ADDENDUM TO THE
RITTER RANCH SPECIFIC PLAN
(AND ASSOCIATED ANNEXATION AREAS) FINAL EIR

STATE CLEARINGHOUSE NO. 90010124

Lead Agency:

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Table of Contents

1.0 Purpose of the Addendum 1
2.0 Project Background 2
3.0 Introduction 5
4.0 Project Location and Setting 9
5.0 Project Description 11
6.0 CEQA Requirements for Ritter Ranch Specific Plan Subsequent Project Submittals 17
7.0 Environmental Assessment of the Proposed Project 19
7.1 Aesthetics 19
7.2 Agriculture and Forestry Resources 21
7.3 Air Quality 21
7.4 Biological Resources 24
7.5 Cultural Resources 29
7.6 Energy 32
7.7 Geology and Soils 34
7.8 Greenhouse Gas Emissions 39
7.9 Hazards and Hazardous Materials 39
7.10 Hydrology and Water Quality 41
7.11 Land Use and Planning 44
7.12 Mineral Resources 46
7.13 Noise 46
7.14 Population and Housing 48
7.15 Public Services and Recreation 49
7.16 Transportation 51
7.17 Utilities and Service Systems 53
7.18 Wildfire 63
8.0 Cumulative Impacts Discussion 65
9.0 Environmental Review Determination 67
10.0 References 70

List of Figures

Figure 1: Regional Map 6
Figure 2: Vicinity Map 7
Figure 3: Phase 1 - Planning Area 5 Planned Development 8
Figure 4: Infrastructure Plan 10
Figure 5: Phase 1B Planned Development Area 15
Figure 6: Ritter Ranch Water Tank and Access Road 16

List of Tables

Table 1: Dwelling Unit Density Transfer 11
Table 2: Summary of Proposed Development 12
Table 3: Land Use Acreage and Equivalent Dwelling Units – Phase 1B 54
Table 4: Yearly Water Demand Estimate for Ritter Ranch 1A & 1B 55
Table 5: Potable and Non-Potable Water Use (UWMP Table 4-2) 56
Table 6: Potable and Non-Potable Water Use (2020 UWMP Table 6-9) 56

List of Appendices

**Refer to Section 7 of this EIR Addendum for additional information and further updates regarding the technical studies included in the EIR Addendum appendices*

Appendix 1 – Nuisance Runoff Assessment
Appendix 2 – Biological/Regulatory Overview
Appendix 3 – Burrowing Owl Focused Survey
Appendix 4 – Special-Status Plant Survey
Appendix 5 – Cultural Resources Study Update
Appendix 6 – Phase I Cultural Resources Assessment
Appendix 7 – Geotechnical Update Report
Appendix 8 – Traffic Impact Analysis
Appendix 9 – Phase 1B Water Supply Reliability Report
Appendix 10 – Ritter Ranch FEIR Findings of Fact & Statement of Overriding Considerations

1.0 PURPOSE OF THE ADDENDUM

This Addendum has been prepared in accordance with the provisions of the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Sections 21000 et seq.); the State CEQA Guidelines (Title 14, California Code of Regulations [CCR] Sections 15000 et seq.); and the rules, regulations, and procedures for implementing CEQA as set forth by the City of Palmdale (City).

State CEQA Guidelines Section 15164(a) of the State CEQA Guidelines states that "the lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Pursuant to Section 15162(a) of the State CEQA Guidelines, a subsequent environmental impact report (EIR) or Negative Declaration is only required when:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

   (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

   (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

   (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

   (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The City is the Lead Agency under CEQA.

2.0 PROJECT BACKGROUND

The City approved the Ritter Ranch Specific Plan ("Ritter Ranch SP" or "Specific Plan") and pre-zoning for other areas to be annexed into the City and certified the associated Final EIR (FEIR) in February 1992 (State Clearinghouse [SCH] No. 90010124). The Ritter Ranch FEIR was prepared in accordance with CEQA (California Public Resources Code, Sections 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000, et seq.). As further described below, the project evaluated in the Ritter Ranch FEIR consisted of the 10,625-acre Ritter Ranch SP area, and pre-zoning for approximately 449 acres on several adjacent parcels also proposed by the City for annexation (Other Annexation Areas) to avoid creating unincorporated "islands." Although the Other Annexation Areas were addressed in the Ritter Ranch FEIR, no development plans were proposed for that land. The Ritter Ranch SP area and Other Annexation Areas were subsequently annexed into the City, following approval of the Ritter Ranch SP and certification of the Ritter Ranch FEIR by the City in 1992.

The Ritter Ranch SP and Other Annexation Areas are in the southwest foothills of the Antelope Valley, generally bound by Elizabeth Lake Road to the north, the Angeles National Forest and Community of Leona Valley to the west, Sierra Pelona Ridge to the south, and the City Ranch Specific Plan area to the east. **Figure 1: Regional Map**, depicts the location of the Ritter Ranch SP area.

The Ritter Ranch SP, as defined in the Ritter Ranch FEIR, entails all actions associated with the implementation and development of the Ritter Ranch SP. The Ritter Ranch SP manages the use of land, establishes provisions for site development, and provides a comprehensive approach to infrastructure planning and financing.[1] The Ritter Ranch SP allows for the development of up to 7,200 dwelling units, 692,135 square feet (sf) of neighborhood commercial development, approximately 7,906 acres of open space/recreation use, approximately 120 acres of school sites, and approximately 148 acres of major roadways throughout the originally proposed eight Planning Areas (PAs) (PA-1 through PA-8) of the planned three phases for the Ritter Ranch SP.[2] Refer to **Figure 2: Vicinity Map**.

Subsequent to approval of the Ritter Ranch SP in 1992, the City approved Specific Plan Amendment (Specific Plan Amendment) 95-1-RR, which amended the Specific Plan to:

- Reflect the provisions of the Agreement of Compromise, Settlement and Release between Ritter Park Associates (the original proposed developer of the Ritter Ranch SP), the Leona Valley Town Council and the City of Palmdale; and,
- Amend and correct certain other portions of the Specific Plan.

At that time, the City found that the proposed action was consistent with the project reviewed in the Ritter Ranch FEIR prepared for the Ritter Ranch SP.

[1] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas. Page 2.*
[2] Ibid, Page 50.

The Specific Plan Amendment did not affect the density or intensity of land uses proposed and did not conflict with any General Plan policy.

To date, no homes have been built within the Ritter Ranch SP area. However, grading for certain areas within Phase 1A of PA 5 was completed in 2005/2006, and backbone roadways and infrastructure for these areas were installed. The backbone roadways are open to the public including Westland Drive and Avenue S adjacent to Phase 1B.

Phase 1B, which is approximately 75.6 acres, is the second phase for completion of construction within PA 5, and within the entirety of the Ritter Ranch SP Area. PA 5 was originally approved in the Ritter Ranch Specific Plan for the development of 2,591 DUs.[3] As with the remainder of the Ritter Ranch SP area, development of the remainder of PA 5 will be subject to subsequent entitlement approvals and CEQA review. Therefore, this EIR Addendum focuses only on the proposed Phase 1B development, as described herein.

The City approved extensions of vesting tentative tract maps (VTTMs) 51508-03 and 63145 on January 20, 2015, subject to various Conditions of Approval (COAs). Additionally, Planned Development (PD) No. 05-02 was approved by the City in July 2006 and provided for the lot sizes and other features included in the previously approved VTTMs. The City determined the VTTMs were consistent with the Ritter Ranch SP and the Ritter Ranch FEIR (including implementation of identified mitigation measure[s]).

When the City extended the life of VTTMs 51508-03 and 63145 it relied upon the findings of the Ritter Ranch FEIR and found that no further CEQA review was required. In approving a 2014 "Initial Study" for the discretionary extensions of these tract maps, the City stated as to the Ritter Ranch FEIR, as follows:

> *"The analysis contained in the Final EIR for the Ritter Ranch Specific Plan was sufficiently detailed to analyze the potential impacts of subdividing the subject property for future residential, commercial, recreational, educational, and open space uses. Therefore, this project is subject to the mitigation measures presented in the Final EIR for the Ritter Ranch Specific Plan."*

Additionally, in July 2006, the City approved PD No. 05-02, which provided for the lot sizes and other features included in aforementioned VTTMs.

Phase 1A Overview

Phase 1A is approximately 138 acres and is the first phase for completion of construction within PA 5, and the entirety of the Ritter Ranch Specific Plan Area. As previously noted, PA 5 encompasses 656 acres and was approved to include 2,591 DUs. Phase 1A included VTTMs 51604, 51605, 51606, 51607, 52093, and 52116, which were granted discretionary extensions by the City on January 20, 2015, subject to various Conditions of Approval (COAs).

[3] Ibid, Page 55.

The City determined the VTTMs were consistent with the Ritter Ranch Specific Plan and the Ritter Ranch FEIR (including implementation of identified mitigation measures) when these VTTMs were re-entitled in 2022.[4] The City's 2022 approvals also included a PD and an associated residential planned development conditional use permit (CUP). The City relied upon the findings of the Ritter Ranch FEIR in determining that no further CEQA review was required. The 2022 approvals were challenged in litigation and the City's actions were upheld by the Los Angeles Superior Court.[5]

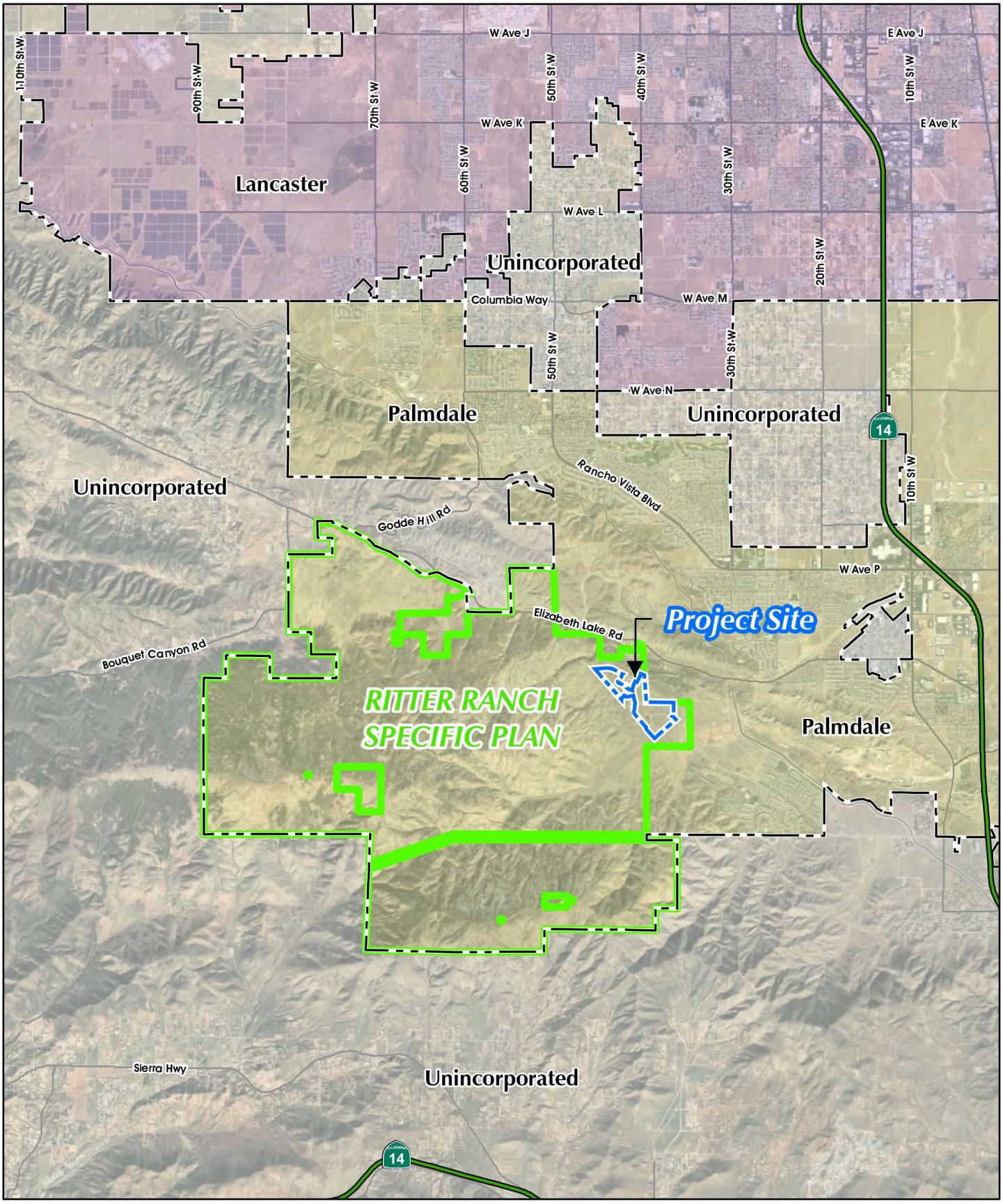
[4] Phase 1A VTTM's expired and new applications were processed for the same VTTM entitlements as previously approved.
[5] *Leona Valley Town Council v. City of Palmdale, et al.*, Los Angeles County Superior Court Case No. 22STCP01932.

3.0 INTRODUCTION

RdR Development Holdings, LLC., is seeking approval of two Vesting Tentative Tract Maps (VTTMs), VTTMs 51508-03 and 63145 (proposed VTTMs), a proposed Ritter Ranch Phase 1B Planned Development (PD or Planned Development) CDEV23-0002, and an associated residential planned development conditional use permit (CUP) to authorize alternative lot and subdivision design standards that implement a portion of Planning Area (PA or Planning Area) 5 which is host to both Phase 1A and Phase 1B (Ranch Center) of the approved Ritter Ranch SP. Refer to **Figure 3: Phase 1 - Planning Area 5 Planned Development**. Specifically, Planning Units (PU or Planning Unit) 5U, 5T (partial) community park, 5X-1, 5X-2, 5W-4, 5W-5 and 5U (neighborhood park) collectively represent "Phase 1B" of the Ritter Ranch SP development. Together the requested approvals for these Planning Units are also referred to herein in this Addendum as the "Project".

Although the City previously approved the VTTMs and PD No. 05-02, those approvals expired, and so the new PD CDEV23-0002 will replace the prior PD approval. The Project (described in **Section 5.0: Project Description**) will require discretionary approval of the proposed VTTMs, PD and CUP. As such the Project is subject to compliance with the CEQA. The purpose of this Addendum is to inform decision-makers on the potential environmental impacts associated with the proposed development of Ritter Ranch Phase 1B, as well as to demonstrate that these potential environmental impacts would be within the envelope of impacts already evaluated in the certified Ritter Ranch FEIR. That is, that no environmental impact associated with the proposed modifications represents a new or substantially increased impact. Based on the analysis contained herein, the City has determined that an Addendum to the FEIR is the appropriate form of CEQA-compliance documentation for the proposed Project.

As further addressed in **Section 7.0: Environmental Assessment of the Proposed Project** of this Addendum, it is our professional opinion that the proposed Project is consistent with the Ritter Ranch SP, and within the scope of the analysis presented in the 1992 Ritter Ranch FEIR (SCH No. 90010124). There is no new information and there are no changes in circumstances or changes to the project that would preclude the City's ability to rely on the Ritter Ranch FEIR, and the conditions for requiring preparation of a Subsequent or Supplemental EIR are not met. Refer to **Appendix 10** of this Addendum which contains findings that incorporate, by reference, the original Findings and Statement of Overriding Considerations which were adopted for the Ritter Ranch Specific Plan, pursuant to CEQA Guidelines Section 15091 and Public Resources Code Section 21081.



Source: Stantec Consulting Services, Inc., October 2023.

FIGURE 1: Regional Location
Ritter Ranch Specific Plan Project

Not to scale

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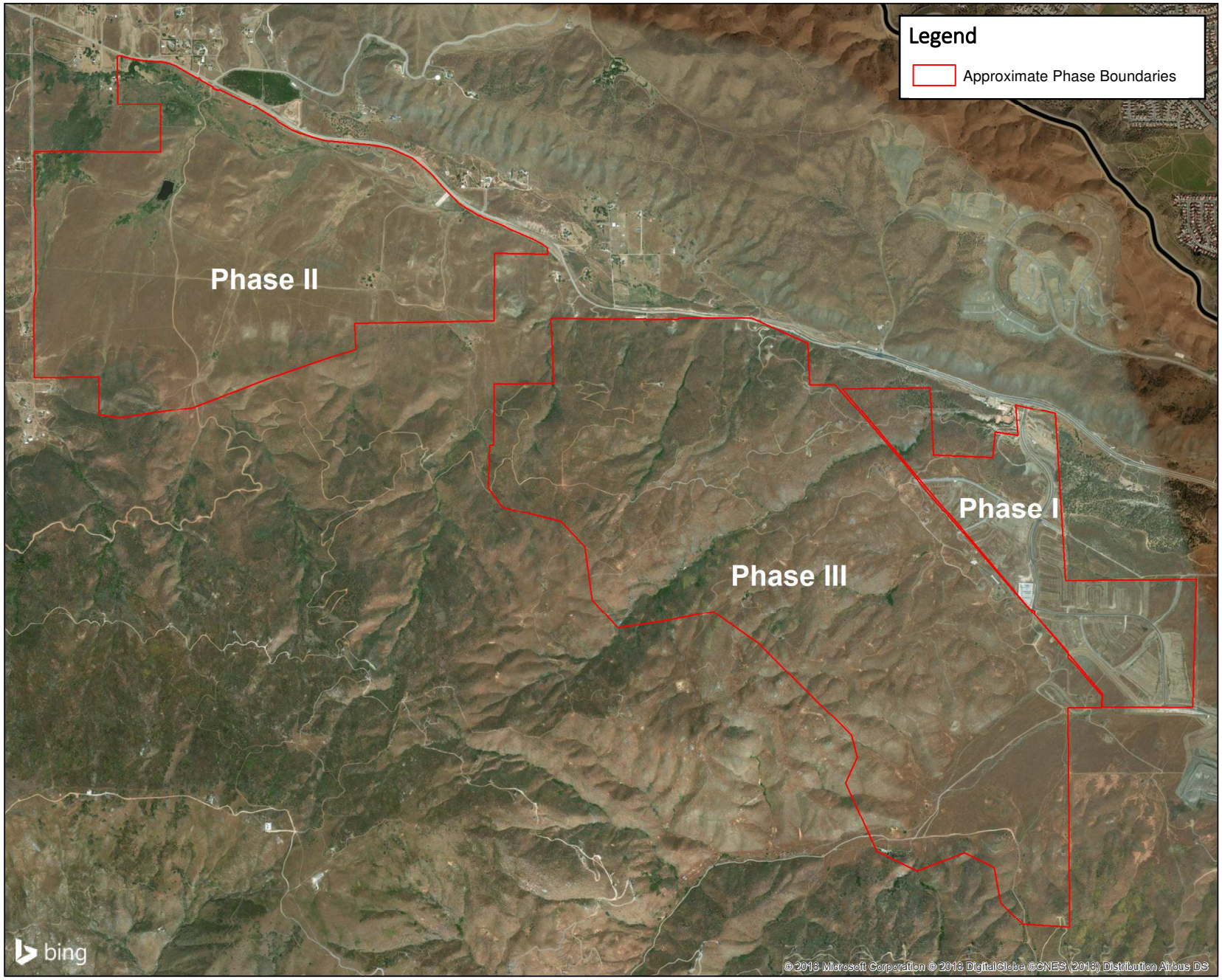

Source: Glenn Lukos Associates, September 2018.

FIGURE 2: Vicinity Map
Ritter Ranch Specific Plan Project

Not to scale

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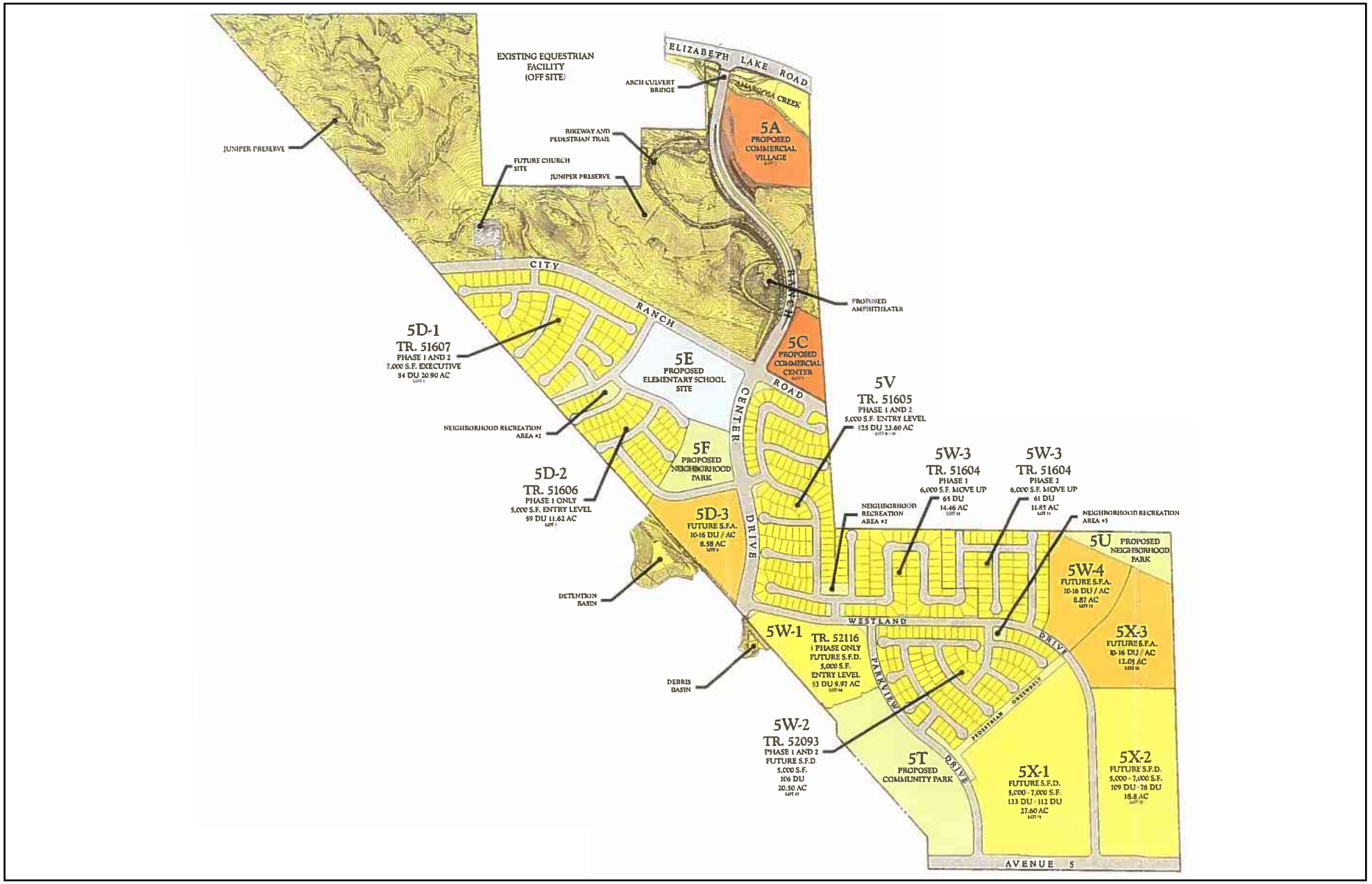

Source: Stantec Consulting Services, Inc., March 2024.

