



Draft
Environmental Impact Report Appendices

for the

Lancaster Health District Master Plan



SCH No. 2017051076 | **December 2020**

Prepared for:
City of Lancaster

Development Services Department
Community Development Division
44933 Fern Avenue, Lancaster, California 93534

Prepared by:
Meridian Consultants

Westlake Village Office
920 Hampshire Road, Suite A5
Westlake Village, California 91361

Los Angeles Office
706 S. Hill Street, 11th Floor
Los Angeles, California 90014

APPENDIX A

Notice of Preparation and Comment Letters

APPENDIX A.1

Revised Notice of Preparation

REVISED NOTICE OF PREPARATION (SCH # 2017051076)

LANCASTER HEALTH DISTRICT MASTER PLAN


(GENERAL PLAN AMENDMENT NO. 17-03/ZONE CHANGE NO. 17-03)

DATE: APRIL 1, 2020

TO: STATE CLEARINGHOUSE AND INTERESTED PARTIES

FROM: CITY OF LANCASTER DEVELOPMENT SERVICES DEPARTMENT,
COMMUNITY DEVELOPMENT DIVISION

SUBJECT: REVISED NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL
IMPACT REPORT FOR LANCASTER HEALTH DISTRICT MASTER PLAN (SCH #
2017051076)



The City of Lancaster is releasing a revised NOP for the Lancaster Health District Master Plan as a result of a significant increase in the amount of development to be allowed through the Master Plan. All comments submitted will be added to those previously received and included in the Draft EIR. The 30-day comment period for the revised NOP is from March 20, 2020 to April 20, 2020. No additional scoping meetings will be held.

Pursuant to Section 15082(a) of the California Environmental Quality Act, the City of Lancaster is the Lead Agency in charge of environmental review for the proposed Lancaster Health District Master Plan ("Project"). The City has determined that an Environmental Impact Report (EIR) shall be prepared to evaluate potential effects on the environment. The City is soliciting comments from reviewing agencies and the public regarding the scope and content of the EIR. For reviewing agencies, the City requests comments with respect to your agency's statutory authority pertaining to the proposed Project. Your agency may need to use the EIR prepared by the City when considering any applicable permits or other approvals for the Project. The City is also seeking comments from residents, property owners, and other interested parties regarding the potential environmental effects the City should address in this EIR.

Comment Period: Comments may be sent anytime during the 30-day NOP comment period. The original NOP review and comment period started on May 31, 2017 and ended on June 29, 2017. The review and comment period for the Revised NOP starts on **April 1, 2020** and ends on **May 1, 2020**. All comments must be received during the comment period and no later than 6 p.m. on May 1, 2020. Please include the name of a contact person for your agency, if applicable. All comments should be directed to:

City of Lancaster
Attn: Jocelyn Swain, Senior Planner
44933 Fern Avenue
Lancaster, CA 93534

Comments may also be emailed to jswain@cityoflancasterca.org or faxed to (661) 723-6182.

Scoping Meeting: A scoping meeting was previously held on Wednesday, May 31, 2017 at the Cedar Center for the Arts located at 44851 Cedar Avenue, Lancaster, California 93534. No additional scoping meetings have been scheduled for this project.

Project Location: The Lancaster Health District Master Plan addresses approximately 288 gross acres in the central portion of the City of Lancaster (“project site”). Specifically, the project site is located south of Avenue J; north of Avenue K; east of 20th Street West and State Route 14; and west of Kingtree Avenue (see Figures 1 and 2). The proposed project encompasses the following assessor’s parcel numbers: 3123-001-004, 005, 028, 042, 045, 062, 068, 069, 901, 904, 908, 909, 912, 914, 915, 917, 920 to 922; 3123-002-031, 032, 034, 047, 050, 051, 059 thru 066, 903, 907, 909; 3123-003-086 thru 089, 094 thru 101; 3123-004-024, 027, 037, 038, 040, 042, 045 thru 048, 903, 904, 907 thru 910; 3123-012-015, 041; 3123-013-036, 041, 068, 101, 900, 901; 3123-014-900 thru 916; 3123-015-026 thru 028, 030, 033, 035, 900 thru 908; and 3123-016-004, 005, 085, 904, 905.

Existing Environmental Conditions: The project site consists of land developed with a variety of commercial, retail, and medical facilities, as well as vacant land, undeveloped land containing native and nonnative vegetation, including several ornamental trees. The existing Antelope Valley Hospital is located in the north-central portion of the project site. The Amargosa Creek/flood control channel forms the southwestern boundary and intersects the southern portion of the project site. The project site is surrounded by developed areas and has been disturbed from compaction of soil, dumping and excavation, off-road vehicle use, and other man-made disturbances.

Project Description: The City of Lancaster is proposing to develop the Lancaster Health District Master Plan, which would provide direction for development around the Antelope Valley Hospital over a 20-year period. Mixed-use development is proposed including medical and general offices, retail and commercial uses, housing, and hotel/conference space. The Master Plan defines a vision for the long-term improvements that would enable the City and Antelope Valley Hospital to transform the existing urban character toward a pedestrian-oriented, transit-oriented, mixed-use district that would support medical institutions and health-related businesses.

The maximum development allowed by the Master Plan will be analyzed in the EIR to provide a conservative estimate of the potential impacts from the Project. Specifically, the Master Plan would allow for the development of 1,600 residential units; 259,200 sf of hotel uses (180 rooms) and a 70,000 sf conference center; 740,000 sf of commercial/office space; 480,000 sf of continuum of care facilities; 791,000 sf of acute care facilities including replacing the existing

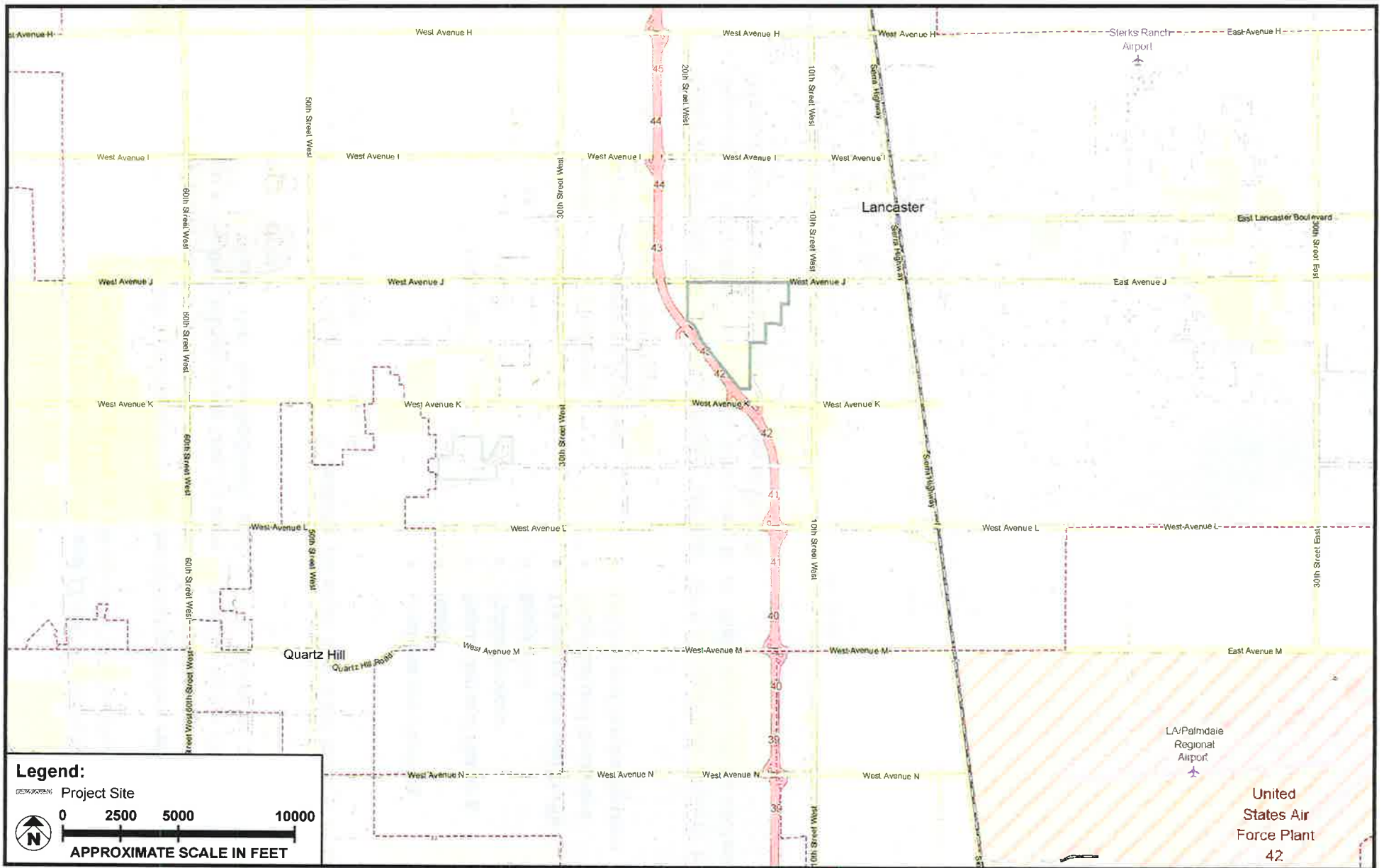
hospital with a new 700,000 sf facility (380 beds) and 12,000 sf plant facility; 249,800 sf of sub-acute care facilities and a 385,000 sf parking car garage with 1,100 parking spaces.

