

APPENDIX B

NOP Comment Letters



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

Notice of Preparation

July 25, 2016

To: Reviewing Agencies
Re: Avanti South Specific Plan
SCH# 2016071067



Attached for your review and comment is the Notice of Preparation (NOP) for the Avanti South Specific Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jocelyn Swain
City of Lancaster
44933 N. Fern Avenue
Lancaster, CA 93534

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016071067
Project Title Avanti South Specific Plan
Lead Agency Lancaster, City of

Type **NOP** Notice of Preparation

Description The Avanti South Specific Plan (SP 15-02) proposes a master planned community on approx. 307.6 within the southwestern portion of the City of Lancaster. The plan includes the following elements: 1,375 single family lots ranging from 2,800 sq. ft. to 7,500 sq. ft. including 431 age-targeted and active adult units; 325 apartment units; 14 acres of commercial uses; 12.8 acre elementary school; 1.3 acre fire station; 31 acres of parks and open space; and Trail network. The principal discretionary actions required of the City of Lancaster to implement the proposed project include the adoption of the Avanti South Specific Plan and approval of General Plan Amendment (GPA) 16-01, Zone Change (ZC) 16-01, and VTTM 74312.

Lead Agency Contact

Name Jocelyn Swain
Agency City of Lancaster
Phone 661-723-6249 **Fax**
email
Address 44933 N. Fern Avenue
City Lancaster **State** CA **Zip** 93534

Project Location

County Los Angeles
City Lancaster
Region
Cross Streets Avenue L, 70th Street West, Avenue K-8
Lat / Long
Parcel No. 3204008045/047, 3204001184/195
Township **Range** **Section** **Base** SBBM

Proximity to:

Highways
Airports
Railways
Waterways
Schools Quartz Hill HS
Land Use LU: Vacant
GP: Non Urban Residential/Urban Residential
Zoning: Specific Plan and RR-2.5

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; California Highway Patrol; Department of Housing and Community Development; Office of Emergency Services, California; Native American Heritage Commission; Caltrans, District 7; Regional Water Quality Control Board, Region 4

Date Received 07/25/2016 **Start of Review** 07/25/2016 **End of Review** 08/23/2016

2016071067

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Avanti South Specific Plan

Lead Agency: City of Lancaster

Contact Person: Jocelyn Swain

Mailing Address: 44933 Fern Avenue

Phone: 661-723-6249

City: Lancaster

Zip: 93534

County: Los Angeles

Project Location: County: Los Angeles

City/Nearest Community: Lancaster

Cross Streets: Avenue L, 70th Street West, Avenue K-8

Zip Code: 93536

Longitude/Latitude (degrees, minutes and seconds): ... Total Acres: 307.6

Assessor's Parcel No.: 3204008045/047, 3204001184/195

Section: ... Twp.: ... Range: ... Base: SBBM

Within 2 Miles: State Hwy #: N/A

Waterways: N/A

Airports: N/A

Railways: N/A

Schools: Quartz Hill HS

Document Type:

- CEQA: [X] NOP, [] Early Cons, [] Neg Dec, [] Mit Neg Dec
[] Draft EIR, [] Supplement/Subsequent EIR (Prior SCH No.), [] Other:
NEPA: [] NOI, [] EA, [] Draft EIS, [] FONSI
Other: [] Joint Document, [] Final Document, [] Other:

GOVERNOR'S OFFICE OF PLANNING & RESEARCH
JUL 25 2016

Local Action Type:

- [] General Plan Update, [X] General Plan Amendment, [] General Plan Element, [] Community Plan
[X] Specific Plan, [] Master Plan, [] Planned Unit Development, [] Site Plan
[X] Rezone, [] Prezone, [] Use Permit, [X] Land Division (Subdivision, etc.)
[] Annexation, [] Redevelopment, [] Coastal Permit, [] Other:

STATE CLEARINGHOUSE

Development Type:

- [X] Residential: Units 1700 Acres
[] Office: Sq.ft. Acres Employees
[X] Commercial: Sq.ft. Acres 14 Employees
[] Industrial: Sq.ft. Acres Employees
[X] Educational: 12.8 acre elementary school
[X] Recreational: 31 acres of parks/open space
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[X] Other: fire station

Project Issues Discussed in Document:

- [X] Aesthetic/Visual, [] Agricultural Land, [X] Air Quality, [X] Archeological/Historical, [X] Biological Resources, [] Coastal Zone, [] Drainage/Absorption, [] Economic/Jobs
[] Fiscal, [] Flood Plain/Flooding, [] Forest Land/Fire Hazard, [X] Geologic/Seismic, [] Minerals, [X] Noise, [X] Population/Housing Balance, [X] Public Services/Facilities
[X] Recreation/Parks, [X] Schools/Universities, [] Septic Systems, [X] Sewer Capacity, [X] Soil Erosion/Compaction/Grading, [X] Solid Waste, [X] Toxic/Hazardous, [X] Traffic/Circulation
[] Vegetation, [X] Water Quality, [X] Water Supply/Groundwater, [] Wetland/Riparian, [X] Growth Inducement, [X] Land Use, [X] Cumulative Effects, [] Other:

Present Land Use/Zoning/General Plan Designation:

Land use: vacant, General Plan: Non Urban Residential/Urban Residential, Zoning: Specific Plan and RR-2.5

Project Description: (please use a separate page if necessary)

The Avanti South Specific Plan (SP 15-02) proposes a master planned community on approximately 307.6 within the southwestern portion of the City of Lancaster. The plan includes the following elements: 1,375 single family lots ranging from 2,800 square feet to 7,500 square feet including 431 age-targeted and active adult units; 325 apartment units; 14 acres of commercial uses; 12.8 acre elementary school; 1.3 acre fire station; 31 acres of parks and open space; and Trail network. The principal discretionary actions required of the City of Lancaster to implement the proposed project include the adoption of the Avanti South Specific Plan and approval of General Plan Amendment (GPA) 16-01, Zone Change (ZC) 16-01, and VTTM 74312.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
 West Sacramento, CA 95691
 Phone (916) 373-3710
 Fax (916) 373-5471
 Email: nahc@nahc.ca.gov
 Website: <http://www.nahc.ca.gov>
 Twitter: @CA_NAHC



July 27, 2016

Jocelyn Swain
 City of Lancaster
 44933 N. Fern Avenue
 Lancaster, CA 93534

sent via e-mail:
jswain@cityoflanasterca.org

RE: SCH# 2016071067; Avanti South Specific Plan Project, Draft Environmental Impact Report, Los Angeles County, California

Dear Ms. Swain:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - I. Planning and construction to avoid the resources and protect the cultural and natural context.

- ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)). *This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,



Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

August 4, 2016

Jocelyn Swain, Principal Planner
City Of Lancaster
Community Development Division
44933 Fern Avenue
Lancaster, CA 93535

Dear Jocelyn Swain:

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
"THE AVANTI SOUTH PROJECT," (SP 15-02 / GPA 16-01 / ZC 16-01 / VTTM 74312),
IS PROPOSING A MASTER PLANNED COMMUNITY ON APPROXIMATELY 307.6
WITHIN THE SOUTHWESTERN PORTION OF THE CITY OF LANCASTER,
(ANTELOPE VALLEY AREA), FFER 201600117**

The has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

This area currently has a rural level of fire protection and emergency medical services. This project will need to include provisions for a fire station facility to serve the urban-level development of this mater planned community.

Specifics of the location and configuration of the fire station site must be approved by the Chief of the Fire Department's Planning Division, Debbie Aguirre. She can be reached at (323) 881-2404.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY

DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLENDORA
HAWAIIAN GARDENS
HAWTHORNE

HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANAÑA FLINTRIDGE
LA HABRA

LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA
LYNWOOD

MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA

POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAG
WHITTIER

LAND DEVELOPMENT UNIT:

1. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
3. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.
4. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
5. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.
6. Fire Department requirements for access, fire flows, and hydrants are addressed during the building permit stage.
7. The development may require fire flows up to 8,000 gallons per minute at 20 lbs. per square inch residual pressure for up to a four-hour duration, as outlined in the 2014 County of Los Angeles Fire Code Appendix B105.1. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
8. Fire hydrant spacing shall be based on fire flow requirements, as outlined in the 2014 County of Los Angeles Fire Code Appendix C. Additional hydrants will be required if hydrant spacing exceeds specified distances.
9. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

13. The 28 feet in width shall be increased to:
 - a. Thirty-four feet in width when parallel parking is allowed on one side of the access way.
 - b. Thirty-six feet in width when parallel parking is allowed on both sides of the access way.
 - c. Any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map and final building plans.
 - d. For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
14. When serving land zoned for residential uses having a density of more than four units per net acre:
 - a. A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length.
 - b. The length of the cul-de-sac may be increased to 1000 feet if a minimum of 36 feet in width is provided.
 - c. A Fire Department approved turning area shall be provided at the end of a cul-de-sac.
15. Fire hydrant spacing shall be 600 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.
 - b. No portion of a structure should be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant.
 - c. When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.
 - d. Additional hydrants will be required if hydrant spacing exceeds specified distances.

16. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
17. Streets or driveways within the development shall be provided with the following:
 - a. Provide 36 feet in width on all streets where parking is allowed on both sides.
 - b. Provide 34 feet in width on cul-de-sacs up to 700 feet in length. This allows parking on both sides of the street.
 - c. Provide 36 feet in width on cul-de-sacs from 701 to 1,000 feet in length. This allows parking on both sides of the street.
 - d. For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road.
18. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.
19. All access devices and gates shall meet the following requirements:
 - a. Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width clear-to-sky.
 - b. Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d. All limited access devices shall be of a type approved by the Fire Department.
 - e. Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.

Jocelyn Swain, Principal Planner
August 4, 2016
Page 6

20. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.
21. Provide three sets of alternate route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction. Complete architectural/structural plans are not necessary.
22. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

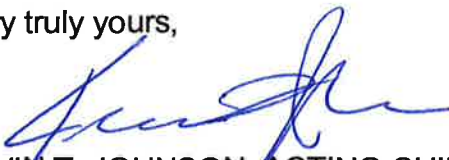
The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department advises that the proposed public school within the future subject site development would require environmental assessment to be overseen by the CalEPA, Department of Toxic Substances Control.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:cc

Lahontan Regional Water Quality Control Board

August 9, 2016

File: Environmental Doc Review
Los Angeles County

Jocelyn Swain, Principal Planner
Development Services Department
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534
Email: jswain@cityoflancafterca.org

Comments on the Notice of Preparation of an Environmental Impact Report for the Avanti South Specific Plan Project, City of Lancaster, Los Angeles County

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project (Project) on July 18, 2016. The NOP, which included a brief Project description and proposed Land Use Plan, was prepared by the city of Lancaster (City) and submitted in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We encourage the City to take this opportunity to integrate elements into the Project that (1) promote watershed management, (2) support low impact development (LID), (3) reduce the effects of hydromodification, and (4) encourage recycled water uses. Our comments on the NOP are outlined below.

PROPOSED PROJECT

The Avanti South Specific Plan proposes a master planned community on approximately 308 acres within the southwestern portion of the city of Lancaster. The Project includes 1,375 single family residences, 325 apartment units, 14 acres dedicated to commercial uses, an elementary school site, a fire station, 31 acres of park and open space, a trail network, and associated roadway and utility improvements.

AUTHORITY

All groundwater and surface waters are considered waters of the State. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some

waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at

http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml.

RECOMMENDED ELEMENTS TO INCLUDE IN THE PROJECT

We encourage the City to take this opportunity and incorporate into the Project elements that promote watershed management, support LID, reduce the effects of hydromodification, and encourage recycled water uses. We recommend the following be included as part of the proposed Project and considered environmental review.

1. **A Watershed Approach** – Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of our region. The City is located within the Lancaster Hydrologic Area (626.50) of the larger Antelope Valley watershed.

The watershed approach for managing water resource quality and quantity is a collaborative process that focuses public and private efforts on the highest priority problems within a drainage basin. The Antelope Valley Integrated Regional Water Management Group has assembled a collaborative group of stakeholders, both public and private, to address both water quantity and water quality issues within the Inyo and Mono basins. A number of water management plans are being developed through that stakeholder collaboration process, and strategies continue to be developed and refined to sustain water quantity and to manage salts and nutrients to maintain the quality of groundwater and surface water resources. The City is encouraged to play an active stakeholder role in the development of these plans and to incorporate the applicable implementation strategies into their Plan.

2. **Low Impact Development Strategies** – The foremost method of reducing impacts to watersheds from development is LID, the goals of which are maintaining a landscape functionally equivalent to predevelopment hydrologic conditions and minimal generation of non-point source pollutants. LID results in

less surface runoff and potentially less impacts to receiving waters, the principles of which include:

- Maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge;
- Reducing compacted and impervious cover created by development and the associated road network; and
- Managing runoff as close to the source as possible.