FIGURE 3: Planning Area 5 Planned Development
Ritter Ranch Specific Plan Project

Not to scale

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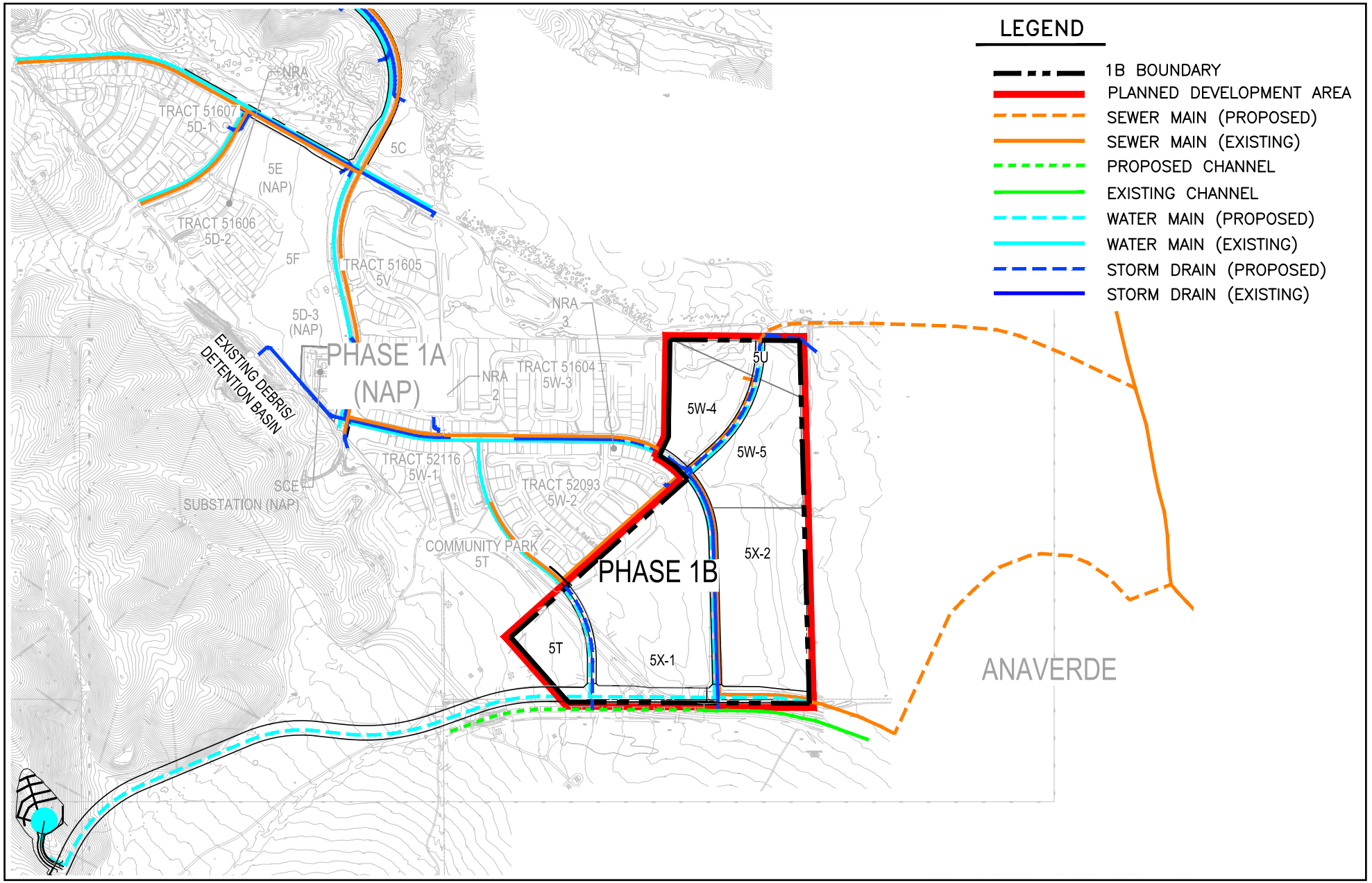
4.0 PROJECT LOCATION AND SETTING

Proposed VTTMs 51508-03 and 63145 encompass approximately 75.6 acres in vacant conditions, located just east of Phase 1A and located generally south of City Ranch Road, west of Ranch Center Drive, and east of the Southern California Edison (SCE) easement.[6] New roadways adjacent to Phase 1B, including Westland Drive and Avenue S, have been constructed, as has been a sewer line. The Project site is generally bound to the north by West City Ranch Road, to the south by Avenue S, to the east by Parkwood Drive, and to the west by 40th Street West. Westland Drive cuts through the interior of the Project site and has been previously paved. The Project site is currently vacant, barren and some grading from the previous backbone improvements has occurred. The constructed backbone improvements for VVTM 51508-03 include street and storm drain infrastructure on Ritter Ranch Road/Avenue S and Westland Drive. The constructed improvements also include a temporary channel south of the Phase 1B boundary to convey stormwater to Anaverde Creek and a drainage channel discharging to Amargosa Creek at the northeast corner of VVTM 51508-03. Additionally, the Project site is located near the base of a series of alluvial fans originating from Sierra Pelona Mountains on the north**.**

As shown in **Figure 4: Infrastructure Plan**, backbone sewer and water lines have been installed along Ranch Center Drive, City Ranch Road, Westland Drive, Red Trail Drive, and Park View Drive. Figure 3 also shows proposed infrastructure locations. Surface waters from this mountain range drain and discharge to Anaverde Creek and Amargosa Creek as overland flow. Moreover, Phase 1A of the Ritter Ranch development is designed with several detention basins and debris basins throughout its tracts to collect surface water and debris from the natural overland flows coming from the mountains. As a result, Phase 1B will receive minimal debris (if any) coming from the mountain.[7]

[6] Stantec. April 2024. *Ritter Ranch Project, Phase 1B – Planned Development, Exhibit C – Development Feasibility Map.*
[7] Stantec. March 15, 2024. *Ritter Ranch Project, Phase 1B – Nuisance Runoff Assessment.*



Source: Stantec Consulting Services, Inc., April 2024.

FIGURE 4: Infrastructure Plan
Ritter Ranch Specific Plan Project

Not to scale

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5.0 PROJECT DESCRIPTION

The Project is located within the Ritter Ranch Specific Plan PUs 5U, 5T, 5X, and 5W (refer to Figure 3). The Ritter Ranch Specific Plan designates PUs 5X (384 DUs) and 5W (436 DUs) for the development of up to 820 residential units (base units prior to density transfer), and PUs 5U and 5T are designated for approximately 20 acres of parks (refer to **Table 2**).

The Project proposes the development of 135 single-family detached dwelling units (DUs) in PU 5X-1 and 492 single-family attached DUs within PUs 5W-4, 5W-5, AND 5X-2 for a total of 627 dwelling units. As Phase 1A includes 285 units in PU 5W, the total unit count for PUs 5X and 5W within Phases 1A and 1B is 912 DUs. Accordingly, development of Phase 1B in PUs 5W and 5X requires an allocation of additional DUs to achieve the desired density. As Ritter Ranch Specific Plan Section 8.17.2.3 allows for a density transfer of 20 percent from other PUs, PD CDEV23-0002 proposes the transfer of 92 DUs from an unspecified Planning Unit(s) in PA 5 that remain unallocated and available for transfer to satisfy the total DU count of 912; refer to **Table 1: Dwelling Unit Density Transfer** to assist in the tracking of density-transferred units. Further, the base DU capacity for the entirety of PA 5 is 2,591 DUs; therefore, 1,411 DUs still remain available for potential future development in PA5 even after the aforementioned allocations to Phase 1A and 1B.

Table 1: Dwelling Unit Density Transfer

Planning Unit	Base DU Allowed in PU*	Maximum DU with Density Transfer	DU Previously Allocated	PD Proposed DU Breakdown by Sub Area	Remaining Base DU Capacity in Planning Unit
5D	269	323	144	0	125
5J	291	349	0	0	291
5K	265	318	0	0	265
5V	104**	124	124	0	-20
5O	152	182	0	0	152
5Q	494	593	0	0	494
5R	196	235	0	0	196
5W	436	523	285	5W-4: 74 5W-5: 111	-34
5X	384	461	0	5X-1: 135 5X-2: 307	-58
Total	**2,591**	**2,846*** **	**553**	**627**	**1,411**

* From Ritter Ranch SP Section 8.0 Transfer of Dwelling Units Table: Planning Area 5, in accordance with SP Section 8.17.2.3.
**Base dwelling units (DU) allowed increased to 104 per SPA 95-1.
***The maximum permitted units with transfer of dwelling units within Planning Area 5 is 2,846 per SP Section 8.0.

Table 2: Summary of Proposed Development, shows the proposed development breakdown by Planning Unit. In addition to the 135 single-family detached DUs in PU 5X-1, PUs 5W-4, 5W-5, and 5X-2 include the development of 74, 111, and 307, single-family attached DUs, respectively. Additionally, PU 5U would be an approximately 5.5-acre neighborhood park and PU 5T would be an approximately 6.7-acre community park (refer to **Figure 5: Phase 1B Planned Development Area**).

Standards for the various lot types are included in the proposed Planned Development document including private, usable outdoor space for single-family attached DUs which would be in conformance

with the Ritter Ranch Specific Plan open space requirements. Additional details for the single-family attached standards are included in the proposed Planned Development document.

Proposed VTTMs 51508-03 and 63145 are consistent with the previously approved VTTMs and, as previously described, are part of Phase 1B of Ritter Ranch SP PA 5. As discussed above, the Ritter Ranch SP allows for development of PA 5 with up to 2,591 dwelling units on 656 acres, for an overall density of approximately 4.0 dwelling units per acre (du/ac). As summarized in **Table 2: Summary of Proposed Development**, the two proposed VTTMs would create 135 single-family detached dwelling units, 492 single-family attached dwelling units, and approximately 12.2 acres of open space (for pedestrian, landscape/open space, greenbelt uses, and neighborhood recreation areas), an "A" Street roadway providing access to the neighborhood park located in PU 5U, all located on approximately 75.6 acres.

Table 2: Summary of Proposed Development

Planning Unit	Land Use	Dwelling Units	Acres	Open Space Lots	
				Neighborhood Recreation Area Number	Neighborhood Parks (Acres)
Residential					
5W-4	Single-Family Attached	74	8.3	N/A	0
5W-5	Single-Family Attached	111	11.2	N/A	0
5X-1	Single-Family Detached	135	25.0	4	0.30
5X-2	Single-Family Attached	307	18.9	5	0.57
	Total Residential	**627**	**63.4**	**N/A**	**0.87**
Non-Residential					
5U	Neighborhood Park (including access road)		5.5	4	Public
5T	Community Park (remainder from Phase 1A)		6.7	5	Public

***Approximate**
Source: Stantec. April 2024. *Planned Development. Ritter Ranch Phase IB, Land Development. Table 1: Residential Land Use Statistics and Table 2: Non-Residential Land Use Statistics.*

Two neighborhood recreation areas will be provided in-tract to supplement the one neighborhood park, and one community park[8]. Specifically, the proposed parks would occur within PU 5U (approximately 5.5-acre public Neighborhood Park) and in PU 5T (approximately 6.7-acre partial public Community Park). The Project PD includes the southern portion of Community Park PU 5T, the northern portion would be completed earlier to ensure timely delivery of the amenity program for Phase 1A.

Earthwork

The Ritter Ranch SP FEIR anticipated that significant grading would occur within Ritter Ranch including portions of natural drainage courses, over most of the gently sloped areas, and portions of the lower foothills in PAs 2, 4, 5 and 6 (total grading is estimated at 50 million cubic yards). According to VTTM No. 51508-03, Phase 1B anticipated approximately 450,798 cubic yards (cy) of soil cut and 482,698 cy of soil fill.[9]

[8] The Community Park site adjoins and will be part of a larger community Park that includes a portion approved as part of Phase 1A.
[9] There will be a borrow site located north of the tank site access road for additional fill required. This borrow site will be included in the tank access road grading plans.

Water Tank Access Road

Phase 1B includes an approximately 40-acre Ritter Ranch Water Tank area, consisting of a paved access road extending west from the intersection of Avenue S and Westland Drive to the proposed new water tank,[10] and an area set aside as a potential borrow site (refer to **Figure 6: Ritter Ranch Water Tank and Access Road**). The proposed paved access road parallels and crosses the Anaverde Creek as well as another unnamed seasonal drainage. A small access bridge would be constructed to allow access across Anaverde Creek.

Water Supply

The water supply proposed for Ritter Ranch will originate from several sources. The potable water supply will be acquired from Los Angeles County Waterworks District No. 40 (District 40) which serves as the water retailer to the Project site. District No. 40 obtains its water supply from water wholesaler Antelope Valley – East Kern (AVEK) Water Agency and is supplemented by groundwater pumped from the Antelope Valley Groundwater Basin by approximately 54 wells owned and operated by District 40[11]. AVEK water is treated at the Quartz Hill Water Treatment Plant, conveyed through the South Feeder transmission mains, and delivered through three separate turnouts. The backup water supply is obtained from groundwater wells located in the Lancaster Subunit of the Antelope Valley Groundwater Basin.[12] Refer to **Section 7.17: Utilities and Service Systems**, of this document for specific water supply details. As discussed in detail under **Section 7.17: Utilities and Service Systems**, Phase 1B is anticipated to have water supply available during normal, single-dry, and multiple-dry years within a 20-year projection.[13]

Off-Site Water Pipeline

Cannon, the Project's water/wastewater consulting engineer (see **Appendix 9**) has confirmed that there is sufficient water supply to serve the Project, contingent upon a phasing strategy to design and construct off-site water conveyance infrastructure in conformance with AVEK and District 40's requirements for the Project. The three required off-site water system facilities are listed as follows:

1. A 36-Inch Transmission Main in 25th Street West between Avenue O-8 to the O12/25th Street West Pump Station.
2. O12/25th Street West Pump Station.
3. A 36-Inch Transmission Main in 25th Street West between O12/25th Street West Pump Station and Ranch Vista Blvd.

Bio-Swale and Alternative Water Runoff Treatment Systems

Stantec prepared a Nuisance Runoff Assessment (NRA) for the Ritter Ranch Phase 1B Project. Findings from this report are summarized below and the report (refer to **Appendix 1**). The NRA notes that Phase 1B

[10] Stantec. April 2024. *Ritter Ranch Project, Phase 1B – Planned Development, Exhibit P – Trails Plan.*
[11] Los Angeles County Public Works. ND. *District Overview*. Available at: https://dpw.lacounty.gov/wwd/web/About/Overview.aspx, (accessed November 2023).
[12] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*.
[13] Cannon. July 1, 2024. *Ritter Ranch Phase 1B Water Supply Reliability Report* (see **Appendix 9**).

Project will have two proposed bio-swale systems to treat nuisance surface water flows from the proposed development area. One will be located in the northeast corner of Ritter Ranch Road and Westland Drive, treating flows from Tract 61345 and PA 5X-2. The second will be in the southern corner of PA 5X-4 and will treat runoff water from PA 5X-4 and 5W-4 coming from the west. The southern system will receive nuisance flow from a total of 44 acres (447 DU), through a low-splitter in the main line in Westland Drive, which then will discharge into the bio-swale where possible pollutants will be filtered and mitigated, then the water will discharge into an outflow pipe in the downstream of the swale, which then discharges to the downstream mainline and into Anaverde Creek.[14] The northern bio-swale will follow the same pattern and design as the southern bio-swale, it will receive an approximate 25 acres of nuisance flow (180 DU), where the runoffs will be routed from the mainline located on the future street between PA 5X-4 and 5W-4, into a low-splitter and then discharges to the proposed bio-swale, which then discharges back into the mainline and out to an offsite temporary channel to the west.[15]

In the event that the proposed bio-swale treatment is not feasible, a drywell treatment system is proposed as an alternative solution. The drywell system is an underground structure designed to manage and dispose of excess water, in this case, any nuisance water from the proposed Phase 1B Project site. This system helps to mitigate pollutants by filtering the excess water through the soil, thus protecting nearby streams from pollutants. Just like any other treatment systems, sizing and locations will depend on the amount of runoff while also being in mind of local code and regulations.

Project Approvals

The Project site covered by the proposed Project has a General Plan land use designation of Specific Plan (SP-Ritter Ranch) and is zoned Specific Plan. While the Ritter Ranch SP identifies a land use designation of SFA (single-family attached), in the prior PD approval for Phase 1A of Ritter Ranch, single-family detached homes were approved consistent with procedures and process provided in the Specific Plan. Single-family detached homes and single family attached units are proposed in the current PD and CUP applications consistent with procedures and process provided in the Specific Plan. Pursuant to the Specific Plan, the currently requested approvals do not require a General Plan Amendment, Specific Plan Amendment, or zone change.

The Project contemplates the approval of the two proposed VTTMs (VTTMs 51508-03 and 63145), proposed Ritter Ranch Phase 1B PD CDEV23-0002, and an associated residential planned development CUP to authorize alternative lot and subdivision design standards that implement a portion of PA 5 (Ranch Center) of the approved Ritter Ranch SP.

There is currently no specific order of construction phasing for each Phase 1B PU. Existing backbone infrastructure associated with Phase 1A will also serve Phase 1B such that construction of individual Project PUs would be able to commence without waiting for infrastructure to be built out by earlier phases of either Phase 1A or Phase 1B. This circumstance allows individual Phase 1B PU's to be developed independently of each other, in any order.

[14] Stantec. 2024. *Nuisance Runoff Assessment* (see **Appendix 1**).
[15] Stantec. *March 15, 2024. Ritter Ranch Project, Phase 1B – Nuisance Runoff Assessment*, Pages 6 and 7 (See **Appendix 1**).

Source: Stantec Consulting Services, Inc., April 2024.

FIGURE 5: Planned Development Area
Ritter Ranch Specific Plan Project

Not to scale

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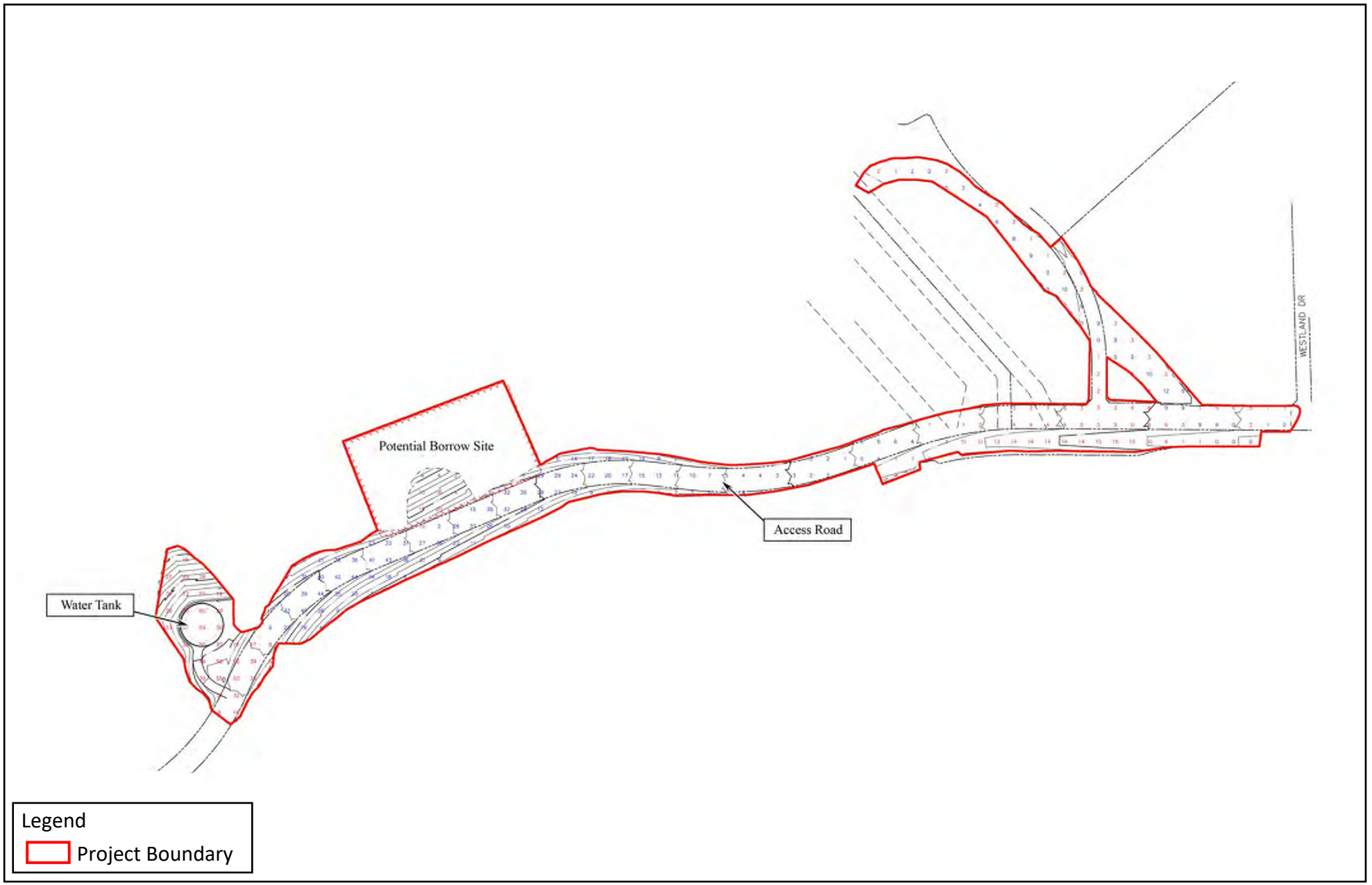

Source: Brian F. Smith and Associates, Inc., March 2022.