The City of Lancaster will consider approval of the following actions related to the proposed Lancaster Health District Master Plan: 1) General Plan Amendment to change the land use designation to Health District Mixed Use; 2) Zone Change to Health District Mixed Use and Health District Mixed Use Neighborhood; and 3) the formation of an infrastructure Maintenance District.

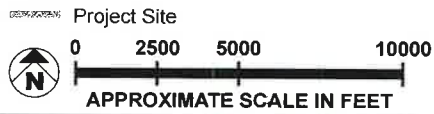
Scope of the EIR: The City proposes to evaluate potential significant impacts related to the following environmental topics in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

Based on the site, the proposed Project will not result in significant impacts to Mineral Resources or Agricultural and Forestry Resources; there, these topics will be addressed in the Effects Found Not to be Significant section of the EIR.



Legend:



SOURCE: © OpenStreetMap contributors - 2017



APPENDIX A.2

Comment Letters



NATIVE AMERICAN HERITAGE COMMISSION

April 6, 2020

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

CHAIRPERSON
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Luiseño

VICE CHAIRPERSON
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Stenslie**
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[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

Re: 2017051076, Lancaster Health District Master Plan NOP (Revised) Project, Los Angeles County

Dear Ms. Swain:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a 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 §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, § 5064 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 within the area of potential 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, a notice of negative declaration, or a 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 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, subs. (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 §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 §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 §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 §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 §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 non-federally 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 §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §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 §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

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 §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 §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 already been 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, § 15064.5(f) (CEQA Guidelines § 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 § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 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.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

State of California – Natural Resources Agency

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

DEPARTMENT OF FISH AND WILDLIFE

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov



April 17, 2020

Ms. Jocelyn Swain
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534
jswain@cityoflanasterca.org

Subject: Revised Notice of Preparation of a Draft Environmental Impact Report for Lancaster Health District Master Plan, SCH #2017051076, City of Lancaster, Los Angeles County

Dear Ms. Swain:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) for the Lancaster Health District Master Plan (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & Game Code, §§ 711.7, subdivision (a) & 1802; Public Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, §1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Ms. Jocelyn Swain
City of Lancaster
April 17, 2020
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Project Description and Summary

Objective: The City of Lancaster (City) is proposing the Project, which would provide direction for development around the Antelope Valley Hospital over a 20-year period. Mixed-use development is proposed, including medical and general offices, retail and commercial uses, housing, and hotel/conference space. The Project would allow for the development of 1,600 residential units; 259,200 square feet (ft²) of hotel uses and a 70,000 ft² conference center; 740,000 ft² of commercial/office space; 480,000 ft² of continuum of care facilities; 791,000 ft² of acute care facilities including replacing the existing hospital with a new 700,000 ft² facility (380 beds) and 12,000 ft² plant facility; 249,800 ft² of subacute care facilities and a 385,000 ft² parking car garage.

Location: The Project addresses approximately 288 gross acres in the central portion of the City of Lancaster. Specifically, the Project site is located south of Avenue J; north of Avenue K; east of 20th Street West and State Route 14; and west of Kingtree Avenue. The proposed Project encompasses the following assessor's parcel numbers: 3123-001-004, 005, 028, 042, 045, 062, 068, 069, 901, 904, 908, 909, 912, 914, 915, 917, 920 to 922; 3123-002-031, 032, 034, 047, 050, 051, 059 through 066, 903, 907, 909; 3123-003-086 through 089, 094 through 101; 3123-004-024, 027, 037, 038, 040, 042, 045 through 048, 903, 904, 907 through 910; 3123-012-015, 041; 3123-013-036, 041, 068, 101, 900, 901; 3123-014-900 through 916; 3123-015-026, 027, 028, 030, 033, 035, 900 through 908; and 3123-016-004, 005, 085, 904, 905.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Specific Comments

- 1) Nesting Birds. Based on a review of satellite imagery, there is scattered vegetation throughout the Project site that may provide potential habitat where Project activities may impact nesting birds. Project activities occurring during the breeding season of nesting birds could result in the incidental loss of fertile eggs, or nestlings, or otherwise lead to nest abandonment in trees directly adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species.
 - CDFW recommends that measures be taken to avoid Project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).
 - Proposed Project activities including (but not limited to) staging and disturbances to native and nonnative vegetation, structures, and substrates should occur outside of the avian breeding season which generally runs from February 15 through August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. If avoidance of the avian breeding season is not feasible, CDFW recommends surveys

Ms. Jocelyn Swain
City of Lancaster
April 17, 2020
Page 3 of 7

by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300-feet of the disturbance area (within 500-feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 2) Landscaping. As part of this redevelopment plan, landscaping will occur throughout the 288-acre site for aesthetic purposes. Habitat loss and invasive plants are a leading cause of native biodiversity loss. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and create monocultures. CDFW recommends using native, locally appropriate plant species for landscaping on the Project site. CDFW recommends invasive/exotic plants, such as pampas grass (*Cortaderia selloana*) and salt cedar (*Tamarisk spp.*), be restricted from use in landscape plans for this Project. A list of invasive/exotic plants that should be avoided as well as suggestions for better landscape plants can be found at <https://www.cal-ipc.org/solutions/prevention/landscaping/>
- 3) Biological Baseline Assessment. Page 2 of the NOP states that “The Project site consists of land developed with a variety of commercial, retail, and medical facilities, as well as vacant land, undeveloped land containing native and nonnative vegetation, including several ornamental trees.” Undisturbed land may be considered sensitive habitat or may provide suitable habitat for special status or regionally and locally unique species. CDFW recommends providing a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area, with emphasis upon identifying endangered, threatened, sensitive, regionally and locally unique species, and sensitive habitats. Impact analysis will aid in determining any direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends avoiding any sensitive natural communities found on or adjacent to the Project. CDFW also considers impacts to Species of Special Concern a significant direct and cumulative adverse effect without implementing appropriate avoid and/or mitigation measures. The DEIR should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities from Project-related impacts. Project implementation may result in impacts to rare or endangered plants or plant communities that have been recorded adjacent to the Project vicinity. CDFW considers these communities as threatened habitats having both regional and local significance. Plant communities, alliances, and associations with a state-wide ranking of S1, S2, S3 and S4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting <https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities>;
 - b) A thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to*

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City of Lancaster
April 17, 2020
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Special Status Native Plant Populations and Natural Communities (CDFW, 2018) (see <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>);

- c) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the neighboring vicinity. *The Manual of California Vegetation*, second edition, should also be used to inform this mapping and assessment (Sawyer, 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
 - d) A complete, recent, assessment of the biological resources associated with each habitat type on site and within adjacent areas that could also be affected by the Project. CDFW's CNDDDB in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp;
 - e) A complete, recent, assessment of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050 and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the USFWS; and,
 - f) A recent, wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Assessments for rare plants may be considered valid for a period of up to three years, except when significant environmental changes occur, such as disturbance resulting from urbanization or wildfire. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if build out could occur over a protracted time frame, or in phases.
- 4) Biological Direct, Indirect, and Cumulative Impacts. Page 2 of the NOP states that "The Amargosa Creek/flood control channel forms the southwestern boundary and intersects the southern portion of the Project site." The Amargosa Creek is the main riparian corridor in the Lancaster area that serves as an important wildlife movement corridor connecting much of the open spaces through the rapidly urbanizing city. It is essential to understand how these open spaces and the biological diversity within them may be impacted by Project activities. This should aid in identifying specific mitigation or avoidance measures necessary to offset those impacts. CDFW recommends providing a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts. The following should be addressed in the DEIR:

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April 17, 2020
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- a) A discussion regarding indirect Project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Plan (NCCP, Fish & G. Code, § 2800 et. seq.). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR;
- b) A discussion of potential adverse impacts from lighting, noise, human activity, and exotic species and identification of any mitigation measures;
- c) A discussion on Project-related changes on drainage patterns and downstream of the Project site; the volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-Project fate of runoff from the Project site. The discussion should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary and the potential resulting impacts on the habitat (if any) supported by the groundwater. Mitigation measures proposed to alleviate such Project impacts should be included;
- d) An analysis of impacts from land use designations and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR; and,
- e) A cumulative effects analysis, as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

General Comments

- 1) Project Description and Alternatives. To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in the DEIR:
 - a) A complete discussion of the purpose and need for, and description of, the proposed Project, including all staging areas and access routes to the construction and staging areas; and,
 - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.
- 2) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed rare plant species that results from the Project is prohibited, except as authorized by State law (Fish and G. Code, §§ 2080, 2085; Cal. Code

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Regs., tit. 14, §786.9). Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

- 3) Compensatory Mitigation. The DEIR should include mitigation measures for adverse Project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 4) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the DEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset the Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 5) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of moving an individual from the Project site and permanently moving it to a new location. CDFW generally does not support the use of, translocation or transplantation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.


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April 17, 2020
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- 6) Moving out of Harm's Way. The proposed Project is anticipated to result in clearing of natural habitats that support many species of indigenous wildlife. To avoid direct mortality, we recommend that a qualified biological monitor approved by CDFW be on-site prior to and during ground and habitat disturbing activities to move out of harm's way special status species or other wildlife of low mobility that would be injured or killed by grubbing or Project- related construction activities. It should be noted that the temporary relocation of on-site wildlife does not constitute effective mitigation for the purposes of offsetting Project impacts associated with habitat loss. If the Project requires species to be removed, disturbed, or otherwise handled, we recommend that the DEIR clearly identify that the designated entity should obtain all appropriate state and federal permits.

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the City of Lancaster in identifying and mitigating Project impacts on biological resources. If you have any questions or comments regarding this letter, please contact Andrew Valand, Environmental Scientist, at Andrew.Valand@wildlife.ca.gov or (562) 292-6821.

Sincerely, 4/17/2020

DocuSigned by:

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signing on
behalf of

Erinn Wilson
Environmental Program Manager I

ec: CDFW
Victoria Tang – Los Alamitos
Andrew Valand – Los Alamitos
Felicia Silva – Los Alamitos
Malinda Santonil – Los Alamitos
CEQA HQ - Sacramento

State Clearinghouse

References:

California Department of Fish and Wildlife [CDFW]. March 20, 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <https://www.wildlife.ca.gov/Conservation/Plants>).

Sawyer, J.O., Keeler Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2nd ed. ISBN 978 0 943460 4.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
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April 24, 2020

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

RE: Lancaster Health District Master Plan
NOP (Revised)
Vic. LA-14/PM R67.98-R66.75
SCH # 2017051076
GTS # LA-2017-03223AL-NOP

Dear Ms. Swain:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The City of Lancaster is proposing to develop the Lancaster Health District Master Plan. The Master Plan would allow for the development of 1,600 residential units; 259,000 sf of hotel uses (180 rooms) and a 70,000 sf conference center; 740,000 sf of commercial/office space; 480,000 sf of continuum of care facilities; 791,000 sf of acute care facilities including replacing the existing hospital with a new 700,000 sf facility (380 beds) and 12,000 sf plant facility; 249,800 sf of subacute care facilities and a 385,000 sf parking car garage with 1,100 parking spaces.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference to The Governor's Office of Planning and Research (OPR) for more information.

<http://opr.ca.gov/ceqa/updates/guidelines/>

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this development should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient

modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

As a reminder, Vehicle Miles Traveled (VMT) will be the standard transportation analysis metric in CEQA for land use projects after the July 1, 2020 statewide implementation date. Agencies may opt-in prior to that date.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing.

Overall, the EIR should include Transportation Impact Study (TIS) to ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

One of Caltrans' safety concerns is the potential traffic conflict on the State facilities such that Avenue K has the potential for queuing vehicles upstream on SR-14 which can create a significant speed differential and increase the conflicts at that intersection. Currently, the state facilities are operating at or near capacity during the peak hours. Any additional trips may cause potential rear-end accident. When this large project is at built-out condition, many project traffic and cumulative trips would assign to the state facilities, traffic analysis should include queuing analysis to address safety issues to comply with CEQA. We recommend following to be included in the traffic analysis.

1. Caltrans requests information regarding the assignment of direct and cumulative trips to state facilities in the project vicinity.

2. The impact study should include the potential traffic conflict impact of the added traffic volumes to SR-14 and the on- and off-ramps from Avenue J to Avenue K.
3. The project proponent may use a 95 percentile to obtain queue length for a queuing analysis. To calculate the baseline condition for total queue length on off-ramps, measure the distance from the intersection to the gore point. Caltrans recommends that any queuing on an off-ramp beyond 85% of this total length be considered a significant impact for direct or cumulative impacts. If Synchro software is used to calculate queue length, then actual signal timing must be used for existing condition as a based condition.
4. In the event that the project proponent finds a significant impact to an intersection, an Intersection Control Evaluation (ICE) should be prepared as an initial step of an intersection-improvement project.
5. If an impact is identified, Caltrans recommends consideration of the following potential traffic conflict improvement measures:
 - a. Safety sign/Yield Sign, delineation
 - b. Pavement markings
 - c. ADA ramps, pedestrian sidewalk
 - d. Ramp metering
 - e. Intersection control, signal optimization
 - f. Ramp/lane widening. While ramp or lane widening is a potential improvement measure, this measure should be considered as a last resort after first considering measures (a) through (e) above.
 - g. Please note that the above is a non-exclusive list of potential improvement measures. The project proponent should consider additional feasible measures.
6. The project proponent may pay 100% of the direct impact and/or fair-share contribution (i.e., a fee program) with cumulative impacts.

A discussion of mitigation measures appropriate to alleviate anticipated traffic impacts should be presented in the traffic study. Any mitigation involving transit or Transportation Demand Management (TDM) is encouraged and should be justified to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2017-03223AL-NOP.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



**COUNTY OF LOS ANGELES
FIRE DEPARTMENT**

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FIFTH DISTRICT

April 28, 2020

Jocelyn Swain, Senior Planner
City of Lancaster
Community Development Division
44933 Fern Avenue
Lancaster, CA 93534

Dear Ms. Swain:

REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "LANCASTER HEALTH DISTRICT MASTER PLAN," WOULD PROVIDE DIRECTION FOR DEVELOPMENT AROUND THE ANTELOPE VALLEY HOSPITAL OVER A 20-YEAR PERIOD, LANCASTER, FFER 2020001953

The Revised Notice of Preparation of a Draft Environmental Impact Report 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:

We will reserve our comments for the Draft EIR.

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

The proposed Land Development comments are "Preliminary", and are "Subject to Change" with the submittal of plans. Additional Land Development Unit requirements may be required to be addressed with the submittal of plans. The proposed project is required to comply with all applicable codes, ordinances and regulations.