LID development practices that maintain aquatic values also reduce local infrastructure requirements and maintenance costs and benefit air quality, open space, and habitat. Vegetated areas for storm water management and infiltration onsite are valuable in LID. We encourage the City to establish LID implementation strategies for all types of development projects, particularly for master planned communities where people live, work, and play.

3. **Urban Storm Water Management** – Because increased runoff from developed areas is a key variable driving a number of other adverse effects, attention to maintaining the pre-development hydrograph will prevent or minimize many problems and will limit the need for other analyses and mitigation. However, traditional methods for managing urban storm water do not adequately protect the environment and tend to treat symptoms instead of causes. Such practices have led to channelization and stream armoring that permanently alter stream habitat, hydrology, and aesthetics, resulting in overall degradation of a watershed.

Storm water control measures that are compatible with LID are preferred over more traditional methods. Examples include the use of bioretention swales, pervious pavement, and vegetated infiltration basins, all of which can effectively treat post-construction storm water runoff, help sustain watershed processes, protect receiving waters, and maintain healthy watersheds. Any particular one of these control measures may not be suitable, effective, or even feasible on every site, but the right combination, in the right places, can successfully achieve these goals.

We encourage the City to establish guidelines for implementing specific storm water control measures into the Project. Additional information regarding sustainable storm water management can be accessed online at http://www.waterboards.ca.gov/water_issues/programs/low_impact_development.

4. **Hydromodification** – Hydromodification is the alteration of the natural flow of water through a landscape (i.e. lining channels, flow diversions, culvert installations, armoring, etc.). Disturbing and compacting soils, changing or removing the vegetation cover, increasing impervious surfaces, and altering

drainage patterns limit the natural hydrologic cycle processes of absorption, infiltration, and evapotranspiration, and increases the volume and frequency of runoff and sediment transport. Hydromodification typically results in stream channel instability, water quality degradation, changes in groundwater recharge processes, impacts to aquatic habitats, and disconnecting of a stream channel from its floodplain. Floodplain areas provide natural recharge, attenuate flood flows, provide habitat, and filter pollutants from urban runoff. Floodplain areas also store and release sediment, one of the essential processes to maintain the health of the watershed. Information regarding hydromodification can be accessed online at http://www.waterboards.ca.gov/water_issues/programs/stormwater/hydromodification.shtml.

We encourage the City to establish guidelines and develop mitigation measures that will help to avoid hydromodification from this Project and from future projects. The guidelines should include maintaining natural drainage paths of streams and creeks and establishing buffers and setback requirements to protect channels, wetlands, and floodplain areas from encroaching development.

5. **Recycled Water Uses** – The State Water Resources Control Board adopted the Recycled Water Policy in February 2009 (effective May 14, 2009, and amended January 22, 2013). The purpose of the policy is to increase the use of recycled water from municipal wastewater sources, in a manner that implements state and federal water quality laws, as a means towards achieving sustainable local water supplies. The Recycled Water Policy establishes goals and mandates for recycled water use. The mandates are to increase the use of recycled water from the amount used in 2009 by 200,000 acre-feet per year by 2020 and by 500,000 acre-feet per year by 2030. Incentives for implementing recycled water projects include grant opportunities and priority funding. The City is encouraged to consider the use of recycled water as an implementation strategy in their Project to reduce demand on groundwater resources.
6. **Beneficial Uses** – The Project area is located within Lancaster Hydrologic Area (626.50) of the Antelope Valley Hydrologic Unit and overlies the Antelope Valley Groundwater Basin No. 6-44. The beneficial uses of these waters are listed either by watershed (for surface waters) or by groundwater basin in Chapter 2 of the Basin Plan. The EIR should identify and list the beneficial uses of all water resources within the Project area and include an analysis of the potential impacts to water quality and hydrology with respect to those beneficial uses.
7. **Water quality objectives** – Water quality objectives and standards, both numerical and narrative, for all waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water. It is these objectives and

standards that should be used in the environmental review when evaluating thresholds of significance for Project impacts.

8. **Storm Water Pollution Prevention Plan** – A Project-specific Storm Water Pollution Prevention Plan and implementation of site-specific erosion and sediment control BMPs is an effective way to reduce potentially significant water quality impacts to a less than significant level. To that end, we recommend that the City require the Project proponent develop and implement of a Project-specific SWPPP during both the construction and post-construction phases of the Project. The SWPPP should be applicable to all areas of the Project site. Please note that temporary BMPs need to be implemented for the Project until such time that permanent BMPs are in place and functioning.