FIGURE 6: Ritter Ranch Water Tank and Access Road
Ritter Ranch Specific Plan Project

Not to scale

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6.0 CEQA REQUIREMENTS FOR RITTER RANCH SPECIFIC PLAN SUBSEQUENT PROJECT SUBMITTALS

Section 2.4 of the Specific Plan states that:

> *"All subsequent project submittals, such as site plans and tentative maps, shall be evaluated by the City to determine potential environmental impacts associated with the site-specific project submittal. For a negative declaration, mitigated negative declaration or finding of consistency, such proposed development must be consistent with the design, intent, density, use and development standards of the Ritter Ranch Specific Plan; otherwise, a Subsequent EIR or Supplemental EIR will be required. A Subsequent or Supplemental EIR may be required as provided by CEQA."*

As previously identified, when the City approved VTTMs 63145 and 51508-3, the City relied upon the findings of the Ritter Ranch FEIR in determining that no further CEQA review was required. Pursuant to Section 15162 of the CEQA Guidelines, no subsequent EIR may be required for a project unless the City determines, on the basis of substantial evidence, that one or more of the following conditions are met:

A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

   a. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

   b. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

   c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

      i. The project would have one or more significant effects not discussed in the previous EIR or negative declaration;

      ii. Significant effects previously examined would be substantially more severe than shown in the previous EIR;

      iii. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

      iv. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

California Government Code Section 65457

California Government Code Section 65457 is a CEQA exemption that allows residential development projects, subdivisions, and zoning changes to be exempt from Division 13 of the Public Resources Code. The exemption applies if the project is consistent with a specific plan that has an environmental impact report (EIR) certified after January 1, 1980, and if none of the factors that would trigger a supplemental environmental review have occurred. However, if after adoption of a specific plan an event as specified in Section 21166 of the Public Resources Code occurs, the exemption provided by this subdivision does not apply unless and until a supplemental environmental impact report for the specific plan is prepared and certified in accordance with the provisions of Division 13 (commencing with Section 21000) of the Public Resources Code. The exemption also has a shorter statute of limitations than other CEQA exemptions. This EIR Addendum demonstrates that no subsequent or supplemental EIR is required, and the Project is consistent with the Ritter Ranch SP. As such, the City has the authority to deem the Project exempt from CEQA.

7.0 ENVIRONMENTAL ASSESSMENT OF THE PROPOSED PROJECT

Provided below is an environmental assessment of the proposed Project considering each of the environmental topics included in the checklist provided in Appendix G of the State CEQA Guidelines. The purpose of this section is to inform the appropriate form of CEQA-compliance documentation for the proposed Project. Notably, the proposed Project has been reviewed to determine if any of the conditions set forth in Public Resources Code Section 21166 and CEQA Guidelines Section 15162 requiring preparation of a Subsequent EIR or a Supplemental EIR have been met. The analysis and substantial evidence set forth in this Addendum demonstrates that none of the conditions described in CEQA Guidelines Section 15162 requiring preparation of a Subsequent EIR or a Supplemental EIR have occurred. Consequently, the analysis below and its supporting evidence provides the basis for finding that the proposed Project, with the implementation of the identified FEIR mitigation measures, is consistent with the analysis and findings in the Ritter Ranch FEIR.

The proposed Project incorporates applicable mitigation measures from the Ritter Ranch FEIR, which are identified in the Mitigation Monitoring Program included in Attachment A of this Addendum. The applicable mitigation measures identified in the Mitigation Monitoring Program will be included in the proposed Project's conditions of approval.

7.1 Aesthetics

The Ritter Ranch FEIR discusses potential aesthetic impacts in Section IV.F Aesthetics/Light and Glare. The FEIR concluded that development of the Ritter Ranch SP would result in significant and unavoidable impacts due to the loss of open space and vegetation, and that viewsheds in adjacent and surrounding areas also would be impacted; refer to **Appendix 10: Ritter Ranch FEIR Findings of Fact & Statement of Overriding Considerations**.[16] However, the Ritter Ranch SP provides substantial mitigation in the form of clustered development and extensive natural open space. However, after implementation of Mitigation Measures 56 through 65, significant impacts due to removal of natural habitat/open space, grading of hillsides and filling portions of natural stream courses, and increased lighting would remain.

The Project would allow the development of portions of the Ritter Ranch SP PA 5 with 135 single-family detached dwelling units, 492 single-family attached dwelling units, and 12.2 acres of neighborhood and community parks. The construction of backbone improvements such as roadways has commenced. Therefore, to a large extent, the long-term impacts such as the loss of open space, changes to the natural topography, and associated change in visual character addressed in the Ritter Ranch FEIR have already occurred within the Phase 1B site. Project site construction would result in temporary aesthetic impacts consistent with those identified in the FEIR, such as light and glare from construction machinery, security night lighting, and dust during construction.

The proposed Project site development would be visible from vantage points on- and off-site, as identified in the Ritter Ranch FEIR. Development of the Project site would be required to comply with the residential

[16] Ibid, Page 213.

Development Standards and Design Guidelines included in the Ritter Ranch SP, PD CDEV23-0002, and applicable mitigation measures outlined in the Ritter Ranch FEIR. The visual appearance of the Project would be consistent with what was evaluated in the Ritter Ranch FEIR. The Project would also be implemented in compliance with all applicable ordinances and requirements of the City Municipal Code related to light and glare, including Section 17.86.030, Outdoor Lighting which regulates new development and exterior alterations pertaining to outdoor lighting.

Therefore, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to aesthetics.

Ritter Ranch FEIR Mitigation Measures

#56 During project construction, the Applicant shall be required to provide appropriate screening (as with temporary fencing with opaque material), dust control, restricted construction hours, and a traffic control plan.

#57 All required landscaping will be installed in accordance with City Standards in effect at the time of approval of the landscape plan, prior to issuance of occupancy permits for a particular area.

#58 The Applicant shall be required to submit a detailed landscape Plan, to the satisfaction of the Director of Planning and the City Engineer. The Landscape Plan shall, at minimum, address special edge treatments for adjacent offsite areas (including Leona Valley), use of native vegetation, treatment of native vegetation in Specialty Parks, incorporation of natural channel areas within development areas and the golf course, and special screening techniques for aesthetically sensitive uses (including the amphitheater, Water Reclamation Plant, Equestrian Center, above-ground water storage tanks and commercial uses).

#59 Landscaping will be consistent with the Specific Plan in order to maintain a cohesive theme across the project site, and in order to reduce aesthetic impacts of structures to adjacent roadways and residential properties.

#60 Any lights used to illuminate the parking areas, driveways, and other exterior or interior areas, shall be designed and located so that direct lighting is confined to the property. The Applicant shall submit photometric lighting plans for commercial, multi-family and recreational projects. In addition to directional lighting, lighting should not be of greater intensity (wattage) than otherwise necessary for public safety.

#61 Project design shall incorporate additional techniques to reduce light and glare, such as use of opaque glass instead of reflective glass, and earthtone building materials in high visibility in high visibility areas.

#62 Flood control improvements shall utilize natural channels and/or be composed of natural materials with interspersed vegetation to maintain existing aesthetic qualities, where feasible, without jeopardizing the adequacy of flood control.

#63 Disturbed and landscaped areas shall be replanted with native vegetation with the existing native vegetation appropriate to the site, which will blend in with existing species.

#64 The project will follow the grading plans approved by the City and avoid disturbance of adjacent areas where possible.

~~**#65** To the extent feasible, removal of existing native trees and vegetation shall be minimized during project construction and grading, particularly within existing natural channels (this can be accomplished by staking sensitive habitat at the limits of grading to avoid incidental disruption). The project grading plan shall clearly indicate permit limits and areas to remain~~. [Not Applicable. Completed with original grading and no natural channel exists onsite.]

7.2 Agriculture and Forestry Resources

Agricultural resources are addressed in Section IV.G, Land Use, of the Ritter Ranch FEIR. The FEIR concludes that the losses of agricultural area will not be significant, because there are remaining areas in Leona Valley designated for heavy agriculture.[17] Forestry resources were added as an environmental topic in the CEQA checklist after preparation of the Ritter Ranch FEIR. However, there are no forest lands on the Project site, the National Land Cover Database categorizes land cover on the Project site as shrub/scrub.[18]

Additionally, based on review of the most current California Department of Conservation (DOC) Office of Land Conservation Farmland Mapping and Monitoring Program (FFMP) for Los Angeles County, the Project site and surrounding areas are not designated as containing important farmland (Prime Farmland, Unique Farmland, or Farmland of Statewide Importance); The Project site is designated Grazing Land and Other Land.[19] Additionally, there are no lands under a Williamson Act Contract within the Project site or the surrounding area.[20] The Project site is zoned Specific Plan (SP) – Ritter Ranch by the City.[21]

Therefore, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to agricultural and forestry resources.

7.3 Air Quality

The Ritter Ranch FEIR concluded that even with implementation of the identified mitigation measures, implementation of the Ritter Ranch Specific Plan would have significant and unavoidable impacts air quality impacts associated with fugitive dust and particulates during construction, and emissions during operations. Cumulative air quality impacts were also determined to be significant and unavoidable; refer to **Appendix 10: Ritter Ranch FEIR Findings of Fact & Statement of Overriding Considerations**. Local impacts (i.e., carbon monoxide "hot spots" were determined to be less than significant.

[17] Ibid, Page 194.
[18] CDFW. ND. BIOS, *NLCD 2016 Land Cover Layer*. Available at: https://apps.wildlife.ca.gov/bios/?bookmark=940, (accessed November 2023).
[19] DOC. 2022. *California Important Farmland Finder*. Available at: https://maps.conservation.ca.gov/dlrp/ciff/, (accessed May 2024).
[20] California Department of Conservation. 2022. *California Williamson Act Enrollment Finder.* Available at: https://maps.conservation.ca.gov/dlrp/WilliamsonAct/, (accessed May 2024).
[21] City of Palmdale. 2023. *Palmdale Zoning Map.* Available at: https://www.cityofpalmdaleca.gov/DocumentCenter/View/516/Zoning-with-street-labels-PDF?bidId=, (accessed November 2023).

However, the Ritter Ranch FEIR noted that incorporating a comprehensive emissions minimization program into an air quality element can have a measurable benefit for the Ritter Ranch area. While mitigation measures would not reduce impacts to less-than-significant levels implementation of Mitigation Measures 21 through 30 would still reduce air quality impacts.

The Ritter Ranch FEIR used URBEMIS #2 (URBan EMISsions), a computer program developed by California Air Pollution Control Officers Association (CAPCOA) to estimate emissions from various land use development projects and EMFAC7C (EMission FACtors) developed by California Air Resources Board (CARB) to calculate vehicle emissions. Both programs were current in 1990 when the air quality analysis was conducted.

Vehicle CO and NO_X emission rates fell by 75 and 95 percent, respectively, between 1990 and 2018.[22] In addition, CO_2 emissions decreased by 25 percent between 1990 and 2017 due to stricter fuel economy standards in the late 2010s.[23] Therefore, criteria pollutants generated from vehicle emissions have clearly decreased since the 1990 Ritter Ranch Specific Plan air quality analysis was prepared.

The proposed Project would not change the type of use or increase the total amount of development anticipated by the Ritter Ranch Specific Plan, and as evaluated in the Ritter Ranch FEIR. The Project proposes the development of 135 single-family detached dwelling units (DUs) in PU 5X-1 and 492 single-family attached DUs within Pus 5W-4, 5W-5, and 5X-2 for a total of 627 DUs proposed. The previous Phase 1A had 285 units allocated from PU 5W, therefore the total 5X and 5W unit count for 1A and 1B is 912 units. PUs 5W and 5X will require allocation of additional DUs to achieve the desired density. Ritter Ranch Specific Plan Section 8.17.2.3 allows for a density transfer of 20 percent from other PUs. The PD proposes the transfer of 92 DUs from unallocated units in an unspecified Planning Unit in PA 5 to satisfy the total unit count of 912. It should be noted that the base DU capacity for PA 5 is 2,591 units and therefore 1,411 units remain after allocations to Phase 1A and 1B. Because the same types of uses would be developed with the previously approved Project area, the type of operations and associated types of pollutant emissions would also be the same.

Due to federal and State requirements for cleaner and more fuel-efficient construction equipment, cars and light trucks that have been adopted and enforced since the certification of the Ritter Ranch FEIR, emissions of vehicle pollutants (mobile emissions) can be expected to be less than those considered in the Ritter Ranch FEIR. Therefore, with the reduction in units proposed for PUs 5W-4, 5W-5, 5X-1, and 5X-2, mobile source emissions from the proposed Project would be reduced compared to that anticipated in the Ritter Ranch FEIR.

As a result, it can be assumed that buildout of the Ritter Ranch Specific Plan would result in fewer or equal vehicle trips that would generate less emissions than those analyzed in the Ritter Ranch FEIR, for the reasons previously noted which state that vehicle emissions have decreased greatly since 1990. However,

[22] Energy Institute at HAAS. August 2023. *Regulating Untaxable Externalities: Are Vehicle Air Pollution Standards Effective and Efficient?* Available at: https://haas.berkeley.edu/wp-content/uploads/WP334.pdf.
[23] Ibid.

even with implementation of Ritter Ranch FEIR Mitigation Measures 21 through 30, potential impacts to air quality would likely remain significant and unavoidable.

Based on the findings noted above, the Phase 1B Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to air quality.

Ritter Ranch FEIR Mitigation Measures

#21 To mitigate potential dust generation impacts, the project will comply with State, County and City dust control regulations. These regulations are intended to provide sufficient protection so as to prevent the soil from being eroded by wind, creating dust, or blowing onto a public road or roads or other public or private property.

#22 In addition to watering prior to and during grading (as discussed in SCAQMD Rule 403), the application of water and dust that solidify loose soils shall be implemented for construction vehicle access, as directed by the City Engineer.

#23 Grading activity shall be suspended when local winds exceed 30 miles per hour. To validate wind velocities and/or rainfall amounts, the installation of a minimum of two remote weather stations will be required at locations determined by the City Engineer.

#24 Heavy construction equipment shall use low sulfur fuel (0.05% by weight) and shall be properly tuned and maintained to reduce emissions.

#25 Construction activities shall be phased and scheduled to avoid high ozone days; the extent feasible.

#26 Construction will be discontinued during second stage smog alerts.

#27 The Applicant shall, as required by the Planning Department and the City of Palmdale's proposed Air Quality Element, implement applicable Tier I Control Measures contained in the Final 1991 AQMP, as may be subsequently amended. Additionally, the Best Available Guidelines published by SCAQMD shall be used. As project buildout will occur over a 20-year period, subsequent phases/approvals will be held to Tier II and Tier III measures which are implemented as mandatory AQMD Rules and Regulations applicable to the project phase. General measures which shall be applied for the development include:

a) Encourage the use of alternative transportation modes by promoting public transit usage and providing secure bicycle facilities. The applicant will implement the trails system indicated in the Specific Plan including pedestrian, bicycle and equestrian facilities. The applicant shall distribute educational material at the time of occupancy to all businesses and homeowners regarding the availability of public transit, ridesharing and other alternative transit methods and the location of bicycle routes in the project vicinity. In addition, the educational material, as reviewed and approved by the City of Palmdale Planning Department shall describe the available methods for reducing energy consumption.

b) Provide mass transit accommodations such as bus turnout lanes and bus shelters if determined necessary by the City Traffic Engineer. As final plans are developed, these features should be considered.

c) The applicant shall contribute a pro-rata share toward acquisition and construction of a Park and Ride facility in the Avenue S/SR-14 vicinity. This shall include design and construction of one space per ten dwelling units (up to 400 total spaces). This mitigation measure shall be satisfied prior to occupancy of fifty percent of the total dwelling units approved for the project as a whole.

d) Encourage the placement of dwelling units to take full advantage of solar energy for natural heating and cooling as recommended in Section 7.5.1.6 of the Specific Plan in order to reduce the use of electricity and natural gas within the project area.

e) The applicant shall utilize Best Available Control Technology to control volatile organic compounds and Toxic Air Contaminants as required by SCAQMD Rules and Regulations. The Best Available Control Technology Guidelines, published by SCAQMD, shall be used to assess compliance with the mitigation measure.

#28 Prior to subsequent approvals, energy conservation practices, as required by the Subdivision Map Act, Building Energy Efficiency Standards (California Energy Commission), and slate and local laws, shall be incorporated into the design of the project to have the secondary effect of limiting stationary source pollutants both on and offsite.

#29 [Mitigation Measure 29 was omitted from the Final EIR.]

#30 Projects that exceed SCAQMD threshold levels shall contribute to traffic mitigation programs imposed on the development in effect at such time building permits are issued for the project, and each part thereof.

7.4 Biological Resources

Section IV.D of the Ritter Ranch FEIR addresses biological resources. The Ritter Ranch FEIR concluded that buildout of the Ritter Ranch SP and other annexation areas would result in the loss of over 3,000 acres of habitat with loss, displacement, or disruption of associated wildlife.[24] This is considered a significant and unavoidable impact even after implementation of the identified feasible Mitigation Measures 36 through 49. Additionally, the Ritter Ranch FEIR concluded that implementation of the Ritter Ranch Specific Plan in combination with future development in the surrounding area would result in a significant and unavoidable cumulative loss of natural resources; refer to **Appendix 10: Ritter Ranch FEIR Findings of Fact & Statement of Overriding Considerations**[25] According to the Ritter Ranch FEIR, these cumulative impacts could be mitigated on a project-by-project basis by funding and the implementation, restoration, and enhancement of the existing rare and endangered plant communities, as applicable.

[24] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas.*

[25] Glenn Lukos Associates. 2018. *Biological/Regulatory Overview. Special Status Animal Species Evaluated for the Ritter Ranch Property*, Pages 11 -17.

Glenn Lukos Associates prepared a Biological/Regulatory Overview for the Ritter Ranch Phase 1 Development Project area, and a Precursory Review for the Ritter Ranch, Phases 2 and 3 Development Project (refer to **Appendix 2: Biological/Regulatory Overview**). The original Phase 1 area of the Ritter Ranch Specific Plan Development Project includes Phases 1A and 1B. Refer to **Figure 2** and **Figure 5**.

Sensitive Species

With respect to potential impacts to sensitive plant and wildlife species, the Project site lacks large trees that would be considered suitable nesting habitat for species, such as the Swainson's hawk (*Buteo swainsoni*) (CDFW State Threatened), or ponded areas for species such as the California red-legged frog (*Rana draytonii*) (CDFW State Threatened).[26] Therefore, there is no potential for these species to occur within the Project site. Recently, four bumble-bee species were listed as candidate species under CESA. Of these species, only Crotch's Bumble Bee's range includes the Project Site.[27] Given the highly disturbed nature of the Project site, this species has a low likelihood of occurrence, although there may be habitat along the water tank access road alignment and water tank pad. Mitigation Measure No. 48 will require a habitat assessment prior to grading. Should any listed species be detected during focused surveys, the applicant would be required to coordinate with CDFW to implement appropriate mitigation or compensation pursuant to CESA.

Although previous focused surveys did not detect burrowing owl (*Athene cunicularia*) (CDFW State Species of Special Concern), this species has potential to occur within the Project site. Mitigation Measure 48 of the Ritter Ranch FEIR—which applies to the Project—requires focused surveys be conducted by a City approved biologist to establish the presence or absence of sensitive species (as defined by federal, state, or local laws) on the Project site.[28] If sensitive species are present, applicable mitigation shall be implemented per federal, state, and local Endangered Species Protection regulations as determined necessary by the City Planning Director.[29] Accordingly, in 2022 ELMT Consulting conducted a focused burrowing owl (*Athene cunicularia*) survey for the Project. The focused burrowing owl survey consisted of four separate surveys conducted on April 14, May 6, May 31, and June 21, 2022. The surveys were conducted to document the presence/absence of burrowing owl on the Project site. No burrowing owls were observed during these focused surveys.[30] The findings of the focused burrowing owl survey are provided as **Appendix 3.** Prior to Project construction activities, through implementation of Ritter Ranch FEIR Mitigation Measure 48, follow-up botanical and pre- construction burrowing owl surveys would be conducted to confirm the conclusions of the focused surveys. In sum, potential impacts would be less than significant.