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

- | | | | | | | |
|--------------|-------------|------------------|----------------------|----------------------|-----------------------|------------------|
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| BELLFLOWER | CUDAHY | HIDDEN HILLS | LA PUENTE | PALMDALE | ROSEMEAD | WESTLAKE VILLAGE |
| BRADBURY | DIAMOND BAR | HUNTINGTON PARK | LAKEWOOD | PALOS VERDES ESTATES | SAN DIMAS | WHITTIER |
| | DUARTE | | LANCASTER | | SANTA CLARITA | |

ACCESS REQUIREMENTS:

1. All on-site Fire Apparatus Access Roads shall be labeled as "Private Driveway and Fire Lane" on the site plan along with the widths clearly depicted on the plan. Labeling is necessary to assure the access availability for Fire Department use. The designation allows for appropriate signage prohibiting parking.
2. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.
3. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.
4. The Fire Apparatus Access Roads and designated fire lanes shall be measured from flow line to flow line.
5. For buildings where the vertical distance between the access roadway and the highest roof surface does not exceed 30 feet, Fire Apparatus Access Roads shall have an unobstructed width of not less than 26 feet, exclusive of shoulders, and an unobstructed clearance of clear to the sky. The highest roof surface shall be determined by measurement of the vertical distance between the access roadway and the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater.
6. For buildings where the vertical distance between access roadway and the highest roof surface exceeds 30 feet, an approved Fire Apparatus Access Roadway with a minimum width of 28 feet, exclusive of shoulders, shall be provided in the immediate vicinity of the building or portion thereof. This roadway shall have an unobstructed clearance of clear to the sky. At least one required access route meeting this condition shall be located such that the edge of the Fire Apparatus Access Roadway, not including shoulders, that is closest to the building being served, is between 10 feet and 30 feet from the building, as determined by the fire code official, and shall be positioned parallel to one entire side of the building. The side of the building on which the Fire Apparatus Access Road is positioned shall be approved by the fire code official.
7. If the Fire Apparatus Access Road is separated by island, provide a minimum unobstructed width of 20 feet, exclusive of shoulders, and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building.
8. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.
9. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. The dimensions of the

turnaround, with the orientation of the turnaround shall be properly placed in the direction of travel of the access roadway on the plan.

10. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. The centerline, inside, and outside turning radii for each change in direction shall be indicated on the plan.
11. Fire Apparatus Access Roads shall be designed and maintained to support the imposed load of fire apparatus weighing 75,000 pounds and shall be surfaced so as to provide all-weather driving capabilities. Fire Apparatus Access Roads having a grade of 10 percent or greater shall have a paved or concrete surface.
12. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector.
13. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in the Fire Code shall be maintained at all times.
14. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.
15. A minimum 5-foot wide approved firefighter access walkway leading from the Fire Department Access Road to all required openings in the building's exterior walls shall be provided for firefighting and rescue purposes. The firefighter walkway access routes shall be clearly indicated on the site plan, along with the required width, and the slope and walking surface material.
16. Security barriers, visual screen barriers, or other obstructions shall not be installed on the roof of any building in such a manner as to obstruct firefighter access or egress in the event of fire or other emergency. Parapets shall not exceed 36 inches on at least two sides of the building. These sides should face an access roadway or yard sufficient to accommodate ladder operations. The height of all parapets shall be clearly indicated in a section view.
17. Approved building address numbers, building numbers, or approved building identification shall be provided and maintained so as to be plainly visible and legible from the street fronting the property. The numbers shall contrast with their background, be Arabic numerals or alphabet letters, and be a minimum of 4 inches high with a minimum stroke width of 0.5 inch.

18. Multiple residential and commercial buildings having entrances to individual units not visible from the street or road shall have unit numbers displayed in groups for all units within each structure. Such numbers may be grouped on the wall of the structure or mounted on a post independent of the structure and shall be positioned to be plainly visible from the street or road as required by the Fire Code.
19. Gate Requirements: The method of gate control shall be subject to review by the Fire Department, prior to clearance to proceed to public hearing. All gates, to control vehicular access shall be in compliance with the following:
 - a. The keypad location shall be located a minimum of 50 feet from the public right-of-way.
 - b. Provide a minimum 32-foot turning radius beyond the keypad, prior to the gate entrance at a minimum width of 20' for turnaround purposes.
 - c. The gated entrance design with a single access point (ingress and egress) shall provide for a minimum width of 20 feet, clear-to-sky, with all gate hardware is clear of the access way.
 - d. Where the Fire Apparatus Access Road consists of a divided roadway, the gate width shall be not less than 15 feet for residential use and 20 feet for commercial /industrial uses. Each side of the roadway shall be clear-to-sky.
 - e. Construction of gates shall be materials that allow manual operations by one person.
 - f. Gates shall be of the swinging or sliding type.
 - g. The security gate shall be provided with an approved means of emergency operation, and shall be maintained operational at all times and replaced or repaired when defective.
 - h. Electric gate operators, where provided, shall be listed in accordance with UL 325.
 - i. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.
 - j. All locking devices shall comply with the County of Los Angeles Fire Department Regulation 5, Compliance for Installation of Emergency Access Devices.
 - k. An approved key box, listed in accordance with UL 1037 shall be provided as required by the Fire Code. The location of each key box shall be determined by the Fire Inspector.

WATER SYSTEM REQUIREMENTS:

1. All fire hydrants shall measure 6"x 4"x 2-1/2" brass or bronze conforming to current AWWA standard C503 or approved equal and shall be installed in accordance with the County of Los Angeles Fire Code.
2. All required public fire hydrants shall be installed, tested, and accepted prior to beginning construction.
3. All required private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Plans showing underground piping for private on-site fire hydrants shall be submitted to the Sprinkler Plan Check Unit for review and approval prior to installation. Fire Code 901.2 and County of Los Angeles Fire Department Regulation 7.
4. All on-site fire hydrants shall be installed a minimum of 25 feet from a structure or protected by a two (2) hour rated firewall. Indicate compliance prior to project proceeding to the public hearing process.

Exception: For fully sprinkled multi-family structures, on-site hydrants may be installed a minimum of 10 feet from the structure.

5. The required fire flow for the public fire hydrants for will determined with the submittal of plans. The type of construction and total square footage for each proposed and existing building, along with written verification of an approved automatic fire sprinkler system in conformance of NFPA 13 shall be submitted to determine the exact fire flow. The maximum fire flow is 8,000 GPM at 20 pounds PSI for 4 hours.
6. The required fire flow for the on-site private fire hydrants for this project is 2,500 GPM at 20 pounds psi residual pressure for 2 hours. Two (2) on-site fire hydrants flowing simultaneously may be used to achieve the required fire flow. Each on-site fire hydrant is required a minimum 1,250 GPM at 20 pounds PSI for 2 hours.
7. An approved automatic fire sprinkler system is required for the proposed buildings within this development. Submit design plans to the Fire Department Sprinkler Plan Check Unit for review and approval prior to installation.
8. The public and the on-site fire hydrants will be determined with the submittal of plans.

For any questions regarding the report, please contact FPEA Wally Collins at (323) 890-4243 or Wally.Collins@fire.lacounty.gov.

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, archeological and

cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.


HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time.

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

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

Very truly yours,



RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac



May 1, 2020

Ms. Jocelyn Swain, Senior Planner
City of Lancaster
44933 Fern Avenue
Lancaster, California 93534
Phone: (661) 723-6249
E-mail: jswain@cityoflanasterca.org

RE: SCAG Comments on the Revised Notice of Preparation of a Draft Environmental Impact Report for the Lancaster Health District Master Plan [SCAG NO. IGR9276]

Dear Ms. Swain,

Thank you for submitting the Revised Notice of Preparation of a Draft Environmental Impact Report for the Lancaster Health District Master Plan (“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 SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Revised Notice of Preparation of a Draft Environmental Impact Report for the Lancaster Health District Master Plan. The proposed project includes the development of 1,600 residential units, 259,200 square feet (SF) of hotel uses, a 70,000 SF conference center, 740,000 SF of commercial/office space, 480,000 SF of continuum of care facilities, 791,000 SF of acute care facilities, 249,800 SF of sub-acute care facilities, and a 385,000 SF parking car garage on 288 acres.

When available, please email environmental documentation to IGR@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.: Anita Au, Associate Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
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.

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

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Transportation
Cheryl Viegas-Walker, El Centro

**COMMENTS ON THE REVISED NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
LANCASTER HEALTH DISTRICT MASTER PLAN [SCAG NO. IGR9276]**

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.

Please note the Draft 2020 RTP/SCS (Connect SoCal) was released for public review on November 14, 2019 until January 24, 2020. The Final Connect SoCal is anticipated to be adopted on May 7, 2020. Please refer to the adopted Connect SoCal goals and growth forecast for RTP/SCS consistency for future projects. The Proposed Final Connect SoCal is now available for review here: <https://www.connectsocial.org/Pages/Connect-SoCal-Final-Plan.aspx>.

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>
<small>*SCAG does not yet have an agreed-upon security performance measure.</small>	

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.

Please note the Draft Connect SoCal PEIR was released for public review from December 9, 2019 to January 24, 2020. The Final Connect SoCal PEIR is anticipated to be certified by SCAG's Regional Council on May 7, 2020. Please refer to the certified Final Connect SoCal PEIR and adopted Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) for future projects. The Proposed Final Connect SoCal PEIR is now available for review here: <https://www.connectsocial.org/Pages/Final-2020-PEIR.aspx>.



