen or eliminate these adverse environmental impacts entirely and could increase or create certain environmental impacts as compared to the Project.

Alternative 3 would result in similar but lesser impacts on the following resource areas: aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, transportation, and wildfire. However, Alternative 3 would also result in greater impacts than the Project in resource areas including energy, GHG emissions, air quality, and utilities and service systems. Alternative 3 would result in greater energy impacts than the Project because Alternative 3 would facilitate fewer projects that would reduce Countywide energy use compared to the Project, resulting in greater energy consumption than the Project. Alternative 3 would result in greater GHG emissions impacts than the Project because Alternative 3 would not reduce Countywide GHG emissions as compared to the Project through 2030 and 2035, producing much greater GHG emissions than the Project. Additionally, implementation of Alternative 3 would result in greater air quality impacts than the Project for operational impacts because Alternative 3 would facilitate fewer projects through 2030 and 2035, resulting in much greater emissions of criteria pollutants and TACs throughout the county for these years, resulting in greater human health risks as compared to the Project. Finally, Alternative 3 would result in greater utilities and service systems because projects facilitated by Alternative 3 would lead to increased use of recycled and gray water systems compared to the Project, increasing the amount of wastewater requiring treatment by wastewater treatment providers, and thus, would require the development of new water recycling and direct potable reuse facilities.

Importantly, as discussed above, Alternative 3 is unable to meet Project Objectives 1, 2, and 5. Alternative 3 would not meet Project Objective 1 (identify detailed programs, actions, and performance goals to achieve the climate policies of the General Plan) because implementation would result in an inconsistency with the County's General Plan Policy AQ 3.9 ("Ensure the availability of zero-carbon electricity to serve unincorporated Los Angeles County."). Alternative 3 would not meet Project Objective 2 (identify GHG emissions reduction targets tailored to the unincorporated County that closely align with state and County climate goals) because implementation of Alternative 3 does not align with County or state goals, including AB 1279, which establishes the state policy to achieve net zero GHG emissions as soon as possible but no later than 2045 and to achieve and maintain net negative GHG emissions thereafter. AB 1279 also mandates that by 2045, statewide anthropogenic GHG emissions are to be reduced at least 85 percent below 1990 levels. Alternative 3 would also not meet Project Objective 5 (demonstrate a level of GHG emissions below which the County would have less than cumulatively considerable GHG impacts for future environmental review projects and provide CEQA streamlining for development projects via the Checklist) because Alternative 3's lower targets would not meet CEQA standards for a level of GHG emissions that would not be cumulatively considerable for future environmental review of projects, given that Alternative 3's targets do not align with state goals and consistency with state goals is the criteria for whether the targets represent a level of GHG emissions that would have a less than cumulatively considerable GHG impact for future environmental review projects.

Alternative 3 would likely exclude several recommended priority local GHG emissions reduction strategies that the 2022 Scoping Plan recommends be incorporated "to the extent appropriate to ensure alignment with State climate goals." Alternative 3 would likely not align with the state's GHG emissions reduction goals if it excluded 2022 Scoping Plan priority local GHG emissions reduction strategies, making Alternative 3 inconsistent with Project Objectives 1, 2, and 5.

Finding: Based on the analysis for each alternative above, Alternative 3 is considered the environmentally superior alternative to the Project in relation to some short-term environmental impacts because Alternative 3's reduced performance objectives would facilitate fewer projects for years 2030 through 2035. However, Alternative 3 would likely facilitate the same number of projects through 2045, resulting in the same environmental impacts through 2045 compared to the Project, and would more likely facilitate a greater number of projects in the 2035 to 2045 period than the Project. Consequently, Alternative 3 would delay the realization of its environmental impacts but would not lessen or eliminate these adverse environmental impacts and would likely worsen environmental impacts during the 2035 to 2045 timeframe compared to the Project. The Board rejects Alternative 3, the Environmentally Superior Alternative, as undesirable from a policy standpoint and infeasible on the basis of environmental considerations, as Alternative 3 would result in greater adverse environmental impacts associated with energy, GHG emissions, air quality, and utilities and service systems. Alternative 3 would not meet Project Objectives 1, 2, and 5 and the Board finds that Alternative 3's failure to meet these Project Objectives makes this alternative undesirable from a policy standpoint and rejects Alternative 3 as infeasible. Specifically, Alternative 3 would not align with County and state GHG emissions reduction goals, including the County's General Plan Policy AQ 3.9, AB 1279, or CARB's 2022 Scoping Plan. This failure substantially impairs the ability of Alternative 3 to achieve the basic Project Objectives, including Objectives 1, 2, and 5.