With respect to special-status plants, the Project site visit conducted by Glenn Lukos Associates for the Biological/Regulatory Overview was not conducted during the typical blooming period for most special-status plant species; therefore, there is a limitation relative to detection and the presence/absence of

[26] Ibid.
[27] https://wildlife.ca.gov/Conservation/CESA#bumble-bee (accessed November 25, 2024).
[28] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 165.
[29] Ibid.
[30] ELMT Consulting. 2022. *Burrowing Owl Focused Survey for the Ritter Ranch Residential Development Project Located in the City of Palmdale, Los Angeles County, California,* Page 1.

special-status plant species could not be confirmed. However, a focused botanical survey was conducted for the Ritter Ranch FEIR and no listed special-status plants were detected.[31] Based on the negative survey results during pre-disturbance conditions, and due to the removal of native topsoil resulting from grading to construct streets listed species are not anticipated to occur on the Project site.

In addition, in 2022 ELMT Consulting also conducted a focused special-status plant survey for the Project, which included two separate focused plant surveys to coincide with the flowering periods of those special-status plant species known to occur within the general vicinity of the Project site. The findings of the focused special-status plant survey are provided as **Appendix 4**. No special-status plants were observed on the Project site during the focused plant surveys.[32]

Lastly, during the biological survey conducted for the Ritter Ranch FEIR, 64 bird species were identified. Two of the species, the European Starling and the House Sparrow were documented to be not native North American avifauna. The native birds that are expected to breed within the Ritter Ranch SP area include the Western Wood Pewee, Ash-throated Flycatcher, Scott's Oriole, and the Wilson's Warbler. Primarily desert birds that were seen in the more arid, Joshua Tree/Juniper Woodland habitat include Scott's Oriole, Phainopepla, and Cactus Wren. Both the red-tailed Hawk and the Golden Eagle were seen flying over Ritter Ridge. It is not likely that either species would nest in the Ritter Ranch SP area, but there are historical nesting records of eagles within five miles of the Ritter Ranch SP area. Due to the lack of trees on the Project site, it is anticipated that these birds would remain off-site as previously determined under the Ritter Ranch FEIR. Additionally, this would be verified through the implementation of Mitigation Measure 48 that would confirm that potential impacts to sensitive birds would be less than significant.

In sum, suitable habitat for additional State and Federally listed species is not supported within the Project site; therefore, listed species are not expected to occur. Further, while the Project site has potential to support non-listed special-status species, it is not expected that any listed or non-listed special-status wildlife species would occur within the Project site that were not previously addressed in the Ritter Ranch FEIR. With implementation of Ritter Ranch Mitigation Measure 48, potential impacts to sensitive plant and wildlife species would be less than significant.

Jurisdictional Drainages

According to the Biological/Regulatory Overview, due to the grading activities that have occurred onsite, the development footprint of Phase 1B no longer contains jurisdictional drainages.[33] The development footprint is established pursuant to the Phase 1B grading plan, and any deviations from that grading plan would require City and/or regulatory agency approvals as appropriate. Future grading and construction activities associated with the proposed water tank access road (required to provide access to the water tank necessary to provide water to Phase 1B) may affect a small drainage course; refer to **Figure 6**. The potential disturbance to the small drainage course associated with the future water tank access road is

[31] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 176.
[32] ELMT Consulting. 2022. *Special-Status Plant Survey for the Ritter Ranch Residential Development Project Located in the City of Palmdale, Los Angeles County, California,* Page 4.
[33] Ibid.

consistent with the Ritter Ranch SP Final EIR analysis which assumed the impact of this natural drainage course at a much larger scale. Additionally, as part of the Phase 1B Project, the water tank access road has been realigned to avoid the "larger" drainage course previously assumed to be impacted. The access road drainage course impacts would be addressed through Final EIR Mitigation Measure Nos. 38 and 40.

Conclusion

Based on the analysis above, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to biological resources with implementation of applicable mitigation measures.

Ritter Ranch FEIR Mitigation Measures

#37 Prior to Development Application approval, setbacks or other alternatives identified in a site-specific biological study will be provided to reduce impacts to raptor nesting sites and other biological resources as listed in Section IV.D, Table 11, Preferred Development Envelop Setback Distances, of the Ritter Ranch FEIR. However, actual setbacks for each resource may vary less or more than the recommended distance as determined by a site-specific biological report, reviews and approved by the Director of Planning. Setbacks less than the recommended distance may constitute a locally significant impact.

~~**#38** At the time of construction improvements, bridges, or oversized culverts, as determined by a qualified biologist and reviewed and approved by the Director of Planning shall be constructed within the canyons of Rogers Creek, Pine Creek, and Ritter Canyon where development areas or access roads would isolate wildlife. This would allow wildlife movement across the site and into other portions of the region.~~ [Not applicable. Development will not isolate wildlife in any way.]

#39 Fuel break shall be from 20 to 100 feet in width and shall be manually cleared to avoid exacerbation of erosion. The fuel brake system must conform to fire code standards. The fuel brake system shall not be computed for credit purposes as open space due to the significant modification of the native vegetation which is required for the fuel break.

~~**#40** Prior to Development Application approval, portions of the site shall be designated for restoration, enhancement, or expansion of wetland habitat. Portions to be designated will be subject to Director of Planning approval but, at a minimum, the proposal shall equate to a 1:1 replacement of impacted wetlands. A Wetlands Restoration Plan, indicating specific guidelines, designation of areas suitable for mitigation, and an explanation of methods which will assure permanent preservation, shall be submitted for review and approval by the City of Palmdale, California, Department of Fish and Game, and U.S. Army Corps of Engineers. Said plan shall be consistent with restoration required for the Amargosa Creek Improvement Project.~~ [Not Applicable. Biological studies determined that the Project site does not contain any wetlands or wetland habitat.]

~~**#41** As directed by the City, the applicant shall conduct periodic removal of Tamarisk infestations (to include at minimum an initial clearing of specimen trees followed by annual juvenile Tamarisk removals for the next two years). In addition, infestations of *Arundo donax*, in any area located within the property, shall be eradicated to ensure that the development does not act as a point source for continued~~

~~infestations into the National Forest.~~ [Not Applicable. Biological studies determined that the Project site does not contain specimen trees.]

#42 Plants such as Pampas grass, African Fountaingrass, Tamarisk, Castor bean, *Arundo donax*, and exotic Fescues shall not be planted within the Ritter Ranch SP area. A review of the Landscape Plan's plant selection shall be made by a qualified revegetation biologist approved by the City Engineer and Director of Planning prior to Landscape Plan approval. The applicant shall also require that residences exclude these plants from their landscaping (as through Covenants, Codes and Restrictions enforced by a Homeowners Association).

#43 Trails within the natural open space areas shall prohibit the recreational use of four-wheel and three-wheel vehicles, motorized dirt bikes, and motor cross bicycles. Special gates and barriers shall be installed and maintained at trail access points to ensure that recreational vehicle access is prohibited.

#44 The Applicant shall post signs along trail systems which designated trail boundaries for recreational uses, in order to minimize incidental disruption to open space, vegetation, and wildlife.

#45 Slopes at the edge of the development shall be revegetated with low combustible plant material as approved by the City Engineer.

~~**#46** The Specific Plan shall include a condition to either exclude the maintenance of horses on private property, due to too small lot size or to maintain such animals in corrals of specific size, as determined appropriate by the City. In large lots with adjacent natural areas, it is important to limit grouping of horses or other livestock to prevent destruction of native plants.~~[Not applicable. No horse sized lots would be located within the Phase 1B.]

~~**#47** The Applicant shall apply for and receive a 404 Permit from the Army Corps of Engineers and a 1603 Agreement from the California Department of Fish and Game prior to Grading Plan approval in areas which include wetlands due to the projects impact on lands under the jurisdiction of these areas.~~ [Not applicable. This mitigation does not apply to Phase 1B due to the City's existing Municipal Code 17.89.030.]

#48 Prior to Development Application approvals, focused surveys shall be conducted by a City approved biologist to establish the presence or absence of sensitive species (as defined by Federal, State, or Local laws) on the development site. Should sensitive species be present, applicable mitigation shall be implemented per Federal, State, and Local Endangered Species Protection regulations as determined necessary by the City Planning Director.

~~**#49** The Joshua Tree Woodland area shall be protected by in situ preservation of the habitat or, at the option of the City, acquisition equivalent, offsite habitat within the Sphere of Influence of the City of Palmdale. Preservation is considered to include fencing of the site and dedication of an open space easement to the City of Palmdale. Areas adjacent to the woodland should have a 50 to 150 foot setback from the Joshua Trees, other measures as recommended in a site-specific biological study (refer to Table 11 of the Ritter Ranch FEIR, Preferred Development Envelopment Setback Distances).~~

A. ~~Where possible, development of residential or commercial structures within the Specific Plan area should be designed to avoid displacement or destruction of Joshua Tree habitat. Areas adjacent to the woodland should have a 50-foot setback from the Joshua Tree plans unless a shorter distance is identified in a site-specific biological report. Within that setback, native plant cover should be restored to natural habitat values to serve as a buffer if such plant cover is not present.~~

B. ~~Upon implementation of the project, any Joshua Tree plants that are removed will be transplanted to onsite landscaped areas and/or offsite.~~

C. ~~A Joshua Tree Preservation and Transplantation Plan will be developed and submitted to the City of Palmdale Director of Planning for review and approval prior to grading permit issuance~~.

[Not applicable. There is no Joshua Tree Woodland area onsite.]

~~**#50** The Maple Canyon Spring shall be protected by ensuring that trails do not direct people to the vicinity of the spring. The McDill Loop trail depicted on Exhibit 24 of the Ritter Ranch SP shall be reviewed to determine its proximity to the spring. The alignment of this trail will be modified if field inspections determine that the spring is visible from the trail.~~ [Not applicable. The McDill Loop trail is not within or near Phase 1B.]

7.5 Cultural Resources

The Ritter Ranch FEIR addresses cultural resources in Section IV.J, Cultural Resources, which concluded that with implementation of required Mitigation Measures 78, 79, 80, 81, 82, 84, 85, 86, 87, 88, 89, 90 and 91 impacts to cultural resources would be reduced to a less than significant level.

In 2022, BFSA Environmental Services (BFSA), conducted a focused Cultural Resources Study Update for Phase 1B (refer to **Appendix 5**) and archaeological survey identified as Phase I Cultural Resource Assessment (refer to **Appendix 6**). As part of the focused cultural resources study update a site records forms search was conducted at the South-Central Coastal Information Center (SCCIC) at California State University, Fullerton. Information regarding archaeological sites and studies within a quarter-mile radius of the Project site was compiled.[34] A search was also done through the National Register of Historic Places, Archaeological Determinations of Eligibility, the Office of Historic Preservation, the California Register of Historical Resources, and the Directory of Properties in the Historic Property Data File.[35] The results of the records search identified 10 recorded resources within one-quarter mile of the Project site. Of these recorded resources, only one resource, P-19-100989, an isolated prehistoric flake, or "isolate," was recorded within Phase 1B during the latest cultural resources update conducted for Phase 1B by BFSA.[36] A historic prehistoric flake is a piece of stone waste left over after shaping a stone tool using a process called flintknapping. Flakes are also known as debitage or lithic flakes. Since the isolate is considered an isolated find, is not considered a historical resource under CEQA.

[34] BFSA Environmental Services. 2022. *Cultural Resources Study Update for Phase 1B of the Ritter Ranch Project*, Page 3.
[35] Ibid.
[36] Ibid.

The field review of the Project site identified that between February 2005 and March 2006, the Phase 1B area was superficially impacted with roadway improvements associated with previous work conducted for the Ritter Ranch Phase 1A, but final grading was never completed. At that time, an unnamed street and adjacent canal were constructed in the northeastern corner of VTTM 51508-03, extending between Westland Drive and City Ranch Road.

Work associated with the BFSA cultural resources study update determined that no new cultural resources were identified within the Project site during the latest field review.[37] However, given the Project's proximity to natural sources of water and other prehistoric sites, the potential still exists for previously unidentified resources to be inadvertently uncovered during future Project site development.[38] Therefore, the archaeological and paleontological mitigation measures established within the Ritter Ranch FEIR are still applicable to the proposed Project and all future ground disturbance within VTTM 51508-03 must be monitored by an archaeologist, Native American, and paleontologist.

The issue of Tribal Cultural Resources was added to the CEQA Guidelines in response to California Assembly Bill 52 (AB 52), which requires consultation with affected tribes regarding potential tribal cultural resources that may be impacted by a development. However, the provisions of AB 52 apply only to projects that have a notice of preparation or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015. Therefore, AB 52 requirements are not applicable to the Project. However, the Project Applicant and the City would continue to work with the consulting tribes throughout the life of the Project, as described in Ritter Ranch FEIR mitigation measures 79 through 82. All aspects of the proposed Project have been conducted in cooperation with Native American representatives from the San Fernando Band of Mission Indians.

Based on the analysis above, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to cultural resources including paleontological resources.

Ritter Ranch FEIR Mitigation Measures

#78 Reports, maps, or figures with plotted site locations are considered confidential and are to be released only on a clearly defined "need to know" basis.

#79 Prior to the issuance of grading permits for each area of the Ritter Specific Plan, a qualified archeologist shall be retained at the expense of the developer to formulate and carry out an Archeological Monitoring Program for that particular area. The Archeological Monitoring Program as approved by the Director of Planning shall include, but not be limited to measures identified in Ritter Ranch FEIR.

#79a The following additional work shall be performed by a qualified archeologist, retained by the Developer, and approved by the Planning Director. Because the introduction of residents into the area will result in the degradation of these archeological sites, the required testing specified below and

[37] Ibid, Page 7.
[38] Ibid.

preparation of the subregional report shall be completed, and reviewed and approved by the Planning Director, prior to recordation of the first parcel map or tract map prepared for the project.

Lan-947: There is an additional petroglyph boulder that needs to be recorded. Since the site cannot be preserved in place as the project is currently designed, test units shall be excavated to determine whether subsurface deposits are present. If any are encountered, data recovery shall be conducted.

Those sites, which contained surface artifacts but were only auger tested shall be tested with at least one standard test unit per site. The testing program shall be submitted to the City Planning Department for review and approval prior to commencement. In addition, untested cupule sites and hunting blinds shall also be tested in this manner. Any additional testing shall be required as a mitigation measure for the development application.

A subregional analysis shall be prepared to provide a basis for significance determinations. It shall include a research design that would set standards for future work in the Ana Verde/Sierra Pelona subregion.

Cupule boulders, which have to be relocated, must be done under the direction of a qualified archeologist who will give careful attention to orientation of the boulders. The boulders shall be moved prior to site disturbance in their immediate vicinity to a location approved by the Planning Director. Since context will be lost, some shall be relocated in an interpretive center where they can be used for educational purposes. Representative artifacts could be worked into some sort of display for an interpretive center as well.

#80 Required research salvaging and/or protection of known sites shall occur prior to approval of a grading permit within the affected area of resources (to the extent feasible/ sites shall be protected in place). This includes, but is not limited to the following:

- 767, 917, 1247, 1281, RR-28H, RR-33, RR-39, and RR-40.

#81 Monitoring during grading activities shall be accomplished by an archaeologist approved by the Director of Planning. Said archaeologist shall be present at any pre-grading conference and shall have the power to enforce required mitigation measures related to cultural resources. Mass grading activity shall be periodically monitored, particularly during initial site clearing, to ensure that any buried archaeological deposits which may exist on the property are detected. This monitoring shall be maintained until undisturbed bedrock is exposed. The monitoring archaeologist shall be prepared to document and recover any material which appears as quickly as is consistent with standard archaeological practice. If determined necessary, the archaeologist may halt grading to ensure adequate salvaging and/or protection of cultural resources (upon which the Director of Planning and Applicant shall be notified).

#82 Areas to be disturbed by grading shall be reexamined for cultural resources following removal of the vegetation cover and during initial grading stages. If cultural resource sites are exposed by this activity, they shall be subjected to appropriate test excavation and salvaging/protection efforts.

~~**#83** Reports, maps or figures with plotted fossil localities are considered confidential and are to be released only on a dearly defined 'need to know basis~~. [Not Applicable. There are no plotted fossils.]

#84 Prior to issuance of a grading permits for each area of the Ritter Ranch SP, a qualified paleontologist shall be retained at the expense of the developer to formulate and carry out a Paleontological Monitoring Program for that particular area. The Paleontological Monitoring Program approved by the Planning Director shall include, but not be limited to measures identified in the Ritter Ranch FEIR.

#85 A qualified paleontologist shall be retained to monitor and, if necessary, salvage scientifically significant fossil remains.

#86 The paleontologist shall have the power to temporarily divert or direct grading efforts to allow evaluation and, if necessary, salvage of exposed fossils.

#87 The matrix samples for microvertebrates shall be submitted for processing and identification at a facility such as the Los Angeles County Museum of Natural History.

#88 Paleontological monitoring efforts shall be based on the sensitivity of the geological units being excavated, the number of equipment in operation at one time, and the amount of material (in cubic yards) being moved.

A. Geological units of "high" sensitivity shall be monitored on a full-time basis. If more than one piece of heavy equipment is being run simultaneously and/or more than 25,000 cubic yards of earth is to be graded per day, then additional monitors will be needed.

B. Geological units of "low" sensitivity require monitoring at least once every five days of grading activity. If significant fossils are recovered during grading, then a change in palaeontologic sensitivity would be warranted, and full-time monitoring could be needed.

C. Geologic units of "no" palaeontologic sensitivity will not require monitoring.

#89 Matrix samples for micro vertebrate screening shall be collected and processed during monitoring. If microvertebrates are present, up to 6,000 pounds of matrix will need to be sampled. This material can be placed to one side of the active grading so as not to delay the project. Screening may be done onsite.

#90 All fossils collected need to be prepared to the point of identification. These remains should be donated to an institution with an educational and/or research interest in the materials and a retrievable storage system.

#91 A final report summarizing findings, including an itemized inventory, contextual stratigraphic data, and photographs shall accompany the fossils to the designated repository with an additional copy sent to the City of Palmdale Planning Department.

7.6 Energy

Prior to the 2018 updates to the CEQA Guidelines, the topic of energy was not evaluated in detail in CEQA documents. Additionally, regulatory changes do not constitute new information requiring subsequent or supplemental environmental review if the information about the underlying issue was known or should have been known at the time the original EIR was certified.

The Ritter Ranch FEIR discusses energy in Section IV.B Air Quality, addressing that project-related energy demand that is met by burning fossil fuel will contribute to air pollutant emissions. Mitigation Measure 28 from the Ritter Ranch FEIR requires that energy conservation practices, as required by the Subdivision Map Act, Building Energy Efficiency Standards (California Energy Commission), and state and local laws, be incorporated into the design of the Project to limit pollutants on and off site.[39]

The Project proposes single-family attached and detached dwelling units and associated open and park spaces. These land uses are planned for in PA 5 of the Ritter Ranch SP, and consistent with the intensity of development contemplated within PA 5. The Project includes the development of up to 135 single-family detached dwelling units, 492 single-family attached dwelling units, and associated open space and landscape areas. The construction and operation of the proposed residential units would be the same as that anticipated in the Ritter Ranch FEIR.

Energy demands relating to construction of the Project would include energy and fuel used by construction equipment, construction worker vehicles, and construction vendor/hauling vehicles, coupled with construction energy efficiency/conservation measures. Electricity and fuel used by construction equipment for the Project would be typical for the type of construction proposed because there are no aspects of the proposed construction process that are anticipated to be unusually energy-intensive, and construction equipment would conform to applicable California Air Resources Board (CARB) emission standards, which promote equipment fuel efficiencies. Additionally, gasoline and diesel fuel would be supplied by local and regional commercial vendors. It should be noted that fuel efficiencies are improving for on- and off-road vehicle engines due to increasingly stringent government requirements compared to when the Ritter Ranch FEIR was prepared.

Energy consumption for construction of the Project would represent a "single event" demand and would not require ongoing or permanent commitment of energy resources. It is also not anticipated that the Project would require the use of construction equipment or process that are less energy efficient than at similar construction sites. For context, emission standards for nonroad (or off-road) engines and vehicles, such as those used in construction are set by the US EPA. The first federal standards (Tier 1) for nonroad diesel engines went into effect in 1996. Since that time the EPA has continued to lower emission limits, Tier 4 standards have reduced emissions by 80 to 90 percent over Tier 1 standards and construction equipment is now 11 to 15 percent more fuel efficient than in 1996.[40] Therefore, construction equipment that would be used on the Project site would have less pollutant emissions than those originally assumed in the Ritter Ranch FEIR analysis because of the continuing reduction in emission rates resulting from federal and State requirements for cleaner diesel engines. Applicable air quality mitigation measures identified in the Ritter Ranch FEIR would be incorporated into the proposed Project. Consequently, construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

[39] Robert Bein, William Frost & Associates. *1992. Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 120.
[40] 2022 CalEEMod UserGuide Appendix G. https://www.caleemod.com/user-guide.

The Project would be required to comply with Ritter Ranch FEIR Mitigation Measure 28 requiring that applicable energy conservation regulations be incorporated into the Project design.[41] Current energy efficiency requirements are far more stringent than when the Ritter Ranch FEIR was certified in 1992. The Project would be required to comply with current energy standards, including California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings and the Title 24 California Green Building Standards Code (CALGreen). The California Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings are updated every three years, and they were last updated in 2022 and became effective on January 1, 2023.[42] CALGreen contains mandatory and voluntary requirements for new residential and nonresidential buildings and went into effect in 2009. CALGreen is also updated on a regular basis, with the most recent approved update consisting of the 2022 CALGreen Standards that became effective January 1, 2023.[43]

The Project's residential uses would be constructed to achieve the building energy standards set forth in the Title 24 requirements in effect at the time of building permit issuance. Therefore, there would be additional reductions in energy consumption due to new and updated codes compared to those anticipated in the Ritter Ranch FEIR.