**LOS ANGELES COUNTY
SANITATION DISTRICTS**
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

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

May 1, 2020

Ref. DOC 5690553

Ms. Jocelyn Swain
Senior Planner
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534-2461

Dear Ms. Swain:

Revised NOP Response to the Lancaster Health District Master Plan

The Los Angeles County Sanitation Districts (Districts) received a Revised Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on April 1, 2020. Previous comments submitted by the Districts in correspondence dated June 8, 2017 (copy enclosed), to Mr. Christopher Aune of your agency, still apply to the subject project with the following comments and updated information:

1. Segments of the proposed project may require an amendment to a Districts' permit for Industrial Wastewater Discharge. Project developers should contact the Districts' Industrial Waste Section in order to reach a determination on this matter. If this update is necessary, project developers will be required to forward copies of final plans and supporting information for the proposed project to the Districts for review and approval before beginning project construction.
2. The wastewater flow originating from the proposed project will discharge to local sewer lines, which are not maintained by the Districts, for conveyance to either or both the Districts' Westside Trunk Sewer, located along Avenue J between Kingtree Avenue and 15th Street West, or the Districts' Westside Relief Trunk Sewer, located in 17th Street West at Lancaster Boulevard. The Districts' 15-inch diameter Westside Trunk Sewer has a capacity range of 2.3 million gallons per day (mgd) to 2.8 mgd and conveyed a peak flow of 1.6 mgd when last measured in 2018. The Districts' 24-inch diameter Westside Relief Trunk Sewer has a capacity of 7.8 mgd and conveyed a peak flow of 2.1 mgd when last measured in 2018.
3. The Lancaster Water Reclamation Plant currently processes an average flow of 14.3 mgd.
4. The Master Plan allows for a maximum development of 1,600 residential units, 180 hotel rooms, including 70,000 square feet of conference center space, 740,000 square feet of commercial/office space, 480,000 square feet of continuum of care facilities, 380 hospital beds, 91,000 square feet of auxiliary facilities, and 249,800 square feet of acute care facilities. Based on these project

Ms. Jocelyn Swain

-2-

May 1, 2020

specifications, the expected increase in average wastewater flow from the project site is 568,777 gallons per day, after the structures on the project site are demolished.

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

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: D. Curry
L. Smith
A. Schmidt
A. Howard



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

June 8, 2017

Ref. Doc. No.: 4153171

Mr. Christopher Aune, Associate Planner
Community Development Technician
Community Development Services
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534-2461

Dear Mr. Aune:

Response to NOP for the Lancaster Health District Master Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on May 16, 2017. The majority of the proposed project area is located within the jurisdictional boundary of District No. 14. We offer the following comments:

1. The portions of the project area outside of the jurisdictional boundaries of the Districts will require annexation into District No. 14 before sewerage service can be provided to proposed development within those areas. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708.
2. The Districts own, operate, and maintain the trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system within the Lancaster Health District area (LHD) except to state that presently no deficiencies exist in Districts' facilities that serve LHD. For information on deficiencies within LHD's sewerage system, please contact the City of Lancaster's Department of Public Works and/or the Los Angeles County Department of Public Works.
3. The wastewater generated by the proposed project area will be treated at the Lancaster Water Reclamation Plant, which has a capacity of 18 mgd and currently produces an average recycled water flow of 12.8 mgd.
4. Based on the Districts' average wastewater generation factors, the maximum development capacity stated in the notice as 875,000 square feet of commercial and office space, a renovated or new hospital with up to 468 beds, approximately 147,000 square feet of continuum of care space, up to 150 hotel rooms, 275 single-family residential dwelling units, and 965 multi-family residential dwelling units would total to an average wastewater flow of approximately 627,765 gallons per day. For a copy of the Districts' average wastewater generation factors, go to

Mr. Christopher Aune

-2-

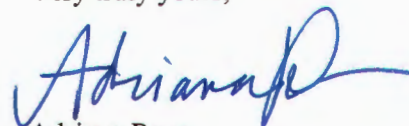
June 8, 2017

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.

5. The Districts should review individual developments within LHD in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
6. 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 proposed projects. 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.
7. 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: M. Sullivan
M. Tatalovich



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



May 4, 2020

Jocelyn Swain, Senior Planner
City of Lancaster
44933 Fern Avenue
Lancaster, California 93534

Dear Ms. Swain:

**REVIEW COMMENTS
REVISED NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT
LANCASTER HEALTH DISTRICT MASTER PLAN PROJECT**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the April 2020 Revised Notice of Preparation (Revised NOP) of a Draft Environmental Impact Report (Draft EIR) for the Lancaster Health District Master Plan Project (Project). The proposed Project, a master plan which would provide direction for a pedestrian-oriented, transit-oriented, mixed-use district in support of medical institutions and health-related businesses over a 20-year period, is located along the south side of Avenue J; north of Avenue K; and east of 20th Street West and State Route 14; and west of Kingtree Avenue in the City of Lancaster (City). The proposed Project involves the development of 1,600 residential units, 25,900 sf of hotel uses (180 rooms) and a 70,000 sf conference center, 740,000 sf of commercial/office space, 480,000 sf of continuum of care facilities, 791,000 sf of acute care facilities including replacing the existing hospital with a new 700,000 sf facility (380 beds) and 12,000 sf plant facility, 249,800 sf of sub-acute care facilities and a 385,000 sf parking car garage with 1,100 parking spaces.

The proposed Project is located within the service area of the Department's Lancaster Sheriff's Station (Station) and approximately 2.3 miles from the Station. It may impact the current level of service provided by the Station due to the potential increase in resident and workforce population proposed by the Project. The Project applicant will be required to pay all required development and impact fees associated with the project.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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In addition, the Department's Station is equipped with a heliport and a communications tower at its northern parking lot and recommends that the Draft EIR address that any new construction and improvements for the proposed Project shall not interfere with Flight Approach and Take-Off pattern of the Station's heliport and with the signal and radio frequency of its communications tower. The project designer shall coordinate with the Department on the design of any projects within the Master Plan area that may affect these essential infrastructure.

The proposed Project and its surrounding area is served by the Lancaster Library (County Library). The Department's CSB provide law enforcement service to the County Library. Once the Project is completed and new residents begin occupancy, the law enforcement service requirements for the County Library would increase. The Department remains concerned that continued growth and intensification of land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. The Department will provide further impact comments for the Draft EIR during the public review period.

Also, for future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF



Tracey Jue, Director
Facilities Planning Bureau

APPENDIX A.3

Original Notice of Preparation and Comment Letters



NOTICE OF PREPARATION

City of Lancaster, California

LANCASTER HEALTH DISTRICT MASTER PLAN GENERAL PLAN AMENDMENT NO. 17-03/ZONE CHANGE NO. 17-03

To: California Office of Planning and Research, State Clearinghouse
Responsible and Trustee Agencies
Other Interested Parties

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR)

Project: Lancaster Health District Master Plan

Lead Agency: City of Lancaster

Pursuant to Section 15082(a) of the California Environmental Quality Act (1970), the City of Lancaster is the Lead Agency in charge of environmental review for the proposed Lancaster Health District Master Plan Project ("Project"). Based on preliminary review of this proposed Project, the City has determined that an Environmental Impact Report (EIR) should be prepared to evaluate potential effects on the environment. The City is soliciting comments from reviewing agencies and the public regarding the scope and content of the EIR. For reviewing agencies, the City requests comments with respect to your agency's statutory authority pertaining to the proposed Project. Your agency may need to use the EIR prepared by the City of Lancaster when considering any applicable permits or other approvals for the Project. The City is also seeking comments from residents, property owners, and other interested parties regarding the potential environmental effects the City should address in this EIR.

Comment Period: Comments may be sent to the City of Lancaster during the 30-day NOP review and comment period, which begins on May 31, 2017, and ends on June 29, 2017. All comments must be received by the City by 5:00 PM on June 29, 2017. Please include the name of a contact person for your agency, if applicable. Direct all comments to:

City of Lancaster
Attn: Christopher Aune, Associate Planner
44933 Fern Avenue
Lancaster, CA 93564

Comments can also be provided by fax at (661) 723-5873 or e-mailed to caune@cityoflancasterca.org.

Any questions can be directed to the City at 661-723-6100.

