

6. Significant Unavoidable Adverse Impacts

Chapter 1, *Executive Summary*, contains Table 1-3, which summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. While mitigation measures would reduce the level of impact, the following impacts would remain significant, unavoidable, and adverse after mitigation measures are applied:

Agricultural Resources

- **Impact 5.2-1:** Buildout of the Proposed Project would convert mapped important farmland in the Project Area to non-agricultural uses. No mitigation measures are available that would reduce the impacts of the conversion of mapped important farmland to less than significant. Efforts to preserve offsite farmland through agricultural or conservation easements, or mitigation banks, do not offset or decrease the reduction in total mapped important farmland due to the implementation of a project. This impact would remain significant and unavoidable.
- **Impact 5.2-5:** Buildout of the Proposed Project would indirectly result in the conversion of mapped important farmland to non-agricultural uses in the Project Area. Although goals and policies have been incorporated into the Proposed Project to protect farming operations from urbanization, these goals and policies cannot ensure that additional conversion of farmland will not occur. This impact would remain significant and unavoidable.

Air Quality

- **Impact 5.3-1:** Although the Proposed Project would generate less growth than the Adopted Area Plan, buildout of the Proposed Project would exceed the South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD) significance thresholds and would cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB) and Mojave Desert Air Basin (MDAB -Antelope Valley portion). Therefore, the Proposed Project would be inconsistent with SCAQMD's 2012 Air Quality Management Plan (AQMP) and AVAQMD's Ozone Attainment Plan. Mitigation measures incorporated into future development projects and adherence to the Proposed Project policies described in in Section 5.3.3 above would reduce criteria air pollutant emissions associated with buildout of the Proposed Project. Goals and policies included in the Proposed Project would facilitate continued County participation/cooperation with SCAQMD, AVAQMD, and Southern California Association of Governments (SCAG) to achieve regional air quality improvement goals, promote energy conservation design and development techniques, encourage alternative transportation modes, and implement transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management

6. Significant Unavoidable Adverse Impacts

plans due to the associated emissions that would be generated by the buildout of the Project Area in accordance with the Proposed Project. Impact 5.3-1 would remain significant and unavoidable.

- **Impact 5.3-2:** Construction activities indirectly associated with the buildout of the Proposed Project would generate criteria air pollutant emissions that would exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Mitigation Measure AQ-1 would reduce air pollutant emissions. However, due to the magnitude of emissions generated by future construction activities associated with the buildout of the Proposed Project, no additional mitigation measures are available that would reduce impacts below SCAQMD's and AVAQMD's thresholds. Impact 5.3-2 would remain significant and unavoidable.
- **Impact 5.3-3:** Buildout of the proposed land use plan would generate additional vehicle trips and area sources of criteria air pollutant emissions that exceed SCAQMD's and AVAQMD's regional significance thresholds and would contribute to the nonattainment designations of the SoCAB and Antelope Valley portion of the MDAB. Goals and policies are included in the Proposed Project that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by the buildout of the Proposed Project, no mitigation measures are available that would reduce impacts below SCAQMD's or AVAQMD's thresholds. Impact 5.3-3 would remain significant and unavoidable.
- **Impact 5.3-4:** Buildout of the Proposed Project could result in new sources of criteria air pollutant emissions and/or toxic air contaminants near existing or planned sensitive receptors. Goals and policies are included in the Proposed Project that would reduce concentrations of criteria air pollutant emissions and toxic air contaminants (TACs) generated by new development.

Review of projects by SCAQMD or AVAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure health risks are minimized. Mitigation Measure AQ-2 would ensure mobile sources of TACs not covered under SCAQMD or AVAQMD permits are considered during subsequent project-level environmental review. Development of individual projects would be required to achieve the incremental risk thresholds established by SCAQMD or AVAQMD, and TACs would be less than significant.

However, localized emissions of criteria air pollutants could exceed the SCAQMD or AVAQMD regional significance thresholds because of the scale of development activity associated with theoretical buildout of the Proposed Project. For this broad-based Proposed Project, it is not possible to determine whether the scale and phasing of individual projects would result in the exceedance of the localized emissions thresholds. Therefore, in accordance with the SCAQMD and AVAQMD methodology, Impact 5.3-4 would remain significant and unavoidable.

6. Significant Unavoidable Adverse Impacts

Biological Resources

- **Impact 5.4-1 and 5.4-2:** Development of the Proposed Project would impact, either directly or through habitat modifications, species identified as candidate, sensitive, or special-status in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.

Although direct impacts to special-status species would be mitigated and the Significant Ecological Areas (SEAs) also provides protection of important sensitive habitats, there is no mitigation provided to fully address the indirect impacts to special-status species through the loss of common (i.e., non-sensitive) habitats. Special-status species are dependent on a variety of habitat types (comprised of both common and sensitive habitats), and the conversion of common habitat types with the buildout of the Project would result in the overall reduction of habitat and resources to support special-status species. Thus, due to the loss of common habitats capable of supporting special-status species and diminished resource availability, impacts to special-status species and associated habitat remain significant and unavoidable at the Proposed Area Plan level.

- **Impact 5.4-4:** The Proposed Project would affect wildlife movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Implementation of the Proposed Project, which includes the expansion of the SEA boundaries, will have both direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. However, buildout of the Project will impact regional wildlife linkages and may impact nursery sites. Thus, buildout of the Project will have a significant adverse effect on wildlife movement and nursery sites.