Energy consumption during the operation phase of the Project also would include transportation energy demands, which includes energy consumed by vehicles. The types of trips generated by the residential uses would be the same as other residential developments of similar scale and configuration. The Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips nor associated excess and wasteful vehicle energy consumption. Additionally, because the Project does not propose new or additional dwelling units than originally assumed under the Ritter Ranch FEIR, the same number of vehicle trips would occur under Phase 1B.

Based on the analysis above, the Project would not result in any new or substantially more severe effects than the effects disclosed in the Ritter Ranch FEIR.

Ritter Ranch FEIR Mitigation Measures

#28 Prior to subsequent approvals, energy conservation practices, as required by the Subdivision Map Act, Building Energy Efficiency Standards (California Energy Commission), and state and local laws, shall be incorporated into the design of the project to have the secondary effect of limiting stationary source pollutants both on and offsite.

7.7 Geology and Soils

The Ritter Ranch FEIR addresses geology and soils in Section IV.A, Earth Resources. The Ritter Ranch FEIR concluded that ground shaking would be expected to occur in the Project site area due to future seismic

[41] Ibid, Page 120.
[42] California Energy Commission. 2023. *Building Energy Efficiency Standards*. Available at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards, (accessed November 2023).
[43] California Department of Housing and Community Development. 2023. *CALGreen*. Available at: https://www.hcd.ca.gov/building-standards/calgreen, (accessed November 2023).

activity along known and undiscovered faults in the surrounding region.[44] However, as discussed in the Ritter Ranch FEIR, compliance with applicable grading and building design requirements and adherence to the identified mitigation measures would reduce potential impacts to the extent feasible, but significant and unavoidable impacts may still occur.[45] Additionally, according to the Ritter Ranch FEIR, impacts due to tsunami or dam failure were considered not significant.[46]

RMA GeoScience prepared a Geotechnical Update Report in April 2024 (see **Appendix 7**) which documents the site conditions of VTTM 63415 and VTTM 51508-03, which noted that Grading within Tract 63145 was undertaken between September 8 through October 1, 2014, to construct Ritter Ranch Road, Westland Drive, and the Channel Berm for the Anaverde Drainage. Dirt was borrowed from Tentative Tract 63145 to achieve planned grades for the roadway and channel berm grading. No other changes have taken place with the VVTMs, and the recommendations contained in the referenced reports (Ritter Ranch FEIR and original Geotechnical Study) are still applicable to future site grading and development of the Phase 1B Project site.

The geology and soils underlying the Project site have not changed from what is presented in the Ritter Ranch FEIR. Therefore, potential impacts, including impacts related to seismic hazards, unstable soil conditions, groundwater would remain the same as presented in the FEIR. Project site development would be in compliance with local and state building regulations in effect at the time building permits are issued. The Project would also be required to comply with applicable mitigation measures outlined in the Ritter Ranch FEIR.

Based on the above analysis, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the Ritter Ranch FEIR related to geology and soils.

Ritter Ranch FEIR Mitigation Measures

#1 Prior to approval of any Development Application, the applicant shall provide a detailed geotechnical investigation, including recommended design, construction, and maintenance of mitigation measures to reduce potential geologic constraints, to the satisfaction of the City Engineer. At minimum, the report shall address slope stability, locations and setbacks for active/potentially active faults, excavation requirements for unsuitable surficial material, liquefaction potential and groundwater/seepage conditions. All future discretionary approvals must comply with the applicable recommendations set forth in the required investigation. Typical mitigation for geologic hazards include excavation and/or stabilization (buttress/retaining walls) of landslides and excavation of undesirable materials (such as those subject to settlement, hydro consolidation, expansion or liquefaction) and re-compaction, if necessary, with suitable material. Recommendations from the report shall be incorporated into final grading plans, to the satisfaction of the City Engineer.

[44] Robert Bein, William Frost & Associates. 1992. Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas, Page 88.
[45] Ibid.
[46] Ibid.

#2 All grading and landform modifications shall be conducted in conformance with state-of-the-practice design and construction parameters as set forth in Chapter 70 of the Uniform Building Code. All graded slopes should be constructed to be grossly and superficially stable, to the satisfaction of the City Engineer.

~~**#3** Reshaping of the natural terrain to permit access and construction shall be kept to a minimum. Where possible, improvements should be designed to conform to the terrain to the satisfaction of the City Engineer~~. [Not Applicable. Reshaping of the natural terrain was completed with original grading of the site.]

#4 Where grading is necessary on minor inclined or steep terrains; the following guidelines shall apply:

- Traditional Design: The angle of the graded slope shall be gradually adjusted to the angle of the natural terrain.
- Angular Form: Angular forms should be avoided. The graded form shall reflect the natural rounded terrain, to the extent feasible.
- Exposed Slopes: Graded slopes shall be concealed wherever possible.

#5 Remedial grading within the sites to mitigate the effect of collapsible surficial soils shall be performed prior to site development.

#6 Positive surface-water drainage control measures shall be undertaken by the project Applicant to reduce the creation of new springs or seeps to the satisfaction of the City Engineer, particularly in any high groundwater areas proposed for development.

#7 Fill slopes should be constructed at a maximum slope of 2:1, unless otherwise approved by the City Engineer.

#8 To prevent erosion and subsequent downstream siltation, the Applicant shall comply with the conditions of an Erosion and Sedimentation Control Plan to be submitted for review by the Antelope Valley Resource Conservation District and review and approval by the City of Palmdale. The Plan shall address the following at a minimum:

- Recommendations for drought resistant slope planting shall be provided by a qualified landscape architect prior to project approval and implemented by the project applicant.
- Periodic maintenance and repair of all slopes and drainage outlets shall be conducted during and following site development.
- Following site development, slope plantings and irrigation systems shall be maintained and leaks in the irrigation system shall be fixed without delay.
- Drainage outlets shall be periodically inspected and cleaned of silt and debris both during and following site development.
- All slopes shall be periodically inspected for evidence of cracking and erosion and any problems shall be repaired immediately.
- Rodent activity shall be controlled to prevent water penetration and loosening of the soil.

- Minimizing the length of time that soils be exposed.
- Regular watering of cleared areas, in compliance with City requirements and SCAQMD Rule 403.
- Minimize the extent of cleared areas at any given time.
- Establishment of maximum vehicle speeds within construction areas.
- Pursuant to City Standards. revegetating graded areas as soon as possible after rough grading (landscaping, hydroseeding, or any other method of providing vegetative cover).
- Using of sandbags or similar surface water controls prior to and during grading if grading is to be done during the rainy season.
- Use of soil stabilizers where feasible.

#9 Each deed or other conveyance of Real Property shall include the following statement: "Ritter Ranch is traversed by major slays (branches) of the San Andreas Fault Zone, a very youthful geologic feature. Due to the proximity of the Ritter Ranch site to the San Andreas Fault, there is a high risk of experiencing strong ground shaking and possible surface fault rupture." Additionally, where applicable, each disclosure statement within the deed shall contain language which denotes the possibility of building restrictions on residential additions for human occupancy on those parcels which are located in Fault Hazard Restricted Use Zones.

#10 In addition to the mitigation measures listed below, compliance with the mitigation measures from the following sections of the Buena Engineers, Inc. Geotechnical Report is required to the satisfaction of the City Engineer (this report is included in Appendix B, PRELIMINARY GEOTECHNICAL INVESTIGATION): Site Grading and Foundation Recommendations; General Site Preparation; Slope Stability (fill slopes and cut slopes); Mountain Road Grading; Building Pad Construction; General Site Grading -All Lot Conditions; Lots Within Younger Alluvial Areas; Lots Within Older Alluvial Areas; Lots with Bedrock Exposed or Located within Two Feet of the Surface; Transition Lots; Excavations; Utility Trenches; Foundations; Slabs-on-Grade; Lateral Earth Pressures; Expansion; Preliminary Paving Sections; Swimming Pools; and Seepage Control.

#11 The site shall be designed to accommodate City of Palmdale Engineering Design Standards and the Master Plan Drainage, except as otherwise approved by the City Engineer, for controlling flooding and debris flows within and adjacent to Anaverde Creek, Amargosa Creek, and other existing natural drainage courses.

#12 Areas noted on Exhibit 10A with an "SF" (Special Foundation Areas) or as identified in subsequent geotechnical studies are recommended for more heavily reinforced foundations and such requirements shall be indicated on each deed for Real Property within the Special Foundation Areas relative to existing and potential additional foundations on the property.

#13 Due to possible adverse geologic conditions in the bedrock areas, detailed site-specific analyses relative to slope stability shall be performed for all proposed cut slopes prior to issuance of grading permit. Grading permit issuance will be subject to the grading plan demonstrating compliance with applicable recommended slope stability measures.

#14 Cut slopes within alluvial areas shall be constructed at a maximum slope of $2^1/_4$:1 (unless otherwise approved by the City).

#15 Road fills proposed for any planned high cut slopes, and buttress fill shall be required to stabilize the cut and adjacent hillsides.

#16 Prior to Development Application approval, the Applicant shall demonstrate to the satisfaction of the City Director of Planning and Engineer that all feasible mitigation measures have been implemented to minimize grading impacts. The Applicant may be required to submit complete geotechnical studies and/or reports to the satisfaction of the City Engineer. Consideration shall be given to use of "stepped" play fields for the school and park sites, particularly where a relatively level surface across the entire facility would require significant grading.

#17 The project geotechnical consultant shall be responsible to perform confirmatory tests and observations during grading to assure that the geotechnical recommendations are being followed and shall certify that all grading complies with the provisions of all approved plans and specifications, pursuant to the Los Angeles County Uniform Building Code, Chapter 70.

#18 Comprehensive geotechnical investigations including exploratory drilling, sampling, and laboratory testing shall be performed prior to issuance of grading permit. Grading permit issuance will be subject to grading plan compliance with applicable recommendations.

#19 Subsurface exploration shall be performed prior to issuance of grading permit. Grading permit issuance will be subject to grading plan compliance with applicable recommendations.

#20 In order to evaluate the potential for ground-surface rupture along the trace of an active fault within the San Andreas fault zone, and provide setback recommendations for proposed structures, exploratory fault trenching shall be performed prior to issuance of grading permit.

#20a Prior to issuance of building permits, the project applicant shall prepare an emergency spill response plan, which includes the following measures for review and approval by the City and County Sanitation District No. 20:

- Measure detects early warning of a sewage trunk leak;
- The installation of manual or automatic isolation valves;
- Provisions for spilled sewage retention;
- Spill response measures;
- Clean-up and disinfection measures; and
- Training and funding for implementation of the spill plan.

7.8 Greenhouse Gas Emissions

Greenhouse gas (GHG) emissions for the Original Project were not quantified in the Ritter Ranch FEIR. Since the FEIR has already been certified, the determination of whether GHG emissions and climate change needs to be analyzed for modifications to the Original Project is governed by the law on supplemental or subsequent EIRs (Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163). GHG emissions and climate change are not required to be analyzed under those standards unless it constitutes "new information of substantial importance, which was not known and could not have been known at the time" the Ritter Ranch FEIR was approved (CEQA Guidelines Section 15162[a][3]). Consistent with the statutory language, the courts have repeatedly held that new information that "was known" or "could have been known with the exercise of reasonable diligence" at the time of the EIR certification does not trigger the supplemental EIR standard (Citizens Against Airport Pollution v. City of San Jose [2014] 227 Cal.App.4th 788, 807 [CAAP]). An agency may not require a subsequent or supplemental EIR unless new information, which was not known and could not have been known at the time the EIR was certified as complete, becomes available. Therefore, since the potential environmental impact of GHG emissions does not constitute new information within the meaning of Section 21166(c), the City's preparation of an Addendum for the Project is consistent with CEQA Guidelines Section 15064.4.

The issue of GHG emissions and climate change impacts is not a changed circumstance and there is no new information that was not known or could not have been known with the exercise of reasonable diligence when the City approved the Ritter Ranch FEIR. The issue of climate change and GHG emissions was widely known prior to the Ritter Ranch FEIR approval. The regulation of GHG emissions to reduce climate change impacts was extensively debated and analyzed throughout the early 1990s. Courts have also established that any new thresholds for measuring GHG emissions do not qualify as "new information" triggering supplemental environmental review. Overall, the Project would not change the overall total number of permitted dwelling units within the approved Specific Plan. Nonetheless, it is important to note that since the Ritter Ranch FEIR was originally approved, energy efficiency from construction equipment, building materials, vehicles, and overall, every aspect of consumer products have increased energy efficiency compared to when the Ritter Ranch SP was approved. Energy emissions continue to being reduced under current regulatory requirements.

Therefore, a supplemental environmental analysis of GHG impacts is not required because information about the effect of GHG emissions on climate was known long before the City certified the FEIR in 1992, such that the effect of GHG emissions on climate could have been raised in 1992 when the City considered the FEIR.

7.9 Hazards and Hazardous Materials

Hazards and hazardous materials are discussed in Section IV.H, Public Health and Safety, of the Ritter Ranch FEIR. The Ritter Ranch FEIR concluded that after implementation of required mitigation measures, potentially unavoidable adverse impacts could occur in the future if conclusive evidence links the extremely low frequency (ELF) electromagnetic field associated with power transmission lines to

deleterious health effects; refer to **Appendix 10: Ritter Ranch FEIR Findings of Fact & Statement of Overriding Considerations**.[47] All other impacts related to hazards and hazardous materials, including hazards from proposed uses, were determined to be less than significant.

The Project site is not located on any of the areas identified in the Ritter Ranch FEIR as having a potential for hazardous materials due to the previous use of the area. Additionally, the Project only proposes residential, recreational, and open space land uses and does not propose industrial land uses. The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project is also not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable release of hazardous materials into the environment. The Phase 1A Ritter Ranch PD was approved to include an elementary school within one-quarter mile of the Phase 1B proposed Project. However, the proposed residential and recreational uses would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Additionally, the Project site is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 56962.5.[48] The Project site is also located approximately 4.8 miles southwest of the Palmdale Regional Airport, which indicates that the Project would not be subject to hazards associated with aircraft operations. With respect to the ELF electromagnetic fields, the ELF lines are located approximately 1,000 feet from the nearest residential DUs. The relationship of proposed residential uses to existing overhead transmission lines remains consistent with that disclosed and evaluated in the Ritter Ranch FEIR; the existence of such transmission lines is not new information.

Therefore, based on the analysis above the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to hazards and hazardous materials.

Ritter Ranch FEIR Mitigation Measures

#67 In the areas where trash and debris have been dumped into stream channels within the property, near-surface soil samples and analysis of those samples for the identification of chemicals or contaminants shall be collected prior to removal operations to evaluate landfill class designations for the debris.

#68 Prior to issuance of grading permits for the area described below, further investigation shall be conducted for each area to ascertain the types and amounts of potential; hazardous materials associated with the following: the former turkey ranch area; partially and completely buried refuse; the Hunt Club area; surficial debris and a locked trailer marked "Lockheed Emergency Vehicle;" and existing structures with the potential of containing asbestos fibers.

[47] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 204.

[48] EnviroStor. 2023. *Hazardous Waste and Substance Site List (Cortese).* Available at: https://dtsc.ca.gov/dtscs-cortese-list/#:~:text=The%20Hazardous%20Waste%20and%20Substances,of%20hazardous%20materials%20release%20sites, (accessed November 2023).

#69 If subsequent investigations of the site determine the presence of hazardous materials, the developer shall retain a licensed hazardous materials contractor to conduct cleanup of the site using proper disposal procedures. Clean-up and disposal of the site shall comply with all local, state and federal regulations regarding handling, transport and disposal of hazardous materials.

#70 Although the right-of-ways surrounding the power transmission lines traversing the project site appear to be sufficient to protect residents, specific guidelines including the City of Palmdale Undergrounding Ordinance shall be incorporated into the project plans and are subject to approval by the City Engineer and City Planning Department.

Basic Minimum Allowable Clearances of Wires
Above Thoroughfares and Ground-Clearances From Poles, Buildings, Structures, or Other Objects

Nature of Clearance	**225 – 300 kV**	**300 – 550 kV**
Crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts.	30 feet	30 feet*
Above ground in areas accessible to pedestrian only.	25 feet	25 feet*
Horizontal clearance of conductor from buildings.	6 feet	15 feet*
*Shall be increased by 0.025 feet per kV in excess of 300 kV.		
Source: Rule 37, General Order No. 95, Rules for Overhead Electric Line Construction, Public Utilities Commission of the State of California March 1981. PUC staff (Mr. Pat Stone) has indicated there are not separate ELF guidelines for school facilities.		

#71 All project homeowners and tenants shall be advised of potential health risks associated with power transmission lines prior to close of escrow/execution of rental lease. Said notification shall be indicated in the applicable escrow, deed and/or lease documents in a format acceptable to the City Attorney.

7.10 Hydrology and Water Quality

Hydrology and water quality are addressed in Section IV.A, Earth Resources (groundwater), and Section IV.C, Water Resources (surface drainage, flooding, and water quality), of the Ritter Ranch FEIR. The Ritter Ranch FEIR found that increased groundwater recharge resulting from landscape irrigation may significantly affect local groundwater levels and is considered an unavoidable impact.[49] Additionally, the FEIR concluded that implementation of the Ritter Ranch SP would significantly alter existing drainage patterns of the area, and no significant impacts related to flood hazards or water quality are anticipated to occur with implementation of required mitigation measures.[50]

The residential, recreational, and open space uses would alter the drainage of the Project site. Additionally, the change in drainage patterns would occur when the Project site is graded. Water quality treatment would occur in two previously approved treatment areas: a basin that serves the Amargosa watershed and a swale that threats the Anaverde watershed. Runoff from individual tracts would be directed to either the basin or the swale outside of the Project site boundary. The Project would have substantially the same drainage pattern as originally assumed in the Ritter Ranch FEIR.

[49] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 94.
[50] Ibid, Page 135.

Water quality management requirements are more stringent than when the Ritter Ranch FEIR was prepared. Therefore, it is anticipated that with implementation of the previously approved water quality treatment facilities, water quality impacts would be reduced compared to what was concluded in the FEIR. Prior to the issuance of any Grading Permit, the Project would be required to prepare, to the satisfaction of the Director of Public Works and the City Engineer, a Water Quality Management Plan (WQMP). The WQMP would identify permanent site design, source control and treatment control Best Management Practices that would be used on the site to control predictable pollutant runoff. Implementation of a Project specific WQMP would minimize impacts associated with increased runoff (erosion hazards and exceeding capacity of existing storm drain facilities). The Project site is also not in the 100-year flood plain, and the Pacific Ocean is approximately 65 miles to the west of the Project site.[51] Therefore, the proposed uses are not subject to flood hazards, tsunamis, or seiche hazards. Additionally, the storm drain infrastructure for the Project would be designed in compliance with the City Design Manual for 10-year, 25-year, and 50-year storm events.

Based on the above analysis, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to hydrology and water quality.

Ritter Ranch FEIR Mitigation Measures

#31 All drainage facilities shall be designed and constructed in accordance with the City of Palmdale Drainage Master Plan and the Los Angeles County Hydrology Manual to the satisfaction of the City Engineer. Local facilities will be installed concurrently with or immediately after completion of grading activities, and in some cases as approved by the City Engineer, interim facilities may be provided. Each facility shall be completed prior to issuance of occupancy permits for a development application for the portion of the project which is served by the facility.

#32 All regional and major on-site facilities will be designed to accommodate a 50-year Los Angeles County Capital Flood with bulking and freeboard included as required by the City Engineer.

#33 All local drainage facilities shall be designed to accommodate a 25-year or a 10-year storm in accordance with the City Engineering Design Standards, in general:

1. Peak runoff from a 25-year storm will be contained within the street right-of-way.
2. Peak runoff from a 10-year storm will be contained at or below the street top of curbs.

#34 The lowest finish floor elevation of all habitable structures shall be a minimum of one- foot above the maximum water level resulting from the applicable capital flood.

[51] FEMA. 2021. *FEMA's National Flood Hazard Layer Viewer*. Available at: https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd, (accessed November 2023).

~~**#35** Flood Control basin design shall incorporate adequate peak attenuation and storage features and safety provisions (fencing, signage) to the satisfaction of the City Engineer.~~ [Not Applicable. Basins are not proposed in Phase IB area]

#36 The Applicant shall submit a water quality control plan for review and approval by the City Engineer and the Director of Planning, prior to issuance of grading permits. This plan shall be reviewed by the Regional Water Quality Control Board for their review and comment. The plan shall indicate specific means of reducing urban pollutants and sedimentation and shall comply with the provisions of any National Pollution Discharge Elimination System permit requirements that may be required by other regulatory agencies including but not limited to the following:

a) Incorporation of measures identified in the required Erosion Control Plan.

b) Surplus **or waste material from construction** shall not be placed in drainage ways or within the 50-year Los Angeles County Capital Storm floodplain of surface waters.

c) All loose piles of soil, sill, clay, sand, debris, or other earthen materials shall be protected in a reasonable manner to eliminate any discharge to waters of the Slate.

d) Dewatering shall be done in a manner so as to eliminate the discharge of earthen material from the site.

e) All disturbed areas shall be stabilized by appropriate soil stabilization measures by October 15th of each year.

f) All work performed between October 15th and May 1st of each year shall be conducted in such a manner that the project can be winterized within 48 hours.

g) All non-construction areas shall be restricted by fencing, signage or other means to prevent unnecessary disturbance.

h) During construction, temporary gravel or sandbag dikes shall be used as necessary to prevent discharge of earthen materials from the site during periods of precipitation or runoff.

i) Stabilizing agents such as straw, wood chips and/or hydroseeding shall be used during (he interim period after grading in Older to strengthen slopes while ground cover takes hold in accordance with City's Engineering Design Standards.

j) Impervious areas shall be constructed with infiltration trenches along the downhill edges to dispose of all drainage emanating from them.

k) Infiltration trenches shall be constructed on the downgradient side of all structural drip lines.

l) Revegetated areas shall be continually maintained in order to assure adequate growth and root development.

m) Physical erosion control facilities shall be placed on a routine maintenance and inspection program to provide continued erosion control integrity.

n) Where construction activities involve the crossing and/or alteration of a stream channel, such activities should occur only after obtaining a 404 Permit (Army Corps of Engineers) and a 1601/1603 Agreement (California Department of Fish and Game), as necessary.

o) Routine cleaning of manholes and catch basins shall be performed to remove sediment and debris.

p) Control of washdown drainage from commercial uses shall be enforced in accordance with all waste discharge regulations and/or provisions.

q) Information reviewed and approved by the City Attorney, regarding the disposal of waste oil/grease, pesticide containers and other hazardous materials shall be provided to new businesses and homeowners at the time of occupancy.

r) Controlled use of pesticides and fertilizers within common areas including the golf course shall be enforced through provisions in the Landscape Plan, including frequency and type of fertilizers/pesticides to be used, and application by qualified persons. For the golf course (which would drain into a proposed wetland mitigation area), special consideration should be given to use of slow release fertilizers and contact herbicides, prohibition of fungicides and broad spectrum insecticides, and the suppression of mosquito populations using bacterial insecticides or light oils instead of chemical agents.