Scoping Meeting: The City will also hold a Scoping Meeting to provide an additional opportunity to discuss the potential environmental effects of this Project on Wednesday, May 31, 2017, at 6:30 PM, at the Cedar Center for the Arts located at 44851 Cedar Avenue, Lancaster, California, 93534. A brief presentation describing the proposed Project and environmental review process will be provided, followed by a public comment period and open forum with city staff. Public agencies, organizations, and interested parties are encouraged to attend and participate in this meeting.

Project Location: The Lancaster Health District Master Plan addresses approximately 288 gross acres in the central portion of the City of Lancaster (“Project site”). Specifically, the Project site is located south of Avenue J; north of Avenue K; east of 20th Street West and State Route 14; and west of Kingtree Avenue. See the attached **Figure 1, Regional Map**, and **Figure 2, Vicinity Map**.

Existing Environmental Condition: The Project site consists of land developed with a variety of commercial, industrial, retail, and medical facilities, as well as vacant, undeveloped land containing native and nonnative vegetation, including several ornamental trees. The existing Antelope Valley Hospital is located in the north-central portion of the Project site. A flood-control channel forms the southwestern boundary and intersects the southern portion of the Project site. The Project site is surrounded by developed areas and has been disturbed from compaction of soil, dumping and excavation, off-road vehicle use, and other man-made disturbances. See attached **Figure 3, Aerial Photograph**.

Project Description: The City of Lancaster is proposing to develop the Lancaster Health District Master Plan, which would provide direction for development around the Antelope Valley Hospital over a 20-year period. Mixed-use development is proposed, including medical and general offices, retail and commercial uses, and a range of housing types, as shown in **Figure 4, Conceptual Framework Plan**.

A primary objective of the Project is to surround the Antelope Valley Hospital with a variety of health and wellness related uses, supporting and expanding the hospital’s medical facilities and treatment capabilities while accommodating the needs of patients and their families, faculty, staff, and the community. The Master Plan defines a vision for the long-term improvements that would enable the City and Antelope Valley Hospital to transform the existing urban character toward a pedestrian-oriented, transit-oriented, mixed-use district character that would support existing medical institutions and health-related businesses of many types.

The Master Plan includes a vision plan, implementation plan, and development code to guide future development over the next 20 years on the Project site.

The maximum development capacity allowed by the Master Plan will be analyzed in the EIR to provide a conservative estimate of potential impacts from the Project. The Master Plan would allow development

of up to approximately 875,000 square feet of commercial and office space; a renovated or new hospital with up to 468 beds; approximately 147,000 square feet of continuum of care space; up 150 hotel rooms; 275 single-family residential dwelling units; 965 multifamily residential dwelling units; redesign of the internal circulation system; and other infrastructure systems.

The City of Lancaster will consider approval of the following actions related to the proposed Lancaster Health District Master Plan: (1) General Plan Amendment to change the land use designation to Health District Mixed Use; (2) Zone Change to Health District Mixed Use and Health District Mixed Use Neighborhood; (3) Tentative Map(s); and (4) the formation of an Infrastructure or Financing and Maintenance District.

Scope of the EIR: The City proposes to evaluate potential significant impacts related to the following environmental topics in the EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

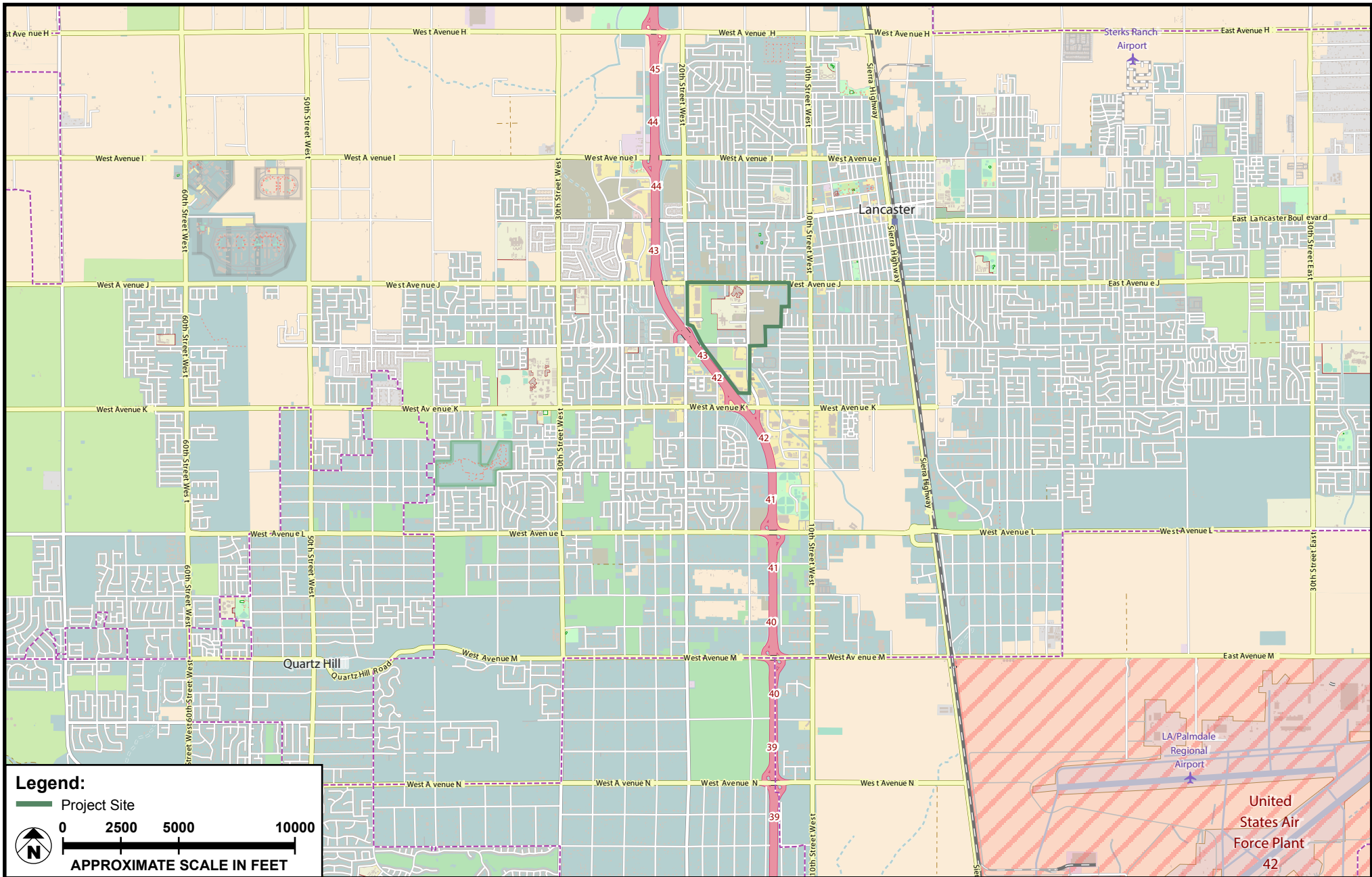
Based on the site, the proposed Project will not result in significant impacts to Mineral Resources or Agricultural and Forestry Resources; therefore, these topics will be addressed in the Effects Found Not to Be Significant section of the EIR.

Signature:  _____ **Date:** May 10, 2017

Christopher Aune, Associate Planner

City of Lancaster

Attachments: 1) Regional Map; 2) Vicinity Map; 3) Aerial Photograph; 4) Conceptual Framework Plan