PERMITTING REQUIREMENTS

A number of activities associated with the proposed Project may have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Board or Lahontan Water Board. The required permits may include the following.

9. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board. All unavoidable permanent impacts to waters of the State must be mitigated to ensure no net loss of beneficial use and wetland function and value. Water Board staff coordinate mitigation requirements with staff from federal and other state regulatory agencies. In determining appropriate mitigation ratios for impacts to waters of the State, we consider Basin Plan requirements (minimum 1.5 to 1 mitigation ratio for impacts to wetlands) and utilize *12501-SPD Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios*, published December 2012 by the US Army Corps of Engineers, South Pacific Division.
10. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.
11. Recycled water use may require General WDRs under WQO 2009-0006-DWQ (specifically for landscape irrigation uses), or under WQO-2014-0090-DWQ (for all other authorized uses), both issued by the Lahontan Water Board.

We request that the EIR recognize the potential permits that may be required, as outlined above, and identify the specific activities that may trigger these permitting

actions in the appropriate sections of the environmental document. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan/>.

Thank you for the opportunity to comment on the NOP. If you have any questions regarding this letter, please contact me at (760) 241-7376 jan.zimmerman@waterboards.ca.gov or Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404 patrice.copeland@waterboards.ca.gov. Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse No. and Project name in the subject line.



Jan M. Zimmerman, PG
Engineering Geologist

cc: California Department of Fish and Wildlife (AskRegion6@wildlife.ca.gov)

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August 4, 2016

City of Lancaster
Attn: Jocelyn Swain, Principal Planner- Environmental
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain:

Although late, I attended the meeting on July 27th at the Cedar Center. Many of the people at this meeting resonating the same thoughts that I have regarding the Avanti South/ West project. This project represents the worst use of this land. The Avanti project will produce more traffic, more congestion, on the schools, facilities, and more crime.

The City of Lancaster has no intention of providing a better quality of life for its residents The whole purpose and intent of this project is to provide patrons for the Walmart (60th and L) . Most of the residents of this development will have limited income and resources and will add greatly to Walmart's coffers at the expense of the residents of the Westside.

The City of Lancaster's motto is "it's positively clear."

"It's positively clear," that the City of Lancaster is more interested in making a profit, than providing a quality place for its residents to live.

"It's positively clear," that the City of Lancaster is more interested in attracting residents with limited resources.

"It's positively clear,"that the City of Lancaster is more interested in attracting crime than deterring crime.

"It's positively clear," that the City of Lancaster will let Royal Investors build whatever they want to build.

"It's positively clear,"that the City of Lancaster does not give a damn about the Westside or its residents.

2

My family moved to Lancaster in 1964, it was a small town, filled with honest, hardworking and modest income people. At that time Lancaster was unincorporated area of LA County. Today the City of Lancaster has helped my community transform into one with a significant amount of poverty, crime, unemployment, homelessness, and other social problems.

Sincerely,

Lisa Fourr
Property Owner
K-6 / 62nd Street West



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

August 15, 2016

Ref. Doc. No.: 3807941

Ms. Joceyln Swain
Principal Planner - Environmental
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534-2461

Dear Ms. Swain:

Comment Letter for The Avanti South Project

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on July 19, 2016. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Avenue "J" West Trunk Sewer, located in Avenue J at 60th Street West. The Districts' 36-inch diameter trunk sewer has a capacity of 15.9 million gallons per day (mgd) and conveyed a peak flow of 2.6 mgd when last measured in 2014.
2. The wastewater generated by the proposed project will be treated at the Lancaster Water Reclamation Plant, which has a capacity of 18 mgd and currently processes an average flow of 12.9 mgd.
3. The expected average wastewater flow from the proposed project, described in the notice as 1,375 single family lots including 431 age-targeted and active adult units, 325 apartment units, 14 acres of commercial uses, 12.8 acres of elementary school, and a 1.3-acre fire station, is 1,503,233 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the [Table 1, Loadings for Each Class of Land Use](#) link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the

Sewerage System and applicable connection fees, the Districts' Chief Engineer will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