7.11 Land Use and Planning

The Ritter Ranch FEIR addresses land use impacts in Section IV.G, Land Use. The Ritter Ranch FEIR included the analysis of approximately 449 acres of parcels proposed to be annexed to the City of Palmdale. In order to meet Local Agency Formation Commission (LAFCO) requirements and to avoid unincorporated "islands" after Ritter Ranch SP incorporation into the City, the City proposed the annexation of an additional seven properties, described in Ritter Ranch FEIR Section IV.G, Land Use. LAFCOs are approving bodies of government within each county which are responsible for local government changes of organization, including city incorporations, annexations to a city or special district, and city and special district consolidations. Prior to initiating annexation, LAFCO requires the City to demonstrate that the proposed annexation has been addressed in the City's General Plan and is consistent with the General Plan; prepare a comprehensive environmental document analyzing the environmental impacts of the proposed annexation; ensure that the annexed lands are pre-zoned to be consistent with the City's General Plan; and submit an application to LAFCO in compliance with state law and Los Angeles LAFCO policies and procedures.

The Ritter Ranch FEIR concluded that temporary, construction impacts associated with mass grading operations and impacts associated with the loss of existing open space areas would be a significant and unavoidable; refer to **Appendix 10: Ritter Ranch FEIR Findings of Fact & Statement of Overriding Considerations**.[52] Additionally, buildout of the Ritter Ranch SP was identified to result in the loss of

[52] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 197.

existing open space areas and significant alterations of natural terrain that could significantly impact the Lazy-T Ranch.[53]

The Project implements the Ritter Ranch SP. The Project implements the Ritter Ranch SP and is consistent with the Ritter Ranch SP as discussed in **Section 5.0: Project Description** and in the Project application materials. The proposed Project involves the same land uses as assumed in the Ritter Ranch SP. The proposed Project is within the allowable dwelling unit densities for Phase 1B, which was assumed for development as part of the Approved Project. The proposed Project would also be consistent with the City's General Plan and Municipal Code. The proposed Project would not divide an established community; rather, it would implement the approved Project. The Project does not involve any land uses, construction or operations not anticipated by the Ritter Ranch FEIR and would not result in adverse environmental effects due to a conflict with the Ritter Ranch SP, the City's General Plan, or Municipal Code. The current Project site has a Specific Plan (SP) land use designation[54] and zoning.[55] Additionally, the buildout of the residential, recreational, and open spaces uses would not result in any impacts to existing land uses that were not evaluated in the Ritter Ranch FEIR. Overall, the Project would not change the overall total number of permitted dwelling units within the approved Specific Plan and the Project would be consistent with the approved Ritter Ranch SP found in Section 5.2, General Plan Consistency elements of the Ritter Ranch SP. More specifically, the Project would be consistent with Section 5.2.1 Land Use Element, Section 5.2.6 Circulation Element, and Section 5.2.4 Community Design Element.

Therefore, based on the analysis above, the proposed Project would not result in any new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR in regard to land use.

Ritter Ranch FEIR Mitigation Measure

#66 The Applicant shall annually evaluate all design guidelines, development standards, and mitigation measures for the Ritter Ranch Specific Plan, submitting a Monitoring Report to the Director of Planning the first quarter of each year through buildout of the project. In addition, the applicant shall submit aerial photos of the project site taken on a monthly basis when grading is occurring. Monitoring and verification of compliance with adopted applicable Specific Plan development standards shall also be performed prior to subsequent approvals, to determine if the proposed measures are achieving their intended purpose. To the extent allowed by law, future discretionary approvals may include additional conditions of approval based upon City review of the Annual Monitoring Report. Nothing in this mitigation measure shall be construed to permit environmental review beyond the extent permitted by State law.

[53] Ibid.
[54] City of Palmdale. 2022. *General Plan Chapter 5 Land Use and Community Design, Figure 5.5 General Plan Land Use Designations*. Available at: https://palmdale2045gp.org/wp-content/uploads/2023/05/PalmdaleGPU_Ch05_041823.pdf, (accessed November 2023).
[55] City of Palmdale. 2023. *Palmdale Zoning Map*. Available at: https://www.cityofpalmdaleca.gov/DocumentCenter/View/516/Zoning-with-street-labels-PDF?bidId=, (accessed November 2023).

7.12 Mineral Resources

The Ritter Ranch FEIR addresses mineral resources in Section IV.A, Mineral Resources. Per the Ritter Ranch FEIR, mineral production within the Ritter Ranch SP area has been limited to areas within the Pelona Schist soil type, with most mineral extraction occurring at the southeast end of McDill Ridge.[56] The FEIR did not identify any impacts related to loss of mineral resources.

The Project site and the surrounding areas are not designated as a locally important mineral resource recovery site by the City of Palmdale.[57] Additionally, the Project site is designated as mineral resource zone (MRZ) 3 by the California Department of Conservation, which indicates that the property does not contain known mineral resources.[58]

Therefore, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to mineral resources.

7.13 Noise

The Ritter Ranch FEIR discusses potential noise impacts in the Noise section. The Ritter Ranch FEIR concluded that a cumulative significant noise impact would result from Ritter Ranch SP related traffic on receptors within more heavily developed areas of the City and near heavily traveled arterials within the Ritter Ranch SP area.[59] Additionally, the Ritter Ranch FEIR concluded that the Ritter Ranch construction activities would generate short-term noise. Additionally, increased operational traffic noise levels were anticipated to occur due to the traffic volumes generated by the Ritter Ranch Specific Plan. Moreover, other noise impacts associated with the construction of other project features were anticipated. To offset the anticipated noise impacts, the Ritter Ranch FEIR notes that buildout of the Ritter Ranch Specific Plan community should implement mitigation measures 51, 52, 53, and 55. Like the Ritter Ranch FEIR, with implementation of the mitigation measures identified in the Ritter Ranch FEIR, construction and operational noise impacts associated with the Project would be reduced to less than significant levels.[60] However, the Ritter Ranch FEIR found that buildout of the Ritter Ranch Specific Plan plus other development in the surrounding area would result in a significant and unavoidable cumulative off-site noise impact from Project-related traffic.[61] Implementation of mitigation measures was also determined to help reduce cumulative off-site noise impacts to a less than significant level on heavily developed areas of the City and near heavily traveled arterials within Project areas.

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[56] Ibid, Page 74.
[57] Rincon Consultants, Inc. 2022. *City of Palmdale 2045 General Plan Update Draft Environmental Impact Report*, Page 4.12-1. Available at: https://www.cityofpalmdaleca.gov/DocumentCenter/View/11872/Palmdale-General-Plan-Public-Draft-Environmental-Impact-Report-PDF, (accessed November 2023).
[58] California Department of Conservation. 1983. *Mineral Land Classification and Index to Detailed Zone & Sector Maps for the Saugus – Newhall & Palmdale P-C Regions*. Available at: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc, (accessed November 2023).
[59] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 180.
[60] Ibid.
[61] Ibid, Page 178.

The analysis in the Ritter Ranch FEIR relies on the Noise and Land Use Compatibility Standards established by the Department of Health Services Office of Noise Control. The Ritter Ranch FEIR also discusses that the City General Plan Noise element (which was being drafted at the time) states that a noise exposure level of 60 dBA Community Noise Equivalent Level (CNEL) is acceptable for noise sensitive land uses, such as residential uses.[62]

Additionally, the most recent City General Plan was adopted on October 22, 2022, and amended on March 15, 2023. The updated Noise Element establishes goals and policies to minimize the exposure of residents to excessive noise levels. Policy N-1.2 restricts noise on sensitive land uses near existing or future air, rail, or highway transportation noise sources unless mitigation measures have been incorporated into the design of the project to reduce the noise levels at the noise-sensitive land uses to less than 65 dBA CNEL at all exterior living spaces including but not limited to, single-family yards and multi-family patios, balconies, pool areas, cook-out areas and related private recreation areas.[63] The adopted exterior noise standard of 65 dBA CNEL is an increase of 5 dBA CNEL over what was previously identified in the Ritter Ranch FEIR. Therefore, the Project will not generate any new noise impacts or increase any existing noise impacts that were previously analyzed in the Ritter Ranch FEIR. Increasing the noise threshold by 5 dBA will not have any negative consequences, and the noise generated by the Project would be the same or less than what was already analyzed in the Ritter Ranch FEIR.

The Ritter Ranch FEIR acknowledges that the Ritter Ranch development plans were not yet fully detailed to identify specific noise constraints or mandatory mitigation measures for any of the development parcels.[64] Therefore, the Ritter Ranch FEIR determined that site specific noise studies would be required as development applications are filed to adequately protect each community from exterior traffic noise intrusions.[65] Additionally, mitigation measures identified in the FEIR include using perimeter noise walls or berms, and placing parking facilities for multi-family dwellings near the street to act as a noise barrier or locate commercial uses near the roadway to act as a noise barrier for residential uses away from the street.[66] With implementation of the recommended noise mitigation measures, the FEIR anticipated that on-site noise impacts associated with buildout of the Ritter Ranch Specific Plan would be less than significant.

The Ritter Ranch FEIR considered both off-site and on-site traffic noise level impacts for the Ritter Ranch SP, including the proposed Project. The Project proposes a reduced number of dwelling units compared to what was anticipated in the Ritter Ranch FEIR, therefore it is anticipated that the Project would have reduced noise impacts as compared to what was evaluated and disclosed for the Project site in the Ritter Ranch FEIR. Additionally, as identified in FEIR Mitigation Measure 51, at the building permit stage, site-specific acoustic studies would be prepared to identify any specific measures to ensure that established

[62] Ibid, Page 173.
[63] City of Palmdale. 2022. *Chapter 16 Noise Element.* Page 416. Available at: https://palmdale2045gp.org/wp-content/uploads/2023/05/PalmdaleGPU_Ch16_041823.pdf, (accessed November 2023).
[64] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 176.
[65] Ibid, Page 176.
[66] Ibid, Page 179.

noise standards are met. Therefore, no additional noise documentation pursuant to CEQA is needed to support the Project.

Based on the analysis above the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to noise.

Ritter Ranch FEIR Mitigation Measures

#51 All construction and general maintenance activities, except in an emergency, shall be limited by City of Palmdale Municipal Code Section 828.030 to the hours of 6:30 a.m. to 8 p.m. Monday through Saturday. The operation of any machine, mechanism, device or contrivance during construction shall comply with noise limits in the City of Palmdale municipal noise ordinance.

#52 Development along internal and adjacent arterials will incorporate design measures or structural measures which will reduce noise levels to acceptable levels with the living or recreational (as defined by the City) of any lot. The measures that may be utilized to reduce noise impacts include placement of non-residential buildings adjacent to the arterial roadway, increasing the setbacks along the roadway, creation of landscaped berms, or other unobtrusive barriers. The acceptable noise level CNEL which will be applied to future projects will be that level which is in place, either by ordinance, resolution, or General Plan policy, at the time that future development applications are deemed complete.

#53 Elementary school and neighborhood park development should avoid the most heavily traveled village roadways to minimize traffic noise intrusion on these uses requiring relative quiet for concentration or serenity. Where necessary, noise mitigation such as barriers or sound walls will be employed.

#54 This Mitigation was omitted from the Final EIR.

~~**#55** The proposed amphitheater shall require a Conditional Use Permit. As part of the CUP review process, the Applicant shall provide City staff with sufficient detail to indicate that the amphitheater will not adversely affect offsite areas (as in orientation, screening and permitted activities). Adverse noise impacts shall be determined based on City Noise Ordinance provisions (with respect to peak noise levels and nuisance noise). The Applicant shall also provide City staff with possible alternative locations more proximate to Town Center, but the alternative locations should not impact noise-sensitive uses such as residential areas.~~ [Not Applicable. Prior PD advanced the amphitheater which is in Planning Area 4. This PD includes only areas in Planning Area 1B.]

7.14 Population and Housing

The Ritter Ranch FEIR discusses the increase in population associated with implementation of the Ritter Ranch SP. The Ritter Ranch FEIR determined that buildout of the Ritter Ranch SP would have a significant

incremental growth inducing impact.[67] Additionally, Section IX Effects Found Not to Be Significant concluded that the loss of one occupied ranch house within the Ritter Ranch SP area, would not be a significant impact due to the large scope of the Ritter Ranch SP and the number of new residential DUs.[68]

The Project occurs within the Ritter Ranch SP PUs 5U, 5T (partial), 5X-1, 5X-2, 5W-4, and 5W-5. The Ritter Ranch SP designates PUs 5X and 5W for the development of up to 820 residential units, PUs 5U and 5T are designated for approximately 20 acres of parks.[69] The Project proposes the development of 135 single-family detached dwelling units and 492 single-family attached dwelling units, a total of 627 dwelling units are proposed. The total number of dwelling units proposed is less than what is assumed in the Ritter Ranch FEIR for the Project site. Additionally, using the population generation factor identified in the FEIR (2.7 people per unit), the proposed Project would potentially generate 1,693 new residents, compared to the 2,214 new residents anticipated in the FEIR for 820 dwelling units in PUs 5X-1, 5X-2, 5W-4, and 5W-5. Therefore, the Project would not induce substantial unplanned population growth in the area, either directly or indirectly that was not already anticipate in the Ritter Ranch FEIR. Additionally, the Project site is vacant and undeveloped and would not displace substantial numbers of existing people or housing, requiring the construction of replacement housing elsewhere.

Therefore, based on the analysis above, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to population and housing.

7.15 Public Services and Recreation

The Ritter Ranch FEIR addresses public services and recreation facilities in Section IV.K, Public Services and Utilities. The Ritter Ranch FEIR concluded that if a new police station is not constructed within the City vicinity, significant cumulative impacts are expected for police response time.[70] Additionally, impacts to fire services were expected to be significant, but once new fire facilities are built impacts would be reduced to less than significant levels. [71] The Ritter Ranch FEIR notes Mitigation Measures 112 and 113 would be applicable and would require the Project to provide a pumper truck and patrol car prior to the issuance of the 250th Certificate of Occupancy, which would be triggered during Phase 1A, and provide a fully operational fire station of an acceptable size and location, as determined by the LA County Fire Department by the 1,800th Certificate of Occupancy, which would not be triggered during the permitting, construction, or operation of Phase 1B. Additionally, other associated mitigation measures noted below were determined to be applicable to development within Ritter Ranch.

The Ritter Ranch FEIR also concluded that the Ritter Ranch Specific Plan would result in an increased student population that is not considered individually significant, but would contribute to cumulative

[67] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 306.
[68] Ibid, Page 373.
[69] City of Palmdale. *Ritter Ranch Specific Plan*, Page 4-58.
[70] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 273.
[71] Ibid, Page 294.

impacts that will affect school districts.[72] The Ritter Ranch FEIR also found that the Ritter Ranch Specific Plan would result in significant impacts to library services.[73] Lastly, the City's Parks and Recreation Department indicated that the Ritter Ranch Specific Plan would create impacts to parks and other recreational facilities, construction of parks and trails will be required to offset the potential impacts to park service.[74] This however would be offset by the two parks proposed within Phase 1B. As shown in Figure 3 and Table 1, PU 5U and 5T would include a neighborhood park and a community park totaling 5.5 acres and 6.7 acres, respectively. As discussed above, under **Section 7.14: Population and Housing**, the Project would construct 193 fewer dwelling units than what was originally evaluated in the Ritter Ranch FEIR for PUs 5X-1, 5X-2, 5W-4, and 5W-5. Additionally, using the population generation factor identified in the Ritter Ranch FEIR (2.7 persons per unit), this would result in a reduction of the anticipated new residents by approximately 521 persons. Therefore, the Project's demand for public services including fire protection, police protection, schools, parks/recreation, and libraries would be reduced in comparison to the projected growth evaluated in the Ritter Ranch FEIR. Additionally, the Project would comply with applicable Ritter Ranch FEIR mitigation measures addressing impacts to public services, and the Project Applicant would pay applicable development impact fees to the City, subject to applicable credits for providing in-kind mitigation. Lastly, the Project Applicant would also be required to comply with provisions of any agreement between the Project Applicant and the City as well as any City regulatory requirements with respect to the provision of public services.

Based on the analysis above, the Project would not result in new significant environmental effects or an increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to public services with implementation of applicable mitigation measures.

Ritter Ranch FEIR Mitigation Measures

#112 Site-specific development plans shall require review and approval by the Los Angeles County Fire Department with respect to adequate fire flows, emergency access and building construction standards.

#113 The applicant shall provide a pumper truck and patrol car prior to the issuance of the 250th Certificate of Occupancy and provide a fully operational fire station of an acceptable size and location as determined by the Los Angeles County Fire Department, Building and Safety by the 1,800th Certificate of Occupancy.

~~**#114** If only one access is provided within Planning Area 3, the Applicant shall install fire sprinklers within all residential units, provide an additional 25-foot width on the access road, and provide a helipad for fire service access for approval by the Los Angeles County Fire Department prior to issuance of occupancy permits.~~ [Not applicable. The Project is not within PA 3.]

#115 The applicant shall pay park fees or dedicate and construct the improvements for the proposed community, neighborhood, and specialty park facilities shown in the Specific Plan as approved by the Director of Parks and Recreation pursuant to Ordinance 789.

[72] Ibid, Page 278.
[73] Ibid, Page 275.
[74] Ibid, Page 296.

#116 Prior to issuance of grading permits for each area of the Ritter Ranch Specific Plan, the applicant shall provide appropriate safety etiquette signs for all off-set trails, particularly at trail parking facilities and trail segments with limited sight distance, in order to minimize safety hazards to bicyclists, pedestrians, and equestrians. The nature, location and language for these signs shall be approved by the Director of Planning and the City Traffic Engineer. Said signs may also include other restrictions/warnings such as discouraging damage to natural resources.

#117 The applicant shall install lighting along pedestrian trails located within the urban areas to provide adequate public safety as determined appropriate by the City Traffic Engineer. However, lights shall be designed and located so that direct lighting is confined to the property, lights shall be designed and located so that direct lighting is confined to the property, and lighting should not be of greater intensity (wattage) than otherwise necessary for public safety.

#117a The trails plan for the Ritter Ranch Specific Plan shall be reviewed for consistency with any trails plan or recreation management plan that may be prepared for the portion of the Angeles National are inconsistent, the Ritter Ranch trails plan will be modified to conform with the Forest Service's plan.

7.16 Transportation

The Ritter Ranch FEIR discusses traffic impacts in Section IV.I, Traffic and Circulation. The FEIR concluded that if off-site improvements are not constructed by the time the Ritter Ranch development begins, a significant impact could occur to the existing circulation system.[75]

As previously discussed, the Project would result in fewer dwelling units than what was originally anticipated for in PUs 5X-1, 5X-2, 5W-4, and 5W-5 in the Ritter Ranch SP and the FEIR. With a reduction in dwelling units, it is anticipated that trip generation would also be reduced.

Although no longer required by CEQA, to evaluate the potential intersection deficiencies resulting from implementation of the Project, DKS prepared a Traffic Impact Analysis (TIA) (refer to **Appendix 8**). The TIA evaluates traffic impacts resulting from development of Phase 1A (553 single-family units and associated parks and recreation areas) and Phase 1B (492 attached single-family units, 135 single-family detached units, an elementary school, and associated parks) of the Ritter Ranch Project. The number of dwelling units studied in the Ritter Ranch FEIR TIA was 7,200 dwelling units (DU) which was substantially greater than the 627 dwelling units proposed as part of this Phase 1B Project. Additionally, as required by the Ritter Ranch FEIR, Mitigation Measures 73 and 74 the Project Applicant would be required to pay applicable traffic impact fees, which provide the Project's required pro-rata contribution towards off-site roadway improvements or construct off-site roadway improvements in-lieu of traffic impact fees. Therefore, it can be concluded that the Project would generate less trips compared to that anticipated in the Ritter Ranch FEIR and would not result in any significant traffic impacts.