## **VIII. FINDINGS CONCERNING CERTAIN RECOMMENDED MITIGATION MEASURES NOT INCLUDED IN MMRP**

During the PEIR's public review process, commenters recommended certain mitigation measures. With respect to those specific mitigation measures suggested in public comments, which were not incorporated into the Final PEIR and are not included in the Mitigation Monitoring and Reporting Plan (MMRP), the Board finds as follows:

Programmatic mitigation measures for utility-scale solar projects to address dust control, water supply, wildlife impacts, heat islands, and aesthetic impacts. To reduce project impacts, one commenter generally recommended implementation of unspecified programmatic mitigation measures to address potential impacts from utility-scale solar projects (Recirculated Draft PEIR Comment O2-17 and O2-18). The PEIR identified reasonable, feasible programmatic mitigation measures to avoid or reduce significant environmental impacts, including cumulative environmental impacts, of future projects implementing 2045 CAP measures and actions, including utility-scale solar projects. The Board hereby rejects the proposed mitigation on the basis that other mitigation has been identified in the PEIR and included in the MMRP to reduce impacts to less than significant levels, because the proposed, unspecified measure would not be effective in mitigating a significant Project impact or provide substantial additional mitigation beyond the measures identified in the PEIR and included in the MMRP, and for the reasons set forth in Response to Comment O2-17 and O2-18.

Programmatic mitigation measures for utility-scale energy storage projects to address potential impacts. To reduce project impacts, one commenter generally recommended implementation of unspecified programmatic mitigation measures to address potential impacts from utility-scale energy storage projects (Recirculated Draft PEIR Comment O2-24 and O2-25). The PEIR identified reasonable, feasible programmatic mitigation measures to avoid or reduce significant environmental impacts, including cumulative environmental impacts, of future projects implementing 2045 CAP measures and actions, including utility-scale battery projects. The Board hereby rejects the proposed, unspecified mitigation on the basis that other mitigation has been identified in the PEIR and included in the MMRP to reduce impacts to less than significant levels, because the proposed, unspecified measure would not be effective in mitigating a significant Project impact or provide substantial additional mitigation beyond the measures identified in the PEIR and included in the MMRP, and for the reasons set forth in Response to Comment O2-24 and O2-25.

Limiting application of Action ES3.6 (streamlining and prioritizing permitting for solar and battery storage projects) to only distributed battery storage projects. To reduce Project impacts on unidentified "risks", one commenter suggested a mitigation measure limiting application of 2045 CAP Action ES3.6 to only distributed battery storage projects "because utility scale storage projects pose substantial risks...." (See Recirculated Draft PEIR Comment O2-26.) The PEIR identified mitigation measures to reduce hazards and hazardous materials impacts to a less than significant level. The Board hereby rejects the proposed mitigation on the basis that other mitigation has been identified in the PEIR and included in the MMRP to reduce this impact to a less than significant level, because the proposed measure would not be effective in mitigating a significant Project impact or provide substantial additional mitigation beyond the measures identified in the PEIR and included in the MMRP, and for the reasons set forth in Response to Comment O2-26.

Locating utility scale storage projects outside of Very High Fire Hazard Severity Zones and remote areas where there are no residents. To reduce Project impacts, one commenter recommended mitigation for

wildfire risk posed by utility scale storage facilities that might be caused by the projects facilitating 2045 CAP strategies, measures, and actions. (See Recirculated Draft PEIR Comment O2-27.) The EIR identified mitigation measures to reduce impacts on wildfire to a less than significant level. The Board hereby rejects the proposed mitigation on the basis that other mitigation has been identified in the PEIR and included in the MMRP to reduce this impact to a less than significant level, because the proposed measure would not be effective in mitigating a significant Project impact or provide substantial additional mitigation beyond the measures identified in the PEIR and included in the MMRP, and for the reasons set forth in Response to Comment O2-27.