SOURCE: © OpenStreetMap contributors - 2017

FIGURE 2

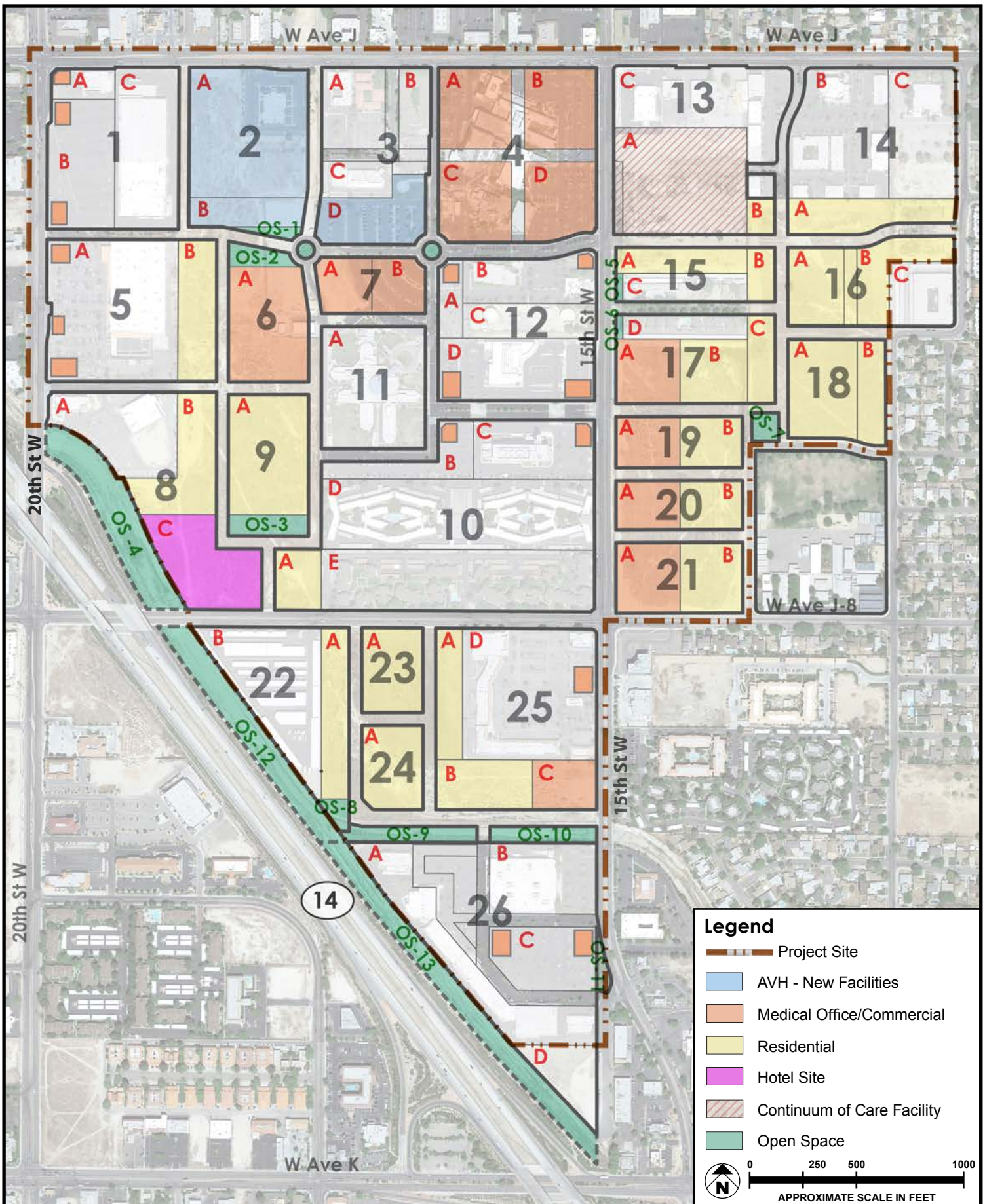


SOURCE: Google Earth - 2016

FIGURE 3



Aerial Photograph



SOURCE: Sargent Town Planning - April 10, 2017

FIGURE 4

Mr. Aune
June 9, 2017
Page 2

The City should refer the project's traffic consultant to OPR's website, guidelines on evaluating transportation impacts in CEQA if VMT methodology is used:

https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

If the City decides to use Level of Service (LOS) when preparing the traffic analysis on the State facilities, please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

To assist in evaluating the impacts of this project on State transportation facilities, a traffic study should be prepared prior to preparing the Draft Environmental Impact Report (DEIR). Please refer the project's traffic consultant to Caltrans' traffic study guide Website:

http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf

Listed below are elements of what is generally expected in the traffic study:

1. Key intersections and any traffic impact including, but not limited to SR-14.
2. Traffic volume counts to include anticipated AM and PM peak-hour volumes
3. Level of Service (LOS) before and during construction.
4. A brief traffic discussion showing ingress/egress, turning movements, and the directional flow of project vehicle trips.
5. Analysis of the multimodal travel demand expected from the proposed project. The study should include and analysis of the Base Year, (at the time the project opens for business), project only, as well as Base Year plus Project. This analysis should also identify potentially significant adverse impacts from such demands and avoidance, minimization, and mitigation measures needed to address them.
6. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts, including sharing of mitigation costs.

In the Spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2017-00932ME

Sincerely,



DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



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richard@lozeaudrury.com



Via Email and U.S. Mail

June 6, 2017

Christopher Aune, Planner
Planning Department
City of Lancaster
44933 Fern Avenue
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caune@cityoflanasterca.org

Director of Planning
Development Services
Community Development Division – Planning
44933 Fern Avenue
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Planning Commission Secretary
Development Services
Community Development Division – Planning
44933 Fern Avenue
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mcoleman@cityoflanasterca.org

Britt Avrit, City Clerk
City of Lancaster
Office of the City Clerk
44933 Fern Avenue, Floor 2
Lancaster, CA 93534
bavrit@cityoflanasterca.org

Re: CEQA and Land Use Notice Request for the Lancaster Health District Master Plan (SCH2017051076)

Dear Addressees:

I am writing on behalf of the Laborers International Union of North America, Local Union 300 and its members living in Los Angeles County and/or the City of Lancaster (“LiUNA”) regarding the Project known as Lancaster Health District Master Plan (SCH 2017051076), including all actions referring or related to the development of up to approximately 875,000 sf of commercial and office space; a renovated or new hospital with up to 468 beds; 147,000 sf of continuum of care space; up 150 hotel rooms; 275 single family residential dwelling units, and 965 multifamily residential dwelling units near the cross of Avenue J, Avenue K, 20th St West, and Kingtree Ave (“Project”).

We hereby request that the City of Lancaster (“City”) send by electronic mail, if possible or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the City and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the City, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.
- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act (“CEQA”), including, but not limited to:

June 6, 2017

CEQA and Land Use Notice Request for Lancaster Health District Master Plan
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- Notices of any public hearing held pursuant to CEQA.
- Notices of determination that an Environmental Impact Report ("EIR") is required for a project, prepared pursuant to Public Resources Code Section 21080.4.
- Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
- Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.
- Notice of determination, prepared pursuant to Public Resources Code Section 21108 or Section 21152.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which require local counties to mail such notices to any person who has filed a written request for them with the clerk of the agency's governing body.

Please send notice by electronic mail, if possible or U.S. mail to:

Richard Drury
Theresa Rettinghouse
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
richard@lozeaudrury.com
theresa@lozeaudrury.com

Please call if you have any questions. Thank you for your attention to this matter.

Sincerely,



Theresa Rettinghouse
Paralegal
Lozeau | Drury LLP



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

June 8, 2017

Ref. Doc. No.: 4153171

Mr. Christopher Aune, Associate Planner
Community Development Technician
Community Development Services
City of Lancaster
44933 Fern Avenue
Lancaster, CA 93534-2461

Dear Mr. Aune:

Response to NOP for the Lancaster Health District Master Plan

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on May 16, 2017. The majority of the proposed project area is located within the jurisdictional boundary of District No. 14. We offer the following comments:

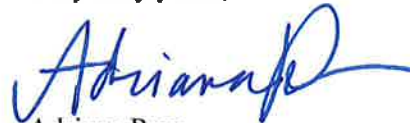
1. The portions of the project area outside of the jurisdictional boundaries of the Districts will require annexation into District No. 14 before sewerage service can be provided to proposed development within those areas. For a copy of the Districts' Annexation Information and Processing Fee sheets, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708.
2. The Districts own, operate, and maintain the trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As such, the Districts cannot comment on any deficiencies in the sewerage system within the Lancaster Health District area (LHD) except to state that presently no deficiencies exist in Districts' facilities that serve LHD. For information on deficiencies within LHD's sewerage system, please contact the City of Lancaster's Department of Public Works and/or the Los Angeles County Department of Public Works.
3. The wastewater generated by the proposed project area will be treated at the Lancaster Water Reclamation Plant, which has a capacity of 18 mgd and currently produces an average recycled water flow of 12.8 mgd.
4. Based on the Districts' average wastewater generation factors, the maximum development capacity stated in the notice as 875,000 square feet of commercial and office space, a renovated or new hospital with up to 468 beds, approximately 147,000 square feet of continuum of care space, up to 150 hotel rooms, 275 single-family residential dwelling units, and 965 multi-family residential dwelling units would total to an average wastewater flow of approximately 627,765 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.