Based on the City of Palmdale LOS thresholds, the acceptable Level of Service for all study intersections is LOS D or better. The TIA demonstrates that the Ritter Ranch project would not result in any deficiencies

[75] Ibid, Page 236.

under Existing plus Project conditions. The TIA concludes that the Future Year (2024) with Project Phase 1A the Level of Service (LOS) analysis shows that the majority of the study intersections would operate at LOS D or better except for Elizabeth Lake Road/Palmdale Boulevard and 10th Street/Tierra Subida Avenue.[76]

Additionally, the TIA conclude that in Future Year (2027) with both Project Phase 1A and 1B LOS analysis shows that out of the eighteen analyzed study intersections, eleven would operate at LOS D or better with the exception for the following intersections seven intersections:[77]

- Elizabeth Lake Road/Palmdale Boulevard & 10th Street/Tierra Subida Avenue
- Palmdale Boulevard & 5th Street West
- Avenue S & SR-14 Northbound Ramps
- Avenue S & SR-14 Southbound Ramps
- Avenue S & Tierra Subida Avenue
- City Ranch Road & Bridge Road
- Avenue S & Bridge Road

Therefore, with implementation of mitigation measures identified in the Ritter Ranch FEIR, all impacted intersections would be mitigated to operate at LOS D or better and would be within the City's acceptable LOS threshold.[78]

VMT-based transportation impact requirements were applied to all lead agencies as of July 1, 2020. CEQA Guidelines Section 15064.3 states that its provisions "shall apply prospectively as described in Section 15007". Section 15007 provides that CEQA documents that meet requirements in effect when the document is sent out for public review do not need to be revised to include new requirements. Consequently, no VMT analysis is required for the Project.

The Project is designed to meet applicable roadway standards established by the Ritter Ranch SP and the City. Therefore, the Project would also not substantially increase hazards due to a geometric design feature or incompatible uses and would accommodate adequate emergency access.

Therefore, based on the analysis above the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to transportation.

Ritter Ranch FEIR Mitigation Measures

#72 All road improvements shall be designed in accordance with City of Palmdale Specific Plan roadway design standards as approved by the City Engineer.

[76] DKS. 2022. *Traffic Impact Analysis Ritter Ranch Project*, Page 48.
[77] Ibid.
[78] Ibid.

#73 The applicant shall be required to submit a Traffic Control Plan for review and approval by the City Traffic Engineer, prior to issuance of grading permits, which incorporates state of the practice standards to minimize construction related traffic impacts. Said plan shall be consistent with traffic measures for the Amargosa Creek Improvement Project.

#74 The Ritter Ranch Specific Plan identifies ultimate onsite roadway cross-sections and lane configurations necessary to serve the project at buildout. Phasing of onsite roadway improvements shall be in accordance with the Ritter Ranch Specific Plan Phasing Plan as approved by the City Public Works Department.

#75 Prior to development application approval, the applicant shall pay appropriate traffic impact fees in accordance with City Ordinance 825, and all other traffic fees applied Citywide that may be in place at the time of issuance of Certificates of Occupancy. These traffic impact fees provide the project's required pro rata contribution towards offsite roadway improvements needed to service the development. Funds generated from the traffic impact fees shall be applied toward offsite improvements to Elizabeth Lake Road, Palmdale Boulevard, Avenue S, and 10th Street West/Tierra Subida Road, as approved by the City Public Works Department.

#76 The developer(s) of Ritter Ranch may construct offsite roadway improvements in lieu of Traffic Impact fees, as approved by the City Public Works Department.

#77 The developer shall comply with the provisions of the Congestion Management Plan adopted pursuant to State law.

7.17 Utilities and Service Systems

Utilities and service systems are addressed in Section IV.K, Public Services and Utilities of the Ritter Ranch FEIR. The FEIR concludes that implementation of the Ritter Ranch SP would cause significant individual and cumulative impacts related to solid waste and radio communications even with implementation of applicable mitigation measures noted below.[79] Impacts to gas service were determined to be less than significant.[80] Additionally, with implementation of mitigation measures noted below, the Ritter Ranch FEIR determined that impacts to telephone, electricity, water, and sewer were determined to be less than significant.

The Project site is undeveloped, but backbone utility infrastructure needed to service Phase 1A of the PD have been installed in Elizabeth Lake Road and Ranch Center Drive, only limited improvements would be required to connect to existing facilities to serve the Project site (Phase 1B). As shown in Figure 4, the Phase 1B Project site is currently served by an existing storm drain and sewer main which traverse the Project site in a north-south direction. Additionally, the Project site would be provided with additional sewer main connections along the northeast portion of the Project site and to the southeast of the Project site to connect to an existing sewer main further to the east of the Project. Moreover, the Project is

[79] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*, Page 302.
[80] Ibid, Page 298.

anticipated to provide storm drains along the southwest and northeast portions of the site, a water main along the south and southwest along the proposed access road leading up to the proposed water tank, and proposed channel to connect to an existing channel located along the southeast portion of the Project site.

The Project would comply with applicable mitigations identified in the Ritter Ranch FEIR. Additionally, as discussed above in **Section 7.14: Population and Housing**, the Project would construct fewer dwelling units than what was evaluated in the Ritter Ranch FEIR for PA 5 which assumed the development of 2,591 DU vs. the proposed 912 DUs for PUs 5X-1, 5X-2, 5W-4, and 5W-5, and there would be a reduction in anticipated new residents to the area. Therefore, the Project's anticipated demand for water, wastewater treatment, solid waste disposal, electricity, natural gas, and telecommunication facilities would be less than what was assumed by the Ritter Ranch FEIR. The Project would also be required to comply with regulatory requirements related to water conservation, solid waste management, energy consumption, etc., which are currently more stringent than when the Ritter Ranch FEIR was prepared and would further reduce utility demands compared to what was assumed in the Ritter Ranch FEIR. In particular, the Project would comply with the City's Solid Waste Management Plan (SWMP), which includes a Source Reduction and Recycling Element (SRRE) and a Household Hazardous Waste Element (HHWE). Compliance with the SWMP, including the SRRE and HHWE, and General Plan policies for solid waste would ensure impacts to landfill capacities would be minimized.

Cannon prepared a Water Supply Reliability Report (WSRR) (refer to **Appendix 9**) which supplements the water availability determination that the Project would have sufficient water supplies. The WSRR identifies the Project's water supply needs and water availability by the water provider the Los Angeles County Waterworks District Number (No.) 40 (District 40).[81]

Phases 1A and 1B of Ritter Ranch include six major land uses that require water supply: single family residential, multi-family residential, commercial, recreational areas, an elementary school, parks, medians and road-side landscaping irrigation. In order to accurately calculate water demand, the WSSR converted multi-family residential, commercial, recreational and schools to equivalent dwelling units (EDU). Multi-family residential units generate less water demand because the dwelling units per acreage is higher. **Table 3: Land Use Acreage and Equivalent Dwelling Units – Phase 1B** shows the estimated EDU conversion that was used to calculate the Project's water demand.

Table 3: Land Use Acreage and Equivalent Dwelling Units – Phase 1B

Planning Unit	Numbers of Lots	Acres (ac)	Gross Density (du/ac)	EDU
5X-1	135	25	5.4	135
5X-2*	307	18.9	16.2	215
5W-4	74	8.3	8.9	74
5W-5	111	11.2	9.9	111
Total Phase 1B	**627**	**63**	**-**	**535**

*5X-2 are Multi-Family Homes (Gross Density (16.2 > 10), and the demand is reduced by 30 percent – equivalent dwelling units (EDU) = 307 x 0.7 = 215 EDU.
Source: Cannon. October 2024. Ritter Ranch Phase 1B Water Supply Reliability Report, *Table 1, Land Use Acreage and Equivalent Dwelling Units - Ritter Ranch Phase 1A and 1B.* (See **Appendix 9**).

[81] Cannon. October 2024. *Ritter Ranch Phase 1B Water Supply Reliability Report* (see **Appendix 9**).

The total demand for Phases 1A and 1B was then calculated by multiplying the EDU by the water use factor utilized by District 40 development services staff for similar projects within the District 40 service area: 0.82 acre-feet per year (AFY) per single-family residential lot. The 2020 Urban Water Management Plan (2020 UWMP) does not define water use duty factors instead, the District 40 demands are calculated based on available meter data. When considering the target 2020 confirmed 225 Target Gallons Per Capita Demand as set forth in District 40's UWMP[82] along with 3.22 average people per Household in Antelope Valley, the demand calculates to be very close to the 0.82 acre-feet per single family residential lot. Subsequently, District 40 demands are consistent with the UWMP goals (225 gal./capita/day x 365 days/year x 1 acre-ft/325,872 gal. x 3.22 = 0.82 APY/family lot.

The total demands for equivalent dwelling units and landscape irrigation for Phases 1A and 1B are summarized below in **Table 4: Yearly Water Demand Estimate for Ritter Ranch 1A & 1B.** Please note that the Project's water demand considered for this impact is for Phase 1B only and Phase 1A water demand totals are included for information purposes only.

Table 4: Yearly Water Demand Estimate for Ritter Ranch 1A & 1B

Land Use	QTY (EDU)	Demand Factor (AFY)	Demand (AFY)
Phase 1B	535	0.82	438.70
Phase 1B Irrigation			9.49
Project Total (exclusive of parks)			**448.19**
Phase 1A	645	0.82	528.90
Phase 1A Irrigation			43.97
ELR PH1 Landscape Irrigation			11.29
Parks (inclusive of Phases 1A and 1B)			154.14
Approved Phase 1A Total			**735.3**
Cumulative Total			**1,186**
Source: Cannon. October 2024. Ritter Ranch Phase 1B Water Supply Reliability Report, *Table 4, Yearly Water Demand Estimate for Ritter Ranch 1A & 1B*. (See **Appendix 9**).			

As shown in **Table 4**, Phase 1B, inclusive of residential uses and landscape irrigation would require 448.19 AFY of water. Inclusive with Phase 1A, parks would require a water demand of 154.14 AFY. Cumulatively, water demand for Phase 1A and Phase 1B, inclusive of residential uses, landscape irrigation and parks, would be 1,186 AFY. The District 40 2020 UWMP specifically accounts for 1,108 AFY of water demand from Ritter Ranch in its assessment of water supply.[83] Table 4-2A of the UWMP provides a summary of the future water demands that the District has committed to serve.[84] Section 6.8 of the UWMP summarizes District 40's existing and planned sources of water for a 20-year period.

Section 7 of the 2020 UWMP focuses on Water Supply Reliability and Drought Risk Assessment and incorporates the Ritter Ranch water commitment in its evaluation of District 40's capacity to fulfill demand under varying hydrological conditions. The analysis ensures that the 1,108 AFY for Ritter Ranch is factored into the overall projections for normal, single-dry, and multiple-dry years. This includes assessing the

[82] UWMP Table 5.2 Page 5-1.
[83] Los Angeles County Public Works. 2021. *2020 Urban Water Management Plan for Los Angeles County Waterworks District No. 40*, Table 4-2A, Page 4-3. Available at: https://dpw.lacounty.gov/wwd/web/Documents/D40_AV2020_UWMP%20FINAL.pdf, (accessed November 2023).
[84] Ibid.

adequacy of existing and planned water sources, as well as identifying strategies to mitigate potential supply shortfalls. By including this Ritter Ranch water demand in its projections for Phase 1A and 1B and District 40's other water demands, we can determine whether District 40 has sufficient water supply under normal, average, and multiple dry year scenarios assessed in its 2020 UWMP to serve Phase 1B. Ritter Ranch Phase 1B water demand, when added to water demand for Phase 1A, exceeds District 40's committed Ritter Ranch water demand projections by 78 AFY (1,108 AFY – 1,186 AFY). In light of this slight overage, to determine whether District 40 has sufficient water supply to serve Phase 1B, the additional required demand must be added to District 40's accounted for district-wide Potable and Non-Potable Water Use demands under the various scenarios assessed in the 2020 UWMP.

Table 5: Potable and Non-Potable Water Use (UWMP Table 4-2), below adds the 78 AFY to District 40's projected water uses to determine the adjusted total projected water use amount. This new adjusted total was compared to District 40's water supply to assess water supply reliability under the various scenarios assessed in the 2020 UWMP.

Table 5: Potable and Non-Potable Water Use (UWMP Table 4-2)

Use Type	Projected Water Use (AFY)*				
	2025	2030	2035	2040	2045
Single Family Residential	40,919	43,706	46,599	49,601	52,116
Multi-Family Residential	2,212	2,364	2,518	2,683	2,819
Commercial	3,112	2,617	2,178	1,780	1,870
Industrial	3,315	3,546	3,777	4,022	4,226
Institutional / Governmental	1,035	870	726	595	625
Losses	3,808	3,998	4,202	4,419	4,643
Total	**54,400**	**57,100**	**60,000**	**63,100**	**66,300**
Ritter Ranch Phase 1B Overage	78	78	78	78	78
Adjusted Total	**54,478**	**57,178**	**60,078**	**63,178**	**66,378**

***AFY = acre-feet per year**
Source: Cannon. October 2024. *Ritter Ranch Phase 1B Water Supply Reliability Report, Table 4, Potable and Non-Potable Water Use* (See **Appendix 9**).

District 40's water supply over a 20-year period is summarized in Table 6-9 of District 40's UWMP and reproduced in **Table 6: Potable and Non-Potable Water Use (2020 UWMP Table 6-9)**, below.

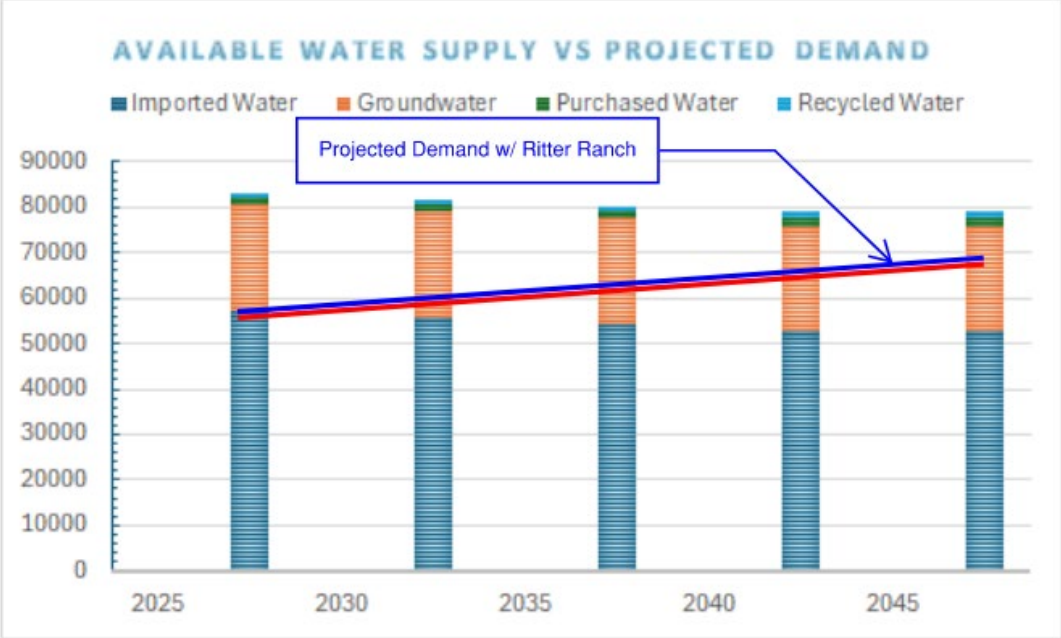
Table 6: Potable and Non-Potable Water Use (2020 UWMP Table 6-9)

Source Type	Water Supply (AFY)*				
	2025	2030	2035	2040	2045
Purchased or Imported Water	57,300	55,800	54,200	52,700	52,700
Groundwater	23,298	23,298	23,298	23,298	23,298
Purchased or Imported Water	1,733	1,733	1,733	1,733	1,733
Recycled Water	764	902	1,102	1,302	1,302
Total	**83,095**	**80,831**	**80,333**	**79,033**	**79,033**

***AFY = acre-feet per year**
Source: Cannon. October 2024. *Ritter Ranch Phase 1B Water Supply Reliability Report, Table 5, Potable and Non-Potable Water Use* (2020 UWMP Table 6-9) (See **Appendix 9**).

By plotting available water supply and projected demand in a bar chart, it is evident District 40 has sufficient supply for Ritter Ranch Phases 1A and 1B including the Elizabeth Lake Road Landscape Irrigation.

The following bar graph shows the Ritter Ranch Phase 1A and Phase 1B Demands to be with the Supply Zone (orange).



Consequently, based on the UWMP, District 40's total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection, as noted in the WSRR, District 40 will meet the projected demand associated with Phase 1B taking into account existing and future planned uses.

District 40 uses both purchased (imported) water and groundwater as its supply sources.[85] District 40 purchases water from the Antelope Valley East Kern Water District (AVEK).[86] AVEK receives most of its water supplies from the State Water Project (SWP), and is able to purchase additional SWP supplies from the Department of Water Resources (DWR).[87] In preparation for instances when AVEK's supplies from the SWP and District 40's groundwater does not meet demands during dry years, District 40 has purchased excess imported water from AVEK and "banked" it in local groundwater basins to use for future dry years.[88] Water banking involves storing imported water in an aquifer when excess supplies are available in wet years or low-demand periods and then using it in periods of drought or high water demand.[89] To maximize the use of its SWP supplies, AVEK has developed and is planning several groundwater banks including the Westside Water Bank, Antelope Valley Water Bank, and the Water Supply Stabilization Project 2.[90] AVEK's Drought Risk Assessment (DRA) indicates that there is no projected supply shortage during any single year of the five-year drought period.[91]

[85] Los Angeles County Public Works. 2021. *2020 Urban Water Management Plan for Los Angeles County Waterworks District No. 40*, Page 4-1. Available at: https://dpw.lacounty.gov/wwd/web/Documents/D40_AV2020_UWMP%20FINAL.pdf, (accessed November 2023).
[86] Ibid.
[87] Ibid.
[88] Ibid.
[89] Ibid.
[90] Ibid.
[91] Cannon. October 2024. *Ritter Ranch Phase 1B Water Supply Reliability Report,* Page 9 *(see **Appendix 9**).*

District 40 anticipates that additional water supplies will have to be acquired and imported into the Antelope Valley to meet the demands associated with the level of growth projected for the District 40 service area.[92] To acquire the additional water supplies needed, District 40 has executed a Memorandum of Understanding (MOU) with AVEK to implement a new Water Supply Entitlement Acquisition program for new developments, which will be used to acquire additional imported water supplies.[93] Developers can secure water entitlements by working with District 40 to determine the volume of new water supply needed to meet their project's annual demand.[94] The developer would then pay AVEK to purchase the new water supply permanently, and AVEK would designate the new water supply to District 40 for the developer, over and above District 40's current supply allocation.[95] However, as noted above, the UWMP already committed 1,108 AFY of water to Ritter Ranch that is accounted for in its long-term supply assessment, shows the overage can also be accommodated by District 40. In any event, even if there were a supply deficit, pursuant to the approved MOU between District 40 and AVEK, the Project site Developer would coordinate with District 40 and pay applicable fees to secure needed water supplies for the Project.

Furthermore, as discussed above, the Phase 1B Project proposes fewer dwelling units for the Project site that what was anticipated in the Ritter Ranch FEIR (the overall density within the Ritter Ranch Specific Plan would not be affected). Therefore, the Project's demand for water would be less than what was assumed in the Ritter Ranch FEIR. Additionally, The Project would be required to comply with current regulatory requirements related to water conservation, which have become more stringent than when the Ritter Ranch FEIR was prepared. This would further reduce water demands compared to what was assumed in the Ritter Ranch FEIR. Lastly, as noted in the Ritter Ranch FEIR, the project would be subject to sewer service Mitigation Measures 109 through 111, which would require the Project to pay sewer assessment fees and the design and implementation of new sewer must comply and be reviewed by the County of Los Angeles Department of Public Works and the City of Palmdale.

Based on the analysis above, it is not anticipated that the Project would result in new significant environmental effects or a substantial increase in the severity of significant effects disclosed in the Ritter Ranch FEIR related to utilities and service systems.

Ritter Ranch FEIR Mitigation Measures

#92 Adequate emergency access and circulation throughout and around the project shall be provided to the satisfaction of the Los Angeles County Sheriff's Department. Temporary emergency access shall be provided during project construction.

#93 Adequate lighting shall be provided to enhance crime prevention and law enforcement efforts to the satisfaction of the Los Angeles County Sheriff's Department. However, lights shall be designed and located so that direct lighting is confined to the property, and lighting should not be of greater intensity (wattage) than otherwise necessary for public safety.

[92] Ibid.
[93] Ibid.
[94] Ibid.
[95] Ibid.

#94 Proper address signs shall be provided for identification of locations during emergencies.

#95 The Applicant shall consult with the Los Angeles County Sheriff's Department regarding landscape standards to ensure that landscape features do not conceal potential criminal activity around buildings and in parking areas. This measure will be implemented to the satisfaction of the City of Palmdale Planning Director and City Engineer, prior to staff acceptance of Landscape Plan.

#96 Mitigation was omitted from the FEIR.

#97 Mitigation was omitted from the FEIR.

#98 All schools shall be required to implement safety programs (in accordance with State and City Guidelines) which may include where appropriate, the following:

- Crossing guards to be present to assist students in crossing the street
- School speed zone signs,
- Pedestrian crosswalks
- Flashing warning lights where sight distance is limited, as in Planning Unit 2A
- Signalized intersection or stop signs (to be provided by applicant if deemed necessary by the City traffic engineer)

#99

A. Westside Union School District. The developer shall comply with the terms of the agreement, dated November 26, 1991, between the developer and Westside Union School District as mitigation for impacts caused by development of the project on the Westside Union School District. The terms of that agreement are as follows:

   i. Development Fees. Developer hereby agrees to pay to District one dollar and ninety-nine cents ($1.99) per square foot of habitable residential development prior to the issuance of the building permit on each unit. A fee of twenty-six cents ($26) per square foot of industrial/commercial construction shall be paid to the District prior to the issuance of each commercial building permit. All such amounts shall be subject to annual adjustment pursuant to increases or decreases in the School Construction Cost Index of the Office of Local Assistance with January 1, 1992 as the base.

   ii. School Sites. In addition, Developer hereby agrees to sell to District three (3) eight acre elementary school sites with each being adjacent to a park, two (2) five acre school sites with each being adjacent to a park, and one (1) twenty - acre middle school site, designated in Exhibit B, attached hereto and incorporated herein by reference.