Cultural Resources

- **Impact 5.5-1:** The federal, state, and local regulations stated above afford only limited protection to historic structures and would not ultimately prevent the demolition of a historic structure if preservation is determined to be infeasible. The determination of feasibility would occur on a case-by-case basis as future development applications on sites containing historic structures are submitted. Additionally, some structures that are not currently considered for historic value (as they must generally be at least 50 years or older) could become worthy of consideration during the planning period for the Proposed Project. While policies would minimize the probability of historic structures being demolished, these policies cannot ensure that the demolition of a historic structure would not occur. This is considered a significant unavoidable adverse impact.

6. Significant Unavoidable Adverse Impacts

Greenhouse Gas Emissions

- **Impact 5.7-1:** The goals and policies of the Proposed Project in addition to Mitigation Measures GHG-1 and GHG-2 would ensure that greenhouse gas (GHG) emissions from buildout of the Proposed Project would be minimized. However, additional statewide measures would be necessary to reduce GHG emissions under the Proposed Project to meet the long-term GHG reduction goals under Executive Order S-03-05 (S-03-05), which identified a goal to reduce GHG emissions to 80 percent of 1990 levels by 2050. The California Air Resources Board is currently updating the Scoping Plan to identify additional measures to achieve the long-term GHG reduction targets. At this time, there is no plan past 2020 that achieves the long-term GHG reduction goal established under S-03-05. As identified by the California Council on Science and Technology, the state cannot meet the 2050 goal without major advancements in technology (CCST 2012). Since no additional statewide measures are currently available, Impact 5.7-1 would remain significant and unavoidable.

Mineral Resources

- **Impact 5.11-1:** Future development pursuant to the Proposed Project could cause a loss of availability of known mineral resources within the Project Area. No mitigation measures are available that would reduce this impact to less than significant. Mineral resources are limited and nonrenewable and cannot be increased elsewhere to compensate for the loss of availability of mineral resources due to the buildout of the Proposed Project. Compensatory mitigation outside of the region is also infeasible. Such mitigation would not reduce the loss of availability of mineral resources in the Project Area due to the very high cost of transporting aggregate. Impact 5.11-1 would be significant and unavoidable.
- **Impact 5.11-2:** Implementation of the Proposed Project would cause a substantial loss of availability of mineral resources in one mineral extraction area identified in the Adopted General Plan: the Little Rock Wash area. No mitigation measures are available that would this impact to less than significant. Impact 5.11-2 impact would be significant and unavoidable.
- **Cumulative Impacts:** Cumulative projects in combination with the buildout of the Proposed Project would contribute to significant cumulative impacts in the Antelope Valley Region. Urbanization and growth in the cities adjacent to the unincorporated areas would have the potential to result in land uses that are incompatible with mining and resource recovery and would result in a cumulative loss of available resources. Similar to portions of the Project Area, the California Geological Survey has classified land within Palmdale and Lancaster into mineral resource zones. Adjacent cities have included protections in their general plans or other planning documents to protect these and other mineral resources. However, planned and projected growth in the region would result in a reasonably foreseeable loss of mineral resources due to the encroachment of incompatible uses that would limit future areas from being permitted for mining operations. No mitigation measures are available that would reduce this impact to less than significant; therefore, this impact would remain significant and unavoidable.

6. Significant Unavoidable Adverse Impacts

Noise

- **Impact 5.12-2:** Buildout of the Proposed Project would result in an increase in traffic on local roadways in the Project Area, which would substantially increase the existing ambient noise environment. No feasible mitigation measures are available to further reduce traffic noise impacts to existing noise sensitive receptors. Therefore, Impact 5.12 2 would remain significant and unavoidable.

Transportation and Traffic

- **Impact 5.16-1:** The impacted locations are still considered to be significantly impacted with mitigation. Because this is a program-level analysis, additional case-by-case mitigation analysis of impacts and mitigation will occur at the project level to determine more specific physical, program and policy-level mitigation measures to reduce the level of impact below a significant level.

Furthermore, inasmuch as the primary responsibility for approving and/or completing certain improvements lies with agencies other than the County (i.e., cities and Caltrans), there is the potential that significant impacts may not be fully mitigated if such improvements are not completed for reasons beyond the County's control (e.g., the County cannot undertake or require improvements outside of the County's jurisdiction or the County cannot construct improvements in the Caltrans right of way without Caltrans' approval). Therefore, Impact 5.16 1 would remain significant and unavoidable.

- **Cumulative Impacts:** Traffic analysis for the Proposed Project anticipates that the cumulative impact of the project traffic along with other regional growth at the identified ramp and freeway locations will be largely mitigated through a combination of regional programs that are the responsibility of other agencies such as cities and Caltrans. Future developers/project applicants will contribute its fair share to these regional programs, as applicable. However, if these programs are not in place, the cumulative transportation and traffic impacts would remain significant and unavoidable. Under these circumstances, the Proposed Project could result in a cumulatively significant traffic impact that may remain significant and unavoidable.

Utilities and Service Systems

- **Impact 5.17-3:** Adequate water supplies have been identified in the UWMP's for the Project Area for demand as projected through the year 2035. However, additional water supplies necessary to serve buildout of the Proposed Project, which is expected to occur beyond the year 2035, have not been identified for the Project Area. Considering current water supply constraints—including the record 2013–2014 California drought—it is uncertain whether the water districts serving the Project Area would be able to secure water supplies greater than those currently forecasted for 2035. Therefore, impacts of the Proposed Project buildout on water supplies are significant and unavoidable.

6. Significant Unavoidable Adverse Impacts

This page intentionally left blank.