5. The Districts should review individual developments within LHD in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.
6. 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 proposed projects. 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.
7. 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: M. Sullivan
M. Tatalovich



June 13, 2017

Mr. Christopher Aune, Associate Planner
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RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Lancaster Health District Master Plan [SCAG NO. IGR9276]

Dear Mr. Aune,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Lancaster Health District Master Plan ("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 Lancaster Health District Master Plan in Los Angeles County. The proposed project would permit development potential of up to 875,000 square feet (sf) of commercial and office space, 147,000 sf of continuum of care space, a hospital with up to 468 beds, a hotel with up to 150 rooms, 275 single-family residential dwelling units, and 965 multi-family residential dwelling units.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to au@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.: Anita Au, Assistant Regional Planner, at (213) 236-1874 or au@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
LANCASTER HEALTH DISTRICT MASTER PLAN [SCAG NO. IGR9276]**

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	59,800

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.

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MCKINNEY TX 75070

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730 N BEDFORD DR
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312 STARLANE DR
LA CANADA CA 91011

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LANCASTER CA 93534

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SOLANA BEACH CA 92075

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MEDICAL HEALTH INTERNATIONAL
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ENCINO CA 91436

SPTMNR PROPERTIES TRUST
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VAC/VIC 17TH STW/AVE J4
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ALEXANDRIA VA 22320

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WEST VALLEY MEDICAL PLAZA LLC
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L A COUNTY
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LOS ANGELES CA 90012

T H EQUITY LLC
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PALMDALE GRAND PLAZA LLC
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LANCASTER CA 93534

MARY E MATHENY
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LANCASTER CA 93534

KEVIN ROKE
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LANCASTER CA 93534

TERESA A BEAUDET
44930 CAMOLIN AVE
LANCASTER CA 93534

MARNICO INC TR
18375 VENTURA BLVD #406
TARZANA CA 91356

THOMAS J BEAUDET
44930 CAMOLIN AVE
LANCASTER CA 93534

SARGOON & SOUTHLIANA ODISHO
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LANCASTER CA 93534

TERESA A BEAUDET
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LANCASTER CA 93534

BIG H CHANG
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PATRICK MCWHORTER
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LANCASTER CA 93534

TERESA A BEAUDET
44930 CAMOLIN AVE
LANCASTER CA 93534

TERESA A BEAUDET
44930 CAMOLIN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

AUSTIN & EMBARLY WILLIAMS
2064 W AVENUE K4
LANCASTER CA 93536

THOMAS J BEAUDET
44930 CAMOLIN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

J 4 DEVELOPMENT LLC
6520 PLATT AVE #716
WEST HILLS CA 91307

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 N FERN AVE
LANCASTER CA 93534

J 4 DEVELOPMENT LLC
6520 PLATT AVE #716
WEST HILLS CA 91307

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

SHAVER MEDICAL MANAGEMENT INC
1314 W AVENUE J
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

DAVID W & CINDY HOWARD
1318 W AVENUE J
LANCASTER CA 93534

LANCASTER CITY
44933 N FERN AVE
LANCASTER CA 93534

ARMEN MANSSOURIAN
1312 W AVENUE J
LANCASTER CA 93534

LANCASTER CITY
44933 FERN AVE
LANCASTER CA 93534

TRINIDAD OMY CO TR 40928 GRANITE ST PALMDALE CA 93551	LANCASTER CITY 44933 N FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534
VALLEY FLORIST ANTELOPE 1302 W AVENUE J LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534
RAMI DARGHALLI 43924 CLARK CT LANCASTER CA 93536	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534
LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 N FERN AVE LANCASTER CA 93534
LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 N FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534
LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534
LANCASTER CITY 44933 FERN AVE LANCASTER CA 93534	AVERY GOLDEN 16430 VENTURA BLVD 202 ENCINO CA 91436	A V G I ASSOCIATES LLC 1753 W AVE J LANCASTER CA 93534
UNIFIED INVESTMENTS IV LLC 2368 TORRANCE BLVD #200 TORRANCE CA 90501	JAY AND TWENTIETH ASSOCIATES 23113 PARK MARCO POLO CALABASAS CA 91302	JOHN ADEM 4915 ALTA CANYADA RD LA CANADA FLINTRI CA 91011
VALASKANTJIS GEORGE CO TR 97 MARBELLA SAN CLEMENTE CA 92673	SANDRA B HULL 1741 W AVENUE J LANCASTER CA 93534	ENGELHARDT PATTERSON 43912 20TH ST W LANCASTER CA 93534
UNIFIED INVESTMENTS V LLC 2368 TORRANCE BLVD #200 TORRANCE CA 90501	MARJORIE SEBREE 8860 CORBIN AVE #389 NORTHRIDGE CA 91324	FRANK A & SHARON S VISCO PO BOX 5570 LANCASTER CA 93539

MEDICAL ARTS ENTERPRISES LLC
16430 VENTURA BLVD #202
ENCINO CA 91436

16 STREET PLAZA LTD
663 VALLEY AVE #201
SOLANA BEACH CA 92075

UNIFIED INVESTMENTS IV LLC
2368 TORRANCE BLVD #280
TORRANCE CA 90501

UNIFIED INVESTMENTS V LLC
2368 TORRANCE BLVD #200
TORRANCE CA 90501

MANSUKH & MAYA VAZIRANI
1717 W AVENUE J
LANCASTER CA 93534

44404 ASSOCIATES
663 VALLEY AVE #201
SOLANA BEACH CA 92075

RANDY F POITEVINT
1649 W AVENUE J
LANCASTER CA 93534

FRANK M YUSUF
1601 W AVENUE J
LANCASTER CA 93534

JANET R PRIDE
1240 W AVENUE J8
LANCASTER CA 93534

SHARON L WILNER
44440 CHAPARRAL DR
LANCASTER CA 93536

UNIFIED INVESTMENTS IV LLC
2368 TORRANCE BLVD #200
TORRANCE CA 90501

ALLEN & MARILYN GOLDEN
16430 VENTURA BLVD 202
ENCINO CA 91436

BURL W PATTERSON
43912 20TH ST W
LANCASTER CA 93534

UNIFIED INVESTMENTS VI LLC
2368 TORRANCE BLVD #200
TORRANCE CA 90501

BELAL AND YANEL ENTERPRISES INC
3421 COUNTRY CLUB DRIVE
GLENDALE CA 91208

JACK & DORA W GLASER
663 VALLEY AVE #201
SOLANA BEACH CA 92075

DAVID FAMILY LIMITED PARTNERSHIP
LP
2368 TORRANCE BLVD #204
TORRANCE CA 90501

JOSHUA LANE LLC
42220 10TH ST W #101
LANCASTER CA 93534

JAMES E BEASLEY
1922 W AVENUE L
LANCASTER CA 93534

DARLENE B STEINER
1222 W AVENUE J8
LANCASTER CA 93534

SANDRA B HULL
1741 W AVENUE J
LANCASTER CA 93534

ST JOSEPH MANAGEMENT AND
DEVELOPMENT LLC
4615 OCEAN FRONT WALK
MARINA DEL REY CA 90292

NEPHRON PROPERTIES LLC
1643 E PALMDALE BLVD
PALMDALE CA 93550

JAY AND TWENTIETH ASSOCIATES
23113 PARK MARCO POLO
CALABASAS CA 91302

BELAL AND YANEL ENTERPRISES INC
3421 COUNTRY CLUB DR
GLENDALE CA 91208

LB VCC LANCASTER LLC
3424 PEACHTREE RD NE #2200
ATLANTA GA 30326

JOSHUA LANE LLC
42220 10TH ST W #101
LANCASTER CA 93534

GREG & VICKI S GALLI
36506 CHINA PL
PALMDALE CA 93551

ROBERT & ANJANET BRODERICK
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LANCASTER CA 93534

S D & DONNA M ULCH
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FRANK E ANLEY
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SALEM & RADWA DARGHALI
5987 YANA CT
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Sacramento, CA 94298-0001

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Sacramento, CA 95814

CalRecycle
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Sacramento, CA 95812-4025

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Board – Lahontan Region
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Sacramento, CA 95814

CA Department of Fish and Wildlife
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Dist – Fire Chief/Forest & Fire Warden
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Commerce, CA 90040

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Prevention & Conservation Bureau
1320 North Eastern Avenue
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LA County Department of Public Works
Land Development Div. 3rd Floor
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Lancaster, CA 93534

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Development Review
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The Gas Company
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Lancaster, CA 93534-2552

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