   The purchase price for the District shall be the fair market value of each site at the time escrow is opened, not to exceed $100.00 per acre plus annual adjustments based upon increases or decreases in the school construction cost index of the Office of Local Assistance with January 1, 1992 as the base. The fair market value shall include, all offsite improvements and grading of the site.

In the event that the parties cannot agree on the fair market value, each party shall obtain an appraisal from an MAI certified appraiser. If the two appraisals are within $5,000 of each other, the FMV shall be the lowest, value plus one-half of the difference. If the difference between the two appraisals is more than $5,000, the County Superintendent of Schools shall designate a third appraiser who shall be independent of the parties and MAI certified and who shall conclusively establish the fair market value. The cost of the third appraisal shall be borne equally by the parties.

Developer shall perform all offsite improvements such as roads, curbs, gutters, water (with a flow guaranteed to meet fire safety requirements) sewer, and utilities to the site for no cost to District except as provided above. Developer shall also provide rough grading of the site to District's reasonable specifications. Title to the site shall be transferred to District, free and clear of all monetary liens, assessments, taxes and encumbrances and easements or any restrictions which interfere with the District's plans to use the property for the development of the school sites prior to the filing of any final map on the tract. Onsite and offsite improvements shall be performed concurrently with improvements on the remainder of the tract.

The District may exercise its right to acquire the property by serving written notice on Developer and opening an escrow account. Developer shall within thirty (30) days of receipt of notice deposit a gram deed conveying title as referred to above. Notice by the District to purchase the property shall not be served earlier than the filing of a final subdivision map on any adjacent property. The District shall indicate its intent to purchase any particular school site no later than one (1) year after the filing of a final subdivision map on any adjacent property. District shall deposit the purchase price in escrow. Escrow shall close within thirty days of opening.

B. Antelope Valley Union High School District. The Developer shall provide the mitigation to the District in order to provide its contribution toward the District's fifty (50) percent share of funding a new high school on the site, pursuant to Government Code Section 65995 and Education Code Section 17700 et. Seq. (School Facility Funding Law):

   i. Developer Fees. Developer shall pay to the District one dollar and twenty cents ($1.20) per square foot of habitable residential development, including senior housing, prior to the issuance of the building permit on each unit. A fee of twenty-six cents ($.26) per gross leasable square foot of industrial/commercial construction shall be paid to the District prior to the issuance of each commercial building permit. All such amounts shall be subject to annual adjustment pursuant to increases or decreases in the School Construction Cost Index of the Office of Local Assistance with January 1, 1992 as the base.

   ii. School Sites. In addition, Developer hereby agrees to offer the District a site for purposes of constructing a high school thereon, with the terms of dedication as set forth herein. The Developer shall dedicated fifty (50) acres of land in Planning Area 3A for a school site to the District to the District at no cost to the District. The specific fifty (50) acres of the seventy-six (76) acres in Planning Area 3A shall be at the election of the District. Title to the site shall be transferred to District free and clear of all monetary liens, assessments, taxes and encumbrances and easements or any restrictions which interfere with the District's plans to use the property for the

development of the school site prior to the filing of any final map on a subdivision tract in the Specific Plan area. In the event that site preparation work on the school site, including provision of access to Elizabeth Lake Road and utilities, exceeds the amount of $4,300,000, the Developer shall pay fifty (50) percent of the amount over that figure, not to exceed a total of $350,000.

iii. Transfer Procedures. The District may exercise its right to acquire the site specified above by serving written notice on Developer and opening an escrow account. Developer shall within thirty (30) days of receipt of notice deposit into the escrow a grant deed conveying title as referred to above. Escrow shall close within thirty days of opening.

#100 Onsite telephone facilities shall be provided by utilizing joint trenches.

#101 Developers of individual properties within the Specific Plan area will be responsible for payment of assessment fees and installation of required conduits prior to issuance of occupancy permits.

#102 All permanent power lines shall be placed underground (consistent with the City's current Underground Ordinance) by the applicant prior to issuance of occupancy permits.

#103 The project applicant shall coordinate with SCE to ensure that adequate electrical service is provided to the proposed development and that service connection activities will be performed in cooperation with SCE to minimize any short-term impacts.

~~**#104** The applicant shall cause the project area to be annexed to the Los Angeles County Waterworks District No. 40, Regional #34, service area.~~ [Not applicable. The Project has already been annexed into WWD40, and mitigation #104 is therefore no longer applicable.]

#105 As required by state law, water conservation measures will be incorporated into the project:

- Low-flush toilets and urinals
- Low-flow showers and faucets
- Insulation of hot-water lines in water recirculating systems
- All fixtures must be California Energy Commission (CEC) certified

Public lavatory facilities must be equipped with self-closing valves.

#106 Additional interior and exterior water conservation measures shall be implemented where applicable and feasible:

Interior:

- Supply line pressure water pressure greater than 50 pounds per square
- inch (psi) shall be reduced to 50 psi or less by means of a pressure
- reducing valve.
- Drinking fountains shall be equipped with self-closing valves.

- Laundry facilities shall use water-conserving models of washers.
- Ultra low-flush toilet (M/2 gallons per flush) shall be installed in all new construction.

Exterior

- Landscape with low water-consuming plants wherever feasible.
- Minimize use of lawn by limiting it to lawn-dependent uses, such as playing fields. When lawn is used, require warm season grasses.
- Group plants of similar water use to reduce overirrigation of low-water using landscaping.
- Provide information to project residents and tenants regarding benefits of low-water using plants.
- Use mulch extensively in all landscape areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.
- Preserve and protect existing trees and shrubs. Established plants are often adapted to low-water-using conditions and their use saves water needed to establish replacement vegetation.
- Install efficient irrigation systems which minimize runoff and evaporation and maximize the water which will reach the plant roots. Drip irrigation, soil moisture sensors and automatic irrigation systems are a few methods to consider in increasing irrigation efficiency and may be feasible for the project.
- Use pervious paving material whenever feasible to reduce surface water runoff.

#107 Provision of water service to the proposed project will be required as a part of the project development and will occur to the satisfaction of the City of Palmdale prior to issuance of building permits. Project implementation will require mitigation in coordination with the City of Palmdale, Los Angeles County Waterworks District No. 40, Region 34, and the Los Angeles County Fire Department.

#108 Aboveground water storage tanks shall be designed with appropriate grading, color, and landscaping techniques to minimize visual impacts to be reflected in applicable Landscape Plans and Grading Plans.

#109 The project developer will be required to pay sewer assessment will provide adequate onsite wastewater conveyance facilities and will conform with City Public Works Department and County Sanitation District No. 20 development standards pertaining to wastewater. All structures/facilities will connect to the sanitary sewer system. No septic systems will be allowed with the possible exception of restroom facilities located in the remote specialty parks.

#110 Any sewer proposed for incorporation into the Sanitation Districts trunk sewer network for operation and maintenance, shall be reviewed and approved by (The Sanitation District, prior to any construction.

#111 On-site local sewers shall be designed and approved by both the County of Los Angeles Department of Public Works and the City of Palmdale.

#118 ~~Information shall be provided as reviewed and approved by the City to business owners concerning the recycling services in the development area at the time of occupancy.~~ [Not Applicable. There are no "businesses" included in Phase 1B.]

#119 The applicant shall distribute an educational pamphlet to homeowners at the time of occupancy, describing the solid waste disposal problem and methods of reducing solid waste impacts that are available to project residents as reviewed and approved by the City.

#120 This mitigation was omitted from the FEIR.

#121 The applicant shall provide solid waste recycling center(s) onsite to serve commercial, active recreation, and residential areas, to the satisfaction of the City Director of Public Works (to be verified at design level review for each Development Application).

#122 Where applicable the applicant shall comply with the provisions of the City's Source Reduction and Recycling Element, and the City's Household Hazardous Waste Element, after those elements are adopted by the City Council.

7.18 Wildfire

The Ritter Ranch FEIR addresses fire hazards under Section IV.K, Public Services and Utilities. The Ritter Ranch FEIR concludes that there would be increased fire hazard with implementation of the Ritter Ranch SP, but impacts would be reduced to a less than significant level with implementation of mitigation measures and construction of additional fire facilities.[96] Consequently, potential impacts to wildfire is not new information.

The City General Plan Safety Element identifies that the Project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ).[97] According to the California Department of Forestry and Fire Protection, the Project site is located in a local responsibility area and a VHFHSZ.[98] The Project would construct residential development that was planned for in the Ritter Ranch SP. Development of the dwelling units would be subject to compliance with Development Standards and Design Guidelines outlined in the Ritter Ranch SP and the PD, including requirements relating to water supply and fuel management zones. The Project would also be required to comply with applicable mitigation measures in the Ritter Ranch FEIR related to fire protection, including provision of a fire station, and would be subject to the fuel modification zone requirements of the Ritter Ranch Specific Plan, which would address hazards associated with wildland fires. Additionally, the dwelling units would be designed for compliance with the 2022 California Building Code. All building materials would comply with extended testing requirements and labeling where required for ignition-resistant construction. In compliance with the 2022 California Building Code exterior

[96] Robert Bein, William Frost & Associates. 1992. *Final Environmental Impact Report Ritter Ranch Specific Plan and Associated Annexation Areas*. Pages 294 and 302.
[97] City of Palmdale. 2022. *Chapter 13 Safety Element*, Page 333. Available at: https://static1.squarespace.com/static/5c7dc93065a707492aca3e47/t/635311bdf7cddb1b01941440/1666388437627/PalmdaleGPU_Ch13_10322.pdf, (accessed November 2023).
[98] California Department of Forestry & Fire Protection. 2024 https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/, (accessed August 2024).

building elements would be designed to comply with protection requirements listed in Sections 705A through 710A to protect against ignition and intrusion of embers. Compliance with requirements outlined in the Ritter Ranch SP and Ritter Ranch FEIR related to fire protection, and current local and state regulations addressing fire hazards and fire protection, which are more stringent than when the Ritter Ranch FEIR was prepared will ensure that the Project does not result in new significant environmental effects. Additionally, the proposed water tank and associated infrastructure (refer to Figures 3 and 6) would also help mitigate potential effects from wildfires.

Based on the analysis above, the Project would not result in new significant environmental effects or a substantial increase in the severity of significant effects previously disclosed in the Ritter Ranch FEIR related to wildfire.

8.0 CUMULATIVE IMPACTS DISCUSSION

Section 15065 of the CEQA Guidelines states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects that are individually limited by cumulatively considerable. As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects."

As demonstrated in the preceding discussions, the proposed Project would result in comparable impacts, but in no case would exceed the scope or intensity of environmental impacts considered and addressed in the certified Ritter Ranch FEIR. Similarly, potential cumulative impacts of the Project would be comparable to, but no greater in scope or intensity than, cumulative impacts as presented in the Certified FEIR. The Ritter Ranch FEIR quantified cumulative impacts based on City General Plan forecasts and identified significant cumulative impacts concerning air quality, biological resources, noise, public services and utilities, and growth-inducing impacts. Where applicable, these cumulatively considerable impacts are mitigated on a project-by-project basis. In other cases, the only feasible mitigation for cumulative impacts may involve the adoption of ordinance or regulations. Additionally, the most recent City General Plan was adopted on October 22, 2022, and amended on March 15, 2023. The General Plan establishes goals and policies to minimize adverse environmental effects, as described throughout this Addendum EIR. The proposed Project would also be consistent with the City's General Plan and Municipal Code.

The cumulative effects resulting from build out of the City General Plan were previously identified in the City General Plan FEIR. Similarly to the Ritter Ranch FEIR, the City General Plan FEIR concluded that impacts concerning air quality and utilities and service systems (i.e., water and wastewater) resulting from GP implementation would be cumulatively considerable. The type, scale, and location of the Project is consistent with City General Plan and zoning designation and is compatible with the pattern of development that has been approved for adjacent properties. Because of this consistency and, with adherence to General Plan policies, the potential cumulative environmental effects of the Project would fall within the impacts identified in the City General Plan FEIR. As no cumulative impact greater than that identified in the City General Plan FEIR would result from either the construction or occupation of the proposed industrial uses, a less than significant impact is anticipated to occur.

In addition to cumulative development within the City General Plan area, the analysis of transportation and related impacts (such as air quality, greenhouse gases and noise) considers the effects of regional traffic growth, based on existing and future traffic volumes from the current regional growth model maintained by the Southern California Association of Governments (SCAG). SCAG's 2020 Connect SoCal (2020-2045 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]) includes long-range regional transportation plans, regional transportation improvement programs, regional housing needs allocations, and other plans for the region. While SCAG has recently approved its 2024 Connect SoCal (2024-2050 RTP/SCS), the City General Plan is consistent with SCAG's regional policies including those in the 2020 RTP/SCS, which was the prevailing RTP/SCS at the time of the General Plan FEIR

approval. Therefore, the Project is included under the analysis of the City's GP EIR and SCAG's Connect SoCal.

On this basis, the Project would not result in new significant cumulative impacts or substantially more severe cumulative impacts than considered in the Certified FEIR. No changes or additions to the Certified EIR analysis are necessary.

9.0 ENVIRONMENTAL REVIEW DETERMINATION

As demonstrated in the assessment provided above, the Project is consistent with the development assumptions outlined in the Ritter Ranch SP, which was evaluated in the Ritter Ranch FEIR. Based on the Project, as well as a review of the technical studies and other information provided, and the environmental assessment provided of this document, the Project was determined to not result in any new environmental effects or create a substantial increase in the severity of previously identified significant effects beyond what was evaluated and disclosed in the Ritter Ranch FEIR.

None of the conditions requiring preparation of a Subsequent EIR or Supplemental EIR have been met and no changes or additions to the Ritter Ranch FEIR are necessary.

With regard to Section 15162 of the CEQA Guidelines:

- The Project would allow for development of a portion of the Ritter Ranch SP PA 5. Specifically, the Project would occur within PUs 5W-4, 5W-5, 5X-1, 5X-2, 5U, and 5T of the Ritter Ranch SP. The Ritter Ranch SP allows for development of PUs 5X and 5W with up to 820 residential units. The Project proposes the development of 627 dwelling units. Therefore, the Project proposes fewer residential units than the amount identified in the Ritter Ranch SP and evaluated in the Ritter Ranch FEIR. That is, 1,411 dwelling units still remain available for potential future development in PA5 even after the aforementioned allocations to Phase 1A and 1B. Therefore, the Project does not propose substantial changes which will require major revisions to the Ritter Ranch FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Accordingly, a Subsequent EIR would not be required for the Project based on CEQA Guidelines Section 15162 (a)(1).
- Since the Ritter Ranch FEIR was certified in 1992, there has not been any substantial changes in circumstances under which the currently proposed Project would be undertaken. Like the conditions that existed when the FEIR was certified in 1992, areas surrounding the Ritter Ranch SP are largely undeveloped, with exception of the eastern portions of the City Ranch Specific Plan, which was developed around 2005, and is now referred to as the Anaverde Nuevo Specific Plan. However, development of the City Ranch Specific Plan was discussed and anticipated as part of the Ritter Ranch FEIR; thus, the existing development within the Anaverde Nuevo Specific Plan does not comprise a “substantial change” that would warrant major revisions to the FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Therefore, a Subsequent EIR would not be required for the Project based on CEQA Guidelines Section 15162(a)(2).

No new information of substantial importance was found that would:

A. Create new significant environmental effects;

B. Increase the severity of previously examined environmental effects;

C. Determine that mitigation measures or alternatives previously found not to be feasible would in fact be feasible; or,

D. Introduce mitigation measures or alternatives that are considerably different from those analyzed in the Ritter Ranch FEIR that would reduce significant impacts and that the Project proponent is not willing to adopt.

Based on substantial evidence, neither a Subsequent EIR nor a Supplemental EIR is required for the Project based on CEQA Guidelines Section 15162 (a)(3) because none of the following conditions are met:

A. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the bases of substantial evidence in the light of the whole record, one or more of the following:

   a. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

   b. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

   c. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

      i. The project would have one or more significant effects not discussed in the previous EIR or negative declaration;

      ii. Significant effects previously examined would be substantially more severe than shown in the previous EIR;

      iii. Mitigation measures or alternatives previously found not be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

      iv. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum to the Ritter Ranch FEIR, pursuant to CEQA Guidelines Section 15164, documents the above findings.

Therefore, the Project will rely on information and analysis in the Ritter Ranch FEIR, as set forth in this EIR Addendum, and on implementation of the Final EIR mitigation measures to satisfy the CEQA requirements for the review of the Potential impacts of proposed VTTMs 51508-03, 63145, CDEV23-0002, and CUP 23-0018.

Additionally, California Government Code Section 65457 provides a CEQA exemption that allows residential development projects, subdivisions, and zoning changes to be exempt from Division 13 of the Public Resources Code. The exemption applies if the project is consistent with a specific plan that has an environmental impact report (EIR) certified after January 1, 1980, and if none of the factors that would trigger a supplemental environmental review have occurred. The exemption also has a shorter statute of limitations than other CEQA exemptions. This EIR Addendum demonstrates that no subsequent or supplemental EIR is required, and the Project is consistent with the Ritter Ranch Specific Plan. As such, the City has the authority to deem the Project exempt from CEQA.

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ERRATA TO THE ADDENDUM TO THE RITTER RANCH SPECIFIC PLAN (AND ASSOCIATED ANNEXATION AREAS) FINAL EIR

STATE CLEARINGHOUSE NO. 90010124

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January 2025

Errata to the EIR Addendum

INTRODUCTION TO THE ERRATA

Following publication of the Draft EIR Addendum (dated December 20, 2024, and considered at the January 16, 2025, Planning Commission hearing), City staff identified certain minor technical corrections to be incorporated into the Final EIR Addendum. This errata provides changes to the Draft EIR Addendum that have been made to clarify, correct, or supplement the information provided in that document. The changes described in this section do not add significant new information to the EIR Addendum, nor do these minor changes affect the EIR Addendum conclusion, that the Project is adequately addressed in the Final EIR Addendum and does not represent any new significant impact or substantially severe impact than addressed in the Final EIR Addendum.

Changes to the Draft EIR Addendum are listed by Section, page, paragraph, etc. to best guide the reader to the revision. Changes are identified as follows:

- Deletions are indicated by ~~strikeout text.~~
- Additions are indicated by <u>underline text.</u>

CHANGES TO THE EIR ADDENDUM

The following text is hereby incorporated into and revises the EIR Addendum:

Cover Page, Page 1

~~December 2024~~ <u>January 2025</u>

Project Approvals, Page 14

<u>The applicant is requesting approval of a Planned Development (CDEV 23-0002) for Phase 1B of Planning Area 5, which is implemented through a Conditional Use Permit (CUP 23-0018) as required by the SP. In conjunction with CDEV 23-002, the applicant is requesting approval of VTTM's 23-0003/23-0004 to reinstate the prior approved VTTMs5 1508-3 and 63145. The requested approvals would allow the subdivision of 75 acres for the comprehensive development and construction of 627 single-family residences (135 detached and 492 attached) and the associated open space, trails, neighborhood recreation areas, community parks, landscaping, public utility infrastructure, development identification signs, and public roadways/bikeways.</u> ~~The Project site covered by the proposed Project has a General Plan land use designation of Specific Plan (SP-Ritter Ranch) and is zoned Specific Plan. While the Ritter Ranch SP identifies a land use designation of SFA (single-family attached), in the prior PD approval for Phase 1A of Ritter Ranch, single-family detached homes were approved consistent with procedures and process provided in the Specific Plan. Single-family detached homes and single family attached units are proposed in the current PD and CUP applications consistent with procedures and process provided in the Specific Plan. Pursuant to the Specific Plan, the currently requested approvals do not require a General Plan Amendment, Specific Plan Amendment, or zone change.~~

~~The Project contemplates the approval of the two proposed VTTMs (VTTMs 51508-03 and 63145), proposed Ritter Ranch Phase 1B PD CDEV23-0002, and an associated residential planned development~~

~~CUP to authorize alternative lot and subdivision design standards that implement a portion of PA 5 (Ranch Center) of the approved Ritter Ranch SP.~~

Section 7.1 Aesthetics

1. The first paragraph on page 20 (last sentence) is revised as follows:

However, after implementation of Mitigation Measures 56 through 64~~5~~, significant impacts due to removal of natural habitat/open space, grading of hillsides and filling portions of natural stream courses, and increased lighting would remain.

Section 7.4 Biological Resources

1. Jurisdictional Drainages on page 28 (last sentence) is revised as follows:

The access road drainage course impacts would be addressed through Final EIR Mitigation Measure No~~s~~. ~~38 and 40~~48.

Section 7.10 Hydrology and Water Quality

1. The third paragraph on page 43 (last four sentences) is revised as follows:

~~The~~ Although a portion of the Project site is ~~also not~~ within the 100-year flood plain, per Mitigation Measure No. 31, below, all drainage facilities shall be designed and constructed in accordance with the City of Palmdale Drainage Master Plan and the Los Angeles County Hydrology Manual to the satisfaction of the City Engineer. In addition, ~~and~~ the Pacific Ocean is approximately 65 miles to the west of the Project site. Therefore, the proposed uses are not subject to flood hazards, tsunamis, or seiche hazards. Additionally, the storm drain infrastructure for the Project would be designed in compliance with the City Design Manual for 10-year, 25-year, and 50-year storm events.

Section 7.13: Noise

1. The first paragraph on Page 47 (6th sentence) is revised as follows:

To offset the anticipated noise impacts, the Ritter Ranch FEIR notes that buildout of the Ritter Ranch Specific Plan community should implement mitigation measures 51, 52, and 53~~, and 55~~.

Section 7.18: Wildfire

1. The second paragraph on page 64 (5th sentence) is revised as follows:

The Project would also be required to comply with applicable mitigation measures in the Ritter Ranch FEIR related to fire protection~~, including provision of a fire station,~~ and would be subject to the fuel modification zone requirements of the Ritter Ranch Specific Plan, which would address hazards associated with wildland fires.