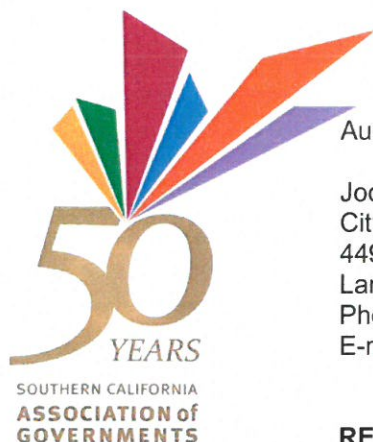
Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: D. Curry
M. Sullivan
M. Tatalovich



August 15, 2016

Jocelyn Swain, Principal Planner - Environmental
City of Lancaster
44933 Fern Avenue
Lancaster, California 93534
Phone: (661) 723-6182
E-mail: jswain@cityoflanasterca.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Avanti South Project [SCAG NO. IGR8936]

Main Office
818 West 7th Street
12th Floor
Los Angeles, California
90017-3435
t (213) 236-1800
f (213) 236-1825
www.scag.ca.gov

Dear Ms. Swain,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Avanti South Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ Guidance provided by these reviews is intended to assist local agencies such as local jurisdictions and project proponents to take actions that help contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Avanti South Project in Los Angeles County. The proposed project includes consists of a Specific Plan to develop a master community on approximately 307.6 acres. The Specific Plan consists of 1,375 single family lots, 325 apartment units, 14 acres of commercial use, a 12.8 acre elementary school, a 1.3 acre fire station, 31 acres of parks and open space, and trail network.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Acting Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
AVANTI SOUTH PROJECT [SCAG NO. IGR8936]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>

*SCAG does not yet have an agreed-upon security performance measure.

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Lancaster Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	167,400	195,800	209,900
Households	6,458,000	7,325,000	7,412,300	52,400	61,000	65,300
Employment	8,414,000	9,441,000	9,871,500	51,700	56,700	59,600

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG’s Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

August 16, 2016

Jocelyn Swain, Principal Planner
City Of Lancaster
Environmental Section
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain:

NOTICE OF PREARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, SP 15-02 / GPA -ZC 16-01 / VTTM 74312, "AVANTI SOUTH PROJECT," PROPOSES A MASTER PLANNED COMMUNITY ON APPROXIMATELY 307.6 WITHIN THE SOUTHWESTERN PORTION OF THE CITY, LANCASTER, FFER 201600129

The has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

This area currently has a rural level of fire protection and emergency medical services. This project will need to include provisions for a fire station facility to serve the urban-level development of this mater planned community.

Specifics of the location and configuration of the fire station site must be approved by the Chief of the Fire Department's Planning Division, Debbie Aguirre. She can be reached at (323) 881-2404.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY

DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLENORA
HAWAIIAN GARDENS
HAWTHORNE

HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA FLINTRIDGE
LA HABRA

LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWNDALE
LOMITA
LYNWOOD

MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA

POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAG
WHITTIER

LAND DEVELOPMENT UNIT:

1. The proposed development may necessitate multiple ingress/egress access for the circulation of traffic and emergency response issues.
2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
3. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.
4. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
5. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.
6. The development may require fire flows up to 8,000 gallons per minute at 20 per square inch residual pressure for up to a four-hour duration, as outlined in the 2014 County of Los Angeles Fire Code Appendix B. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.
7. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d. When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.

- e. A cul-de-sac shall not be more than 500 feet in length when serving land zoned for commercial use.
8. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
 - c. Additional hydrants will be required if hydrant spacing exceeds specified distances.
 - d. When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.
 - e. A cul-de-sac shall not be more than 500 feet in length when serving land zoned for commercial use.
9. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
10. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.
11. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
 - a. Provide 34 feet in-width when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
 - b. Provide 42 feet in-width when parallel parking is allowed on each side of the access roadway/driveway.
 - c. Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map and final building plans.

- d. For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
12. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
 - a. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
 - b. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced fire hydrant.
 - c. When cul-de-sac depth exceeds 200 feet, hydrants will be required at the corner and mid-block.
 - d. Additional hydrants will be required if the hydrant spacing exceeds specified distances.
 13. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
 14. All on-site driveways shall provide a minimum unobstructed width of 28 feet clear-to-sky. The 28 foot width does not allow for parking and shall be designated as a "Fire Lane" and have appropriate signage. The centerline of the on-site driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building.
 15. The 28 feet in width shall be increased to 34 feet in width when parallel parking is allowed on one side of the access way; 36 feet in width when parallel parking is allowed on both sides of the access way; any access way less than 34 feet in width shall be labeled "Fire Lane" on the final recording map, and final building plan. For streets or driveways with parking restrictions, the entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.
 16. When serving land zoned for residential uses having a density of more than four units per net acre:

- a. A cul-de-sac shall be a minimum of 34 feet in width and shall not be more than 700 feet in length.
 - b. The length of the cul-de-sac may be increased to 1000 feet if a minimum of 36 feet in width is provided.
 - c. A Fire Department approved turning area shall be provided at the end of a cul-de-sac.
17. Single family detached homes shall require a minimum fire flow of 1,250 gallons per minute at 20 pounds per square inch residual pressure for two-hour duration. Two family dwelling units (duplexes) shall require a fire flow of 1,500 gallons per minute at 20 pounds per square inch residual pressure for two-hour duration. When there are five or more units taking access on a single driveway, the minimum fire flow shall be increased to 1,500 gallons per minute at 20 pounds per square inch residual pressure for two-hour duration.
18. Fire hydrant spacing shall be 600 feet and shall meet the following requirements:
- a. No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.
 - b. No portion of a structure should be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant.
 - c. When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.
 - d. Additional hydrants will be required if hydrant spacing exceeds specified distances.
19. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
20. Fire Department access shall provide a minimum unobstructed width of 28 feet clear-to-sky and be within 150 feet of all portions of the exterior walls of the first story of any single unit. If exceeding 150 feet, provide 20 feet minimum paved width "Private Driveway/Fire Lane" clear-to-sky to within 150 feet of all portions of the exterior walls of the unit. Fire Lanes serving three or more units shall be increased to 26 feet.
21. Streets or driveways within the development shall be provided with the following:
- a. Provide 36 feet in width on all streets where parking is allowed on both sides.

- b. Provide 34 feet in width on cul-de-sacs up to 700 feet in length. This allows parking on both sides of the street.
 - c. Provide 36 feet in width on cul-de-sacs from 701 to 1,000 feet in length. This allows parking on both sides of the street.
 - d. For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use. - Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road.
22. All access devices and gates shall comply with California Code of Regulations, Title 19, Articles 3.05 and 3.16.
23. All access devices and gates shall meet the following requirements:
- a. Any single gated opening used for ingress and egress shall be a minimum of 26 feet in-width clear-to-sky.
 - b. Any divided gate opening (when each gate is used for a single direction of travel i.e., ingress or egress) shall be a minimum width of 20 feet clear-to-sky.
 - c. Gates and/or control devices shall be positioned a minimum of 50 feet from a public right-of-way and shall be provided with a turnaround having a minimum of 32 feet of turning radius. If an intercom system is used, the 50 feet shall be measured from the right-of-way to the intercom control device.
 - d. All limited access devices shall be of a type approved by the Fire Department.
 - e. Gate plans shall be submitted to the Fire Department prior to installation. These plans shall show all locations, widths, and details of the proposed gates.
24. All proposals for traffic calming measures (speed humps/bumps/cushions, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review prior to implementation.
25. Provide three sets of alternate route (detour) plans with a tentative schedule of planned closures prior to the beginning of construction. Complete architectural/structural plans are not necessary.

Jocelyn Swain, Principal Planner
August 16, 2016
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26. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows, and hydrants are addressed during the subdivision tentative map stage.

The County of Los Angeles Fire Department's Land Development Unit appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

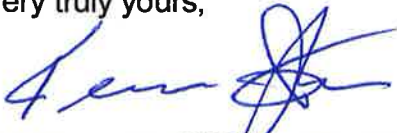
The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department previously provided our comments regarding this project in December 2015. HHMD has no additional comments at this time.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:cc

Swain, Jocelyn

From: Jeff Nichols <jcnenterprises@yahoo.com>
Sent: Friday, August 26, 2016 6:56 PM
To: Swain, Jocelyn; Karen Wiley
Subject: Avante north and south projects

Jocelyn, please add me and my wife, Karen, to the public notifications and meetings about the avante n&s project. I am very concerned about the proposed lot sizes and the apartment complexes being proposed for two reasons. First and foremost is the crime rate increase based on the amount of people this plan will bring with 2800 sqft lots and apartments. Secondly is the traffic increase and what is the plan to increase road throughput prior to home construction.

I would appreciate any information that you can currently provide me on the details of this project and the proposed timelines. Additionally the details on the next public meeting.

Thank you, Jeff and Karen Nichols

Sent from Yahoo Mail for iPhone