## **IX. ADDITIONAL ENVIRONMENTAL FINDINGS**

### **a. Findings Regarding EIR Recirculation**

#### **i. Legal Requirements Regarding Recirculation**

A lead agency is required to recirculate a Draft EIR for additional public review when “significant” new information is added to the EIR after the initial public review, according to CEQA Guidelines section 15088.5(a). New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such effect, including a feasible project alternative that the project proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project but the project’s proponents decline to adopt it.
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies, amplifies, or makes insignificant modifications to an adequate EIR, according to CEQA Guidelines section 15088.5(b).

#### **ii. Recirculated Draft PEIR Comments, Responses, and Revisions Do Not Trigger Draft PEIR Recirculation**

No significant new information has been added to the EIR in Recirculated Draft PEIR comments, responses to Recirculated Draft PEIR comments, and Recirculated Draft PEIR revisions made in the Final PEIR that would trigger recirculation of the Recirculated Draft PEIR under CEQA Guidelines section 15088.5(a) because:

- They did not disclose a new significant environmental impact that would result from the Project or from a new mitigation measure proposed to be implemented.
- They did not disclose a substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- They did not disclose a feasible Project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the adverse environmental impacts of the Project.

- They did not otherwise result in major revisions to the Recirculated Draft PEIR that precluded meaningful public review and comment on a substantial, adverse project impact environment, a feasible mitigation measure, or an alternative not proposed or implemented.

Instead, only minor changes were made to the Recirculated Draft PEIR in response to public comments and to amplify, clarify, and update certain information. The changes and new information provided in the Final PEIR include:

- Clarifications to the Recirculated Draft PEIR analysis in response to comments received;
- Minor revisions to mitigation measures in response to comments received; and
- Corrections of typographical and editorial errors.

This new information does not include identification of new or substantially increased significant impacts associated with the Project, alternatives, or mitigation measures that are considerably different from those previously analyzed that would clearly lessen the Project's significant impacts.

The Board finds that none of the revisions to the Recirculated Draft PEIR made by, or discussion included in, the Final PEIR involves "significant new information" triggering recirculation because the changes do not result in any new significant environmental effects, substantial increase in the severity of previously identified significant effects, or feasible project alternatives that would clearly lessen the environmental effects of the project. The Board further finds that incorporating the information and corrections does not deprive the public of a meaningful opportunity to comment on the Project or its effects, and that no information has been added to the EIR that would warrant recirculation pursuant to Public Resources Code section 21092.1 or CEQA Guidelines section 15088.5. This finding is based upon all the information presented in the Final PEIR and the Record of Proceedings.

#### **b. Findings Regarding Disagreement Among Experts**

It is possible that during the public review process experts may disagree with assumptions, analysis, conclusions, and other materials presented in the Recirculated Draft PEIR. The Final PEIR has summarized the conflicting opinions, where such information is known in advance, including response to comment O14-21. All such information will be considered by the decision-makers during the public review process. However, to be adequate under CEQA, the Recirculated Draft PEIR need not resolve all such disagreements.

In rendering a decision on a project where there is a disagreement among experts, the decision makers may give more weight to the views of one expert than to those of another, and need not resolve a dispute among experts. Disagreement among experts does not make an EIR inadequate. (CEQA Guidelines, § 15151).

The Board has considered the comments and objections received, but need not follow said comments or objections. The Board makes its decisions based on the evidence that is contained within the administrative record provided by the Final PEIR, its supporting information and analysis, and the associated public review process. The Board finds that the Final PEIR accurately reflects the 2045 CAP's impacts on environmental resources and is supported by the County's experts.

#### **c. Section 21082.1(c)(3) Findings**

Pursuant to Public Resources Code section 21082.1(c)(3), the Board hereby finds that the Final PEIR reflects that independent judgment of the lead agency.



## **X. MITIGATION MONITORING AND REPORTING PLAN**

The Board hereby finds that a Mitigation Monitoring and Reporting Program has been prepared for the EIR and has been adopted concurrently with these Findings. (Pub. Resources Code, § 21081.6(a)(1).) The County will use the MMRP to track implementation of EIR mitigation measures adopted in these Findings. The County will also monitor the County's implementation of 2045 CAP policies relied upon to reduce environmental impacts.